

Hi Richard

Could you forward the comments below for inclusion in the LDF. The comments were provided by an M&D Board member.

"The thing that strikes me about the LDF is that although it has some good things in it about Partington there is nothing in it to support our ambition for remodelling to design out crime"

16.7 of the report talks about creating safe environments through consideration of new developments but there is nothing about existing ones.

M&D Housing Association has successfully integrated a number of new developments into the Partington Estate and each development has included packages of road and alleyway closures to ensure crime problems can be designed out or avoided. All schemes have adopted the principles of Secure by Design and achieved full accreditation.

Building on this the Association has begun the process with local residents of identifying priority areas to target estate remodeling and alleyway closures based on

hot spots of anti social behaviour or other comments received from residents. This work is important to the Association since working with other partners a significant drain in resources has been identified due to the ongoing management of ASB due to fundamental design problems with the eliciting estate layout.

Accordingly, and with consideration to the Associations aspirations to carry our major redevelopment and remodelling of Oak Road, there is a clear desire to ensure that this strategy is recognised in the final LDF with respect to existing communities.

It is suggested that existing powers to facilitate such aspirations for local communities are also reviewed and reflected in the document.

14.22 on air quality - Further emphasis needs to be made in relation to the air quality action plan with particular reference to transport planning and to things like securing roadside sites for tree planting. "

It is understood that there are issues with high levels of NO in certain areas.

Richard, trust this gives some specific strategic and other pointers for inclusion in the document.

Regards

Mark

Mark Rogers  
Senior Property Regeneration Manager

You can view our email disclaimer at:  
<http://www.harvesthousing.org.uk/content/1677/Email-Disclaimer.aspx>

Before you print think about the ENVIRONMENT

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29 OCT 2010 29 October 2010

From		
Address		
City		
Area		
Copies to		

Dear Sir/Madam

### Trafford's Core Strategy – Publication September 2010

Please find below, comments on the above document made on behalf of the Highways Agency (Agency). The Agency has been invited to consider the contents of the Core Strategy and supporting documents and submit details of any changes it considers are needed, together with an explanation as to why it considers the changes are necessary to make it "sound". It is also noted that previous representations relating to the Core Strategy document should be restated if still valid.

#### Background

The Agency has been consulted on the Core Strategy as it has come forward through the consultation process, commenting on the Core Strategy Preferred Options in August 2008 and July 2009, and the further consultation in March 2010. In addition, the Agency has been involved in the consultation process for the five strategic sites proposed by the Council in the Core Strategy. In general terms, the Agency has welcomed the Council's approach in the Core Strategy in recognising the need for sustainable development and looking to engage the Agency at an early stage in consultation on the strategic sites.

#### The Profile – Trafford's Place in the North West

The Core Strategy splits Trafford into ten 'places' that the Council considers are locally distinct. For each of these, the Core Strategy describes the spatial profile of the place and identifies key issues. The ten places are as follows:

- Trafford Park;
- Old Trafford;
- Stretford;
- Urmston;
- Mersey Valley;
- Sale;
- Altrincham and neighbouring communities;
- Trafford's rural communities;

- Partington; and
- Carrington

The Agency welcomes the identification of these different places, each with distinctive spatial characteristics and issues to be addressed. Specific transport issues are identified, and those of most interest to the Agency are as follows: Altrincham – Whilst development is mostly located in the town centre with excellent sustainable transport links, the scale of development is of concern to the Agency due to the proximity of the M56 and M60. We therefore urge the Council to consult fully with the Agency regarding large-scale development in Altrincham.

**Trafford Park** – sustainable transport options within the Park are limited, particularly at morning peak times. The Agency welcomes the identification of this problem within the Core Strategy and would encourage that the Council look to address this issue.

**Partington** – access to the Regional Centre (Manchester City Centre) and Trafford’s four town centres is very poor because of the A6144, which links Partington to the M60 (which provides access to the wider region) and Manchester to the north, and Warrington to the south. The aspiration is therefore to reduce this physical isolation through the delivery of improved transport links. The Agency welcomes the aspiration to improve sustainable transport links to Partington, and it is envisaged that these issues will be addressed more comprehensively through analysis of the strategic location proposals at the adjacent Carrington.

**Carrington** – as with Partington, the poor road link (A6144) is identified and the aspiration is to reduce its physical isolation through the delivery of improved transport links. Once again, the Agency will look to address these issues more comprehensively through analysis of the strategic location proposals at Carrington.

### **The Vision for Trafford**

The Core Strategy Vision is an expression of the place the Council wants Trafford to be in 2026. The Agency is encouraged by the aspiration to have an ‘integrated transport network offering a choice of modes of travel.’ The Agency also welcomes the statement that the Green Belt ‘will be preserved, protected and enhanced.’ These outcomes are broadly consistent with the objectives of the Agency.

It is also stated that the focus for economic and housing growth will be within the urban area, primarily in the north east of the Borough and the principal town centre (Altrincham). The following 5 strategic locations are identified as areas for change:

- Pomona Island (SL1);
- Trafford Wharfside (SL2);
- Lancashire County Cricket Club Quarter (SL3);
- Trafford Centre Rectangle (SL4); and
- Carrington (SL5)

These are the strategic locations that have been identified in previous consultation stages for the Core Strategy.

## **Strategic Objectives**

There are 8 strategic objectives (S01-S08) which, it is stated, will provide the framework for the development of the Core Strategy. The strategic objectives apply to the whole Borough but have been applied to the ten locally distinctive places identified earlier in the Core Strategy document to produce a series of 'place objectives' for each of the ten places.

The Agency considers that each of the strategic objectives is sound. Strategic objective 6 (SO6) is concerned with reducing the need to travel and the objective is to 'promote significant levels of development in the most sustainable locations in the Borough and make less sustainable locations accessible by improving transport links, particularly public transport.' The Agency is satisfied that this objective is suitably worded.

## **Place Objectives**

A set of objectives have been defined for each of the ten places identified earlier in the document. These more specific place objectives adhere to the eight broader strategic objectives. The Agency is satisfied that the place objectives have been developed taking into account the issues identified for each of the eight places, and that the place objectives are therefore sound.

In particular, for Partington and Carrington, the objective to 'secure improvements to the public transport infrastructure' is welcomed by the Agency, as this is considered as an essential measure to ensure these places are developed in a sustainable way.

The objective specific to Carrington to 'secure improvements to the transport infrastructure including linkages to the motorway network' is also welcomed in broad terms by the Agency, however this should be done in such a way as to ensure that there is no adverse impact on the capacity, operation and safety of the SRN.

## **Strategic Locations**

For the purposes of the Core Strategy a strategic location is defined as being:

- An important element in the achievement of the Core Strategy;
- Supported by information of what is to be provided, when it will be provided, who will provide it, and 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.

It is also stated that these locations will be programmed for delivery through a further DPD. The Agency is satisfied that this approach is appropriate and that the definition of strategic locations is suitable.

It is stated that other significant areas that were not considered to be strategic locations are detailed in other policies within the Core Strategy and the site specific implications of these areas will be detailed in the Land Allocations DPD. The Agency will need to be involved at the earliest possible stage in the consultation process for the Land Allocations DPD when it emerges.

It is stated that more details of the process of selecting the 5 proposed strategic locations is set out in the accompanying Technical Note. The Agency has assumed that this Technical Note is the document entitled: 'Trafford Core Strategy: Background Note on the 5 Proposed Strategic Locations Update.' This should be made clear.

## **Transport Assessment**

It is stated that the Council has been working with the Highways Agency to consider the impact of the strategic locations on the SRN, with the results of Phase 1 of the Greater Manchester LDF Transport Modelling work providing a summary of the potential impacts on transport networks.

The outputs of this study have been analysed and a number of 'concerns to be addressed' outlined by the Agency for Trafford. These include:

- Growth in traffic and increase in journey times between Junction 5 and 11 of the M60;
- Carrington and the increase in traffic and journey times on the A6144 and the impact on Junction 8 of the M60;
- The increase of CO<sub>2</sub> emissions;
- The increase in traffic and journey times on key public transport corridors; and
- The increase in overall car use and reduction in public transport use across the modelling period.

The Agency confirms that these issues are correctly identified in the Core Strategy. It is also stated in the Core Strategy that the 10 Greater Manchester Authorities have agreed a "concordat" with the Highways Agency, detailing a "sound approach" to addressing the transport impacts of future development in Greater Manchester. The Agency confirms that this is the case.

Going forward, further LDF Transport Modelling work will be undertaken to consider the mitigation measures necessary to offset the identified concerns on the transport networks through the Land Allocations DPD.

It is stated that the Council will continue to work with the Agency and GMPTE to identify and prioritise the required highway and public transport infrastructure provision and any necessary mitigation measures to support the sustainable delivery of the strategic locations. The outcomes of the Phase 2 work will inform the transport evidence base to support the Land Allocations DPD for the LDF and the review of SPD1: Developer Contributions to Highway and Public Transport Schemes. The Agency agrees with this approach.

## **Implementation of the 5 proposed Strategic Locations**

Implementation schedules for the strategic locations prioritise desired schemes to help guide the necessary future work. The Core Strategy is supported by the Local Infrastructure Plan [LIP] which is a living document and which the Agency will provide comments on alongside this response.

The Agency is satisfied that the Core Strategy and LIP together will provide a clear basis for infrastructure providers to plan future investment and service delivery across the plan period.

### **SL1 – Pomona Island**

The proposal for Pomona Island is for a new mixed use commercial district, combining significant commercial and recreational development for communities in Manchester City Centre and Old Trafford areas. In addition to the 546 residential units that have the benefit of an extant planning permission, the Council considers that this location can deliver:

- 10 Ha of employment activity;
- New commercial leisure facilities;

- Small scale ancillary retail and restaurant uses;
- Appropriate new community facilities to support those people using the development;
- A substantial new area of open space for informal recreation; and
- New and improved pedestrian links.

These proposals are in line with the previous proposals at this location that the Agency has provided comments on, and it is noted that no further residential development is proposed above the 546 units that have extant planning permission. Previously the Agency has expressed broad support for the proposals for mixed use development at Pomona Island, due to the relatively good public transport links to the site. However, the Agency also requested that any sustainable transport improvements associated with development at the Pomona site are supported by an accessibility analysis of the site. In addition, the Agency stated that a trip generation and distribution exercise should be undertaken in order to provide the evidence upon which the Agency can make a judgement as to the likely impact of the development at the SRN.

This information is not provided within the Core Strategy and the accompanying documents and therefore the Agency would take this chance to re-iterate the need for this evidence. It is stated however that the site specific implications of the proposal will be detailed in the Land Allocations DPD. The Agency will respond to the Land Allocations DPD as it comes forward, and will expect the document to incorporate results of the transport modelling work to assess the transport impact of the development proposals at Pomona Island.

#### Implementation

It is stated that implementation will be through private sector development. The Agency is identified in the project implementation table as partly responsible for improvements to the local highway network and public transport provision, although not responsible for funding these projects. These transport projects are identified as a Priority 2 scheme, which means that they are needed to ensure the sustainability of growth proposed in the Core Strategy. The Agency broadly supports that this is the appropriate priority level for the transport projects associated with this location.

#### **SL2 – Trafford Wharfside**

It is stated that the Council will identify and promote land for development within this location to create a major mixed-use area of regional and international significance. The focus will be on opportunities for new economic (particularly digital and media industries), leisure (hotels and visitor attractions) and residential development. These development aspirations are in line with those previously commented on by the Agency.

It is stated that the site specific implications of the proposal will be detailed in the Land Allocations DPD. The Agency will respond to the Land Allocations DPD as it comes forward, and will expect the document to incorporate results of the transport modelling work to assess the transport impact of the development proposals at Trafford Wharfside.

#### **Implementation**

As with the proposals for Pomona Island, the HA is identified in the project implementation table as partly responsible for improvements to the local highway network and public transport provision, although not responsible for

funding these projects. These transport projects are identified as Priority 2 schemes, which means that they are needed to ensure the sustainability of growth proposed in the Core Strategy. The Agency broadly supports that this is the appropriate priority level for the transport projects associated with this location.

### **Justification**

It is stated that the outcomes of the Greater Manchester Transport Modelling Assessment indicate that schemes are required to mitigate the impact of this development on the SRN and these will need to be agreed with the Highways Agency. The Agency concurs with this statement.

### **SL3 – Lancashire County Cricket Club Quarter**

The proposal at this location is for a major mixed-use development to provide a high quality experience for visitors balanced with a new, high quality residential neighbourhood centred around an improved stadium at Lancashire County Cricket Club.

The Council considers that this location can deliver the following:

- A redeveloped LCC sports stadium with ancillary sports and leisure facilities;
- 400 residential units comprising predominantly accommodation suitable for families;
- A redeveloped and renovated Trafford Town Hall providing new accommodation for Trafford Council's Civic and administrative functions;
- Improvements to education, community and commercial facilities (including a food superstore); and
- Improvements to the local highway network and better linkages with public transport infrastructure.

These proposals are in line with the previous proposals at this location which the Agency has commented on. It is stated that the site specific implications of the proposal will be detailed in the Land Allocations DPD. The Agency will respond to the Land Allocations DPD as it comes forward, and will expect the document to incorporate results of the transport modelling work to assess the transport impact of the development proposals at this location.

### **Implementation**

The Agency is identified in the project implementation table as partly responsible for improvements to the local highway network and public transport provision, although not responsible for funding these projects. It is stated however that joint ventures with public sector partners will be explored on a site by site basis. The transport projects are identified as Priority 2 schemes, which means that they are needed to ensure the sustainability of growth proposed in the Core Strategy. The Agency broadly supports that this is the appropriate priority level for the transport projects associated with this location.

### **SL4 – Trafford Centre Rectangle**

The proposal for this location comprises a major mixed-use development, providing a new residential neighbourhood together with commercial, leisure and community facilities and substantial improvements to the public transport infrastructure. The Council considers that this location can deliver:

- 1,050 residential units comprising, predominantly, accommodation suitable for families, on the land known as Trafford Quays, commercial office (B1) space and, community facilities;



- 15 hectares of land for employment activity providing high quality commercial (B1) development;
- New community facilities to support those people using the development; and
- A high quality (4\* minimum) hotel and conference facility, in the region of 200 bed spaces located close to Junction 9 of the M60.

These proposals are in line with the previous proposals at this location which the Agency has commented on. It is stated that the site specific implications of the proposal will be detailed in the Land Allocations DPD. The Agency will respond to the Land Allocations DPD as it comes forward, and will expect the document to incorporate results of the transport modelling work to assess the transport impact of the development proposals at this location.

### **Development Requirements**

With regards to transport, it is stated that in order for development in this location to be acceptable the following will be required:

- Significant improvements to public transport infrastructure including an integrated, frequent public transport system;
- Contribution towards a scheme to mitigate the impact of traffic generated by the development on the M60; and
- The provision of the Western Gateway Infrastructure Scheme (WGIS)

The Agency is encouraged by the identification of the need for significant improvements to public transport infrastructure in order to make development at this location acceptable. As has been highlighted previously by the Agency however, the improvements to sustainable transport infrastructure should be supported by an accessibility study to ensure that the improvements are being targeted effectively.

In terms of the scheme to mitigate the impact of traffic generated by the development on the M60, the Agency is not aware of any specific proposals of this nature, relating to development at this location. In addition, the improvement is identified as a requirement in order for development at this location to be acceptable, which would suggest that such a scheme should be 'priority 2' (needed to ensure sustainability of growth proposed in Core Strategy).

However, no such scheme is identified in the project implementation table as priority 2. What is identified in the table is 'Improvements to local highway and strategic networks and public transport provision', and this is set as priority 2 and in terms of phasing, required by 2016. It is also noted that the LIP, which supports the Core Strategy, does not identify this strategic network improvement and therefore there is a lack of consistency between the two documents. Given this, the Agency requests that the Core Strategy is more specific in identifying what scheme at the M60 it is referring to, and to identify in the implementation table when and how this will be delivered. It is stated that the transport mitigation measures will be operational in advance of the first occupation of the development, and the Agency considers this a sound approach.

It is requested that the LIP be updated to reflect the proposed mitigation work to the M60, in order that there is consistency between the two documents. The other development requirement which is identified is the provision of the WGIS. The Agency notes that the phasing of the WGIS is identified in the Core

Strategy as 'unknown'. Given this uncertainty, it may be prudent to include a scenario within the Core Strategy which takes into account different phasing schedules for the WGIS. This will ensure that there is some provision for how the location will be brought forward should the WGIS be delayed.

### **SL5 – Carrington**

It is stated that a major mixed-use development will be delivered in this location, providing a new residential community, together with employment, educational, health and recreational facilities. This will be supported by substantial improvements to both public transport and road infrastructure.

The Council considers that this location can deliver:

- 1560 residential units;
- 75 ha of land for employment activities;
- New road infrastructure to serve the development area to relieve congestion on the existing A6144;
- Significant improvements to public transport infrastructure by improving access to Partington, the Regional Centre and Altrincham with links to the Metrolink system. ;
- Community facilities including convenience retail, school provision, health and recreational facilities; and
- High quality green infrastructure.

These latest proposals differ slightly from those previously seen by the Agency. Whilst the residential proposal is lower, the land area for employment is larger. It is stated that the site specific implications of the proposal will be detailed in the Carrington Area Action Plan. The Agency will respond to the Carrington Area Action Plan as it comes forward, and will expect the document to incorporate results of the transport modelling work to assess the transport impact of the development proposals at this location.

### **Development Requirements**

With regards to transport, it is stated that in order for development in this location to be acceptable the following will be required:

- Contributions towards schemes to mitigate the impact of traffic generated by the development on the Strategic, Primary and Local Road Networks; and
- Contribution towards a scheme(s) to mitigate the impact of traffic generated by the development on the M60

The Agency would recommend that the development requirements also include improvements to the sustainable transport infrastructure serving the site/area, and this should be included in this section.

As with SL4 – Trafford Centre Rectangle, the requirement for a contribution towards a scheme to mitigate the impacts of the development on the M60 is not included in the LIP, and the Agency requests that the LIP is updated to include this.

Whilst public transport improvements are mentioned, they are not given as much emphasis as SL4 – Trafford Centre Rectangle. Given the nature of the Carrington location, the Agency would request that more emphasis is given to show a commitment within the Core Strategy document to ensuring that

sustainable transport infrastructure is in place prior to occupation of the development.

### Strategic Location Phasing

The proposed phasing for the strategic locations is summarised in Table 1 below:

**Table 1 Strategic Location Phasing**

Strategic Location		2006/9 – 2010/11	2011/2 – 2015/6	2016/7 – 2020/1	2021/2 – 2025/6	Total
SL1 - Pomona Island	Residential	0	240	306	0	546
	Employment	0	4	4	2	10
SL2 – Trafford Wharfside	Residential	0	400	300	200	900
	Employment	0	3	3	4	10
SL3 Lancs CC	Residential	0	60	300	40	400
SL4 – Trafford Centre Rectangle	Residential	0	250	250	550	1050
	Employment	0	2	6	7	15
SL5 - Carrington	Residential	0	360	600	600	1,560
	Employment	0	25	25	25	75
Total Residential		0	1,310	1,756	1,390	
Total Employment		0	34	38	38	

*(Residential expressed in Units, Employment expressed in Ha)*

The phasing shown above indicates that the phasing of the strategic location developments is relatively evenly spread, with 2016/7 – 2020/1 anticipated to experience the most intense development at the strategic locations.

The above table provides the cumulative development quantum of the strategic sites as they are anticipated to be brought forward. It can be seen that development at each of the sites is anticipated to have begun by 2015/6 and could start as early as 2011.

With regards to Trafford Centre Rectangle and Carrington, the Agency notes that the Core Strategy states that:

*“Transport mitigation measures will be identified to offset the impact of traffic generated by the development on the M60, in agreement with the HA and GMPTE, with funding streams identified and obtained and be operational in advance of the first occupation of the development in accordance with Policy L4.”*

This would suggest that mitigation schemes need to be identified and funding for them obtained and the scheme to be operational potentially before 2011, when the development at these locations could begin. The Agency has concerns regarding the achievability of these timescales but welcomes the commitment to ensuring mitigation schemes are in place prior to development.

The Managed Motorways Scheme between Junctions 8 and 12 of the M60 and the Additional Lane to Westbound M60 between Junctions 12 and 15 are still programmed to go ahead following the Comprehensive Spending Review (CSR)<sup>1</sup>. As such, these schemes can still be included within the emerging LDF documents.

<sup>1</sup>

## **Core Policies**

17 Core Policies (L1 – L17) are presented in the Core Strategy. The core policies will provide the Council with a framework within which new development in the Borough can be controlled and managed. The Agency provides the following comments on the core policies that are relevant to the SRN.

### **L1 – Land for New Homes**

Policy L1 states that the Council will seek to ensure that an adequate range of sites is made available across the Borough to allow a variety of types of housing to be provided, subject to the capacity of the urban area and infrastructure to accommodate the development and the need to protect the environment.

### **Scale**

The Agency supports the policy to concentrate higher density housing development in sustainable locations, and is encouraged by the statement that in less sustainable locations, housing development will only be acceptable where appropriate provision to meet local infrastructure needs will be delivered. A significant proportion of the housing requirement will be delivered in the strategic locations and/or in areas that will support key regeneration priorities set out in Policy L3 (Regeneration and Reducing Inequalities) and/or will strengthen and support Trafford's 4 town centres.

### **L4 – Sustainable Transport and Accessibility**

To facilitate the Delivery Strategy, it is stated that the Council will promote the development and maintenance of a sustainable integrated transport network that is accessible and offers a choice of modes of travel to all sectors of the local community and visitors to the Borough.

### **The Strategic, Primary and Local Highway Network**

The Agency is encouraged by the commitment to protecting the SRN and promoting sustainable transport expressed in policy L4. In particular the following passage (L4.2 – L4.4) is welcomed by the Agency:

L4.2 The Council will protect and support the maintenance and improvement of the Strategic Road Network and the Primary and Local Highway Authority Network, to ensure they operate in a safe, efficient and environmentally sustainable manner.

L4.3 The Council will not grant planning permission for new development that is likely to have a significant adverse impact on the safe and efficient operation of the Strategic Road Network and the Primary and Local Highway Authority Network unless and until appropriate transport infrastructure improvements and/or traffic mitigation measures and the programme for their implementation are secured.

L4.4 When considering proposals for new development that individually or cumulatively will have a material impact on the functioning of the Strategic Road Network and the Primary and Local Highway Authority Network the Council will seek to ensure that the safety and free flow of traffic is not prejudiced or compromised by that development in a significant adverse way either by ensuring that appropriate transport infrastructure improvements and/or traffic mitigation measures and the programme for their implementation is secured, or by securing contributions in accordance

with SPD 1: Developer Contributions to Highway and Public Transport Schemes, or by a combination of these means.

The Agency is satisfied that this policy accords with the Agency's approach to protecting the capacity, operation and safety of the SRN.

### **The Integrated Public Transport Network**

The policy also states that the Council will seek to secure the development of a high quality integrated public transport network. Again, the Agency welcomes this as it will assist in encouraging the use of sustainable modes as an alternative to the private car.

### **Car and Cycle Parking Standards**

It is stated that maximum levels of car parking for broad classes of development will be used as part of a package of measures to promote sustainable transport choices and promote linked trips and access to development for those without use of a car and to tackle congestion. The Agency welcomes this approach.

### **Funding**

It is stated that funding will generally be through private and public sector investment, LTP funds and s106 contributions towards highway and public transport schemes. The Agency is satisfied with this approach to funding.

### **Accessible Locations for Development**

The Agency is encouraged by the inclusion of this section concerning the importance of accessibility of new developments. It is stated that:

“Any development proposed in locations that do not currently offer access through a choice of modes of transport will be expected to deliver, or significantly contribute towards measures to improve public transport and highways infrastructure.”

The Agency welcomes this approach. The Core Strategy also states that the LIP will identify what measures are required and by when, to ensure the sustainable delivery of the LDF. The Core Strategy correctly states that “this will be informed by the GM LDF transport modelling work and other transport related evidence base. Any necessary public transport or highways schemes should be in place before first occupation of developments.”

The Agency is encouraged the recognition within the Core Strategy of the importance ensuring new developments are accessible.

### **L8 – Planning Obligations**

It is stated that the Council recognise that planning obligations are an established and valuable mechanism for bringing development in line with policies and proposals contained in relevant national and local planning policies. Overall the Agency is broadly supportive of the Council's stance regarding planning obligations, particularly with respect to “Section 106 Agreements” and Community Infrastructure Levy Regulations. It is therefore felt appropriate to remind the Council that the role of the Agency is not to provide new infrastructure to allow new development to take place and that should a scheme come forward which would materially impact upon the safe and efficient operation of the SRN then the Agency would expect any necessary

improvements to be funded through such an agreement as stated in Circular 02/2007:

In general terms, Government policy is no longer to attempt to cater for unrestrained road traffic growth. In working with developers, the Agency will expect to see proposals that include ways to reduce the traffic impact of the development. Developers can no longer expect that all the traffic they might produce will be allowed without restraint.

