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15 January 2010

Dear Dennis

TRAFFORD CORE STRATEGY: INTERIM CONSULTATION ON CORE POLICIES L2,L4,L5 W1 AND R5

The Highways Agency, has undertaken a review of Trafford MBC's Core Strategy: Further Consultation on Core Policies L2, L4, L5, W1 and R5 document as part of the emerging Local Development Framework [LDF].

This technical note has been prepared by the Agency on the likely impact of the Preferred Option at the Strategic Road Network [SRN] and also responds to the Local Planning Authority's formal consultation exercise. The recommendations, outlined within this technical note, take account of national policy guidance as set out in DfT Circular 02/2007 '*Planning and the Strategic Road Network*'.

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

Review of the Core Policies L2, L4, L5, W1 and R5

Trafford MBC initially consulted on their Core Strategy preferred options (July 2008) which was followed by a further consultation for a revised preferred option (June 2009). As a result of the initial consultation and further interim consultations a hybrid spatial option has been derived. As part of the LDF development process infrastructure constraints have been identified, with the phasing of development aspirations to be used to deal the issues.

Through previous responses to Trafford LDF Core Policy Documents the Agency has been encouraged by the inclusion of the 'headline requirement' for the need for development to be accessed by 'adequate public transport'. The previous consultation on the revised Core Strategy Preferred Option (June 2009) did raised concerns regarding the lack of accessibility in Carrington and Partington and the Agency requested some surety and assurances that sustainable transport measures are to be implemented at Trafford Park. The further consultation for policies L2, L4, L5 W1 and R5 do not relate to these previous concerns so the Agency have reiterated the comments above as they are vital for ensuring the impact on the SRN can be managed and mitigated against.

This consultation document has been issued by Trafford MBC to bring matters of policy from the non-statutory Supplementary Planning Documents in to the Statutory Core Strategy document. The following response focuses wholly on the contents of the latest consultation document in relation to the Core Policies L2, L4, L5, W1 and R5.

Core Policies

L2 – Meeting Housing Needs

This policy sets out the Councils requirement to ensure that sufficient land is made available to meet RSS targets and that there is an adequate mix of housing types and sizes to meet the needs of the community.

The Agency supports the proposal that all new residential development will be assessed to determine what housing needs are required by the Borough. It should be noted that the appropriate housing developments should be located to ensure the SRN is not impacted on by unsuitable land allocation. The requirements for new developments could be strengthened to support this by including a need to be in accordance with policy 'L4: Sustainable Transport and Accessibility', as is already included for 'L7: Design'.

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

As a general rule, the Agency will discourage any large scale housing developments close to the SRN which may have an adverse or a material impact on safety and operation, unless it is demonstrated within the accompanying LDF documents or evidence base, that the impact on the SRN can be minimised through the use of sustainable modes.

L4 – Sustainable Transport and Accessibility

This policy focuses on the parking standards for new developments. The standards set out in the Core Strategy have been prepared in accordance with wider policy documents, including emerging work on the RSS Partial Review. The standards included in the policy specify the requirements which each development will normally be expected to provide.

The Agency supports the principles of Core Policy L4 as it aims to promote sustainable travel choices as part of a package of measures. The parking extract taken from Policy L4, has been reviewed by the Agency, and is considered that this should enhance the opportunities to locate development in the most sustainable locations.

In addition the Agency is encouraged by the following statement within Core Policy L4:

The standards are intended to mitigate the impact of parking needs and encourage a modal shift to more sustainable modes of transport and minimise the dangers to public highway safety and the loss of amenity and convenience likely to be caused by on-street parking.

L5 – Climate Change

Policy L5 outlines the focus on climate change in the Borough. The policy states a need for climate change to be considered at all stages of the development process in order to ensure that all development minimises impacts and mitigates those effects.

The Agency has previously noted that there were concerns with regard to the lack of assessment of developments upon air quality. It is unclear whether these assessments have been identified therefore the Agency reiterate the request that air quality assessments of the strategic sites and strategic locations should be undertaken to differentiate between the impacts of planned and unplanned developments.