### **W1 - Economy**

The Council state that in order for the borough to remain competitive and to contribute to the growth of the sub-regional economy, the range of employment types on offer must be diversified.

### **Distribution**

Five of the locations identified have previously been commented upon as the form the Strategic Locations put forward by the Council (Pomona Island, Trafford Wharfside, Trafford Park Core, Trafford Centre Rectangle and Carrington). Therefore it is not deemed necessary to repeat those comments here. The Agency welcomes the intention to focus any further development in town centres and in accordance with the Land Allocations DPD.

### **W2 – Town Centres & Retail**

The Council state that the four town centres of the borough are the key drivers of Trafford's economic prosperity and emphasis will be on the continued development of these centres and commercial, retail and leisure hubs. In addition, the Council will seek to enhance their vitality and viability through encouraging diversity, accessibility and environmental quality.

### **Principal Town Centre, Other Town Centres, District Centres & Local Centres**

The Agency welcome the Council's commitment to focusing development on existing centres and these in general have the greatest potential to operate in a sustainable manner particularly where development includes improvement to sustainable transport. The Agency does however have to remind the Council that it should be consulted upon regarding any major development, particularly those in Altrincham such as Altair due to the potential impact upon the SRN. The Agency also welcomes the presumption against out-of-town retail, leisure or town centre type, especially large-scale extensions to The Trafford Centre.

### **Implementation**

The Agency would like to offer its assistance to the Council with regards to its work to identify further infrastructure requirements and delivery mechanisms required to support the Core Strategy. The Agency also supports the intention of the Council to use planning obligations to deliver infrastructure improvements. The Agency also wishes to pledge its continued support and contribution to the LDF Transport Liaison group.

### **Conclusions**

The Core Strategy allows the Agency to gain an understanding and appreciation of the vision the Council has for the borough over the period up to 2026. The Agency are supportive of the intention of the Council to locate new development in the most sustainable locations possible and would like to remind the Council

that the Agency are willing to assist them in the planning of development to ensure it comes forward in the most sustainable manner possible. In general, the Agency will support any improvements to the public transport network in the borough and any initiatives to increase walking and cycling. Any improvements which reduce the use of the private car and in particular lower the number single occupancy vehicle trips are also supported, particularly where there is potential to reduce the level of trips using the SRN. The Agency also supports connectivity throughout the region by the appropriate management of the SRN and seeks to ensure that development does not detrimentally affect the network.

I hope this response will be of use and the comments made will be reflected in the published Core Strategy. I trust the content of this response is clear, however should you have any queries, please do not hesitate to contact me.

The Agency awaits the forthcoming supporting LDF documents and welcomes the opportunity to be involved in future consultation exercises.  
Yours faithfully

**BY EMAIL (will be also sent by post)**

**Mrs Diane Kisiel  
LDF & Influencing Travel Behaviour Manager**

**Trafford's Core Strategy – Publication September 2010**  
**Annex to Representation form**

1073

**Para 2.1 - The Profile – Trafford's Place in the North West**

The Core Strategy splits Trafford into ten 'places' that the Council considers are locally distinct. For each of these, the Core Strategy describes the spatial profile of the place and identifies key issues.

The Agency welcomes the identification of these different places, each with distinctive spatial characteristics and issues to be addressed. Specific transport issues are identified, and those of most interest to the Agency are as follows:  
**Altrincham** – Whilst development is mostly located in the town centre with excellent sustainable transport links, the scale of development is of concern to the Agency due to the proximity of the M56 and M60. We therefore urge the Council to consult fully with the Agency regarding large-scale development in Altrincham.

**Trafford Park** – sustainable transport options within the Park are limited, particularly at morning peak times. The Agency welcomes the identification of this problem within the Core Strategy and would encourage that the Council look to address this issue.

**Partington** – access to the Regional Centre (Manchester City Centre) and Trafford's four town centres is very poor because of the A6144, which links Partington to the M60 (which provides access to the wider region) and Manchester to the north, and Warrington to the south. The aspiration is therefore to reduce this physical isolation through the delivery of improved transport links. The Agency welcomes the aspiration to improve sustainable transport links to Partington, and it is envisaged that these issues will be addressed more comprehensively through analysis of the strategic location proposals at the adjacent Carrington.

**Carrington** – as with Partington, the poor road link (A6144) is identified and the aspiration is to reduce its physical isolation through the delivery of improved transport links. Once again, the Agency will look to address these issues more comprehensively through analysis of the strategic location proposals at Carrington.

**Para 3.4 - The Vision for Trafford**

The Core Strategy Vision is an expression of the place the Council wants Trafford to be in 2026. The Agency is encouraged by the aspiration to have an 'integrated transport network offering a choice of modes of travel.' The Agency also welcomes the statement that the Green Belt 'will be preserved, protected and enhanced.' These outcomes are broadly consistent with the objectives of the Agency.



#### **Para 4.1 Strategic Objectives**

There are 8 strategic objectives (S01-S08) which, it is stated, will provide the framework for the development of the Core Strategy. The strategic objectives apply to the whole Borough but have been applied to the ten locally distinctive places identified earlier in the Core Strategy document to produce a series of 'place objectives' for each of the ten places. The Agency considers that each of the strategic objectives is sound. Strategic objective 6 (SO6) is concerned with reducing the need to travel and the objective is to 'promote significant levels of development in the most sustainable locations in the Borough and make less sustainable locations accessible by improving transport links, particularly public transport.' The Agency is satisfied that this objective is suitably worded.

#### **Section 5 - Place Objectives**

A set of objectives have been defined for each of the ten places identified earlier in the document. The Agency is satisfied that the place objectives have been developed taking into account the issues identified for each of the eight places, and that the place objectives are therefore sound. In particular, for Partington and Carrington, the objective to 'secure improvements to the public transport infrastructure' is welcomed by the Agency, as this is considered as an essential measure to ensure these places are developed in a sustainable way.

The objective specific to Carrington to 'secure improvements to the transport infrastructure including linkages to the motorway network' is also welcomed in broad terms by the Agency, however this should be done in such a way as to ensure that there is no adverse impact on the capacity, operation and safety of the SRN.

#### **Section 8 - Strategic Locations**

For the purposes of the Core Strategy a strategic location is defined as being:

- An important element in the achievement of the Core Strategy;
- Supported by information of what is to be provided, when it will be provided, who will provide it, and 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.

It is also stated that these locations will be programmed for delivery through a further DPD. The Agency is satisfied that this approach is appropriate and that the definition of strategic locations is suitable.

It is stated that other significant areas that were not considered to be strategic locations are detailed in other policies within the Core Strategy and the site specific implications of these areas will be detailed in the Land Allocations DPD. The Agency will need to be involved at the earliest possible stage in the consultation process for the Land Allocations DPD when it emerges.

It is stated that more details of the process of selecting the 5 proposed strategic locations is set out in the accompanying Technical Note. The Agency has assumed that this Technical Note is the document entitled: 'Trafford Core Strategy: Background Note on the 5 Proposed Strategic Locations Update.' This should be made clear.

### **Para 8.10 - Transport Assessment**

The Agency confirms that these issues are correctly identified in the Core Strategy. It is also stated in the Core Strategy that the 10 Greater Manchester Authorities have agreed a "concordat" with the Highways Agency, detailing a "sound approach" to addressing the transport impacts of future development in Greater Manchester. The Agency confirms that this is the case.

Going forward, further LDF Transport Modelling work will be undertaken to consider the mitigation measures necessary to offset the identified concerns on the transport networks through the Land Allocations DPD.

### **Para 8.13**

It is stated that the Council will continue to work with the Agency and GMPTE to identify and prioritise the required highway and public transport infrastructure provision and any necessary mitigation measures to support the sustainable delivery of the strategic locations. The outcomes of the Phase 2 work will inform the transport evidence base to support the Land Allocations DPD for the LDF and the review of SPD1: Developer Contributions to Highway and Public Transport Schemes. The Agency agrees with this approach.

### **Para 8.15 - Implementation of the 5 proposed Strategic Locations**

Implementation schedules for the strategic locations prioritise desired schemes to help guide the necessary future work. The Core Strategy is supported by the Local Infrastructure Plan [LIP] which is a living document and which the Agency will provide comments on alongside this response.

The Agency is satisfied that the Core Strategy and LIP together will provide a clear basis for infrastructure providers to plan future investment and service delivery across the plan period.

### **Para 8.21**

#### **SL1 – Pomona Island**

The proposal for Pomona Island is for a new mixed use commercial district, combining significant commercial and recreational development for communities in Manchester City Centre and Old Trafford areas.

These proposals are in line with the previous proposals at this location that the Agency has provided comments on, and it is noted that no further residential development is proposed above the 546 units that have extant planning permission. Previously the Agency has expressed broad support for the proposals for mixed use development at Pomona Island, due to the relatively good public transport links to the site. However, the Agency also requested that any sustainable transport improvements associated with development at the Pomona site are supported by an accessibility analysis of the site. In addition, the Agency stated that a trip generation and distribution exercise should be undertaken in order to provide the evidence upon which the Agency can make a judgement as to the likely impact of the development at the SRN.

This information is not provided within the Core Strategy and the accompanying documents and therefore the Agency would take this chance to re-iterate the need for this evidence. It is stated however that the site specific implications of the proposal will be detailed in the Land Allocations DPD. The Agency will

respond to the Land Allocations DPD as it comes forward, and will expect the document to incorporate results of the transport modelling work to assess the transport impact of the development proposals at Pomona Island.

#### Implementation

**Para 8.22** - It is stated that implementation will be through private sector development. The Agency is identified in the project implementation table as partly responsible for improvements to the local highway network and public transport provision, although not responsible for funding these projects. These transport projects are identified as a Priority 2 scheme, which means that they are needed to ensure the sustainability of growth proposed in the Core Strategy. The Agency broadly supports that this is the appropriate priority level for the transport projects associated with this location.

#### **Para 8.32 SL2 – Trafford Wharfside**

It is stated that the Council will identify and promote land for development within this location to create a major mixed-use area of regional and international significance. The focus will be on opportunities for new economic (particularly digital and media industries), leisure (hotels and visitor attractions) and residential development. These development aspirations are in line with those previously commented on by the Agency.

It is stated that the site specific implications of the proposal will be detailed in the Land Allocations DPD. The Agency will respond to the Land Allocations DPD as it comes forward, and will expect the document to incorporate results of the transport modelling work to assess the transport impact of the development proposals at Trafford Wharfside.

#### Implementation

As with the proposals for Pomona Island, the HA is identified in the project implementation table as partly responsible for improvements to the local highway network and public transport provision, although not responsible for funding these projects. These transport projects are identified as Priority 2 schemes, which means that they are needed to ensure the sustainability of growth proposed in the Core Strategy. The Agency broadly supports that this is the appropriate priority level for the transport projects associated with this location.

#### **Para 8.37 - Justification**

It is stated that the outcomes of the Greater Manchester Transport Modelling Assessment indicate that schemes are required to mitigate the impact of this development on the SRN and these will need to be agreed with the Highways Agency. The Agency concurs with this statement.

#### **SL3 – Lancashire County Cricket Club Quarter**

The proposal at this location is for a major mixed-use development to provide a high quality experience for visitors balanced with a new, high quality residential neighbourhood centred around an improved stadium at Lancashire County Cricket Club. These proposals are in line with the previous proposals at this location which the Agency has commented on. It is stated that the site specific implications of the proposal will be detailed in the Land Allocations DPD. The Agency will respond to the Land Allocations DPD as it comes forward, and will

expect the document to incorporate results of the transport modelling work to assess the transport impact of the development proposals at this location.

#### Implementation

The Agency is identified in the project implementation table as partly responsible for improvements to the local highway network and public transport provision, although not responsible for funding these projects. It is stated however that joint ventures with public sector partners will be explored on a site by site basis. The transport projects are identified as Priority 2 schemes, which means that they are needed to ensure the sustainability of growth proposed in the Core Strategy. The Agency broadly supports that this is the appropriate priority level for the transport projects associated with this location.

#### **SL4 – Trafford Centre Rectangle**

The proposal for this location comprises a major mixed-use development, providing a new residential neighbourhood together with commercial, leisure and community facilities and substantial improvements to the public transport infrastructure. These proposals are in line with the previous proposals at this location which the Agency has commented on. It is stated that the site specific implications of the proposal will be detailed in the Land Allocations DPD. The Agency will respond to the Land Allocations DPD as it comes forward, and will expect the document to incorporate results of the transport modelling work to assess the transport impact of the development proposals at this location.

#### **SL4.4 - Development Requirements**

With regards to transport, it is stated that in order for development in this location to be acceptable the following will be required:

- Significant improvements to public transport infrastructure including an integrated, frequent public transport system;
- Contribution towards a scheme to mitigate the impact of traffic generated by the development on the M60; and
- The provision of the Western Gateway Infrastructure Scheme (WGIS)

The Agency is encouraged by the identification of the need for significant improvements to public transport infrastructure in order to make development at this location acceptable. As has been highlighted previously by the Agency however, the improvements to sustainable transport infrastructure should be supported by an accessibility study to ensure that the improvements are being targeted effectively.

In terms of the scheme to mitigate the impact of traffic generated by the development on the M60, the Agency is not aware of any specific proposals of this nature, relating to development at this location. In addition, the improvement is identified as a requirement in order for development at this location to be acceptable, which would suggest that such a scheme should be 'priority 2' (needed to ensure sustainability of growth proposed in Core Strategy).

However, no such scheme is identified in the project implementation table as priority 2. What is identified in the table is 'Improvements to local highway and strategic networks and public transport provision', and this is set as priority 2 and in terms of phasing, required by 2016. It is also noted that the LIP, which supports the Core Strategy, does not identify this strategic network improvement and therefore there is a lack of consistency between the two documents.

Given this, the Agency requests that the Core Strategy is more specific in identifying what scheme at the M60 it is referring to, and to identify in the implementation table when and how this will be delivered. It is stated that the transport mitigation measures will be operational in advance of the first occupation of the development, and the Agency considers this a sound approach.

It is requested that the LIP be updated to reflect the proposed mitigation work to the M60, in order that there is consistency between the two documents. The other development requirement which is identified is the provision of the WGIS. The Agency notes that the phasing of the WGIS is identified in the Core Strategy as 'unknown'. Given this uncertainty, it may be prudent to include a scenario within the Core Strategy which takes into account different phasing schedules for the WGIS. This will ensure that there is some provision for how the location will be brought forward should the WGIS be delayed.

### **SL5 – Carrington**

It is stated that a major mixed-use development will be delivered in this location, providing a new residential community, together with employment, educational, health and recreational facilities. This will be supported by substantial improvements to both public transport and road infrastructure.

The Council considers that this location can deliver:

- 1560 residential units;
- 75 ha of land for employment activities;
- New road infrastructure to serve the development area to relieve congestion on the existing A6144;
- Significant improvements to public transport infrastructure by improving access to Partington, the Regional Centre and Altrincham with links to the Metrolink system. ;
- Community facilities including convenience retail, school provision, health and recreational facilities; and
- High quality green infrastructure.

These latest proposals differ slightly from those previously seen by the Agency. Whilst the residential proposal is lower, the land area for employment is larger. It is stated that the site specific implications of the proposal will be detailed in the Carrington Area Action Plan. The Agency will respond to the Carrington Area Action Plan as it comes forward, and will expect the document to incorporate results of the transport modelling work to assess the transport impact of the development proposals at this location.

### **SL5 .4 - Development Requirements**

With regards to transport, it is stated that in order for development in this location to be acceptable the following will be required:

- Contributions towards schemes to mitigate the impact of traffic generated by the development on the Strategic, Primary and Local Road Networks; and
- Contribution towards a scheme(s) to mitigate the impact of traffic generated by the development on the M60

The Agency would recommend that the development requirements also include improvements to the sustainable transport infrastructure serving the site/area, and this should be included in this section.

As with SL4 – Trafford Centre Rectangle, the requirement for a contribution towards a scheme to mitigate the impacts of the development on the M60 is not included in the LIP, and the Agency requests that the LIP is updated to include this.

Whilst public transport improvements are mentioned, they are not given as much emphasis as SL4 – Trafford Centre Rectangle. Given the nature of the Carrington location, the Agency would request that more emphasis is given to show a commitment within the Core Strategy document to ensuring that sustainable transport infrastructure is in place prior to occupation of the development.

### **Strategic Location Phasing**

The phasing of the strategic location developments is relatively evenly spread, with 2016/7 – 2020/1 anticipated to experience the most intense development at the strategic locations. It can be seen that development at each of the sites is anticipated to have begun by 2015/6 and could start as early as 2011.

#### **Para 8.64**

With regards to Trafford Centre Rectangle and Carrington, the Agency notes that the Core Strategy states that:

*“Transport mitigation measures will be identified to offset the impact of traffic generated by the development on the M60, in agreement with the HA and GMPTE, with funding streams identified and obtained and be operational in advance of the first occupation of the development in accordance with Policy L4.”*

This would suggest that mitigation schemes need to be identified and funding for them obtained and the scheme to be operational potentially before 2011, when the development at these locations could begin. The Agency has concerns regarding the achievability of these timescales but welcomes the commitment to ensuring mitigation schemes are in place prior to development.

The Managed Motorways Scheme between Junctions 8 and 12 of the M60 and the Additional Lane to Westbound M60 between Junctions 12 and 15 are still programmed to go ahead following the Comprehensive Spending Review (CSR)<sup>1</sup>. As such, these schemes can still be included within the emerging LDF documents.

### **L1.2 – Land for New Homes Core Policies - Scale**

The Agency supports the policy to concentrate higher density housing development in sustainable locations, and is encouraged by the statement that in less sustainable locations, housing development will only be acceptable where appropriate provision to meet local infrastructure needs will be delivered. A significant proportion of the housing requirement will be delivered in the strategic locations and/or in areas that will support key regeneration priorities set

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out in Policy L3 (Regeneration and Reducing Inequalities) and/or will strengthen and support Trafford's 4 town centres.

#### **L4 – Sustainable Transport and Accessibility**

##### **The Strategic, Primary and Local Highway Network**

The Agency is encouraged by the commitment to protecting the SRN and promoting sustainable transport expressed in policy L4. In particular the following passage (L4.2 – L4.4) is welcomed by the Agency:

L4.2 The Council will protect and support the maintenance and improvement of the Strategic Road Network and the Primary and Local Highway Authority Network, to ensure they operate in a safe, efficient and environmentally sustainable manner.

L4.3 The Council will not grant planning permission for new development that is likely to have a significant adverse impact on the safe and efficient operation of the Strategic Road Network and the Primary and Local Highway Authority Network unless and until appropriate transport infrastructure improvements and/or traffic mitigation measures and the programme for their implementation are secured.

L4.4 When considering proposals for new development that individually or cumulatively will have a material impact on the functioning of the Strategic Road Network and the Primary and Local Highway Authority Network the Council will seek to ensure that the safety and free flow of traffic is not prejudiced or compromised by that development in a significant adverse way either by ensuring that appropriate transport infrastructure improvements and/or traffic mitigation measures and the programme for their implementation is secured, or by securing contributions in accordance with SPD 1: Developer Contributions to Highway and Public Transport Schemes, or by a combination of these means.

The Agency is satisfied that this policy accords with the Agency's approach to protecting the capacity, operation and safety of the SRN.

##### **L4.5 - The Integrated Public Transport Network**

The policy also states that the Council will seek to secure the development of a high quality integrated public transport network. Again, the Agency welcomes this as it will assist in encouraging the use of sustainable modes as an alternative to the private car.

##### **L4.14 - Car and Cycle Parking Standards**

It is stated that maximum levels of car parking for broad classes of development will be used as part of a package of measures to promote sustainable transport choices and promote linked trips and access to development for those without use of a car and to tackle congestion. The Agency welcomes this approach.

### **Implementation (page 84) - Funding**

It is stated that funding will generally be through private and public sector investment, LTP funds and s106 contributions towards highway and public transport schemes. The Agency is satisfied with this approach to funding.

### **Para 13.6 - Accessible Locations for Development**

The Agency is encouraged by the inclusion of this section concerning the importance of accessibility of new developments. It is stated that:

“Any development proposed in locations that do not currently offer access through a choice of modes of transport will be expected to deliver, or significantly contribute towards measures to improve public transport and highways infrastructure.”

The Agency welcomes this approach. The Core Strategy also states that the LIP will identify what measures are required and by when, to ensure the sustainable delivery of the LDF. The Core Strategy correctly states that “this will be informed by the GM LDF transport modelling work and other transport related evidence base. Any necessary public transport or highways schemes should be in place before first occupation of developments.”

The Agency is encouraged the recognition within the Core Strategy of the importance ensuring new developments are accessible.

### **Para 17.1 - L8 – Planning Obligations**

It is stated that the Council recognise that planning obligations are an established and valuable mechanism for bringing development in line with policies and proposals contained in relevant national and local planning policies. Overall the Agency is broadly supportive of the Council’s stance regarding planning obligations, particularly with respect to “Section 106 Agreements” and Community Infrastructure Levy Regulations. It is therefore felt appropriate to remind the Council that the role of the Agency is not to provide new infrastructure to allow new development to take place and that should a scheme come forward which would materially impact upon the safe and efficient operation of the SRN then the Agency would expect any necessary improvements to be funded through such an agreement as stated in Circular 02/2007:

In general terms, Government policy is no longer to attempt to cater for unrestrained road traffic growth. In working with developers, the Agency will expect to see proposals that include ways to reduce the traffic impact of the development. Developers can no longer expect that all the traffic they might produce will be allowed without restraint.

### **Para 19.1 - Principal Town Centre, Other Town Centres, District Centres & Local Centres**

The Agency welcome the Council’s commitment to focusing development on existing centres and these in general have the greatest potential to operate in a sustainable manner particularly where development includes improvement to sustainable transport. The Agency does however have to remind the Council



that it should be consulted upon regarding any major development, particularly those in Altrincham such as Altair due to the potential impact upon the SRN. The Agency also welcomes the presumption against out-of-town retail, leisure or town centre type, especially large-scale extensions to The Trafford Centre.

#### **Para 27.8 - Implementation**

The Agency would like to offer its assistance to the Council with regards to its work to identify further infrastructure requirements and delivery mechanisms required to support the Core Strategy. The Agency also supports the intention of the Council to use planning obligations to deliver infrastructure improvements. The Agency also wishes to pledge its continued support and contribution to the LDF Transport Liaison group.

#### **Para 27.9**

The Core Strategy allows the Agency to gain an understanding and appreciation of the vision the Council has for the borough over the period up to 2026. The Agency are supportive of the intention of the Council to locate new development in the most sustainable locations possible and would like to remind the Council that the Agency are willing to assist them in the planning of development to ensure it comes forward in the most sustainable manner possible.

In general, the Agency will support any improvements to the public transport network in the borough and any initiatives to increase walking and cycling. Any improvements which reduce the use of the private car and in particular lower the number single occupancy vehicle trips are also supported, particularly where there is potential to reduce the level of trips using the SRN. The Agency also supports connectivity throughout the region by the appropriate management of the SRN and seeks to ensure that development does not detrimentally affect the network.

**Trafford's Core Strategy: Publication Document  
Representation Form – September 2010**

Office Use Only	
Date	
Ref	
Ack	

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**  
[strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

This form has two parts –

**Part A** – Personal Details (You need only submit one copy of Part A)

**Part B** – Your representation(s) (**Please submit a separate Part B for each representation you wish to make**)

**Before completing this representation form please refer to the attached guidance notes.**

**PART A**

**Please use the representation form to make a representation on the Core Strategy: Publication Document.**


**1. Personal Details**

**2. Agents Details (If applicable)**

Name:	Diane Kisiel	Name:	
Organisation (if applicable):	Highways Agency	Organisation (if applicable):	
Address:	Piccadilly Gate Store Street Manchester	Address:	
Postcode:	M1 2WD	Postcode:	
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Fax:	0161 9304786	Fax:	
Email:	Diane.kisiel@highways.gsi.gov.uk	Email:	

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 representation forms enclosed in the box below:

**Total number of representation forms enclosed:**

 **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.** An electronic version of the representation form can be found on the Council's web site at: [www.trafford.gov.uk](http://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](mailto:strategic.planning@trafford.gov.uk).**

Alternatively, completed comment forms can be returned by post to the address below by no later than **Monday 1<sup>st</sup> November 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: Publication Document  
Representation Form – September 2010  
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

**Name or Organisation: Highways Agency**

3. To which part of the DPD does this representation relate?

Paragraph Number	Policy Number
<input type="text" value="See attached"/>	<input type="text"/>

4. Do you consider the DPD is:

4. (1) Legally Compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4. (2) Sound*	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified	<input type="checkbox"/>
(2) Effective	<input type="checkbox"/>
(3) Consistent with national Policy	<input type="checkbox"/>

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Please continue on a separate sheet if required

# Trafford's Core Strategy: Publication Document Representation Form – September 2010

## PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see paper attached.

Please continue on a separate sheet if required

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please note also that the Inspector is not obliged to consider any previous representations that have been made in respect of this Plan. You are urged, therefore, to re-submit, on copies of this form, any previously submitted representations that, in your view, remain valid and that you wish the Inspector to consider.**

8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the  
Oral examination

Yes, I wish to participate  
at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

## Trafford's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

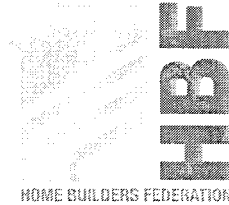
Signature:

Date:

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

STRATEGIC PLANNING AND DEVELOPMENTS			
01 NOV 2010			
Copied to			

1052



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

1 November 2010

Dear sir/madam

**TRAFFORD CORE STRATEGY: PUBLICATION DOCUMENT**

Thank you for consulting with the Home Builders Federation (HBF).