W1 – Economy

Trafford have identified that in order for Trafford to remain competitive and contribute to the growth of the economy of the sub-region, it needs to continue to diversify its range of employment types. The policy aims to facilitate the continued modernisation and revival of industrial and commercial activity through the release of sufficient and appropriate land.

The Agency considers that the transformation of the industrial storage and distribution units should benefit the whole of Trafford. In support of developing the economy, ensuring that the transport infrastructure and sustainable travel options are provided will be required. In relation to this policy the Agency support the aspiration to improve the transport infrastructure, particularly in relation the improvements that would facilitate more integrated and frequent services.

Any significant development proposed should be undertaken using a masterplan approach to ensure that public transport improvements are in place before new developments are occupied. In addition the Agency are supportive of the allocation of employment land outside of the core areas would only be permitted where there is access to other modes of transport to the private car.

The Agency has noted that in Table W1 Carrington is identified to have the highest allocation of new employment land. As previously identified the Agency is concerned by the development aspirations for Carrington due to its poor public transport accessibility and the potential for adverse impact to arise at the SRN if the area is developed without infrastructure.

Public transport infrastructure needs to be explicitly identified and phased in accordance with any development proposals at this site, to ensure that any impacts at the M60 are kept to a minimum.

R5 – Open Space and Recreation

This policy focuses on the availability of open space, sport and recreation facilities. The policy states that by adding to the attractiveness of the Borough, there is potential to encourage potential investors and thereby help stimulate urban regeneration.

The Agency is not required to respond on this Core Policy.

Conclusions

The consultation period has allowed the Agency the opportunity to comment upon the issues pertinent to the operation and safety of the Strategic Road Network, which plays a key role in the Borough of Trafford, as well as having a regional and national function.

The Agency is generally supportive of the alteration to the Core Strategy Policies outlined within the latest consultation document. The principles of sustainable development and providing alternative travel options to the private car are evident in the Core Strategy. The Agency considers that where opportunities exist to strengthen the links between sustainable development and travel they should be implemented. This has been identified in Core Policy L2 where there is an opportunity to relate the housing need to the Policy L4 which focuses on Sustainable Transport and Accessibility.

Overall, the Agency will continue to work proactively with Trafford MBC to ensure sustainable sites and land allocations are brought forward, which are ultimately delivered on a sustainable basis whilst minimising the operation and safety of the SRN.

Please feel free to contact me if you wish to discuss any of the issues raised.

Yours sincerely

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AM/TLDF

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23rd December 2009

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Dear Sirs,

Trafford Core Strategy – Further Consultation

Firstly can I apologise for submitting this response beyond the formal close of the consultation period, but I would hope that it can still be considered.

I would like the comments submitted to the Preferred Options stage to be read alongside this response. I welcome the recognition of the role and importance of the Airport to the Trafford economy through the additions to both the policy wording of W1 and the supporting text, particularly paragraph 5.8.

The concern I have is that whilst you have carried out work to identify the locally derived employment land needs of Trafford (a 'bottom up approach') this seems to close the door on the prospect of economic development that is part of wider sub-regional, or even regional objectives (a 'top down' approach). The bullet points in paragraph 1.4 of the policy W1 should be altered to allow the prospect of such a site within the Borough with the inherent wider benefits and effects.

The protected alignment for Metrolink is identified in Policy T11 of the Unitary Development Plan and Policy L4 of the Core Strategy preferred Option. I suggest you retain this as a transport corridor. It has two benefits :

- the potential to provide improved accessibility to the airport and motorway from the west (including Wythenshawe Hospital). This fits with the Wythenshawe Regeneration Framework.
- as part of improved orbital links to the Airport as set out in our Ground Transport Strategy. The Altrincham – Airport – Stockport corridor is our first priority for such improvements by both road and public transport.

I would very much like to discuss these ideas with you as part of the on-going Local Development Framework process.