We would like to make the following comments on the Core Strategy:

**Strategic locations**

The Core Strategy identifies five strategic locations for change.

The Core Strategy sets a housing requirement of 11,800 net additional dwellings up to 2026.

4456 of these new homes will be provided in the five strategic locations – a figure that is approaching almost half of the council's requirement.

In order to achieve the housing target much will depend on how quickly these strategic locations can be brought forward. We identify some serious obstacles to this, not least in the cost of infrastructure to which is held necessary to bring these areas forward for development and that the council maintains is necessary. The full cost of the remediation works and infrastructure requirements is not fully known for each location. This would appear to be contrary to PPS12 which states in paragraph 4.10 that core strategies must not place undue reliance on critical elements of infrastructure whose funding is not known.

A brief tabulation reveals the following known costs (the lowest figure is used when a range is provided):

Location	Known estimated Infrastructure cost
Pomona Island	£500k
Trafford Wharfside	£27.5m
County Cricket Club	£22m
Trafford Centre Rectangle	£10m
Carrington	£35.8m
<b>Total</b>	<b>£92.8m</b>

These are only the known costs. It is unclear how much the investment money required is expected to come from the activity of house building (CIL and s106) and how much is expected to be raised from other developers and public sources. We are concerned that there may be an expectation that the full amount will be provided by house builders, if funding from other sources is not forthcoming. If this is the expectation then the anticipated development uplift from 4,456 homes will be insufficient to pay for this development and still provide a adequate return to investors to allow these sites to come forward.

£92.8m divided by 4,456 homes would require that each home contributes and average of £20,825. We stress that these figures represent only the known costs. The figure could very well be considerably higher once the plans have been properly costed. Once affordable housing costs, the level of the Code for Sustainable Homes proposed by the core strategy, and site specific planning obligations are factored into the equation, then the costs could be prohibitive.

To illustrate just one area, the Government's latest assessment of the cost impact of the Code for Sustainable Homes<sup>1</sup> above 2006 Building Regulations estimates that building to Code level 3 in medium urban areas (350 dwellings at 80 dph) would add between £2,000 (for a flat) to £2,900 pounds (for a 3 bed semi) to construction costs. Building to Code level 4 (the plan's requirement from 2013) would add between £5,440 (for a flat) to £7,970 (for a 3 bed semi) to construction costs. These costs are Government estimates, and are considered by the industry to be on the conservative side.

Once the cost of affordable housing and planning obligations are added, then it is probably not unreasonable to estimate that the regulatory and policy impact on each home could easily be within the region of £50k per unit. The cost of providing affordable housing will be especially taxing in an environment where no HCA grant will be available.

We would therefore query whether a plan which is so dependent upon unknown funding sources to deliver almost half of its housing requirement over the plan period is realistic and deliverable.

<sup>1</sup> *Code for Sustainable Homes: a cost review* CLG, March 2010. See summary table on page 12.

The problem may well be one that is resolvable once stronger funding commitments are in place from other developers and public sources. An alternative solution may be to reduce regulatory and policy demands in other areas of the plan such as affordable housing (policy L2) and sustainable construction (policy L5).

### **Policy L1: Land for new homes**

The core strategy sets a housing requirement of 11,800 homes for the plan period to 2026. This compares to the now revoked RSS housing target of 10,400 net additions to 2021.

The new targets appear to represent a significant undersupply. Even simply rolling forward the RSS annual average rate of 578 net additions for a further five years would generate a requirement of 13,290 homes. This disregards more up-to-date evidence from the 2006 household projections and the anticipated 2008 projections. It also disregards the 20% uplift associated with the areas growth point status.

The 2006 household projections indicate that there will be a growth of 18,000 households between 2011 (the anticipated date of adoption of the plan) and 2026. This is before factoring in backlog, second homes, and transactional vacancies according to the demographic model deployed by the now defunct National Housing and Planning Advice Unit (NHPAU).

The core strategy target would appear to represent an undersupply. A SHMA has been carried out for the Greater Manchester area but this does not appear to have generated individual local authority level projections of housing need. Consequently we are unable to compare the core strategy target with other SHMA research findings.

We fully appreciate that local authorities are no longer bound by RSS or Regional Strategy targets. However, the Secretary of State in his guidance accompany the revocation letter of the 6 July stated that housing requirements still needed to be evidence based (paragraphs 11 and 12).

It is unclear what the evidence base is for the Trafford housing requirement. Even so, it is the view of the HBF that the targets established through the RSS process still provide the most reliable targets. The targets were based upon a rigorous assessment of need and demand, and were established following a lengthy period of public consultation and examination.

In view of the uncertainty concerning the evidence base for the target the HBF submits that the core strategy should set a housing requirement of at least 13,290 net additions to 2026.

### **Paragraph 11.9**

The HBF objects to off-site payments towards affordable housing. While such an approach can represent a pragmatic response to the challenges of



viability, it does tend to suggest that what really is at issue is value capture not the creation of mixed and balanced communities.

The justification in PPS3 (and predecessor documents) to seek a contribution from developers towards the supply of affordable housing is in order to create mixed and balanced communities.

Therefore, either the contribution is deemed necessary in order to make a development acceptable in planning terms (to create a mixed and balanced community) or, on balance, it is considered acceptable to waive the contribution to ensure a development can come forward, taking into account other benefits of the development that would outweigh the loss of an affordable housing contribution (e.g. developing a brownfield site which requires a lot of site remediation/preparation, providing retirement housing, or because the scheme provides low-cost market housing in an otherwise expensive area).

To seek an affordable housing contribution off-site suggests that the need for a contribution on the original site was never essential to the acceptability of the scheme – that affordable housing was never needed to create a mixed and balanced community.

If affordable housing is needed on site in order to make the development acceptable in planning terms, but the level of provision sought renders the scheme unviable, then other policies will need to be waived or else applied more flexibly to ensure a viable development can come forward (e.g. contributions to s106/tariff, green space, space standards, the Code etc).

### **Paragraph 11.11**

This paragraph appears to imply that the affordable housing target has been arrived at simply by assuming that 50% of all houses built should be set aside for affordable housing, rather than identifying what the true extent of the need for affordable housing might be.

### **Policy L3: Regeneration and reducing inequalities**

The policy requires that developments in the Old Trafford, Partington and Sale West areas will improve amenities including the level of public open space. Such matters will need to be addressed through the Community Infrastructure Levy (CIL) and a Charging Schedule produced to cost these items and apportion the cost of provision across all development. This is necessary if the payment for such items can be achieved through the CIL rather than the s106 mechanism. CIL represents a simpler, fairer and more transparent instrument for the collection of such contributions. In future pooled obligations for items capable of being funded by CIL will be limited to no more than five separate planning obligations.

## **Policy L4: Sustainable transport and accessibility**

### **Paragraph L4.4**

The paragraph refers to the developer contributions SPD 1: Developer Contributions to Highway and Public Transport Schemes. Such matters will need to be addressed through the Community Infrastructure Levy (CIL) or the Government's proposed replacement tariff and a Charging Schedule produced to cost these items and apportion the cost of provision across all development. This is necessary if the payment for such items can be achieved through the CIL rather than the s106 mechanism. The CIL represents a simpler, fairer and more transparent instrument for the collection of such contributions. In future pooled obligations for items capable of being funded by CIL will be limited to no more than five separate planning obligations. Transport is a form of infrastructure that would most fairly and efficiently be funded via the CIL.

## **Policy L5: Climate Change**

### **Paragraph L5.2**

The HBF objects to the requirement in paragraph L5.2 requiring developments to meet Code for Sustainable Homes levels that are currently voluntary for the market sector, and making these mandatory on a wholesale basis. These are matters best addressed through the Building Regulations.

There is no generally accepted market model at present for delivering homes to Code Level 4 standards.

Insisting on these standards through policy will have an injurious effect on housing delivery. It is unclear what evidence the local authority has drawn upon to justify these targets as a policy requirement. PPS1, paragraph 26(vi) requires plan policies to be based on analysis and evidence and (iii) not impose disproportionate costs on development that would constrain beneficial economic and social development.

### **Paragraph L5.5**

The HBF objects to the accelerated programme set out in paragraph L5.2 of the policy for development. The proposed changes to Building Regulations in 2010 and 2013, the national standards they embody, and the pathway to zero carbon up to and from 2016, reflect the results of detailed discussion and negotiation between Government, experts, manufacturers, developers, NGOs and regulators over what is feasible for developers to achieve between now and 2016. These national targets already represent a significant challenge to developers. Trafford has not demonstrated how it has access to any better information that justifies accelerating the national timetable.

The Supplement to PPS1, paragraph 26, states that planning authorities should have an evidence based understanding of the local feasibility and potential for renewable development and low carbon technologies.

Unless rigorously justified, PPS1, paragraph 30 is clear that:

*“Planning policies should not replicate, cut across, or detrimentally affect matters within the scope of other legislative requirements, such as those set out in the Building Regulations for energy efficiency.”*

We are extremely anxious that the accelerated targets set out in the policy will adversely affect delivery. Table L5.1 requires a 17% increase on current Part L of the Building Regulations in Target Area 2 and a 15% increase in Target Area 3. Thus, from date of adoption the local authority is seeking:

	<u>Current Part L</u>
Target Area 2	25% on 2006 Building Regulations + 17% = 42%
Target Area 3	25% on 2006 Building Regulations = 15% = 40%

This effectively represents an acceleration of the timetable to zero carbon by bringing forward the 2013 target of a 44% saving on 2006 Building Regulations to 2010.

The CLG’s recent cost analysis of the Code: *Code for Sustainable Homes: A Cost Review* provides an assessment of the cost of compliance. Page 24, table 7, shows the baseline build costs for four sample dwelling types – the cost before applying higher levels of the Code or Part L.

Page 99 sets out the cost of achieving the carbon compliance targets for Code Level 4 (equivalent to 44% improvement on the 2006 Building Regulations). This indicates additional costs per unit of:

Flat	£4,611
Terrace	£6,243
Semi-detached	£7,022
Detached	£5,219

Even these costs are likely to be too light as they are based on academic studies. Actual developments may generate much higher costs.

Cumulatively, these additional costs will impact on development viability if this is made a policy requirement ahead of the national programme. Viability is further at risk if this is sought in combination with Trafford’s substantial infrastructure requirements and affordable housing policy.

Professor Ball’s recent report to Government highlights the necessity of a ‘light touch’ to boost output in the private housebuilding industry. In chapter 7 Professor Ball acknowledges that progress to zero carbon will raise build costs significantly over the short term. This will only abate once component costs begin to fall *as volumes rise*. Without volume production, therefore, it

will not be possible to benefit from the accumulation of experience and experimentation necessary to achieve higher standards. Ambitious policies will prove counter-productive if they discourage output. The Government understands this tension, hence the requirement in the new draft Supplement (as well as the extant Supplement) that sustainability planning policies should not render new development unviable or discourage supply.

Information from the Zero Carbon Hub demonstrates that achieving an improvement of 44% above 2006 Building Regulations is not feasible in residential schemes without the use of costly on-site renewables and/or off-site solutions. Furthermore, opportunities for off-site solutions are limited in most areas as the energy infrastructure is not yet in place and it is unrealistic to expect house builders to be able to finance the provision of the latter (such as district heating networks). The policy is unachievable and not supported by sufficient evidence (such as a district energy map) to indicate whether it can be delivered over the next three years (2010-2013). By contrast, the Government's own analysis of the costs referred to above – a more thorough and comprehensive study than any other carried out – indicates that adhering to the agreed programme offers the best chance of achieving zero carbon from 2016 and maintaining housing delivery in the interim.

Under the circumstances Trafford's core strategy should adhere to national standards, including the agreed programme to zero carbon. This is essential to ensure development remains viable while avoiding confusion and fragmentation of market signals for the supply chain to help it gear up to the new regulatory standard. If the 2013 and 2016 regulations change then the Trafford Core Strategy policy can be worded in such a way to allow it to reflect such changes.

### **Target Area 1**

We also object to the requirement set out in table L5.1 for these targets to be achieved by certain means (e.g. CCHP) for Target Area 1. Paragraph 26 (i) states that targets should avoid prescription on technologies and be flexible in how carbon reduction is secured.

Experts and Government acknowledge that there is no single, one size fits all answer to carbon compliance. The fabric efficiency standard is already expressed as two values to accommodate the needs of different house types. The technical feasibility and commercial viability of meeting the targets is influenced by a range of variables such as dwelling types, orientation, site sizes, site conditions, climatic conditions and sunshine, etc.

The current carbon compliance targets will be technically impossible on many sites, so that they will simply not be built if the requirement is adhered to inflexibly or the target is increased, which is the risk with Trafford's policy.

The Government does not specify a 'one size fits all' approach to reducing carbon emissions in development. This is evident in the draft replacement to PPS1, While support for district networks is encouraged as probably the most

effective way of achieving this, the Government also recognises that where district networks or plant do not exist, or are inadequate, or where it is not cost effective to provide or connect to these, then other solutions will need to be considered (which might include, for example, micro-renewables or site wide CHP).

The rationale for any specific on-site generation policy, and on and off site connected heat, is rapidly disappearing as a result of the national zero carbon policy, but in any event all decisions need to be taken in relation to the specific development context. This will be a matter for Trafford to assess on a case-by-case basis in accordance with the new draft Supplement to PPS1 (policy LCF8).

Local requirements will also need to conform to the national policy on "allowable solutions" once this has been defined, but national policy, on the basis of the draft Supplement, is likely to phase out Merton-style rules specifying targets for energy generation from on-site renewables as this will no longer be necessary.

Consequently we recommend that Table L5.1 and the targets set in this policy are deleted.

We object to developers being required to prepare Carbon Budget Statements. This is an unnecessary additional bureaucratic burden, and contrary to the aims of the Killian Pretty Review and the new Government's agenda to cut red tape. Developers are only required to demonstrate how they meet the Building Regulations. This should suffice. There is no justification for duplicating matters address through other legislative mechanisms, such as the Building Regulations, as paragraph 30 of PPS1 makes clear.

Finally, we would like to refer to the proportionality of the targets. Since new homes seeking building approval will be constructed to zero carbon from 2016 onwards, the house building industry will already have played a very full part in reducing CO<sub>2</sub> emissions by 2025. The industry is already on course to ensure that new dwellings approved from October 2010 provide a 25% reduction in emissions from regulated energy use compared to the 2006 building regulations, and a 44% reduction from 2006 requirements will be necessary from 2013 onwards. Because the definition of zero carbon agreed by the Government includes currently unregulated emissions from the use of appliances in the home, the national zero carbon regulatory requirement that will apply from 2016 onward for new homes will in fact entail at least a 150% reduction in emissions compared to 2006 requirements. The national zero carbon policy will therefore mean that the home building industry has comfortably more than met the proposed 2025 target so far as its own footprint is concerned.

We would query whether the emphasis on new dwellings is proportionate. Annual building rates have not in any recent year added more than 1% to the existing housing stock. Despite the world-leading progress in the performance

standards of new homes under the zero carbon policy Trafford's carbon reduction ambitions cannot be achieved without very significant improvements being made to the level of emissions generated by the existing housing stock.

### **Policy L8: Planning Obligations**

We are wary about the references to off-site improvements in case this is used as an attempt to circumvent collecting money via the more appropriate mechanism of a CIL. Planning obligations must be strictly related to mitigating the impact of the development in question. If the impact cannot be mitigated by the development in question then the development is unacceptable in planning terms and no number of off-site contributions can remedy this.

We are also wary of the references to maintenance payments. Paragraph B18 of Circular 05/2005 states that where any facilities provided are predominantly for the benefit of the users of the development *it may* be appropriate for the developer to make provision for maintenance. It is a matter for the developer to determine. This emphasis should be reflected in the wording of the policy.

Paragraph B19 of the Circular then goes on to state that where the asset is intended for wider public use (as in the case of public open space) then the cost of maintenance should be normally be borne by the body with whom the asset is vested. This is not necessarily the local authority – it could be the developer or another third party. In such a situation, a payment to the local authority would be inappropriate. This nuance should be reflected in the wording of Policy L8.

### **Paragraph 17.7**

We object most strongly to the reference to overage in this paragraph. This should be deleted.

Overage represents an attempt by the state to speculate and capture land value and as such is strictly contrary to Circular 05/2005. Obligations are required to mitigate the impacts of developments that might otherwise be unacceptable in planning terms, not as a means of securing a share in the profits of development (paragraph B7) or to resolve existing deficiencies in public services or infrastructure (paragraph B9). Obligations should not be sought if they are unnecessary to allow a planning consent to be granted (paragraph B9).

What is needed in terms of planning obligations to mitigate the impact of development will depend on the circumstances of each development, including location (e.g. whether affordable housing is necessary at all if the site is located in an area of high social housing provision), development costs (whether the scheme is viable) and whether it might be advisable to waive planning obligations in order to enable a site to come forward (for example an expensive brownfield site).

If a scheme does produce a greater value than that foreseen at the time of application, then that should be regarded as the legitimate reward to the developer for the risk s/he has taken. Overage provisions, by contrast, cannot account for risk and costs shouldered by developers both in advancing the scheme through the planning system and building the development out.

Planning applications must be assessed on the basis of information available at the time. Exceptions might include very long term, multi-phased developments.

Exceptional cases are supported by the appeal decision in respect of *Flemingate, Beverley* (APP/E2001/V/08/1203215) where the Secretary of State concluded that viability on schemes (phases) in the future should be addressed on the basis of the market conditions prevailing at the time, through reappraisal prior to implementation.

Uncertainty is an important matter in development and in a recent High Court decision is recognised as material. In *Robert Hitchens Ltd v Secretary of State for Communities and Local Government and Forest of Dean District Council* (2010) Mr Justice Nicol concluded that:

“This is not a case of allowing speculation to prevail over an absence of evidence. Rather it is a case of treating inevitable uncertainty as a material consideration whose weight had to be judged and assessed by the primary decision-maker.”

Introducing overage arrangements is tantamount to the public sector determining what it thinks is an appropriate level of development profit to accrue to the builder, and consequently what should be the price of land. This would serve as an extraordinary disincentive to the private housebuilding industry in the UK and would represent a fundamental shift in the nature of the planning system and the relationship of the state to the housebuilding market. It might render private housebuilding as an industry unattractive to investors as house builders would effectively be reduced to the status of contractors operating to fixed-profit margins to be determined by the public sector. Some might think this is desirable, but ultimately it would mean that the risk currently shouldered by the private sector would be transferred onto the state, with the state purchasing land. This would have serious implications for housing delivery, not least in terms of land assembly, how the sale of market homes would be managed by the public sector and the skills needed to take over these functions. Experiences of large public sector run capital projects – the delays and costs – offer little assurance that this would be in the public interest.

### **Policy R1: Historic environment**

We are unclear what is being required by paragraph R1.6. Developers are being asked to ensure that developments protect, preserve and enhance sites identified in Historic Landscape Character reports or other such lists, yet these reports are not complete or have even yet to be undertaken. This would

be unreasonable as developers would be expected to comply with reports that do not yet exist. The same concern might also be levelled at conservation area appraisals and management plans which are also incomplete.

Historic Landscape Character reports cover much wider areas than other heritage designation descriptions. We recommend that any reference to Historic Landscape Character reports is deleted in case the absence of these is used as a reason to refuse development.

Yours sincerely

**James Stevens**  
**Strategic Planner**

Email: [james.stevens@hbf.co.uk](mailto:james.stevens@hbf.co.uk)  
Tel: 0207 960 1623



**Trafford's Core Strategy: Publication Document  
Representation Form – September 2010**

Office Use Only	
Date	
Ref	
Ack	

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**  
[strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

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This form has two parts –


**Part A – Personal Details** (You need only submit one copy of Part A)

**Part B – Your representation(s)** (Please submit a separate Part B for each representation you wish to make)

**Before completing this representation form please refer to the attached guidance notes.**

**PART A**

<b>Please use the representation form to make a representation on the Core Strategy: Publication Document.</b>			
<b>1. Personal Details</b>		<b>2. Agents Details (If applicable)</b>	
Name:		Name:	FAO David Thompson
Organisation (if applicable):	Homestar Investments Limited	Organisation (if applicable):	Peel Holdings (Land and Property) Limited
Address:	c/o Agent	Address:	Peel Dome The Trafford Centre Manchester
Postcode:		Postcode:	M17 8PL
Tel:		Tel:	0161 629 8200
Fax:		Fax:	0161 629 8334
Email:		Email:	dthompson@peel.co.uk
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 representation forms enclosed in the box below:			
<b>Total number of representation forms enclosed:</b>			1

 **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.** An electronic version of the representation form can be found on the Council's web site at: [www.trafford.gov.uk](http://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](mailto:strategic.planning@trafford.gov.uk).**

Alternatively, completed comment forms can be returned by post to the address below by no later than **Monday 1<sup>st</sup> November 2010.**

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

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

STRATEGIC PLANNING AND DEVELOPMENTS			
01 NOV 2010			
Time			
Priority			
Area			
Comments			

**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: Publication Document  
Representation Form – September 2010  
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

**Name or Organisation: Homestar Investments Limited**

3. To which part of the DPD does this representation relate?

Paragraph Number	Policy Number
	R4

4. Do you consider the DPD is:

4. (1) Legally Compliant	Yes	✓	No	
4. (2) Sound*	Yes		No	✓

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified	✓
(2) Effective	✓
(3) Consistent with national Policy	

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Homestar Investments Limited objects to Policy R4 – 'Green Belt and Other Protected Open Land' as it does not allow for a review of Green Belt boundaries.

Homestar notes that Policy L1 'Land for New Homes' and Table 1 identifies that the Council will seek to deliver 4,350 residential units in the 'Other South City Region Sites' between 2008 and 2026 with a target that 90% will be on brownfield land. New Growth Point status would increase this target by 20% to 2018.

Please continue on a separate sheet if required

## Trafford's Core Strategy: Publication Document Representation Form – September 2010

It is noted that the 'Other South City Region Sites' exclude units anticipated to be delivered via 'Strategic Locations', 'Other Inner Area Sites' and 'Regeneration / Town Centre Schemes'.

The volume of housing to be delivered within the 'Other South City Region Sites' is significant – accounting for 41.8% of the Borough wide target (excluding the impact of New Growth Point).

It must therefore be essential to the successful and effectively delivery of the Core Strategy that sufficient housing land is identified to accommodate this level of delivery within the 'Other South City Region Sites' and that account is taken (and flexibility included within the draft Core Strategy) to allow for potential difficulties in delivery and uncertain market conditions.

To achieve the objectives of the draft Core Strategy, a specific emphasis should be given in the subsequent Land Allocations DPD to sites that are deliverable and developable and can meet local housing need.

Setting policies in place which seek to deliver the volumes of housing needed over a 16 year period to meet need and drive sustainable regeneration can require the making of difficult decisions. Allowing flexibility for justified greenfield development following proactive Green Belt review and/or the safeguarding of land to meet future need could be regarded as being a difficult decision. Homestar would however argue that whilst first priority should be given to delivery within the identified 'Strategic Locations' and 'Regeneration Schemes', making such decisions is necessary and crucial to the delivery of the Core Strategy.

National planning guidance makes it clear that Local Planning Authorities may in exceptional circumstances alter Green Belt boundaries through local detailed boundary changes when reviewing their Development Plans. Homestar would argue that meeting local housing need and therefore the successful delivery of the Core Strategy would met the 'exceptional circumstances' threshold.

Homestar considers that Green Belt within the Ashton Upon Mersey area of the Sale 'Place' is suitable for review to enable the delivery of housing to met local, affordable and/or specialist housing need. It is noted within the Spatial Profile for the Sale area that "*The area is tightly constrained to the north and west by the Green Belt in the form of the Mersey Valley and Carrington Moss*" (page 13 of the draft Core Strategy). It is noted within the draft Core Strategy that the greater need for affordable housing falls within the Southern [housing] sub-market (paragraph 11.10 of the draft Core Strategy), which would include the Ashton Upon Mersey area. It is also noted that within the scope of the current draft Policy L2, theoretically some 435 units could be delivered on greenfield sites within the 'Other South City Region Sites' area without prejudicing the identified 90% brownfield target.

In many cases, the development of local need, affordable housing and/or specialist housing (including housing for older persons) on deliverable sites of sufficient size and on site's which are likely to be attractive to the market is considered more likely to be successful in the current housing market than piecemeal provision on smaller sites.

**Trafford's Core Strategy: Publication Document  
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Housing delivery in current market conditions remains uncertain and it is important that the Core Strategy does not create a policy framework which reduces the Council's ability to respond to changing market conditions and potential ongoing difficulties in the delivery of housing within the wider Borough. Specifically, the Core Strategy should avoid policies that reduce the Council's ability to respond flexibly to changing and/or unexpected circumstances, particularly in relation to the delivery of local needs, affordable and/or specialist needs housing.

It is therefore requested that Policy R4 should be amended to allow for a review of detailed Green Belt boundaries changes in the Sale 'Place' (including Ashton Upon Mersey) via the Land Allocations DPD to allow for the provision of development to meet specific local housing needs (in accordance with draft Policy L1.9). It is considered that this amendment would make the Core Strategy more sound.

Homestar contends that not including a mechanism for Green Belt review within the Core Strategy is premature given housing land supply and market conditions, restricts the potential scope of the preparation of the Land Allocations DPD and limits its outcome. It may also have consequential impacts upon the proposed Affordable Housing SPD.

Homestar (via agents MPSL Planning and Design Limited) have previously objected to the absence of a mechanism for Green Belt review within earlier drafts of the Core Strategy and have promoted a specific site (6.42 hectares of land off St. Martin's Road, Ashton Upon Mersey for circa 230 units) through previous Strategic Housing Land Availability Assessment 'site suggestion' exercises.

Further information on this specific site is not included within this representation which deals instead with the issue of Green Belt review in principal, but can be provided upon request.

# Trafford's Core Strategy: Publication Document Representation Form – September 2010

## PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is requested that Policy R4 be amended to allow for a review of detailed Green Belt boundaries changes in the Sale 'Place' (including Ashton Upon Mersey) via the Land Allocations DPD to allow for the provision of development to meet specific local housing needs.

Please continue on a separate sheet if required

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please note also that the Inspector is not obliged to consider any previous representations that have been made in respect of this Plan. You are urged, therefore, to re-submit, on copies of this form, any previously submitted representations that, in your view, remain valid and that you wish the Inspector to consider.**

8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the  
Oral examination

Yes, I wish to participate  
at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To be able to elaborate upon this submission and for it to be discussed at the Examination.

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

# Trafford's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

- |   |                                     |
|---|-------------------------------------|
| Submission of the Core Strategy to the Secretary of State for independent Examination | <input checked="" type="checkbox"/> |
| The publication of the Inspector's Report following the Examination                   | <input checked="" type="checkbox"/> |
| The formal adoption of the Core Strategy  | <input checked="" type="checkbox"/> |

Signature:

Date:

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

# Trafford's Core Strategy: Publication Document Representation Form – September 2010

## Guidance Notes to Accompany Representation Form

### 1. Introduction

The development plan document (DPD) is published in order for representations to be made prior to submission to the Communities and Local Government (CLG) Minister. Once they have been considered by the Council, the representations will be submitted alongside the published DPD to CLG and an independent Planning Inspector will be appointed to hold an Examination in to the Plan. The Planning and Compulsory Purchase Act 2004 (as amended)<sup>1</sup> (the 2004 Act) states that the purpose of the examination is to consider whether the DPD complies with the legal requirements and is 'sound'.

### 2. Legal Compliance

The Inspector will first check that the DPD meets the legal requirements under s20 (5) (a) of the 2004 Act before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The DPD in question should be within the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the Local Development Documents it proposes to produce over a 3 year period. It will set out the key stages in the production of any DPDs which the LPA propose to bring forward for independent examination. If the DPD is not in the current LDS it should not have been published for representations. Trafford's LDS can be found on Trafford's website and is available at Sale Waterside.
- The process of community involvement for the DPD in question should be in general accordance with the LPA's Statement of Community Involvement (SCI). The SCI is a document which sets out the strategy for involving the community in the preparation and revision of Local Development Documents (including DPDs and the consideration of planning applications). Trafford's SCI (2010) can be found on Trafford's website and is available at Sale Waterside.
- The DPD should comply with the Town and Country Planning (Local Development) (England Regulations) 2004 (as amended). On publication, the LPA must publish the documents prescribed in the regulations, and make them available at their principal offices and their website. The LPA must also place local advertisements and notify the DPD bodies (set out in the regulations) and any persons who have requested to be notified.
- The LPA is required to provide a Sustainability Appraisal Report when they publish a DPD. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure that they reflect social, environmental and economic factors. The Sustainability Appraisal for the Core Strategy can be found on Trafford's website and is available at Sale Waterside.

<sup>1</sup> View the 2004 Act at:

[http://www.opsi.gov.uk/acts/acts2004/ukpga\\_20040005\\_en\\_1](http://www.opsi.gov.uk/acts/acts2004/ukpga_20040005_en_1)

View the amending 2008 Act at:

[http://www.opsi.gov.uk/acts/acts2008/pdf/ukpga\\_20080029\\_en.pdf](http://www.opsi.gov.uk/acts/acts2008/pdf/ukpga_20080029_en.pdf)

View the 2009 amending Regulations at:

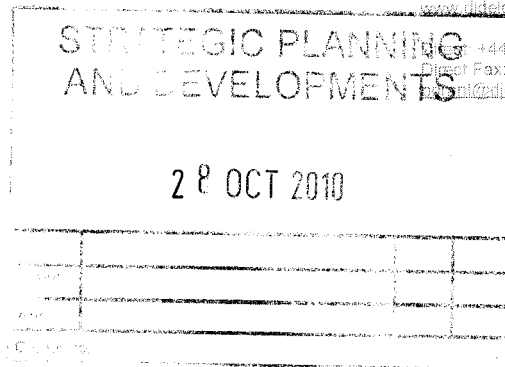
[http://www.opsi.gov.uk/si/si2009/pdf/uksi\\_20090401\\_en.pdf](http://www.opsi.gov.uk/si/si2009/pdf/uksi_20090401_en.pdf)

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28 October 2010  
Our Ref: MS/PG/C-0156950-02



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Dear Sir/Madam

## Trafford Core Strategy: Publication Document Comments on Behalf of Lancashire County Cricket Club and Tesco Stores Ltd

We are writing to provide our comments on the *Trafford Core Strategy: Publication Document* on behalf of Lancashire County Cricket Club (LCCC) and Tesco Stores Limited (Tesco).

LCCC and Tesco jointly secured planning permission on 29 September 2010 (ref. 743093/FULL/2009) for the following development:

*"Part Full/Part Outline Planning Application for redevelopment of Old Trafford Cricket Ground and erection of food superstore. Full consent sought for the erection of a Class A1 food superstore (measuring 15,500m<sup>2</sup> gross internal area) incorporating car parking plus associated petrol filling station, landscaping and infrastructure; creation of pedestrian link between Talbot Road and Chester Road; demolition and replacement of existing Old Trafford Cricket Ground stands and other associated buildings/structures to create a new cricket stadium (Class D2) with new media players and education building, extension to existing cricket school, reconfigured and extended members pavilion, spectator seating, hospitality and ancillary facilities including food and non food retail units, replay/scoreboard screens, sightcreens, 6 no. 60m high floodlighting columns and other associated cricket ground equipment. Outline consent sought for extension to Trafford Lodge Hotel (Class C1) including the creation of a maximum of 82 no. additional hotel rooms, a new fitness suite and a brasserie with details sought for means of access and layout with all other matters reserved for subsequent consideration."*

Our comments on the current consultation document, which are set out below, should be considered in the context of this recently approved planning permission.

### The Vision for Trafford

The Vision for Trafford that is set out in the consultation document identifies 5 areas for change within Trafford, including the Lancashire County Cricket Club Quarter. The land that is the subject of the above planning permission falls within the Lancashire County Cricket Club Quarter and the approved proposals

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will play a critical role in delivering the key objectives for this area, which are set out in the emerging Core Strategy.

## **Place Objectives**

LCCC and Tesco support Draft Place Objective OTO11, which seeks to maximise Lancashire County Cricket Club's role as a visitor attraction and its potential to lead regeneration in the area. The recently approved planning application proposals will be pivotal to the delivery of this Place Objective. The proposals are expected to attract more than 100,000 additional visitors to the area each year, which will provide over £2 million of new expenditure.

## **Strategic Locations**

### Strategic Proposal

In granting planning permission to LCCC and Tesco, Trafford Council has accepted that the identified need for a large superstore in the Old Trafford area can be met through the Tesco proposed for the land off Chester Road. LCCC and Tesco consider that the Strategic Proposal set out in Draft Policy SL3 should be amended to reflect this by specifying that development in the Lancashire County Cricket Club Quarter should deliver the following:

*“a large superstore on the vacant land off Chester Road adjacent to Stretford Leisure Centre in order both to meet the recognised retail need in the Old Trafford/Stretford areas.”*

In addition, this section of the Draft Core Strategy should be updated to acknowledge that planning permission now exists for the development of a food superstore with a gross internal floorspace of 15,500m<sup>2</sup>.

### Development Requirements

Draft Policy SL3 sets out the requirements that development proposals for the Lancashire County Cricket Club Quarter will need to meet.

The third development requirement is for *“a contribution to the provision of a strategic processional route with a high quality public realm area incorporating green infrastructure along Warwick Road and Brian Statham Way to enhance visitor experience and to link to existing and future public transport improvements.”* The recently approved planning application incorporates a proposal to create a new pedestrian linkage between the redeveloped Cricket Ground and the new superstore, alongside Trafford Town Hall, which would significantly improve pedestrian permeability between Chester Road and Talbot Road. LCCC and Tesco consider that this development requirement should be revised to prioritise the delivery of the pedestrian linkage that is now the subject of a planning permission instead of a strategic processional route along Warwick Road and Brian Statham Way, for which a need and delivery strategy has not yet been identified.

## **Core Policies - Town Centres and Retail**

Draft Policy W2 sets out the future strategy for town centres and retailing in Trafford.

Paragraph W2.14 states that further development within any of the three existing retail warehouse parks within the Borough *“should normally be limited to the sale of bulky comparison goods only”*. LCCC and

# Drivers Jonas Deloitte.

Tesco consider that this Paragraph should be strengthened by removing the word "*normally*" to ensure that the existing retail warehouse parks are limited to the sale of bulky comparison goods only. This is necessary in order to protect the existing town and district centres from unrestricted non-food or food retail developments on these retail warehouse parks.

In addition, Paragraph W2.15 states that the Council are committed to the provision of a new superstore on Chester Road in Old Trafford which is limited to a scale that will address any outstanding need within the Old Trafford/Stretford areas. This should also be updated to refer specifically to the permission which has been granted to Tesco for a 15,500m<sup>2</sup> superstore adjacent to Stretford Leisure Centre.

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

Yours sincerely

**Philip Grant**  
**for Deloitte LLP (trading as Drivers Jonas Deloitte)**

**From:** Philip Grant [mailto:pgrant@djdeloitte.co.uk]  
**Sent:** 10 November 2010 10:58  
**To:** Strategic Planning  
**Subject:** RE: Trafford Core Strategy

1057

Dear Sir/Madam,

On behalf of Lancashire County Cricket Club and Tesco, I can confirm that we do not wish to question the soundness or legal compliance of the Plan at this stage, but nevertheless wish to reserve the right to appear at the Examination if necessary, in order to seek to ensure that the policies set out in the Core Strategy are fully supportive of LCCC and Tesco's approved proposals for Old Trafford.

Regards

Phil Grant

I also note that you have not requested to be informed about future stages of the Plan preparation process. If, however, you do wish to be contacted about future stages, I would be grateful if you could return the slip below before the 8<sup>th</sup> November 2010. If I have not heard from you by that date, I will assume that you do not wish to be kept informed of progress with the Plan and I would like to take this opportunity to thank you for your interest in the Plan to date.

Should you have any queries about this matter please do not hesitate to contact a member of the LDF Team on 0161 912 4475:

Yours sincerely

[Redacted Signature]  
Dennis Smith

Name: Philip Grant (on behalf of Lancashire County Cricket Club) and Tesco

Council reference number (please see header) 1057

I wish to be informed about the following stages in the production of the Trafford Core Strategy (please tick the relevant box(es)):

Submission of the Core Strategy to the Secretary of State

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Please return to the Strategic Planning and Developments Team by 5th November 2010.

Via:

Email to: [strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

Post to: c/o Strategic Planning & Developments,  
1<sup>st</sup> Floor Waterside House, Sale Waterside, Sale M33 7ZF

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29 October 2010  
Our Ref: PG/C-0154734-02

1086

STRATEGIC PLANNING AND DEVELOPMENTS	
29 OCT 2010	
Ref:	
Location:	
Area:	
Comments:	

Dear Sir/Madam

## Consultation on Trafford Core Strategy: Publication Document Comments on Behalf of L&M Limited

We are writing to provide our comments on the *Trafford Core Strategy: Publication Document* on behalf of our client, L&M Limited, in respect of the area of land located to the west of Woodfield House off Norman Road in Broadheath, which falls within their ownership.

The land off Norman Road has the potential to accommodate a significant residential-led development that would make an important contribution towards achieving Trafford's emerging housing targets. This is acknowledged in Trafford's *Strategic Housing Land Availability Assessment: 2010 Review*, which confirms that the Norman Road site could accommodate 243 new residential units.

Trafford Council has acknowledged the significant development potential of the Norman Road site in correspondence with L&M Limited dated 30 March 2010, in which it recognises that there is scope for large scale redevelopment of site.

There are no infrastructure constraints within the Norman Road site that would need to be addressed in order to ensure the delivery of a viable, attractive and sustainable residential-led development in this location. Furthermore, the Highways Agency has confirmed its support for the proposed redevelopment of the land off Norman Road on the basis of the site's location and accessibility, in its letter to Trafford Council dated 7 August 2009.

Overall, we consider that more specific reference should be made to the significant potential of the land off Norman Road within the Core Strategy. Our comments on the detailed draft policies within the document are provided below.

### Place Objectives

Several of the Place Objectives that are set out in the consultation document relate specifically to the area defined as "Altrincham and Neighbouring Communities", which includes Broadheath and the Norman Road site.

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# Drivers Jonas Deloitte

Place Objectives AL01 – AL06 relate to the “Altrincham and Neighbouring Communities” area and are linked to the delivery of Strategic Objective SO1, which highlights the requirement to “*promote sufficient housing in sustainable locations, of a size, density and tenure needed to meet the Borough’s needs and contribute towards those of the City Region.*”

L&M Limited considers that an additional objective should be incorporated within this set of Place Objectives which specifically highlights the need to maximise the potential of the Norman Road site to help meet Trafford’s housing needs and create a high quality sustainable residential-led mixed use development in this location. This would be appropriate on the basis that the site’s suitability for significant development of this nature is well-established (as reflected in its allocation in the Adopted Trafford Unitary Development Plan under Policy H3, which permits housing) and also in view of the recognition by the Council in paragraphs 8.5 – 8.7 of the *Technical Note on Strategic Locations & Sites Selection* document (dated March 2010) that the site off Norman Road, along with a wider area of land off Woodfield Road, is an important development priority for the Borough.

## **Land for New Homes**

Draft Policy L1 (and the associated Table L1) provides guidance on the scale of new housing that is required within the Borough and the locations/sites where significant residential development is to be directed over the Plan period.

Table L1 indicates that a total of 4,350 new housing units will be provided by new development on “Other South City Region Sites”. L&M Limited considers that the draft policy and associated table should be revised to specifically acknowledge that the land off Norman Road constitutes one of these “Other South City Region Sites”, in order to reflect its importance to the Core Strategy in delivering new housing.

If you have any queries or require any further information in relation to these representations, please do not hesitate to contact me.

Yours sincerely

**Philip Grant**  
**for Deloitte LLP (trading as Drivers Jonas Deloitte)**

Cc: M Barrett – L&M Limited

1036

**From:** Philip Grant [mailto:pgrant@djdeloitte.co.uk]  
**Sent:** 05 November 2010 11:55  
**To:** Strategic Planning  
**Subject:** FW: Trafford Core Strategy [DJ-WS\_LIVEJOBS.FID743038]

Dear Sir/Madam,

In response to the email below, please find attached a completed slip confirming that I wish to be informed of all future stages in the production of the Trafford Core Strategy.

Within the representations submitted on behalf of L&M Limited, we did not raise any issues relating to the legal compliance or soundness of the Plan.

Regards

Phil Grant

be grateful if you could return the slip below before the 8<sup>th</sup> November 2010. If I have not heard from you by that date, I will assume that you do not wish to be kept informed of progress with the Plan and I would like to take this opportunity to thank you for your interest in the Plan to date.

Should you have any queries about this matter please do not hesitate to contact a member of the LDF Team on 0161 912 4475:

Yours sincerely



Dennis Smith

---

Name: Philip Grant (on behalf of L+M Ltd)

Council reference number (please see header) 1036

I wish to be informed about the following stages in the production of the Trafford Core Strategy (please tick the relevant box(es)):

Submission of the Core Strategy to the Secretary of State

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

**Please return to the Strategic Planning and Developments Team by 5th November 2010.**

Via:

Email to: [strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

Post to: c/o Strategic Planning & Developments,  
1<sup>st</sup> Floor Waterside House, Sale Waterside, Sale M33 7ZF

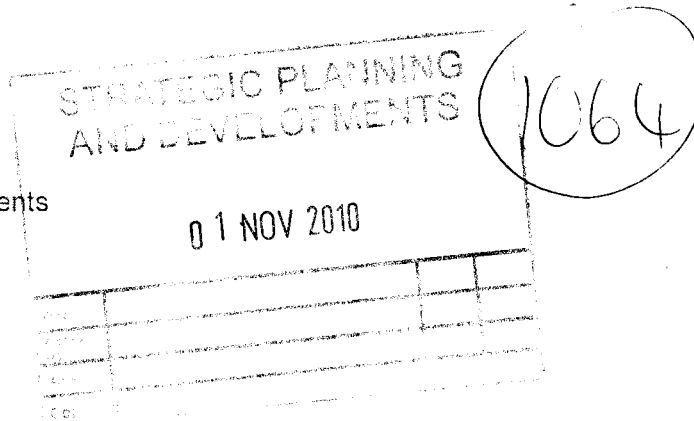




SL/TRA/LDF/Publication  
Direct Line: 0161 489 5828  
Direct Fax: 0161 489 3812  
[sarah.lee@manairport.co.uk](mailto:sarah.lee@manairport.co.uk)

29<sup>th</sup> October 2010

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



Dear Sirs

**RE: TRAFFORD CORE STRATEGY: PUBLICATION CONSULTATION**

Thank you for providing the opportunity to comment on the final consultation stage prior to the adoption of your Core Strategy. However, there are a number of points we wish to draw to your attention, prior to its adoption, which we feel are necessary to reiterate.

The Greater Manchester Strategy establishes the strategic priorities essential for the sustainable economic growth of the City Region. Further studies such as the Manchester Independent Economic Review (MIER) and those forming the basis for a Greater Manchester Spatial Framework (GMSF), all see the Regional Centre, Trafford Park and Manchester Airport representing the most significant growth areas within the whole of Greater Manchester. "As such, major office, commercial, industrial or institutional development should be located in these areas" (Manchester City Region, Greater Manchester Spatial Framework, Economy, Topic Paper 4, October 2010).

The LDF acknowledges the importance of the City Region and that Trafford has a fundamental part to play in contributing towards the regional economy, through both its location, and its potential of developing significant clusters of economic activity in key growth sectors.

The 5 strategic sites identified within the LDF, provide the key spatial proposals to deliver the vision and objectives of the core strategy to meet the local employment needs of Trafford. It does not however, demonstrate how it will implement the wider strategic priorities of the City Region.

As a result, the core strategy is rather inward looking and does not reflect the aspirations of the wider City Region, including recognition that the Airport is one of the major assets of Greater Manchester, with considerable potential to stimulate and attract economic activity (all the more important a consideration given the current economic conditions).



INVESTOR IN PEOPLE

The Manchester Airport Master Plan to 2030, which was published in November 2007, identified the challenges, the opportunities and the actions that need to take place in order to grow the Airport to the Government's envisaged level of throughput. One of the key aspects of the Airport Master Plan is to define our land requirements to support future activity and to set out the policy framework to guide and deliver sustainable growth. While the Master Plan identifies proposed extensions to the Airport Operational Area (AOA), it should be noted that the Master Plan does not propose any extensions to the AOA within the borough of Trafford. It does however recognise that in order to meet the envisaged level of throughput, not all airport business activities and land uses will be located in the AOA, but will still require a location in close proximity to Manchester Airport.

The Master Plan and ideas emerging from the "Airport City" work both identify a significant opportunity for the development of a major airfreight logistics operation that is focused on the Airport, to be located on an adjacent or 'near' airport development site. It is therefore for the LDF process to consider the opportunities to capitalise on the Airport's economic impact and the suitability of land, premises, transport links and skills to match. The possibility of such a site in Trafford has not been fully considered during the LDF process. Likewise the full economic benefits of having an international gateway on the doorstep have not been fully considered during the LDF process.

The Airport plays a key part in attracting investment into the region. Linking businesses to overseas markets, moving people and goods, enabling businesses to compete and win business and grow their contribution to the regional economy. This has other consequences on the borough that have not been considered such as employment and travel patterns (both into and out of the Borough), as well as boosting the local economy.

However, for an airfreight logistics operation to take full advantage of the range of facilities and activities such an opportunity would bring, proximity and accessibility to the Airport is essential.

The Wythenshawe Strategic Regeneration Framework (2004) first established the idea of development corridors (East and West), in order to incorporate *"the new retail / service centre proposal at Baguley, Roundthorn Industrial Estate, Wythenshawe Hospital and any future development at Davenport Green"*.

The Airport Master Plan to 2030 reflects this arc of development extending from Roundthorn Industrial Estate in the west, via Wythenshawe Hospital and Davenport Green to the Airport and beyond in the east, and is designed to maximise the opportunities for Wythenshawe residents and others to benefit from access to employment opportunities both on and off the Airport site

Policy W1 focuses on the need for sites to *"be accessible by a range of alternative modes other than the private car"*. However, Policy L4 does not go far enough through stating that the Council will "promote the improvement and extension of the Metrolink light rail network within the borough" to ensure accessibility to the development corridors outlined above, by protecting the alignment for Metrolink, which was identified in Policy T11 of the UDP, and defined it as a designated 'transport corridor'. This would acknowledge its status as an approved route, and provide an opportunity to connect to the Airport and motorway network from the west (including Wythenshawe Hospital) and as part of improved orbital links to the Airport as set out in our Ground Transport Strategy. Improvements to both road and public transport along the Altrincham – Airport - Stockport corridor would greatly improve accessibility to southern parts of Trafford, including Davenport Green, which was removed from the Core Strategy partly because of perceived accessibility issues.

In light of all of this, we feel it is premature to return land at Davenport Green back to Green Belt, particularly in light of the emerging studies connected to the City Region work and the Airport Master Plan (particularly the Airport City work in connection with the Manchester LDF). There is ongoing work at regional and sub regional level looking at strategic locations for economic activity. We suggest that this work should inform the Core Strategy along with further assessments of sustainable transport and regeneration opportunities in the area.

Yours sincerely

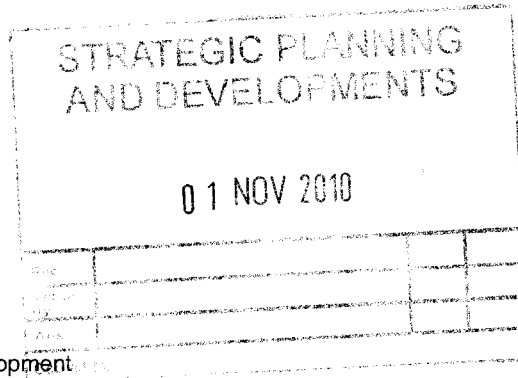


**John Twigg**  
**Group Planning Director**

Direct line: 0161 489 2206

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1097



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**By email**  
**strategic.planning@trafford.gov.uk**  
Our ref. RF/VH/481002

1 November 2010

Dear Sirs

**TRAFFORD CORE STRATEGY: PUBLICATION DOCUMENT  
REPRESENTATIONS ON BEHALF OF NATIONAL GRID PROPERTY  
HOLDINGS LIMITED**

Please find attached a completed representation form in respect of the above document.