Yours sincerely,

John Twigg
Group Director of Planning

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STRATEGIC PLANNING AND DEVELOPMENTS			
22 DEC 2009			
Rec			
Action by			
Ans			
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Dear Sir / Madam

TRAFFORD'S CORE STRATEGY FURTHER CONSULTATION ON POLICIES L2, L4, L5, W1 AND R5 – NOVEMBER 2009

On behalf of our client Exige Developments Limited (a Nikal Limited development company), please find enclosed representations to the Council's further consultation on the Core Strategy in respect of the Altair site which is located within Altrincham Town Centre and is identified as Strategic Site 5.

As you are aware, in August 2008 Trafford Council granted outline planning permission (LPA ref: H/OUT/68603) for the demolition of existing buildings and replacement with a comprehensive mixed use development. A revised application which comprises all the uses approved as part of the original outline application described above as well as a new hospital and healthcare facility was submitted to the Council on 13th November 2009 (LPA reference 74390/O/2009). In the formation of new policies through the Core Strategy, Officers should have regard to the established planning position at Altair and ensure this is reflected in the content of future policies.

A number of representations have been submitted to the Council's Core Strategy on behalf of Exige Developments Limited and Nikal Limited and I therefore request that the representations below are considered in addition to those previously submitted and read as a whole.

Policy L2: Meeting Housing Needs

Policy L2 seeks to ensure that there is an adequate mix of housing types and sizes to meet the needs of the community. The policy explains that all new residential development proposals will be assessed for the contribution that will be made to meeting the housing need of the Borough.

In terms of dwelling type and size, the policy (part L2.7) states '1 bed, general needs accommodation – will, normally, only be acceptable for schemes that support the regeneration of Trafford's town centres and the Regional Centre. In all circumstances, the delivery of such accommodation will need to be specifically justified in terms of a clearly identified need.'

Planning and Environmental Advisers

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The reasoned justification explains that the Greater Manchester SHMA recognised that alongside a sustained emphasis on family housing, it is important that the town centres across the Borough (including Altrincham) continue to attract high quality residential uses to ensure the ongoing renaissance of the town centres and to ensure that they continue to develop as vibrant centres of activity. On this basis, it is important that the implementation of Policy L2 is sufficiently flexible to recognise the need to permit smaller residential units including apartments within town centres such as Altrincham. The redevelopment of the Altair site will significantly contribute towards the regeneration of Altrincham town centre by securing a mix of uses including an ice rink and a hospital / healthcare facility. The scheme will be iconic and contemporary and will comprise apartments instead of family housing. It is important for the financial viability of the scheme that high end value uses such as residential apartments are included to ensure that all the other uses that will provide wider community benefit can be delivered.

Affordable Housing

Paragraph L2.9 identifies Altrincham along with the Mersey Valley and Rural Communities Places as being within a "hot" market location where a 40% contribution towards affordable housing will be sought with a minimum threshold of 5 units.

In line with Circular 05/2005 any planning obligation sought by the Council must meet five key tests; all of which must be met in order for a planning obligation to be sought. In short, a planning obligation must be:

- relevant to planning;
- necessary to make the proposed development acceptable in planning terms;
- directly related to the proposed development;
- fairly and reasonable related in scale and kind to the proposed development; and
- reasonable in all other aspects.

The affordable housing policy must be sufficiently flexible to allow applicants to agree an appropriate and viable affordable housing requirement with the Council. The reasoned justification at paragraph 2.23 explains that the mechanism and required level of evidence for variations in affordable housing requirements relating to economic viability issues will be set out in the associated SPD. We would welcome the opportunity to be consulted on that SPD at the earliest opportunity. In any event, any affordable housing requirement will be an aspirational target and must be applied on a site by site basis.

The policy threshold of 5 units within "hot" locations should be applied with caution. As detailed in Planning Policy Statement 3: Housing, whilst the national indicative minimum threshold is 15 dwellings, Local Authorities can set lower minimum thresholds where it is "viable and practicable". Local Authorities will need to undertake an informed assessment of the economic viability of the thresholds, including their likely impacts on overall levels of housing delivery.