The representations are focussed on the proposed Carrington Strategic Location (reference SL5), linked to National Grid's extensive landholdings within the Carrington/Partington area, and not least the former gas works site off Common Lane which has recently been granted planning permission for a comprehensive mixed employment development.

The representations do not object to the principle of a new sustainable mixed use community within the Carrington area, but rather query whether sufficient safeguards have been introduced to the draft policy to ensure that a development of this magnitude can be delivered without prejudice to success of various other regeneration proposals in the local area, including those proposed by National Grid.

We trust that the enclosed are straight forward, but should you have any queries on the matters raised then please do not hesitate to contact me.

Yours faithfully

Richard Frudd

Enc: As noted  
cc: Mr M Allcock – National Grid

**Indigo Planning Limited**

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John Scain  
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Also in London, Manchester  
and Dublin

**Trafford's Core Strategy: Publication Document  
Representation Form – September 2010**

 PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:  
[strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

Office Use Only	
Date	
Ref	
Ack	

This form has two parts –

**Part A** – Personal Details (You need only submit one copy of Part A)

**Part B** – Your representation(s) (**Please submit a separate Part B for each representation you wish to make**)

Before completing this representation form please refer to the attached guidance notes.

**PART A**

Please use the representation form to make a representation on the Core Strategy: Publication Document.


**1. Personal Details**

**2. Agents Details (If applicable)**

Name:		Name:	RICHARD FRUDD
Organisation (if applicable):	NATIONAL GRID PROPERTY HOLDINGS LIMITED	Organisation (if applicable):	INDIGO PLANNING LIMITED
Address:	C/O AGENT	Address:	36 PARK ROW LEEDS
Postcode:		Postcode:	LS1 5JL
Tel:		Tel:	0113 380 0270
Fax:		Fax:	0113 380 0271
Email:		Email:	RICHARD.FRUDD@INDIGOPLANNING.COM

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 representation forms enclosed in the box below:

**Total number of representation forms enclosed:** 1

 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. An electronic version of the representation form can be found on the Council's web site at: [www.trafford.gov.uk](http://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](mailto:strategic.planning@trafford.gov.uk).**

Alternatively, completed comment forms can be returned by post to the address below by no later than **Monday 1<sup>st</sup> November 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: Publication Document  
Representation Form – September 2010  
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

**Name or Organisation:** NATIONAL GRID PROPERTY HOLDINGS LTD, C/O INDIGO PLANNING LTD

3. To which part of the DPD does this representation relate?

Paragraph Number	Policy Number
	SL5

4. Do you consider the DPD is:

4. (1) Legally Compliant	✓	No	
4. (2) Sound*		No	✓

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified	
(2) Effective	✓
(3) Consistent with national Policy	

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

NATIONAL GRID PROPERTY HOLDINGS LTD ('NATIONAL GRID') ARE FREEHOLD OWNERS OF A SERIES OF KEY STRATEGIC SITES WITHIN THE CARRINGTON/PARTINGTON AREA, INCLUDING THOSE ADJOINING THE CARRINGTON STRATEGIC LOCATION (REFERENCE SL5).

**CONTINUED ON SEPARATE SHEET**

Please continue on a separate sheet if required

**CONTINUED FROM Q6:**

THE SITES COMPRISE REDUNDANT FORMER GAS WORKS AND ASSOCIATED LAND WHICH IS LARGELY VACANT AND AVAILABLE FOR REDEVELOPMENT, AND OTHER LAND WHICH HAS THE POTENTIAL TO BE MADE AVAILABLE FOR DEVELOPMENT OVER THE LONGER TERM PERIOD OF THE DPD. THE SITES COULD MAKE A SIGNIFICANT CONTRIBUTION TO THE EMPLOYMENT AND OTHER DEVELOPMENT REQUIREMENTS IN THIS AREA OF IDENTIFIED REGENERATION NEED.

INDEED, THE 30HA SITE OFF COMMON LANE HAS RECENTLY BEEN GRANTED OUTLINE PLANNING PERMISSION FOR MIXED EMPLOYMENT DEVELOPMENT (LPA REFERENCE H/71194).

NATIONAL GRID DO NOT HAVE ANY OBJECTION TO THE PRINCIPLE OF A NEW 'MIXED USE SUSTAINABLE COMMUNITY' IN THE CARRINGTON AREA.

THEIR CONCERN LIES WITH THE POTENTIAL IMPLICATIONS THAT A DEVELOPMENT OF THIS NATURE AND SCALE COULD HAVE ON SCOPE FOR IMPLEMENTING THEIR OWN SIGNIFICANT REGENERATION PROPOSALS FOR THE LOCAL AREA.

THE FIRST CONCERN RELATES TO THE POTENTIAL IMPACT THAT NEW RESIDENTIAL DEVELOPMENT COULD HAVE ON THE OPERATIONAL FLEXIBILITY OF EMPLOYMENT DEVELOPMENTS WHICH ALREADY HAVE PLANNING PERMISSION ON NATIONAL GRID'S COMMON LANE SITE, FOR EXAMPLE. POLICY SL5, AS CURRENTLY DRAFTED, IS UNSOUND BECAUSE IT IS NOT EFFECTIVE IN IMPOSING SPECIFIC REQUIREMENTS ON THE LOCATION AND DESIGN OF THE RESIDENTIAL ELEMENT OF THE PROPOSALS IN ORDER THAT THEY ENSURE:

- (I) THAT THE AMENITIES OF FUTURE RESIDENTS ARE PROPERLY PROTECTED;
- (II) THAT THE OPERATIONAL FLEXIBILITY OF THE PROPOSED 'EMPLOYMENT' OCCUPIERS OF THE SL5 DEVELOPMENT ARE NOT UNDULY PREJUDICED; AND
- (III) THAT THE OPERATIONAL FLEXIBILITY OF EXISTING AND FUTURE 'EMPLOYMENT' (AND OTHER COMMERCIAL) OCCUPIERS IN THE LOCAL AREA, NOT LEAST THOSE ON THE NATIONAL GRID COMMON LANE SITE, ARE NOT UNDULY PREJUDICED.

THE SECOND AREA OF CONCERN RELATES TO THE PHASING OF NEW INFRASTRUCTURE ASSOCIATED WITH THE DEVELOPMENT. THERE ARE ACKNOWLEDGED ROAD INFRASTRUCTURE CAPACITY ISSUES WITHIN THE LOCAL AREA. WHILST THE POSITIVE AND PROACTIVE APPROACH ADOPTED BY THE COUNCIL IN SUPPORTING NEW DEVELOPMENT IN THE AREA (EG THROUGH THE SPD1 FINANCIAL CONTRIBUTION ROUTE) IS WELCOMED BY NATIONAL GRID, THE SL5 DEVELOPMENT IS CLEARLY OF A DIFFERENT SCALE TO ANY RECENT PROPOSALS IN THE AREA.

IT IS NOTED THAT REFERENCE IS MADE TO INFRASTRUCTURE PHASING REQUIREMENTS BEING ADDRESSED THROUGH A FUTURE CARRINGTON AREA ACTION PLAN. HOWEVER, WE CONSIDER THAT THE ABSENCE OF AT LEAST AN OUTLINE INDICATION AS TO WHEN INFRASTRUCTURE IMPROVEMENTS WOULD BE DELIVERED IN CONJUNCTION WITH THE DEVELOPMENT (I.E. ENDORSING THE PRINCIPLE OF SUCH A LARGE SCALE DEVELOPMENT WITHOUT SOME SAFEGUARDS BEING IN PLACE) REPRESENTS AN UNSOUND POLICY APPROACH DUE TO A LACK OF EFFECTIVENESS. THE 'ALLOCATION' OF SUCH A STRATEGIC SCALE DEVELOPMENT WITHOUT APPROPRIATE SAFEGUARDS BEING IN PLACE COULD UNDERMINE FUTURE DELIVERY OF REQUIRED INFRASTRUCTURE, AND CONSEQUENTLY SUCCESSFUL REGENERATION IN THE AREA.

# Trafford's Core Strategy: Publication Document

## Representation Form – September 2010

### PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

WE RECOMMEND THAT ADDITIONAL CRITERIA ARE ADDED TO POLICY SL5.4 REQUIRING:

THE PROTECTION OF THE AMENITIES OF NEW AND EXISTING RESIDENTS FROM DISTURBANCE CREATED BY ADJOINING EMPLOYMENT ACTIVITIES THROUGH THE APPROPRIATE LOCATION AND DESIGN OF SUCH ACCOMMODATION, SO AS NOT TO PREJUDICE THE OPERATIONAL FLEXIBILITY OF OCCUPIERS IN THIS STRATEGICALLY IMPORTANT EMPLOYMENT LOCATION; AND

AGREEMENT ON THE PHASED DELIVERY OF NEW INFRASTRUCTURE TO ACCOMMODATE DEMANDS ARISING FROM THE DEVELOPMENT, INCORPORATING SPECIFIC TIMESCALES FOR THE COMPLETION OF WORKS, RATHER THAN SIMPLE RELIANCE ON THE PROVISION OF FUNDS VIA SPD1 OR A CORRESPONDING MECHANISM.

Please continue on a separate sheet if required

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please note also that the Inspector is not obliged to consider any previous representations that have been made in respect of this Plan. You are urged, therefore, to re-submit, on copies of this form, any previously submitted representations that, in your view, remain valid and that you wish the Inspector to consider.**

8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the Oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

LINKED TO THE SIGNIFICANCE OF NATIONAL GRID'S LAND HOLDINGS WITHIN THE LOCAL AREA, AND THE IMPLICATIONS THAT FUTURE DEVELOPMENT OF THESE LAND HOLDINGS COULD HAVE FOR DELIVERY OF THE SL5 DEVELOPMENT AND VICE VERSA.

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.



# Trafford's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

(INDIGO)

Date:

06/11/10

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

01 November 2010

Our ref: NW10/11CON 6495

Your ref: CS/Publication

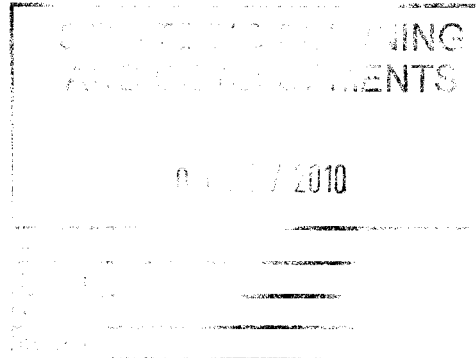
1037

ENGLAND

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

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire CW1 6GJ

T 0300 060 6000



**BY EMAIL ONLY**

Dear Sir/Madam,

**Trafford Core Strategy: Consultation on the Publication Document, Regulation 27**

Thank you for your consultation on the above dated 17 September 2010, which was received by Natural England on 27 September 2010.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England considers that the strategies, policies and proposals in development plans are of considerable importance to the natural environment. We therefore welcome the opportunity to comment upon the Core Strategy which sets out the strategic planning framework for Trafford.

**Core strategy development plan document**

We have completed the Representation Forms, which are enclosed. Our opinion is that there is much that we support in the document. While we have some comments on the documents as currently worded, with one exception, we do not generally consider them 'unsound' on the various tests of soundness.

We have, however, identified some areas of supporting text and wording in policies that we consider could still be improved and we understand that you will be able to consider these and make amendments to the text, as appropriate.

**Sustainability Appraisal**

We welcome the production of this document that sets out to ensure that the principles of sustainable development are inherent throughout the preparation of the Core Strategy. Unfortunately, we have not been able to review this lengthy document in any detail and so have no specific comments to make at this time.

**Habitats Regulations Assessment**

We do not concur with the conclusions of the Habitats Regulations Assessment for the reasons given in the Representation Form and as such, we consider the HRA to be 'unsound' on the grounds of

effectiveness.

### **Further Information**

The advice given in this letter is made for the purpose of the present consultation. We would of course expect to be included as a consultee in relation to any additional matters that may arise as a result of, or are related to, the present consultation.

We trust that these comments are helpful. Should you wish to discuss this response please do not hesitate to contact me at the above address.

Yours sincerely

Janet Baguley  
Planning and Conservation Adviser  
Greater Manchester and South Lancashire Team  
Direct dial: 0300 060 1772  
Email: [janet.baguley@naturalengland.org.uk](mailto:janet.baguley@naturalengland.org.uk)

**Word's Core Strategy: Publication Document  
Representation Form – September 2010**

Office Use Only	
Date	
Ref	
Ack	

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**  
[strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

This form has two parts –

**Part A** – Personal Details (You need only submit one copy of Part A)

**Part B** – Your representation(s) (**Please submit a separate Part B for each representation you wish to make**)

**Before completing this representation form please refer to the attached guidance notes.**

**PART A**

**Please use the representation form to make a representation on the Core Strategy: Publication Document.**


**1. Personal Details**

**2. Agents Details (If applicable)**

Name:	Janet Baguley	Name:	
Organisation (if applicable):	Natural England	Organisation (if applicable):	
Address:	Electra Way Crewe Business Park Crewe Cheshire	Address:	
Postcode:	CW1 6GJ	Postcode:	
Tel:	0300 060 1772	Tel:	
Fax:		Fax:	
Email:	Janet.baguley@naturalengland.org.uk	Email:	

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 representation forms enclosed in the box below:

<b>Total number of representation forms enclosed:</b>	13
---	----

 **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. An electronic version of the representation form can be found on the Council's web site at: [www.trafford.gov.uk](http://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](mailto:strategic.planning@trafford.gov.uk).**

Alternatively, completed comment forms can be returned by post to the address below by no later than **Monday 1<sup>st</sup> November 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: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

- Submission of the Core Strategy to the Secretary of State for independent Examination
- The publication of the Inspector's Report following the Examination
- The formal adoption of the Core Strategy

Signature:

Date:

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

**Board's Core Strategy: Publication Document**  
**Representation Form – September 2010**  
**PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

**Name or Organisation: Natural England**

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

Spatial Profile

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Please continue on a separate sheet if required

# Trafford's Core Strategy: Publication Document Representation Form – September 2010

## PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*While we do not consider the spatial profile to be unsound, we have suggested changes below that would improve the DPD, and which we ask the local planning authority to take into account.*

We welcome the recognition given to the contribution that accessible networks of green space provide to both the population and nature conservation interests, however, this should be more consistently applied across the different areas – so that conserving and enhancing greenspace, biodiversity, landscape character and quality and the opportunities for recreation are identified as key issues throughout. This reflects our earlier comments in our letter dated 26 August 2008 in response to the preferred options consultation and we note that these suggested changes have not been taken on board.

Regarding Mersey Valley (p.12) a key issue should be 'to conserve and enhance the value of the valley for its greenspace and biodiversity' as well as managing its recreational potential.

Regarding Trafford Communities, while we support (in the key issues) protecting 'areas of high biodiversity importance', the issue should be more widely drawn to include also conservation and enhancement of the area's biodiversity, and (in relation to landscape) to conserve and enhance the distinctive and historic landscape character and quality of the area, including (but not limited to) its settlements.

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please note also that the Inspector is not obliged to consider any previous representations that have been made in respect of this Plan. You are urged, therefore, to re-submit, on copies of this form, any previously submitted representations that, in your view, remain valid and that you wish the Inspector to consider.**

8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the Oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

# Board's Core Strategy: Publication Document Presentation Form – September 2010

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

Janet Baguley

Date:

1/11/2010



# Trafford's Core Strategy: Publication Document Representation Form – September 2010

## PART B – Please use a separate sheet for each representation

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: Natural England

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

Vision

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

# ford's Core Strategy: Publication Document presentation Form – September 2010

Please continue on a separate sheet if required

## PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*While we do not consider the vision to be unsound, we have suggested changes below that would improve the DPD, and which we ask the local planning authority to take into account.*

We strongly support the statement that the natural environment will be 'preserved, protected and enhanced' although we consider that landscape should be added to this statement. We welcome also in the vision the desire to achieve good access to green infrastructure/ multi-functional greenspace.

Please continue on a separate sheet if required

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please note also that the Inspector is not obliged to consider any previous representations that have been made in respect of this Plan. You are urged, therefore, to re-submit, on copies of this form, any previously submitted representations that, in your view, remain valid and that you wish the Inspector to consider.**

8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the Oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

## Trafford's Core Strategy: Publication Document Representation Form – September 2010

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

- |   |                                     |
|---|-------------------------------------|
| Submission of the Core Strategy to the Secretary of State for independent Examination | <input checked="" type="checkbox"/> |
| The publication of the Inspector's Report following the Examination                   | <input checked="" type="checkbox"/> |
| The formal adoption of the Core Strategy  | <input checked="" type="checkbox"/> |

Signature:

Date:

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

**ford's Core Strategy: Publication Document**  
**resentation Form – September 2010**  
**ART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: **Natural England**

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

Strategic/place  
objectives

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Please continue on a separate sheet if required

**Trafford's Core Strategy: Publication Document  
Representation Form – September 2010**

**PART B - CONTINUED**

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*While we do not consider the strategic/place objectives to be unsound, we have the following comments to make:*

There is much in the objectives that we support, including (amongst others) objective SO5 'Provide a green environment - achieve an appropriate level of greenspace, to protect and enhance the landscape character, recreational and biodiversity value of the borough's natural environment in both urban and countryside areas and to provide for the growing community.'

Please continue on a separate sheet if required

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please note also that the Inspector is not obliged to consider any previous representations that have been made in respect of this Plan. You are urged, therefore, to re-submit, on copies of this form, any previously submitted representations that, in your view, remain valid and that you wish the Inspector to consider.**

8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the Oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

**ford's Core Strategy: Publication Document  
presentation Form – September 2010**

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

Janet Baguley

Date:

1/11/2010

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

**Trafford's Core Strategy: Publication Document  
Representation Form – September 2010  
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

**Name or Organisation: Natural England**

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

Key diagram p32

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Please continue on a separate sheet if required

**ford's Core Strategy: Publication Document  
Presentation Form – September 2010**

**PART B - CONTINUED**

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*While we do not consider the key diagram to be unsound, we have suggested changes below that would improve the DPD, and which we ask the local planning authority to take into account.*

The diagram could be improved by showing key environmental assets to which policies relate – e.g. SSSIs.

Please continue on a separate sheet if required

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please note also that the Inspector is not obliged to consider any previous representations that have been made in respect of this Plan. You are urged, therefore, to re-submit, on copies of this form, any previously submitted representations that, in your view, remain valid and that you wish the Inspector to consider.**

8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the Oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).



**Trafford's Core Strategy: Publication Document  
Representation Form – September 2010**

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

Janet Baguley

Date:

1/11/2010

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

**Lord's Core Strategy: Publication Document  
Representation Form – September 2010**

**PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

**Name or Organisation: Natural England**

3. To which part of the DPD does this representation relate?

Paragraph Number

8.39

Policy Number

SL2

**Strategic Location 2 – Trafford Wharfside**

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

# Trafford's Core Strategy: Publication Document Representation Form – September 2010

Please continue on a separate sheet if required

## PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*While we do not consider Policy SL2 to be unsound, we have suggested changes below that would improve the DPD, and which we ask the local planning authority to take into account.*

Trafford Wharfside: paragraph 8.39 states that development will be expected to deliver an appropriate scale of green infrastructure and open space in line with R3 and R5, but this is not reflected in the table of 'development requirements' for this area.

Please continue on a separate sheet if required

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please note also that the Inspector is not obliged to consider any previous representations that have been made in respect of this Plan. You are urged, therefore, to re-submit, on copies of this form, any previously submitted representations that, in your view, remain valid and that you wish the Inspector to consider.**

8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

**No,** I do not wish to participate at the Oral examination

**Yes,** I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

# Wford's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

Janet Baguley

Date:

1/11/2010

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

# Trafford's Core Strategy: Publication Document Representation Form – September 2010

## PART B – Please use a separate sheet for each representation

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: **Natural England**

3. To which part of the DPD does this representation relate?

Paragraph Number

SL4.5

Policy Number

SL4

**Strategic Location 4 – Trafford Quays**

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

**Trafford's Core Strategy: Publication Document**  
**Representation Form – September 2010**  
Please continue on a separate sheet if required

**PART B - CONTINUED**

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*While we do not consider SL4 to be unsound, we have suggested changes below that would improve the DPD, and which we ask the local planning authority to take into account.*

Regarding Trafford Quays site (SL4.5) the text states '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'.

We welcome that here, and in some other strategic locations, the text stipulates that an ecological assessment is required. However, any requirement should go beyond 'compensation' and should stipulate that the sites and opportunities for nature conservation should be enhanced.

Please continue on a separate sheet if required

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

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8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the Oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

# Trafford's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

- Submission of the Core Strategy to the Secretary of State for independent Examination
- The publication of the Inspector's Report following the Examination
- The formal adoption of the Core Strategy

Signature:

Date:

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

**ford's Core Strategy: Publication Document**  
**presentation Form – September 2010**  
**ART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: Natural England

3. To which part of the DPD does this representation relate?

Paragraph Number

SL5.4

Policy Number

SL5

Strategic Location 5 - Carrington

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We consider the DPD to be unsound because it does not meet the requirements of Habitats and Birds Directives, and the Habitats Regulations as it does not provide sufficient evidence that there will be no likely significant effect on Manchester Mosses SAC.

In the Habitats Regulations Assessment a conclusion of no likely significant effect on Manchester Mosses SAC is drawn on the condition that some additional/appropriate policy wording is included in the Core Strategy. This has not been carried out adequately.



# Trafford's Core Strategy: Publication Document Representation Form – September 2010

According to Table 8.1 (point 1) of the HRA, the Core Strategy should include a requirement under SL5 that a proposal in this location includes provision for recreational facilities. This policy wording does not appear.

Also in Table 8.1 (point 9) of the HRA, the Core Strategy should include some appropriate wording under SL5 that ensures the protection and enhancement of Manchester Mosses SAC. The wording in the HRA and the Core Strategy is not explicit enough as it does not mention Manchester Mosses SAC specifically.

Please continue on a separate sheet if required

## PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If the appropriate wording, as outlined above, is included in SL5 of the Core Strategy this will provide the necessary evidence that there will be no likely significant effect of the DPD on Manchester Mosses SAC and will thus meet the requirements of Habitats Regulations.

Please continue on a separate sheet if required

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

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8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the Oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

# Afford's Core Strategy: Publication Document Representation Form – September 2010

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

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The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

Date:

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**Trafford's Core Strategy: Publication Document  
Representation Form – September 2010  
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

**Name or Organisation: Natural England**

3. To which part of the DPD does this representation relate?

Paragraph Number	Policy Number	
<input type="text"/>	<input type="text" value="L7"/>	<b>Design</b>

4. Do you consider the DPD is:

4. (1) Legally Compliant	Yes	<input type="text"/>	No	<input type="text"/>
4. (2) Sound*	Yes	<input checked="" type="text"/>	No	<input type="text"/>

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified	<input type="text"/>
(2) Effective	<input type="text"/>
(3) Consistent with national Policy	<input type="text"/>

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Please continue on a separate sheet if required

# Afford's Core Strategy: Publication Document Representation Form – September 2010

## PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*While we do not consider Policy L7 to be unsound, we have suggested changes below that would improve the DPD, and which we ask the local planning authority to take into account.*

The policy should also include requirements for development to:

- Conserve and enhance biodiversity and opportunities for biodiversity
- Conserve and *enhance* the character and quality of the landscape/townscape

These are essential elements of good and sustainable design.

Please continue on a separate sheet if required

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

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8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the Oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

## Trafford's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

Janet Baguley

Date:

1/11/2010

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

**..ford's Core Strategy: Publication Document  
Representation Form – September 2010**

**PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

**Name or Organisation: Natural England**

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

**Town Centres & Retail**

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

# Trafford's Core Strategy: Publication Document Representation Form – September 2010

Please continue on a separate sheet if required

## PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*While we do not consider Policy W2 to be unsound, we have suggested changes below that would improve the DPD, and which we ask the local planning authority to take into account.*

The policy refers to improvements to the public realm (for example, in Altrincham). This opportunity, and other opportunities, should be taken to make provision for nature within town centres – e.g. by provision of street trees where possible which add to amenity and habitat even in town centres.