Policy L5: Climate Change

Policy 5 requires new development to minimise contributions and to mitigate the effects of climate change and maximise its sustainability by adopting measures that reduce carbon emissions. The policy sets out a number of thresholds and targets in relation to sustainable construction, CO2 emissions reductions, pollution and water.

Support is given to part L5.8 which explains that if particular circumstances of the development suggest that the requirement of the policy are not viable, the applicant must provide information to demonstrate this. Notwithstanding the above, the policy should be applied on a site by site basis.

Policy W1: Economy

The aim of this policy is to facilitate the continued modernisation and revival of industrial and commercial activity through the release of sufficient land. The policy seeks to focus economic activity in accordance with the Spatial Strategy i.e. in the Regional Centre and Inner Areas in addition to Trafford's Town Centres, particularly SL7, 11 and 13 i.e. Altrincham Town Centre.

The content of Policy W1 is supported. It is important to guide economic regeneration and development in such locations including Altrincham Town Centre in order to assist growth of the City Region. Altair is specifically recognised as one of the most important regeneration sites in Altrincham Town Centre and represents an opportunity to enhance the town centre's viability and contribute towards Altrincham's role as a sub-regional centre. The mixed use regeneration of the site will encourage shoppers and businesses to Altrincham, which will assist the local economy, provide local job opportunities and provide enhanced facilities for local people.

I trust you will find the representations in order, but should you have any queries please do not hesitate to contact me on the details below.

I would be most grateful if you would confirm safe receipt.

Yours sincerely

 **LAUREN ASHWORTH**
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Cc J Wrigley Esq. (Nikal)

- 8 DEC 2009



INVESTOR IN PEOPLE

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Chief Executive

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Our Ref. SB/JL/2185
Your Ref. CS
4 December 2009

Dear Mr Smith

Trafford LDF Core Strategy: Further consultation on Core Policies L2, L4, L5, W1 and R5

Thank you for your letter dated 20th November 2009 inviting comments on the above. The Northwest Regional Development Agency welcomes the opportunity to respond.

At the previous consultation stage (Summer 2009) the Agency commented on three of the draft policies to which the current consultation relates. Our comments on the latest revisions to these policies are as follows.

Policy L4 – Parking element of ‘Sustainable Transport and Accessibility’

In line with our previous comments, we are pleased to note that relevant details are provided within the policy, rather than simply cross-referring to an associated SPD. Whilst we do not wish to comment on the detailed parking standards set out in Table L4, their inclusion within the policy provides greater transparency to prospective developers.

Policy L5 – ‘Climate Change’

We considered that the previous draft of this policy took an unduly negative approach to proposals for new sources of renewable energy generation. We are pleased to note that Clause L5.9 has been amended along the lines we suggested.

Policy W1 – ‘Economy’

We previously commented that neither the draft policy nor the supporting text set out the amount of employment land to be provided over plan period. We therefore welcome the inclusion of Table W1 within the policy. This sets out the scale of additional employment land to be provided in different parts of the Borough, by 5 year time periods, to 2025/26. The Agency generally welcomes this approach.

On a point of detail, we note that the figures in Table W1 relate to the supply of land for ‘B’ Uses. The supporting text at paragraph 5.7, however, refers to the wider range of ‘town centre uses’ as identified in PPS6, adding that proposals for such uses will be determined in the context of the tests set out in PPS6. Whilst these uses provide employment opportunities, many of them (leisure, entertainment, arts and tourism) fall outside Use Classes B1, B2 and B8). To provide greater clarity, we therefore suggest that paragraph 5.7 is amended to explain that such uses, where permitted, will not be treated as contributing towards the employment land figures in Table W1.