Please continue on a separate sheet if required

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

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8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the Oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

# Afford's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

- |   |                                     |
|---|-------------------------------------|
| Submission of the Core Strategy to the Secretary of State for independent Examination | <input checked="" type="checkbox"/> |
| The publication of the Inspector's Report following the Examination                   | <input checked="" type="checkbox"/> |
| The formal adoption of the Core Strategy  | <input checked="" type="checkbox"/> |

Signature:

Date:

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



**Trafford's Core Strategy: Publication Document  
Representation Form – September 2010  
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

**Name or Organisation: Natural England**

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

**Natural Environment**

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Please continue on a separate sheet if required

**afford's Core Strategy: Publication Document  
Representation Form – September 2010**

**PART B - CONTINUED**

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*While we do not consider Policy R2 to be unsound, we have suggested changes below that would improve the DPD, and which we ask the local planning authority to take into account.*

We do of course strongly support this policy. We support the requirement that developers will need to provide a statement to show how the development will:

- Protect and enhance the landscape character, biodiversity, geodiversity and conservation value of its natural urban and countryside assets having regard not only to its immediate location but its surroundings; and
- Protect the natural environment throughout the construction process.

Preceding this welcome requirement should be a statement that clearly states that 'development should protect and enhance landscape character, biodiversity and geodiversity' and therefore developers will be required to demonstrate through a supporting statement how their proposal will:

- Protect and enhance the landscape character, biodiversity, geodiversity and conservation value of its natural urban and countryside assets having regard not only to its immediate location but its surroundings; and
- Protect the natural environment throughout the construction process.

We welcome the references in the text to the Landscape Strategy, the Geodiversity Action Plan, the Greater Manchester Ecological framework and the Greater Manchester BAP, all of which add to the evidence base and substance of the policy.

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

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8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the Oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Trafford's Core Strategy: Publication Document  
Representation Form – September 2010**

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|---|-------------------------------------|
| Submission of the Core Strategy to the Secretary of State for independent Examination | <input checked="" type="checkbox"/> |
| The publication of the Inspector's Report following the Examination                   | <input checked="" type="checkbox"/> |
| The formal adoption of the Core Strategy  | <input checked="" type="checkbox"/> |

Signature:

Date:

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**afford's Core Strategy: Publication Document  
Representation Form – September 2010**

**PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

**Name or Organisation: Natural England**

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

**Green Infrastructure**

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

# Trafford's Core Strategy: Publication Document Representation Form – September 2010

Please continue on a separate sheet if required

## PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We strongly support the intention of this policy.

Please continue on a separate sheet if required

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

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8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the Oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

# Afford's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

Janet Baguley

Date:

1/11/2010

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

# Trafford's Core Strategy: Publication Document Representation Form – September 2010

## PART B – Please use a separate sheet for each representation

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: Natural England

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

Open Spaces, Sport and Recreation

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

**afford's Core Strategy: Publication Document  
Representation Form – September 2010**

Please continue on a separate sheet if required

**PART B - CONTINUED**

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We strongly support the aims of this policy and we welcome the use of our Accessible Natural Greenspace Standards (ANGSt) in the policy and the supporting text.

Please continue on a separate sheet if required

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

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8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the Oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.



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Submission of the Core Strategy to the Secretary of State for independent Examination	<input checked="" type="checkbox"/>
The publication of the Inspector's Report following the Examination	<input checked="" type="checkbox"/>
The formal adoption of the Core Strategy	<input checked="" type="checkbox"/>

Signature:

Date:

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

**Trafford's Core Strategy: Publication Document  
Representation Form – September 2010**

**PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

**Name or Organisation: Natural England**

3. To which part of the DPD does this representation relate?

**HABITATS REGULATIONS ASSESSMENT**

Paragraph Number

Policy Number

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

It is Natural England's opinion that the Habitats Regulations Assessment of Trafford's Core Strategy is not sound because it fails to meet the requirements of the Habitats and Birds Directive, and the Habitats Regulations. We do not concur with the conclusions of the Habitats Regulations Assessment for the following reasons:

**Regional Spatial Strategy**

The findings of the RSS are quoted as justification for no likely significant effect in several sections of the report (including chapter 3.4.2, Appendix 2 and Table 8.1/8.2). This is not satisfactory as the RSS has now been abolished and the purpose of the Habitats Regulations Assessment is to assess likely significant effect of the Core Strategy itself.

# Trafford's Core Strategy: Publication Document Representation Form – September 2010

6. continued...

## Mersey Estuary SPA/Ramsar

We do not agree with the conclusion drawn in chapter 3.4.2. The two reasons given as justification for 'screening out' this site are not satisfactory. Firstly, it is not sufficient to say that potential negative impacts of the Core Strategy to Mersey Estuary SPA will not be considered simply because it would be too difficult. The second justification given relates to the RSS, see comments above.

In Natural England's opinion, Mersey Estuary SPA should be 'screened in' since a clear 'pathway' has been identified.

## Mitigating plans, policies and strategies

### **Table 8.1 SL5 Carrington**

Mitigation proposal 1 states that within Policy SL5 there will be a requirement for proposals in this area to include provision for recreational facilities. We support this as appropriate mitigation to prevent recreational pressure on Manchester Mosses SAC, however, when this is cross referenced to Policy SL5 in the Core Strategy, this wording does not appear. There is therefore no evidence that this mitigation will be taken forward to prevent negative impacts on Manchester Mosses SAC.

Mitigation proposal 5 & 6 refer to the now abolished RSS (see comments above).

Mitigation proposal 9 states that there will be a Requirement within LS5 Policy to protect and enhance the Mossland. It is our opinion that this wording is not explicit enough, it needs to state that Manchester Mosses SAC will be protected and enhanced. When cross referenced to Policy SL5 in the Core Strategy the wording is also not explicit enough and does not provide evidence that impacts to Manchester Mosses SAC will be avoided.

### **Table 8.2**

L1 Mitigation proposals 7 & 8 refer to the now abolished RSS (See comments above).

L4 Mitigation proposals 4 & 5 refer to the now abolished RSS (see comments above).

## **PART B - CONTINUED**

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- A further Habitats Regulations Assessment should be carried out that does not rely on the RSS
- Mersey Estuary SPA/Ramsar should be 'screened in' because a pathway has been identified
- The wording in Table 8.1 for mitigation proposal 9 needs to be more explicit and state Manchester Mosses SAC
- All proposed amendments/addition to policy must appear in the Core Strategy itself

**afford's Core Strategy: Publication Document**  
**Representation Form – September 2010**  
7 continued..

**Other comments**

Table 8.1 refers to LS5, whereas the Core Strategy refers to SL5.

In Table 8.2 - L1 we recommend that the following is included under the Mitigating plans, policies and strategies section: The requirement under SL5 that proposals include provision for recreational facilities.

In Table 8.2 – L4 we recommend that the following is included under the Mitigating plans, policies and strategies section: The requirement under SL5 that Manchester Mosses SAC will be conserved and enhanced.

Appendix 1 – Mersey Narrows & Wirral Foreshore pSPA – even if site classification details are not available this should not prevent the identification of any hydrological or atmospheric pathways. If there is a possible pathway then this site should be 'screened in' as a precautionary measure.

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

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8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the Oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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# Trafford's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

Janet Baguley

Date:

1/11/2010

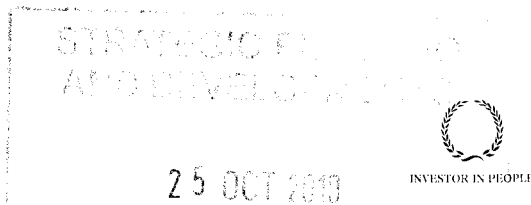
Thank you for taking the time to fill in our Core Strategy representation form, your comments are very much appreciated.



**Northwest**

REGIONAL DEVELOPMENT AGENCY

Mr Dennis Smith  
Head of Strategic Planning & Housing Services  
Trafford Council  
1<sup>st</sup> Floor  
Waterside House  
Sale Waterside  
Sale  
M33 7ZF



INVESTOR IN PEOPLE

1047

**Steven Broomhead**  
Chief Executive

SB/JL/2325  
21 October 2010

Dear Mr Smith

**Trafford LDF: Publication Draft Core Strategy (Reg. 27 consultation)**

Thank you for your letter dated 17 September 2010 inviting comments on the above. The Northwest Regional Development Agency welcomes the opportunity to respond.

The Agency has submitted comments at each consultation stage during the course of the Core Strategy's preparation. Our previous observations are largely reflected in the publication draft version and, as a result, we have few concerns about its soundness.

The only aspect of the Strategy we consider to be unsound is paragraph W1.10 of draft Policy W1. This differs from the version published in November 2009 and, although the change is very minor, it fundamentally alters the way in which the policy would operate. Our detailed comments are set out on the enclosed representation form.

On a point of detail, we note that the Implementation Table for the draft policy on Carrington (SL5) identifies NWDA as a source of funding for improvement works to the Flixton Road/Manchester Road junction. The works relate to the proposed development by SAICA. Agreement has been reached whereby the Agency is no longer funding these works directly. We therefore suggest that 'NWDA' is removed from the implementation table. We do not consider this to be an issue which affects the soundness of the Strategy.

This response has been prepared in accordance with the NWDA's consultation policy by the Strategy and Planning Team. If you have any queries or wish to discuss this matter further, please contact Beverley Doward, Head of Planning (e-mail [Beverley.doward@nwda.co.uk](mailto:Beverley.doward@nwda.co.uk)). Please note that Ian Wray has now left the Agency. I should be grateful if you would update your records accordingly.

Yours sincerely

**Steven Broomhead**  
**Chief Executive**

Enc.

Northwest Regional Development Agency  
Renaissance House,  
Centre Park, Warrington,  
WA1 1QN

Telephone: +44 (0)1925 400100  
Fax: +44 (0)1925 400400  
E-mail: [information@nwda.co.uk](mailto:information@nwda.co.uk)  
[www.nwda.co.uk](http://www.nwda.co.uk)

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englandsnorthwest

**Local Council's Core Strategy: Publication Document  
Representation Form – September 2010**

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**Part B** – Your representation(s) (**Please submit a separate Part B for each representation you wish to make**)

**Before completing this representation form please refer to the attached guidance notes.**

**PART A**

<b>Please use the representation form to make a representation on the Core Strategy: Publication Document.</b>			
<b>1. Personal Details</b>		<b>2. Agents Details (If applicable)</b>	
Name:	Steven Broomhead	Name:	Beverley Doward (Head of Planning)
Organisation (if applicable):	Northwest Regional Development Agency	Organisation (if applicable):	Northwest Regional Development Agency
Address:		Address:	Renaissance House PO Box 37 Centre Park
Postcode:		Postcode:	Warrington
Tel:		Tel:	WA1 1XB
Fax:		Fax:	01925 400100
Email:		Email:	<a href="mailto:Planning.consultations@nwda.co.uk">Planning.consultations@nwda.co.uk</a>
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 representation forms enclosed in the box below:			
<b>Total number of representation forms enclosed:</b>			1

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**Local Authority's Core Strategy: Publication Document  
 Presentation Form – September 2010  
 PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

**Name or Organisation:** Northwest Regional Development Agency

3. To which part of the DPD does this representation relate?

Paragraph Number	Policy Number
W1.10	W1

4. Do you consider the DPD is:

4. (1) Legally Compliant	Yes	✓	No	
4. (2) Sound*	Yes		No	✓

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified	
(2) Effective	✓
(3) Consistent with national Policy	

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraph W1.10 is the same as paragraph W1.4 in the November 2009 draft of this policy except the word 'on' has been inserted in the first line. Unfortunately this fundamentally alters the way in which the policy would operate.

This part of the policy is intended to apply to areas that are not specifically identified for employment development. As currently drafted, it would also apply to smaller employment sites identified in the Land Allocations DPD. Employment uses would only be permitted on such sites where the four criteria set out in W1.10 are met. We suspect this may not be the policy's intention. However, we consider this aspect of the policy to be unduly restrictive as currently drafted and unsound on the basis that it would not effectively deliver employment development on some allocated employment sites.



**J's Core Strategy: Publication Document  
Presentation Form – September 2010**

**PART B - CONTINUED**

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove the word 'on' from the opening sentence of paragraph W1.10 (i.e. revert to the wording used in paragraph W1.4 of the November 2009 version of this policy).

Please continue on a separate sheet if required

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

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The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

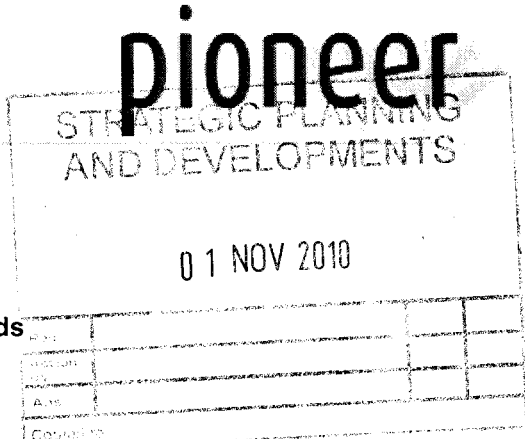
Signature:

Date:

21.10.10

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

1104



Trafford Core Strategy: Publication – September 2010

Representations relating to policy L2: Meeting Housing Needs

Object: to proposed threshold affordable housing provision on sites above threshold of 5 dwellings.

Suggest: threshold is maintained at national indicative minimum of 15 dwellings.

Reason

Paragraph 29 PPS3 advises that within Local Development Documents, Local Planning Authorities should set an overall (ie plan wide) target for the provision of affordable housing. The target should:

*“...reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured.”*

It is therefore evident that the target must be considered achievable across the majority of sites (or site typologies) that are anticipated to contribute toward available housing land supply in order for there to be ‘no risk’ to delivery.

The paragraph continues to advise Local Planning Authorities that they should set out the range of circumstances in which affordable housing will be required:

*“The national indicative minimum site size threshold is 15 dwellings. However, Local Planning Authorities can set lower thresholds, where viable and practicable, including in rural areas. This could include setting different proportions of affordable housing to be sought for a series of site size-thresholds over the plan area”.*

Therefore whilst the ‘national indicative’ minimum site size threshold is 15 dwellings it is still incumbent on a Local Planning Authority to demonstrate that such a threshold is viable and practicable in the context of their particular area, before considering whether a reduction in the threshold would be feasible.

It is our contention that the Council’s evidence base in the form of the **Trafford Economic Viability Study (TEVS)** published by GVA Grimley in May 2009 does not provide a robust and credible assessment of the economic viability of land for development that justifies a reduction in the site size threshold to 5 dwellings within ‘hot’ and ‘moderate’ housing market locations.

In this regard we would draw attention to the comments of the authors in paragraph 6.66 of the TEVS in which they appear to cast considerable doubt on the validity of their own findings:

*“However, it is noted that this analysis is based on a set of generalised assumptions within the model. Viability should be assessed on a site by site basis by Trafford Council, and judgements made regarding exact contributions in light of more detailed cost and value information being provided at the time of the application.”*

Such uncertainty suggests a policy based on this premise would be in direct conflict with the requirements of PPS3 which advises Local Planning Authorities to set targets which are unambiguously attainable for to do otherwise would suggest no regard had been had to the 'risks to delivery'. There may be circumstances where a particular site exhibits different characteristics from the majority of those within the assessment process and as such justifies the precise level of affordable housing provision to be subject to negotiation. However, this would not justify a requirement for the developer of each and every site below the national indicative minimum to submit viability information owing to the uncertainty as to whether or not the Council's policy targets were attainable.

### **Limited Contribution to Affordable Housing Supply**

We would also take issue with the suggestion made in the TEVS and reiterated in paragraph 11.17 of policy L2 that:

*"...such an approach would result in a substantial increase in actual levels of affordable housing being delivered."*  
(emphasis added)

Analysis of the Trafford SHLAA – Draft Report (May 2008) which was used by the authors of the TEVS to inform their site typology modelling identified a potential supply of 13,564 dwellings over a 15 year period. Of these, 3,886 were on sites of 0.8 hectares or less. Of these however, 2,813 dwellings were on sites above the national indicative minimum and 360 dwellings were on sites of 4 dwellings or less. Therefore only 713 dwellings (5.25% of the total identified supply) would be on sites above the proposed threshold of 5 but below the national indicative minimum of 15. It is our contention that any viability issues notwithstanding, the proposed reduction in the threshold to 5 dwellings would not yield a 'substantial increase' in the amount of affordable housing delivered as is claimed.

### **Viability Methodology and Stakeholder Representation**

In respect of the methodology employed in the TEVS to assess the viability of reduced affordable housing thresholds it is evident that no adjustment was made to the development assumptions used to assess larger sites.

Small sites are self evidently unable to benefit from the economies of scale enjoyed by larger sites and fixed costs are likely to represent a larger share of the development budget. Developers of smaller sites will be both less well capitalised (and hence dependent on bank finance to support development), and be more reliant on 'bought in' services. Therefore a higher rate of return may be required in order to mitigate risk, finance costs are likely to be more expensive, and the allowance for professional fees greater. In addition, build costs for small bespoke developments are also likely to be higher, and design requirements for complex sites may preclude the use of standardised solutions.

Neither is it evident that the authors of the TEVS sought to engage small building companies of the sort likely to engage in projects below the 15 dwelling threshold through the stakeholder process. Paragraph 5.3 indicates that a total of only 40 parties were invited to the stakeholder consultation workshop, these being organisations already known to the consultants, or existing stakeholders participating in the SHLAA or strategic sites process. Evidently this is unlikely to include small building companies. Of the 19 persons who attended the stakeholder consultation workshop only 1 represented a (major national) housebuilder, and no small developers were present.

In summary, it is considered unreasonable to utilise the same modelling assumptions for small and larger sites alike, and viability assessments undertaken by other planning authorities have acknowledged that different approaches are required.

## **Credibility of Modelled Sales Revenues**

The modelling scenarios in the TEVS utilise estimated market sales values drawn from analysis of historic sale price data (source Rightmove). This sales value data is aggregated to form the 'cold', 'moderate', and 'hot' housing market areas. However, as the quantum of affordable housing within each modelling scenario is increased the suggested market sales value remains unchanged.

Such an approach is unrealistic and fails to take into account purchaser behaviour. The amount of subsidised affordable housing within an area has a direct bearing on the market value of housing for sale. On larger development sites this influence is mitigated to some degree through the variety of house types and styles, but its influence is likely to be highly pronounced within smaller bespoke developments that are likely to fall beneath the 15 dwelling threshold. It is therefore illusory to suggest that 40% affordable housing provision is viable on sites between 5 and 14 dwellings as in reality the market values suggested would not be attainable.

That such a causal relationship exists between the amount of subsidised affordable housing in an area and the sales value of market housing may be established through the examination of census data. Whilst the TEVS does not establish its housing market typologies on a ward by ward basis there is still sufficient overlap with census geography to enable comparison to be made.

The 'cold' housing market areas comprise Old Trafford, Carrington and Partington. The boundaries broadly correspond with those of 'Clifford' and 'Bucklow St.Martins' wards respectively. According to the census (table KS18) over 38% of households in both these wards resided in Local Authority or RSL owned rented housing, against a Trafford average of slightly less than 17%. The level of social rented accommodation was therefore more than twice the borough average.

The 'hot' housing market areas include the wards of 'Hale Barns', 'Hale Central' and 'Bowdon'. According to the census less than 5.5% of households in these 3 wards resided in Local Authority or RSL owned rented housing, less than one third of the Trafford average. What the TEVS suggests is that it would be feasible to provide a level of social rented accommodation higher than the borough average (50% of the 40% affordable housing requirement) on sites within these areas without any impact on the achievable sales price, and hence development viability.

There is no evidence advanced within the TEVS that this is in fact attainable and it is contended that further research would demonstrate the negative causal relationship indicated above, with an attendant impact upon development viability.

## **Conclusions**

As drafted policy L2 is unsound, and founded on an evidence base which is not considered robust and credible. It is our contention that the deficiencies are so pronounced that the policy would not withstand the examination process if submitted in its current form. Any intent to pursue this policy without amendment to the site size threshold would draw further objections and we would request a seat at the round table hearing to ensure that our concerns could be highlighted to the inspector.

Therefore we suggest that the site size threshold for sites in the 'moderate' and 'hot' housing market locations be amended to the national indicative minimum site size threshold of 15 dwellings.

**Local Council's Core Strategy: Publication Document  
Representation Form – September 2010**

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**PART A**

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<b>1. Personal Details</b>		<b>2. Agents Details (If applicable)</b>	
Name:		Name:	
Organisation (if applicable):	Emery Planning Partnership	Organisation (if applicable):	
Address:	4 South Park Court Hobson Street Macclesfield	Address:	
Postcode:	SK11 8BS	Postcode:	
Tel:	01625 433 881	Tel:	
Fax:		Fax:	
Email:	support@epp-planning.com	Email:	
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PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

**Name or Organisation: Emery Planning Partnership**

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

X

(2) Effective

X

(3) Consistent with national Policy

X

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Please see attached statement by Emery Planning Partnership

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**PART B - CONTINUED**

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No, I do not wish to participate at the Oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We consider that the Examination provides our client with the opportunity to critically examine the council's position and put the strongest case forward in order to ensure that the plan is sound.

We consider that there are fundamental contradictions between national and regional planning policy and the evidence base, and what is being proposed in the emerging Core Strategy. Oral examination would allow a more forensic examination of the evidence and enables a more in depth analysis of the various opinions.

**Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.



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The publication of the Inspector's Report following the Examination  X

The formal adoption of the Core Strategy  X

Signature:

Date:

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

**Local Council's Core Strategy: Publication Document  
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Address:	4 South Park Court Hobson Street Macclesfield	Address:	
Postcode:	SK11 8BS	Postcode:	
Tel:	01625 433 881	Tel:	
Fax:		Fax:	
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Yes

No

4. (2) Sound\*

Yes

No

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(1) Justified

X

(2) Effective

X

(3) Consistent with national Policy

X

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

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Presentation Form – September 2010**

**PART B - CONTINUED**

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached statement by Emery Planning Partnership

Please continue on a separate sheet if required

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No, I do not wish to participate at the Oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We consider that the Examination provides our client with the opportunity to critically examine the council's position and put the strongest case forward in order to ensure that the plan is sound.

We consider that there are fundamental contradictions between national and regional planning policy and the evidence base, and what is being proposed in the emerging Core Strategy. Oral examination would allow a more forensic examination of the evidence and enables a more in depth analysis of the various opinions.

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## Trafford's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

Date:

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

**Local Council's Core Strategy: Publication Document  
Representation Form – September 2010**

Office Use Only	
Date	
Ref	
Ack	

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**  
[strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

This form has two parts –

**Part A** – Personal Details (You need only submit one copy of Part A)

**Part B** – Your representation(s) (**Please submit a separate Part B for each representation you wish to make**)

**Before completing this representation form please refer to the attached guidance notes.**

**PART A**

**Please use the representation form to make a representation on the Core Strategy: Publication Document.**


**1. Personal Details**

**2. Agents Details (If applicable)**

Name:		Name:	
Organisation (if applicable):	Emery Planning Partnership	Organisation (if applicable):	
Address:	4 South Park Court Hobson Street Macclesfield	Address:	
Postcode:	SK11 8BS	Postcode:	
Tel:	01625 433 881	Tel:	
Fax:		Fax:	
Email:	support@epp-planning.com	Email:	

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 representation forms enclosed in the box below:

**Total number of representation forms enclosed:**

 **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.** An electronic version of the representation form can be found on the Council's web site at: [www.trafford.gov.uk](http://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](mailto:strategic.planning@trafford.gov.uk).**

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

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PART B – Please use a separate sheet for each representation**

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**Name or Organisation: Emery Planning Partnership**

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Please see attached statements by Emery Planning Partnership and Pioneer Housing & Development Consultants.

**rd's Core Strategy: Publication Document  
presentation Form – September 2010**

**PART B - CONTINUED**

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Representations to Trafford Core Strategy Publication Consultation

## POLICIES L2, L5 AND R5

PI reference:  
LPA reference:  
EPP reference: 7393

November 2010

**CONTENTS:**

1.	INTRODUCTION	1
2.	RESPONSE TO CORE STRATEGY	3

## 1. INTRODUCTION

1.1 These representations are made by Emery Planning Partnership in respect of the Core Strategy Publication consultation.

1.2 We have previously made representations to the Core Strategy Issues and Options Paper in September and November 2007, representations to the Core Strategy Preferred Options made in August 2008, representations to the further consultation on the Core Strategy Preferred Option in August 2009 and representations to the further consultation on specific core policies in December 2009.

1.3 These objections relate specifically to the following policies of the DPD:

- Core Policy L2: Meeting housing needs.
- Core Policy L5: Climate change.
- Core Policy R5: Open space, sport and recreation.

1.4 Each matter is addressed in turn.

1.5 These representations are made on the basis that the core strategy is not 'sound'. To be 'sound' PPS12 sets out that a core strategy should be:

- Justified in that it is:
  - Founded on a robust and credible evidence base.
  - The most appropriate strategy when considered against the reasonable alternatives.
- Effective in that it is:
  - Deliverable.
  - Flexible.
  - Able to be monitored.
- Consistent with national policy.

1.6 We do not consider that the text and policies set out within the core strategy are justified, effective or consistent with national policy.

## 2. RESPONSE TO CORE STRATEGY

2.1 Our representations are set out below with reference to the policy of the Core Strategy document.

## **Policy L2 - Meeting housing needs**

### **Affordable housing**

2.2 Policy L2, specifically the minimum site threshold for affordable housing in the borough's "hot" or "moderate" locations (paragraphs L2.8 to L2.12), does not meet the test of soundness as set out in PPS12. The Core Strategy does not comply with this test for the following reasons:

2.3 Justified:

- The consultation process has not allowed for effective engagement of all interested parties.
- The policy is not adequately justified by robust evidence.
- The assumptions made in preparing the evidence are not reasonable and justified.

2.4 Effective:

- The proposed policy would not result in a substantial increase in the amount of affordable housing, as stated at paragraph 11.17.

2.5 National Policy:

- The policy is not consistent with PPS3, which requires lower thresholds only to be set only where it can be demonstrated that this would be viable and practicable.

2.6 These matters are detailed further within the accompanying statement produced by Pioneer Housing & Development Consultants.

### **Older persons accommodation**

2.7 The policy specifies that 500 units for the frail elderly will be provided within the overall housing land supply. It is not considered that it is necessary to specify a level of units for the frail elderly. No such requirement or need to set a requirement is established within PPS3 or the now revoked RSS.

2.8 The explanatory text to the policy states that the Trafford Housing Market Assessment estimates that there are a total of 4,289 'frail elderly households' within Trafford and that 10.4% of these (446) live in unsuitable housing.

2.9 The target of 500 units therefore only allows for the creation of 54 new 'frail elderly households' once the existing households living in unsuitable accommodation have been accounted for. This would equate to 3.6 households a year over the 15 year period from

2011 to 2026. It is not explained on what basis this has been calculated and this seems very low for the entire plan period.

- 2.10 It is also not clear how the provision of frail elderly units will be monitored. For example, when will a new dwelling be considered to meet an 'elderly frail' need. Some frail elderly units will fall outside the C3: Dwellinghouse definition as set out in the use classes order. Other accommodation such as bungalows may be suitable for the frail elderly but not specifically restricted to that group.
- 2.11 Furthermore, the policy is not clear whether the affordable housing requirement would apply to the 'frail elderly' category. It should not as these units will be meeting a specified need.
- 2.12 Given the complexities involved and that there is no requirement in national guidance or regional policy to specify a target for 'frail elderly' accommodation, it is considered that:-
1. this should be omitted from the policy; or
  2. the policy should be written to encourage the provision of 'frail elderly' accommodation with no specified target and without the need for the provision of affordable housing.

## **Policy L5 - Climate Change**

- 2.13 Paragraph L5.5 of the policy makes reference to the need to reduce carbon emissions for developments of 10 or more homes or 1000 sq m of floorspace or more. It should be noted that the RSS required targets for decentralised and renewable or low-carbon energy sources to be set in plans; however this has now been revoked.
- 2.14 It is considered that the targets set out in the policy are not transparent. The questions in figure 3 help identify what target area a site may be within. However, even then the document is not clear. For example, a plan is required to identify where existing and proposed district heating and cooling networks are. Further information is required on what targets will be required to be achieved in geographical areas of the borough. The policy should also set out ways in which the use of low or zero carbon energy can be achieved.
- 2.15 The policy should avoid onerous CO2 emissions reductions targets which would prohibit development. Table L5.1 sets out targets devised from the AGMA Decentralised Energy Study. We have not been able to obtain a copy of this document and we are not aware as to whether it is publically available. It is not therefore clear how these targets were derived or what public consultation they were subject to.

- 2.16 The evidence base must be robust and transparent. The policy is therefore not sound and should be amended or deleted accordingly.

### **Policy R5 - Open space, sport and recreation**

- 2.17 We strongly object to the proposed contributions for public swimming pools and health and fitness facilities. Members of the public pay to use these facilities and it should not be necessary for further subsidies from developers.
- 2.18 Whether a contribution is required is based on how far a site is from a swimming pool or health and fitness facility. It is highly unlikely that contributions will be used to build new swimming pools/health and fitness facilities for areas that are more than 1,800 metres from an existing swimming pool/health and fitness facility. Certain parts of the urban area will therefore continue to fail the accessibility test and developers within these areas will continually be required to pay contributions. This is in effect a tax on sites in areas that are more than 1,800 metres from where the local authority chose to build a swimming pool/health and fitness facility.
- 2.19 Furthermore, it is not clear how the stated accessibility standards have been selected for example 1,800 m from swimming pools and health and fitness facilities. This must be justified.
- 2.20 We also object to the requirement to contribute to the provision of cemeteries and burial areas as there is insufficient justification for this.
- 2.21 The policy must set out how the council will use the money provided to improve the provision of public open space and other facilities in accordance with provision of circular 05/05. For example, if a site is more than 300 metres away from local open space, how will the council use the money generated from that proposal to improve the open space for that particular site. The process of where money is spent must be transparent. For example, other councils in Greater Manchester report to planning committee where contributions towards open space for particular developments are spent.
- 2.22 The policy must set out the level of contribution that will be required as part of planning applications and the size of development to which the application will apply.
- 2.23 To conclude, the policy is not in accordance with national guidance and is not the most appropriate option when assessed against reasonable alternatives. It is onerous and could impact upon the deliverability of development targets within the plan. It is therefore unsound.



**Planning Partnership**

4 South Park Court  
Hobson Street  
Macclesfield  
Cheshire SK11 8BS

T: 01625 433881  
F: 01625 511457  
E: info@epp-planning.com  
W: www.epp-planning.co.uk

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

01 November 2010

EPP ref: L3-8433-CP-jc

Contact: Caroline Payne  
Direct dial: 01625 442798  
CarolinePayne@epp-planning.com

Dear Sir or Madam

**RE: CORE STRATEGY PUBLICATION CONSULTATION**

Please find enclosed representations to the above consultation made on behalf of Redrow Homes Ltd. These were also sent by e-mail to you today.

If you require any additional information, please do not hesitate to contact us.

Yours sincerely

**EMERY PLANNING PARTNERSHIP LTD**

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

Enc: Representations - forms and statement

Copy to: Client

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**Trafford's Core Strategy: Publication Document  
Representation Form – September 2010**

 PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:  
[strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

Office Use Only  
Date  
Ref  
Ack

This form has two parts –

**Part A** – Personal Details (You need only submit one copy of Part A)

**Part B** – Your representation(s) (Please submit a separate Part B for each representation you wish to make)

Before completing this representation form please refer to the attached guidance notes.

**PART A**

Please use the representation form to make a representation on the Core Strategy: Publication Document.

**1. Personal Details**

Name: REDROW HOME LTD  
Organisation (if applicable):  
Address:

Postcode:  
Tel:  
Fax:  
Email:


**2. Agents Details (If applicable)**

Name: CAROLINE PAYNE  
Organisation (if applicable): EMERY PLANNING PARTNERSHIP  
Address: 4 SOUTH PARK COURT  
MOBSON STREET  
MACCLESFIELD  
~~SK11 8BS~~

Postcode: SK11 8BS  
Tel: 01625 433 881  
Fax:  
Email: info@epp.planning.com

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Sale  
M33 7ZF

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Representation Form – September 2010  
PART B – Please use a separate sheet for each representation**

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Name or Organisation:

3. To which part of the DPD does this representation relate?

Paragraph Number                      Policy Number

L1

4. Do you consider the DPD is:

4. (1) Legally Compliant

No

4. (2) Sound\*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

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(2) Effective



(3) Consistent with national Policy



6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

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PLEASE SEE ATTACHED STATEMENT

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**Trafford's Core Strategy: Publication Document**

**Representation Form – September 2010**

**PART B - CONTINUED**

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Signature



Date:

1/11/2010

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Name or Organisation:

3. To which part of the DPD does this representation relate?

Paragraph Number	Policy Number
	L3

4. Do you consider the DPD is:

4. (1) Legally Compliant		No
4. (2) Sound*	Yes	No <input checked="" type="checkbox"/>

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered no to 4 (2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified	<input checked="" type="checkbox"/>
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**Representation Form – September 2010**

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Signature:

*pp John Coxon*

Date:

*1/11/2010*

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3. To which part of the DPD does this representation relate?

Paragraph Number                      Policy Number

R4

4. Do you consider the DPD is:

4. (1) Legally Compliant		No
4. (2) Sound*	Yes	No <input checked="" type="checkbox"/>

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Date:

1/11/2010

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

Representations on behalf of Redrow Homes Ltd  
Trafford MBC Core Strategy Submission Consultation

REPRESENTATIONS TO THE TRAFFORD MBC CORE STRATEGY  
SUBMISSION CONSULTATION

EPP reference: REPS1-8433-CP-jc

October 2010

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## 1. INTRODUCTION

1.1 Emery Planning Partnership is instructed by Redrow Homes Ltd to submit representations to the Core Strategy DPD Submission Document (the DPD) that is currently the subject of this six week consultation period. Our clients land interest is the land at Birch Farm, south of Partington. A site location plan is appended at EPP1 for reference.

1.2 These objections relate specifically to the following policies of the DPD:

1. Core Policy L1: Land for new homes.
2. Core Policy L3: Regeneration and reducing inequalities.
3. Core Policy R4: Green Belt and other protected open land.

1.3 Each matter is addressed in turn.

1.4 These representations are made on the basis that the core strategy is not 'sound'. To be 'sound' PPS12 sets out that a core strategy should be:

1. Justified in that it is:
  - Founded on a robust and credible evidence base.
  - The most appropriate strategy when considered against the reasonable alternatives.
2. Effective in that it is:
  - Deliverable.
  - Flexible.
  - Able to be monitored.
3. Consistent with national policy.

1.5 We do not consider that the text and policies set out within the core strategy are justified, effective or consistent with national policy.

## 2. POLICY L1: LAND FOR NEW HOMES

### Scale of development

2.1 The Core Strategy utilises the housing requirement set by the North West RSS of some 578 dwellings per annum. The RSS has now been revoked. We consider that reliance upon the requirement set by a part of the development plan that has been revoked results in the Core Strategy being unsound. Firstly, the evidence base upon which the requirement is based upon is now out of date and has been superseded. Secondly, the RSS requirement was based upon a plan period of 2003-2021. Its extrapolation and use over a different

plan period (i.e. 2011-2026) is not justified by evidence and has not been tested at a public examination.

- 2.2 We advocate the application of an increased annual requirement. PPS3 sets out how the regional level of housing provision should be determined. Paragraph 33 states:

*"In determining the local, sub-regional and regional level of housing provision, Local Planning Authorities and Regional Planning Bodies, working together, should take into account:*

*- Evidence of current and future levels of need and demand for housing and affordability levels based upon:*

- Local and sub-regional evidence of need and demand, set out in Strategic Housing Market Assessments and other relevant market information such as long term house prices.*
- Advice from the National Housing and Planning Advice Unit (NHPAU)<sup>21</sup> on the impact of the proposals for affordability in the region.*
- The Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts.."*

- 2.3 We hereby assess the evidence relating to each of the above:

#### **Local and sub-regional evidence of need and demand**

- 2.4 The affordability of housing in Trafford is a key problem in the borough. Table 3.5 of the SHMA Update Report identifies that Trafford has the worst house price affordability ratio in Greater Manchester, with the average house price being some 5.9 times higher than the average household income.

- 2.5 There is a critical shortfall of affordable housing in Trafford. The SHMA identifies the net annual need for affordable housing in Trafford as follows:

	Total net need	Annual flow (20% of total net need)	<b>Net annual housing need</b>
<b>Trafford</b>	4,015	803	<b>892</b>

- 2.6 The net annual housing need is 892 additional affordable dwellings per annum. This represents 154% of the authorities RSS requirement. Even if the council were to adopt a ten year period to address the backlog of need, the net annual housing need would still equate to 476 additional affordable dwellings per annum.
- 2.7 Set against the existing RSS requirement, it is clear that the need for affordable housing will never be met. Instead, the shortfall will only increase. Addressing this extremely significant need for affordable housing should be an absolute priority for the borough. We

consider that there is a requirement for higher levels of market housing in order to address the backlog of housing need.

### **Advice from the National Housing and Planning Advice Unit (NHPAU)**

- 2.8 The National Housing and Planning Advice Unit (NHPAU) was commissioned following the 2007 Government Green Paper titled "*Homes for the Future: More affordable, more sustainable*". Its purpose is to provide the Government with advice about the supply ranges to be tested by Regional Planning Authorities in future Regional Spatial Strategy (RSS) reviews. We understand that the NHPAU is to be abolished as part of the recent cuts announced by CLG. However, CLG will sustain access to its research reports and these still comprise an important material consideration in the formulation of planning policy.
- 2.9 The NHPAU published their recommendations in the document titled "*Meeting the housing requirements of an aspiring and growing nation: taking the medium and long term view*" in June 2008. The NHPAU report sets out minimum and maximum annual delivery rates for each of the regions.
- 2.10 The NHPAU report sets out minimum and maximum annual delivery rates for each of the regions. The minimum annual delivery rate for the North West to 2026 is 26,600, although by 2016, the minimum delivery point should be 27,600. This is an increase of 16% or 4,489 households over the current RSS. The upper delivery rate for the North West to 2026 is 29,500, although by 2016, the projected delivery point should be 31,300. This is an increase of 26% or 8,189 households over the current RSS.
- 2.11 Whilst the NHPAU report does not advise upon the housing requirements for specific local authorities, its regional delivery rates indicate a clear upward trend in the housing requirement, which should be reflected in housing requirements throughout the North West.

### **Government Household Projections**

- 2.12 The RSS requirement of 578 dwellings per annum was largely based upon the North West Household Growth Estimates Study and the 2003-based household projections. The latest household projections indicate significantly higher levels of household growth than the projections that informed the RSS housing requirement.
- 2.13 The latest household projections were released in March 2009. The projections indicate that the number of households in Trafford is set to grow from 96,000 in 2011 to 114,000 in 2026. This equates to growth over the 15 year period of some 18,000 households, or 1,200 households per annum.

## Conclusions

- 2.14 It is the government's intention to return decision-making powers on the housing requirement to local authorities. The revocation of the RSS confirms this. Whilst the advice issued by the government on the 6th July 2010 states that "*some authorities may decide to retain their existing housing targets that were set out in the revoked Regional Strategies*", such decisions must be based upon an up-to-date and robust evidence base.
- 2.15 In the case of Trafford, we consider that the evidence base upon which the RSS requirement was based is out-of-date and has been superseded. All of the most up-to-date evidence released since the RSS EiP and Panel Report points to a much higher housing requirement for Trafford. We therefore consider that to use the RSS requirement would render the plan unjustified and therefore unsound.
- 2.16 In view of our findings above in respect of local and sub-regional evidence of need and demand, advice from the NHPAU and the most recent Government Household Projections it is clear that there is clear statistical justification for a significant increase in the overall housing requirement set by the revoked RSS.
- 2.17 We consider that as a minimum, the annual housing requirement for Trafford should be 1,200 dwellings per annum between 2011-26 in order to meet the government's household projections and to address the identified large and critical need for affordable housing.
- 2.18 Such a requirement would be in accordance with the strategic objectives of PPS3, principally to achieve a quantity of housing sufficient to meet the needs of the community, widen opportunities for home ownership and to improve affordability across the housing market, including by increasing the supply of housing.
- 2.19 The application of this housing requirement would result in the need to release greenfield sites including protected open land during the plan period in order to meet the boroughs housing needs.

## Plan Period 2011-2026

- 2.20 The identified plan period is 2011-2026. We have concerns over the plan period, as we consider that the end date of 2026 should be extended to at least 2031.
- 2.21 Our reasoning for this is that 2026, although some 15 years from 2011, does not in our view accord with Government guidance. As you will be aware, paragraph 53 of PPS3 states:

*"Local Planning Authorities should set out in Local Development Documents their policies and strategies for delivering the level of*



*housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption, taking account of the level of housing provision set out in the Regional Spatial Strategy."*

- 2.22 PPS3 clearly advises that LDDs should plan for at least 15 years from adoption. Therefore the 15 years should be used as a minimum, not a maximum.
- 2.23 Despite the Local Development Scheme stating that the Land Allocations DPD will be adopted in April 2012, this is now out of date and there has already been slippage in the timetable. We understand that it is actually unlikely to be adopted before 2013. Therefore in order for the Land Allocations DPD to plan for housing at least 15 years from adoption, the DPD would need to project a housing requirement beyond 2026 (to 2028). We consider that this is unsound. The plan period should be addressed in the Core Strategy at an early stage.
- 2.24 To conclude, we consider that the proposed plan period would not allow the future Land Allocations DPD to plan for housing at least 15 years from adoption. The 15 years should be a minimum, and not a maximum. We therefore consider that the policy is unsound, as it fails to accord with national policy, specifically PPS3. We therefore consider that the plan period for the Core Strategy should be extended to 2031.

### **New plan period - deleting the past deficit**

- 2.25 Between 2003 and 2009 there was an under provision of some 208 dwellings against the RSS requirement. This under provision is likely to increase further before the start of the proposed plan period (2011). The Core Strategy proposed to set a new plan period of 2011-2026, and makes no mention of previous levels of over / under supply. Notwithstanding our comments above that applying the RSS requirement is unsound and the evidence base has been superseded, it is also unsound to maintain the RSS housing requirement 2003-2021 AND disregard previous levels of under provision.
- 2.26 The RSS requirement was an assessment of housing need between 2003-2021, and did not simply provide an annual target. This approach would result in an under delivery of housing in the borough, and would therefore fail to meet identified housing needs.
- 2.27 Our position is supported by a recent appeal successfully made by this practice. The appeal was in respect of an application for 19 houses on a greenfield site in neighbouring authority Rochdale. The council argued that the past deficit against the RSS requirement should be deleted following the revocation of the RSS, and a new plan period should apply (Appeal ref: APP/P4225/A/10/2129568). The Inspector concluded that this was inappropriate, and stated at paragraphs 11 and 12:

*"One of the objectives of the plan-led system is to secure a sufficient quantity of housing taking into account need and demand [PPS3, paragraph 10]. Whilst the Council may not have been happy that the RSS introduced a significantly higher requirement which was, effectively, backdated by five years, it has to be assumed that there was sufficient evidence of need to justify that stance, especially since that had also been the basis of the Draft RSS. Certainly, the Council's own representations on the matter refer to the importance of providing for 360-400 additional houses each year over the RSS period. The Council may well be right in that the RSS start date no longer has any relevance to the adopted development plan, but it does not follow that any unmet need ceased to exist with the revocation of the RSS. Guidance issued with the decision to revoke Regional Strategies makes it clear that housing numbers still need to be justified by reliable information. No information has been provided to suggest that the annual requirement should have been anything other than 400 dwellings for the period 2003-2008 and, in that light, a start date of April 2009 appears to be quite arbitrary.*

*The Appellant contends that the annual requirement should be assessed over the period of the RSS, namely 2003-2021, since that is based on the most recent, publicly tested evidence. There is considerable force in this point and, in fact, it was accepted by the Council at the Inquiry that the RSS figures were the best available. Although the emerging Core Strategy will introduce a new time period, I understand that the 2009 Preferred Options Report is to be reviewed in the light of the revocation of the RSS. It can therefore carry little weight at this stage. In the absence of any published, planning justification for an alternative approach I agree that, for the purposes of this appeal, the requirement should be the one set out in RSS. This creates a requirement for the period 2003 – 2021 of 7,200. As 1,456 dwellings (net) had been completed during the period 2003-2009, the shortfall as at April 2009 would have stood at 944."*

- 2.28 This is clear evidence that of the council is to retain the housing requirement set by the RSS the Core Strategy should not create a new plan period and in effect delete the past deficit against the RSS requirement.
- 2.29 To conclude, the policy is not justified by sufficient or adequate evidence, and it is not in accordance with national planning policy. It is therefore unsound. If the Inspector accepts the proposed housing requirement as set by the now revoked RSS, then the past deficit from 2003/04 onwards must be retained.

### **Previously developed land target**

- 2.30 Paragraph L1.7 sets an indicative target of 80% of dwellings to be delivered on previously developed land.
- 2.31 Table L1 identifies out that previously developed sites comprise just 82% of the total supply identified within the SHLAA. The estimated housing supply at 2011 is just 11,906 dwellings, which is just 456 dwellings more than the proposed housing requirement of 11,450 dwellings (2008 - 2026). It is unrealistic to assume that all of the sites identified

within the SHLAA will be delivered within the 0-15 year period. We consider that the target of 80% is unlikely to be deliverable, and the Core Strategy is therefore unsound.

- 2.32 We consider that the target should be revised downwards. Furthermore, if our objections to the housing requirement, distribution and/or mix are accepted, the previously developed land target should be reconsidered.

## Distribution

- 2.33 Paragraph L1.7 states that the council will release previously developed land before greenfield land, and sets an order of priority for development. Paragraph L1.9 then states that the development of greenfield land will only be considered where it can be demonstrated that:

*"the proposed development will be capable of creating sustainable communities; will contribute significantly to the Plan's overall objectives, including the economic growth of the City Region and the provision of affordable housing; and where it can be demonstrated that the development of that land will not compromise the Council's achievement of its brown-field land target over the Plan period and that without its release, the Council's 5-year housing land supply target could not be delivered". [our emphasis]*

- 2.34 We consider that these policies do not accord with Table L1, which shows the locations where significant new housing development is to be directed. This identifies that of the 3,810 dwellings identified within the supply for 2011/12 - 2016/17, only 640 units are within the Regional Centre Area and a 710 within the Inner Area. The council is therefore relying upon 2,460 dwellings to be delivered in the South City Region Area in the first five years of the plan, including the release of greenfield sites.
- 2.35 The proposed policy therefore does not match the proposed delivery and phasing. This inconsistency results in the policies being unsound.
- 2.36 We recommend that the order of priority for development is altered as follows:
1. Previously developed land within the regional centre, inner areas and regeneration areas.
  2. Previously developed land in other areas.
  3. Greenfield sites within the regional centre, inner areas and regeneration areas.
  4. Greenfield sites in other areas.
- 2.37 Paragraph L1.8 states that even if it becomes apparent that build rates have not been met, it is 'possible' that development proposals not in accordance with the proposed phasing policy would still be found premature. We strongly object to this policy. PPS3 is clear at paragraph 7 on the need for local planning authorities to identify and maintain a

rolling five-year supply of deliverable land for housing, particularly in connection with making planning decisions. Paragraph 71 states:

*"Where local planning authorities cannot demonstrate an up-to-date five year supply of deliverable sites, for example, where Local Development Documents have not been reviewed to take into account policies in this PPS or there is less than five years supply of deliverable sites, they should consider favourably planning applications for housing, having regard to the policies in this PPS including the considerations in paragraph 69."*

- 2.38 Furthermore, paragraph 72 states that Local Planning Authorities should not refuse applications solely on the grounds of prematurity. We therefore consider that the proposed policy approach is not in accordance with national planning policy, specifically PPS3. It is also not the most appropriate strategy when considered against the reasonable alternatives. It is therefore unsound.
- 2.39 The policy should clarify that Greenfield sites may come forward ahead of brownfield sites, in order to ensure a continuous deliverable supply of housing and to meet regeneration needs and objectives.

### **3. POLICY L3: REGENERATION AND REDUCING INEQUALITIES**

#### **Priority Regeneration Area - Partington**

##### **Background to the Regeneration Area**

- 3.1 The designation of Partington as an identified Priority Regeneration Area dates back to the Single Regeneration Budget Challenge Fund Bid of January 1998.
- 3.2 The issues within Partington are recognised in the SRB document as arising from Partington's previous status as a Manchester overspill estate. The SRB document considers that these issues will persist without wider investment of social and economic change. Partington is described as:
- "a drab, dismal town with a high percentage of empty boarded up houses and flats. The dilapidated environment of the area compounds all the other problems faced by the community."*
- 3.3 A number of themes are identified for Partington. Of particular relevance is creating a better environment for all, where the objective is to improve the physical environment of Partington and Carrington and the image of the area and to make it a place where people are proud to live and work.
- 3.4 The Partington and Carrington area is the beneficiary of an SRB programme with a total budget of £2.9 million. The overall aim of the programme is to develop community capacity building with an aim of achieving real, sustainable economic and social

regeneration. Two Delivery Plans have been prepared. The first in 1998/1999 identified 5 objectives. These were to:

- Enhance employment prospects, education and skills of local people;
- Encourage sustainable economic growth by improving the competitiveness of the local economy;
- Protect and improve the environment and infrastructure and promote good design;
- Tackle crime and improve community safety; and
- Enhance quality of life, health and capacity to contribute to regeneration of local people, including the promotion of cultural and sporting opportunities.

3.5 Yearly Delivery Plans provided an update to these original objectives and referred to specific projects and initiatives being developed. The aim of the SRB programme remains as outlined in the year 1 delivery plan:

*"To achieve real, sustainable regeneration, economic and social development which will enable the people of Partington and Carrington to develop their individual capacity and play and increased role in the development of their own communities."*

3.6 The 2003/2004 Delivery Plan identifies problems experienced in 2003/2004 as:

*"The neglected state of the Town Centre, and the declining population are major concerns. The 2001 census revealed a loss of 15% of the population from the area over the last decade. There are severe issues that need to be addressed to make the community sustainable and local services viable. The production of a draft strategic development framework to address the unbalanced population through proposed new housing development should help reverse the decline. However, the long lead in periods and planning issues to be overcome makes the process frustrating for the community."*

3.7 A Strategic Development Framework for Partington was prepared by the Council in October 2003. This was the first step in a wider process being pursued by Trafford MBC to regenerate the area. The purpose of the framework is to support the social and economic objectives identified for Partington into a physical development strategy that would ensure regeneration is sustainable in the long term.

3.8 The Strategic Development Framework sets out the profile and baseline analysis of Partington. Key points to note are:

- The high proportion of socially rented stock within Partington and the limited amount of new private housing has meant that the area has not been able to accommodate the more affluent or upwardly mobile groups or attract these groups into the area.

- Trafford is one of the more affluent metropolitan districts within the Country however, there are three wards where there are high levels of deprivation and poor environmental quality. One of these is the Bucklow ward that largely comprises Partington and Carrington. The area is dominated by lower income and deprived groups compared to Trafford and the UK as a whole (paragraph 2.4).
- Partington has suffered from a significant decline in population since 1991 of around 15% (paragraph 2.8).
- The area suffers from higher levels of unemployment which are around twice the Trafford average (paragraph 2.12).
- Based on the multiple index of national deprivation, Bucklow falls within the top 5% of deprived wards of the country (paragraph 2.32).
- The Partington area has a significantly lower proportion of groups within the professional and managerial classes and other non-manual workers than either Trafford or England (paragraph 2.12).
- Within the Partington and Carrington area there is a much lower proportion of owner occupied dwellings than in Trafford or England and Wales but a much higher percentage of social rented housing. The 2001 census indicates that the level of owner occupation in Partington of 51.3% is significantly lower than the average in Trafford (72%) (paragraph 2.26).
- In addition to having an over concentration of social housing, the Partington and Carrington area is also dominated by small terraced and semi-detached houses (paragraph 2.28).
- The decline in population has already had a serious impact on the provision of local services. This has included the closure of Orton Brook primary school, the decline of the local shopping centre and increase in vacancies and contributed to the closure of 3 pubs. A further loss in population will threaten the future of existing facilities such as the 4 other primary schools and Broad Oak High School. A failure to arrest this decline will make it extremely difficult to attract more people and new investment into the area (paragraph 2.33).

3.9 The Strategic Development Framework identifies the issues within Partington and translates these into development opportunities for the area within the planning context. The development of new housing within Partington is identified as being central to the area's regeneration.

- 3.10 In 2008 the council resolved to grant planning permission for the redevelopment of the town centre together with the development of 550 houses on a greenfield site allocated as Protected Linear Open Lane, a wildlife corridor and an Area of Landscape Protection outside the settlement boundary.
- 3.11 As part of the local development framework, the council was preparing an Area Action Plan (AAP) for Partington. Consultation on the issues and options report took place in October 2007. This continued to identify Partington as a priority regeneration area and sought the allocation of suitable sites in order to secure the regeneration of the area. The AAP has since been discontinued. It is therefore essential that the Core Strategy sets an appropriate policy framework for the continued regeneration of the area.

## **Policy considerations**

### **Scale of development**

- 3.12 Paragraph L3.4 states that within Partington, development and redevelopment will be supported which will provide or contribute to the provision of approximately 850 units of new residential accommodation. Firstly, we consider that the wording of this policy should be amended to clarify that the 850 units provided will be net additional dwellings.
- 3.13 Secondly, we consider that the level of development proposed is inadequate to meet the regeneration needs of Partington, in particular the need to facilitate its development as an attractive and sustainable residential location, and to improve the quantity, quality and diversity of the housing stock in the township. The figure used of "approximately 850" does not appear to be based upon any specific evidence. Rather, it seems to be based purely on the capacity identified in the SHLAA. We consider that this is unjustified and therefore unsound.
- 3.14 Background work undertaken in 2003 in the form of the Strategic Development Framework for Partington identified that there is a need for a critical mass of at least 600 dwellings during the period 2005-2015 in Partington in order to support a redeveloped/reconfigured town centre. This equates to an annual need of at least 60 dwellings per annum. Whilst this is a non-statutory document it is a background document setting out the aims for Partington. In accordance with this background document, it is considered that large scale development is necessary to bring about the regeneration required.
- 3.15 This level of housing provision was set against the context of the previous housing requirement of 270 dwellings per annum as set by RPG13, which was much lower than the 578 dwellings per annum introduced by the RSS. The 60 dwellings per annum proposed comprised 22% of the overall housing requirement. Applying this percentage to the

current housing requirement of 578 (excluding any allowance for growth point) would result in an annual requirement for Partington of 127 dwellings per annum.

- 3.16 Based on the evidence relating to the regeneration of Partington, we consider there is a need for at least 2,286 net additional dwellings in Partington to 2026 (127 per annum), over the plan period (2008 - 2026). This much higher housing requirement would result in significant regeneration benefits in accordance with the Strategic Development Framework, and this should be considered accordingly by the Inspector. If the overall housing requirement is increased as we have stated it should be in our objections to Policy L1, then this figure should be increased further.
- 3.17 It should also be noted within the policy that any housing target given for the priority regeneration areas should not be treated as a maximum. New housing of a high standard of design within these areas will contribute to the creation of sustainable communities and achieving wider regeneration benefits.
- 3.18 In order to achieve the requisite quantum of development to regenerate Partington, it may be necessary to release other land for development. The Core Strategy should incorporate flexibility to allow for this. We address this in more detail in our response to Policy R4 below.

### **Locations for development**

- 3.19 The Partington Area Action Plan consulted upon its Issues and Options in October 2007. One of the four options presented was for large scale housing growth, including the development of the protected open land to the south of Partington. We consider that the partial or full allocation of land south of Partington is most appropriate strategy when considered against the reasonable alternatives. According to the sustainability appraisal, this option resulted in the most positive economic and social effects of the four options presented. Potential negative environmental effects were identified, but these would be significantly outweighed by the economic and social benefits for the regeneration area.
- 3.20 The Area Action Plan has since been discontinued. It is apparent that further development in the regeneration area will not be delivered through a statutory development plan document. These spatial options for Partington were not considered further through the Local Development Framework. Therefore we object to the exclusion of this spatial option from the Core Strategy. We consider that the Core Strategy is unsound as it has failed to fully consider or consult upon the reasonable alternatives.



## **4. POLICY R4: GREEN BELT AND OTHER PROTECTED OPEN LAND**

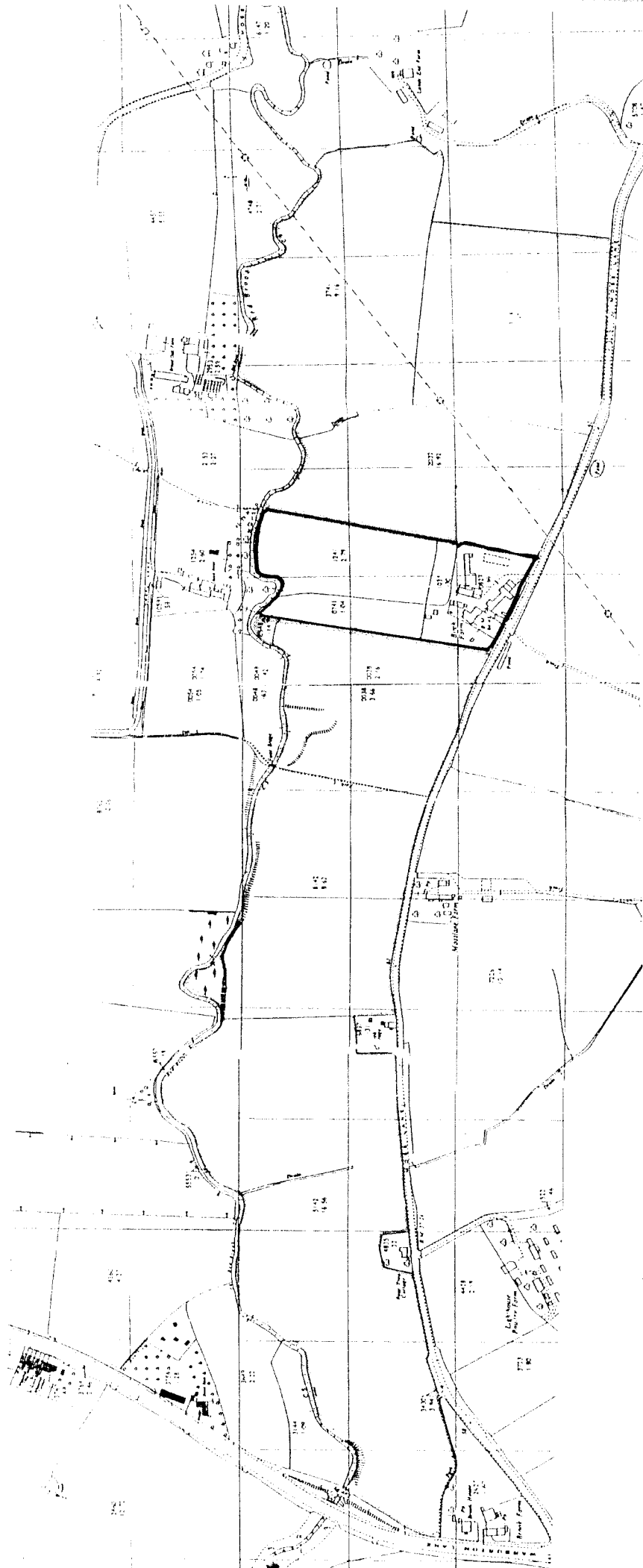
### **Other Protected Open Land**

- 4.1 Paragraph R4.6 identifies that the council will designate the land in Warburton (immediately to the south of Partington) as protected open land. We support this designation, which would represent a continuation of the designation in the current UDP.
- 4.2 Our representations above set out our view that a higher housing requirement for both the borough and Partington itself is needed in order to make the Core Strategy sound. We also have doubts over the deliverability of a number of the sites identified in the SHLAA in Partington. The application for the development of the land adjacent to the ship canal for 550 houses is the subject of a resolution to grant from 2008, but we understand that the Section 106 agreement is still yet to be signed. Even if it is signed, it is likely to be 5 years before reserved matters approval is achieved and development commences on the site. This would leave 10 years left of the plan to develop the site. At a rate of 40 per annum, this would only deliver 400 units. The council is also relying upon a number of brownfield sites to supplement the supply, including public houses and school land. We have significant doubts as to whether these sites will be developed during the plan period.
- 4.3 Assuming that these sites do not come forward there is insufficient flexibility within the Core Strategy to ensure that it is effective. In order to provide the necessary flexibility, we consider that the area of other protected land at Birch Farm be identified within the Plan to be used where it is clear that the identified sites are not delivering the required number of houses. The land at Birch Farm is considered appropriate for this purpose due to its exclusion from the Green Belt and its close relationship with Partington.
- 4.4 The explanatory text at paragraph 24.22 and 24.33 makes the assumption that the land will not be designated for development in the Site Allocations DPD, and will be protected from all but limited essential development to enable it to make the maximum contribution to meeting future unquantified needs. We object to this. PPS3 is clear at paragraph 7 on the need for local planning authorities to identify and maintain a rolling five-year supply of deliverable land for housing, particularly in connection with making planning decisions. The policy is not in accordance with national policy, and is therefore unsound.
- 4.5 If there is a demonstrateable need for the development of the protected open land during the plan period, there needs to be provision for this within the policy for development to be permissible. This may occur due to borough wide or Partington specific housing need, or to assist in the continued regeneration of the area.

## 5. APPENDICES

EPP1. Site location Plan - Land at Birch Farm

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Dear Sir / Madam

## TRAFFORD CORE STRATEGY: PUBLICATION CONSULTATION

On behalf of our client, Sainsburys Supermarkets Limited, we have reviewed the Trafford Core Strategy DPD Publication Document and would like to take this opportunity to comment specifically on Policy W2.

### Policy W2 (Town Centres and Retail)

As you will be aware, Sainsbury's is one of the major food retailers in the Borough. The company have existing stores in Altrincham, Sale and Urmston and are committed to improving the retail offer within each of these centres.

Sainsbury's support Policy W2 which maintains the Borough's retail hierarchy and identifies Altrincham Town Centre as the Principle Town Centre. Sainsbury's also support the inclusion of Sale and Urmston (Other Town Centres) within the retail hierarchy and the proposal for future retail development to be focused on the Principle Town Centre and the surrounding Other Town Centres. In accordance with PPS4, development proposals for town centre uses within each the identified centres should be given clear support where they are of an appropriate scale and function to that centre.

With regard to the District and Local Centres, Sainsbury's agree that the convenience retail offer could be enhanced appropriately to support and meet the needs of the local communities. In view of this, Sainsbury's recommend that the boundaries of the identified centres should be reviewed to establish sustainable locations where proposals for their further economic growth could be supported

I trust that these comments will be taken into account in your consideration of the Publication draft document and incorporated into the Submission draft of the DPD. In the meantime, if you have any questions please do not hesitate to contact me.

Yours sincerely

**Greg Dickson**  
**Assistant Planner**

25 OCT 2010

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Date 19<sup>th</sup> October 2010

**Subject: TRAFFORD MBC CORE STRATEGY: PUBLICATION CORE STRATEGY**

Dear Mr Smith,

Thank you for the opportunity to comment on Trafford's Publication Core Strategy.

Salford City Council is broadly supportive of the approach set out in the document, and welcomes the commitment to the delivery of MediaCityUK and the priority placed on identifying and mitigating the impacts of development on our shared transport network.

We would however like to take this opportunity to make a comment in respect of proposed out of centre office development. Whilst we acknowledge that there may be capacity problems limiting the amount of office development that can be accommodated within town centres (both within your own authority and in neighbouring authorities) it is important that they remain the first priority for office development. To this end, the Core Strategy should provide an indication of the amount of office development expected within the Strategic Locations, but it should also be clear that the sequential considerations identified in Policy W2 will be equally applicable to office schemes within these areas. Such schemes should be justified on a case-by-case basis with individual sites brought forward in a PPS4 consistent sequence.

I trust these comments are of assistance in moving forward to the next stage of your Core Strategy process. If you have any queries, please do not hesitate to contact my colleague Jimmy McManus using the details at the top of this letter.

Yours sincerely

Paul Walker  
STRATEGIC DIRECTOR FOR SUSTAINABLE REGENERATION

1043

# Salford City Council

**Spatial Planning**  
**Sustainable Regeneration Directorate**  
Salford Civic Centre, Chorley Road  
Swinton, Salford, M27 5BY DX 712104 Swinton 2

Dennis Smith  
Strategic Planning and Developments  
First Floor  
Waterside House  
Sale Waterside  
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M33 7ZF

**Phone** 0161 793 2796  
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**Email** jimmy.mcmanus@salford.gov.uk  
**Web** www.salford.gov.uk

**My Ref** CS/Trafford/Publication  
**Your Ref** CS/Publication/1043

Date 8<sup>th</sup> November 2010

**Subject: TRAFFORD MBC CORE STRATEGY: PUBLICATION CORE STRATEGY**

Dear Mr Smith,

Thank you for your letter of the 4<sup>th</sup> November in respect of the status of our comments to your Publication Core Strategy contained in our letter of the 19<sup>th</sup> October. I can confirm that we would like our comments to be considered prior to submission to the Secretary of State, but that we are not seeking to challenge the soundness or legal compliance of the plan.

I can also confirm that we do not wish to attend the Examination but would like to be kept informed of future stages of the plan preparation process (slip attached).

Yours sincerely



Jimmy McManus  
Principal Planning Officer – Sustainable Regeneration

STRATEGIC PLANNING AND DEVELOPMENTS			
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Action by			
Ans			
Copied to			

**Improving people's lives IN Salford**

**Name: Jimmy McManus c/o Salford City Council**

**Council reference number (please see header) CS/Publication/1043**

I wish to be informed about the following stages in the production of the Trafford Core Strategy  
(please tick the relevant box(es):

Submission of the Core Strategy to the Secretary of State

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

**Please return to the Strategic Planning and Developments Team by 5th November 2010.**

Via:

Email to: [strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

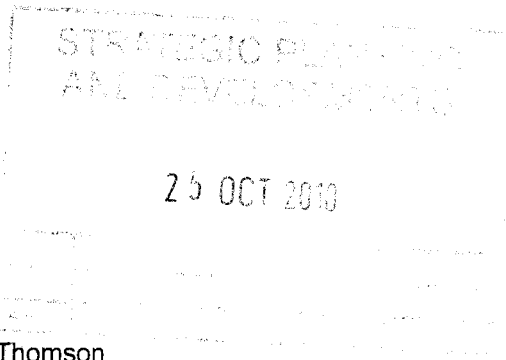
Post to: c/o Strategic Planning & Developments,  
1<sup>st</sup> Floor Waterside House, Sale Waterside, Sale M33 7ZF





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REAL ESTATE**

1026



Mr R Haslam  
Strategic Planning and Developments Team  
c/o Strategic Planning and Developments  
1<sup>st</sup> Floor Waterside House  
Sale Waterside  
Sale  
M33 7ZF

Andrew Thomson  
Director  
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6 Floor Aurora  
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Tel: +44 (0)161 242 2624  
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Email: andrew.thomson@bnpparibas.com

Your ref:  
Our ref: AT L221010jbb

22 October 2010

Dear Sirs

**Trafford Core Strategy – Publication Document September 2010**

I am instructed by Shell International Limited to make representations on their behalf in respect of the Trafford Core Strategy Publication Document and the Trafford Core Strategy Background Note on the 5 Strategic Locations Update.

The allocation of Carrington as a strategic location is welcomed and we support both the allocation and Policy SL5 as they both reflect our on going negotiations and discussions with the Council over the period that the Core Strategy and the emerging policies have been formulated. Policy SL5 recognises that Carrington, including the Shell land holding, is a key strategic location and represents a significant opportunity to create a new mixed use residential led development of a scale to meet the growing employment and housing needs of the city region. The shared vision for Carrington is for a sustainable new community based around the existing settlement providing a range of high quality family housing, employment, leisure and new community facilities within a green space framework. The identification of this strategic location and Policy SL5 will support the priorities of the Council for economic prosperity and residential growth as part of the wider strategy for Greater Manchester.

Shell and the Council are confident that this Strategic Location can deliver 1,560 family houses, 75ha of land for employment activities, new road infrastructure, community facilities and green infrastructure within the Plan period and together have been working towards a masterplan for the area which will provide for residential and employment opportunities over a 30 year period. The new planned community at Carrington will be;

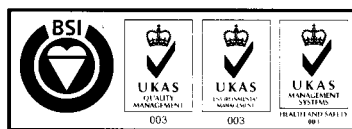
- Inclusive and diverse
- Energy efficient
- Economically stable
- Well designed
- Phased
- Supported by a sustainable transport framework
- Included within a network of linked open spaces

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Within the wider area Carrington and the adjoining open space has a key role to play in providing new important strategic green links to the wider area such as Sale Waterpark, the Mersey Valley and Dunham Massey. Releasing this large strategic area of brownfield land will reduce the pressure upon Greenfield sites across the Borough whilst bringing about significant benefits for the surrounding area.

The strategic site at Carrington will also make a significant contribution to the overall employment needs of Trafford and the City Region involving the consolidation of the area's existing industrial and energy generation character with a potential focus on a range of sectors to include;

- Environmental industries – establishing a location for this growing sector linking into the existing energy infrastructure
- Enterprise – building upon the success of the existing Business Park
- General industry – a home for occupiers across the industrial sector
- Distribution – a major contribution to the distribution needs of the City Region

Given the scale of this location and the availability of the land it has the ability to accommodate a range of sectors and occupiers and has the potential to create a range of new jobs and training opportunities over the lifetime of the development. The regeneration challenge at Carrington will not only relate to the creation of new opportunities and an improvement of the skills agenda but also to open up the wider area, Particularly Partington, with a new package of transport connections stimulating increased levels of investment and innovation, reducing the inequalities and unemployment in the area.

In any Core Strategy delivery is key and by working together Shell and the Council have been able to demonstrate delivery by addressing a number of key issues;

- Substantial areas of brownfield land can be made available within the next 5 years for residential and employment uses
- The existing industrial infrastructure on the site is capable of rationalisation and relocation releasing land for employment uses
- Proposals for other major developments in the Carrington area are re-establishing Carrington as a location for employment generating uses
- The opportunity exists building upon existing infrastructure to establish strong public transport links as part of a phased integrated mix of transportation improvements for the area
- The release of land at Carrington will have positive impacts upon the regeneration of Partington and Sale West
- The services, facilities, landscape setting and infrastructure provided for the new development will be of high quality and will be effectively managed and maintained to meet the changing needs of the community over the long term

Shell have been working closely with the Council and the local community to create a shared vision for the future of the Carrington Strategic location which will contribute to the growth aspirations of Trafford and the city region. The delivery of the development and the wider aspirations for Carrington will be guided by the emerging masterplan and on-going engagement with the community and stakeholders in the area.

Turning to detailed comments upon the policies we have several minor points of clarification in respect of the Carrington Strategic site as opposed to objection and these can be summarised as follows;

- The implementation section of Policy SL5 deals with infrastructure requirements (page 58) and points out that these will be dealt with in detail in the Action Area Plan however one element, the New Ship Canal Crossing, whilst highly desirable as a future long term sub regional link is not within my client's control and is in our submission not required for the delivery of the strategic site.



## **BNP PARIBAS REAL ESTATE**

- Policy L4 (e) requires the public transport schemes and/or highway schemes to be in place before first occupation of the strategic developments however in viability and usage terms this is somewhat unrealistic and provision should be made as part of the phased delivery of the development through the Masterplan/Action Area Plan.
- Policy R4 seeks to protect open areas of land not in the green belt including land to the south of Carrington. We would strongly argue that the land to the south of Carrington is included within the Action Area Plan for potential expansion of the Carrington Strategic location beyond the plan period and that reference is made to this longer term objective within this policy.

In respect of the remainder of the policies in the Core Strategy, Shell are generally in support of these policies but would make the following comments;

- Policy L3 Regeneration - there is no reference in this policy to the positive impact of the development of the Strategic Site at Carrington to both Sale West and Partington.
- Policy L5 Climate Change - this policy appears to be particularly complex and possibly unnecessary following the introduction of Part L of the Building Regulations.
- Policy 8 Planning Obligations - Economic viability on any scheme will be key to delivery.

In conclusion the identification of a strategic location for a residential led mixed use community at Carrington is an important opportunity for Trafford and for the Manchester Sub Region. An area of this scale in predominantly single ownership that can deliver substantial employment space and high quality housing within an attractive setting as well as delivering infrastructure and regeneration benefits for the wider area is a rare opportunity. Significant discussions with the Council have already taken place and are continuing as we jointly develop a master plan for the site. My client's are fully in support of the allocation and supporting policies subject to the 3 relatively minor comments set out above which can be dealt with by rewording of those parts of the relevant policies.

Shell are preparing a promotional document in discussion with the Council for use through out the on going consultation process based upon these representations and incorporating many of the comments set out above. Copies of that document will be submitted to the Council and will be available before the end of November.

Yours sincerely

**Andrew Thomson**  
Director

1026

**From:** Andrew.Thomson@bnpparibas.com [mailto:Andrew.Thomson@bnpparibas.com]  
**Sent:** 08 November 2010 13:41  
**To:** Strategic Planning  
**Subject:** Trafford Core Strategy - representation 1026

Dear sirs,  
Please note that in addition to the representations made on behalf of Shell I wish to state that in my view the Core Strategy is, in my opinion, sound and legally compliant.  
Regards  
Andrew



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**Andrew Thomson**  
Director



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1026

**From:** Andrew.Thomson@bnpparibas.com [mailto:Andrew.Thomson@bnpparibas.com]  
**Sent:** 05 November 2010 11:51  
**To:** Edwards, Andrea  
**Subject:** RE: Trafford Core Strategy

Andrea,  
Please see below, I reply to the other points separately. Have a good weekend.  
Andrew

Name: ...Andrew  
Thomson.....

Council reference number (please see header)CS/Publication  
1026.....

I wish to be informed about the following stages in the production of the Trafford Core Strategy (please tick the relevant box(es):

Submission of the Core Strategy to the Secretary of State

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The formal adoption of the Core Strategy