This response has been prepared in accordance with the NWDA's consultation policy by the Planning, Transport and Housing Team. If you have any queries or wish to discuss this matter further, please contact Ian Wray, Chief Planner, (e-mail Ian.Wray@nwda.co.uk).

Yours sincerely

Steven Broomhead
Chief Executive

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REPRESENTATIONS TO THE FURTHER CONSULTATION ON
CORE POLICIES L2, L4, L5, W1 AND R5

EPP reference: Reps1-1029-RG-CT-JC

December 2009

1. REPRESENTATIONS TO POLICY W1 - ECONOMY

- 1.1 Emery Planning Partnership is instructed by Orchard Barns Ltd to submit representations to the Trafford Core Strategy further consultation specifically in relation to **Core Policy W1**. The representations are made specifically in respect of the omission of Davenport Green, Hale, as an employment allocation. This report sets out our clients key objections.

2. EXISTING UDP ALLOCATION

- 2.1 The Davenport Green site is currently allocated within the Trafford UDP under Policy E13.
- 2.2 The Trafford UDP was adopted in June 2006. The UDP has a plan period to 2016. The UDP does not make provision for the de-allocation of strategic sites during the plan period. Notwithstanding this, the Core Strategy proposes to de-allocate the land just 3 years into the life of the UDP.
- 2.3 We do not consider that the planning policy framework has significantly changed since the adoption of the UDP in 2006. Nor do we consider that there has been a significant change in the need to provide employment sites within the borough that both meet both a local need, and a wider regional and sub-regional need.

3. EMPLOYMENT LAND CONSIDERATIONS

Deliverability of the Supply

- 3.1 We do not consider that the identified supply of employment land is deliverable. Much of the land identified is subject to considerable constraints, and we consider that the supply has been significantly over-estimated.
- 3.2 The identified supply of employment land (190ha) is heavily reliant upon the development of the Carrington site (75ha). This site is subject to numerous constraints, most notably contaminated land and flood risk. The deliverability of this site is a seriously questionable. Additionally, this location is likely to be better suited to heavy industrial uses, and is an unattractive location for high quality employment land.

Deliverability of Davenport Green

- 3.3 Clearly, the site is currently yet to come forward for development. However, the UDP did not identify that the site would come forward for development before 2010, it simply identified the site for development within the plan period. We therefore do not consider that the deliverability of the site can be criticised. We can confirm that there is developer interest in bringing the site forward for development in the near future.

- 3.4 The deliverability of the site has been seriously hampered by the restrictive nature of Policy E14. However, this policy has since been deleted.
- 3.5 The NWDA has removed the site from its list of strategic regional sites. However, we understand that the decision to remove the site was made as part of a review driven by a reduction in funding. This, combined with a lack of development progress on the site, is the likely reason behind the omission of the site.
- 3.6 We note that a number of proposed employment allocations are carried over from the UDP, despite failing to attract employment development since being designated. We are concerned that these sites are rated at 5/5 for 'commercial viability' in the Employment Land Study, whilst Davenport Green scores just 1/5. This scoring is inaccurate, and we have concerns over the robustness of this element of the LDF evidence base.
- 3.7 The Employment Land Study concludes at section 5.9 (2) that there is a general view that sites such as Davenport Green are attractive to the market for employment development. We do not consider that there are any existing constraints that could prevent the site coming forward for development. This finding is contrary to the 1/5 score the site receives in the same document for 'commercial viability'.

Potential contribution of Davenport Green

- 3.8 Notwithstanding our conclusions on the deliverability of the employment land supply, it should be noted that the site itself has been identified as a site that can meet a need that exists at the regional and sub-regional scale.
- 3.9 The NWDA has made representations to previous stages of the Core Strategy, supporting the continued allocation of the site. We do not consider that the omission of the site from the NWDA's list of strategic sites alters deliverability of the site, or its potential contribution to the regional and local economy.
- 3.10 The Employment Land Study concludes at section 5.9 (1) that there are concerns that the industrial core at Trafford Park will be displaced due to market pressures for higher value development.
- 3.11 The proposed development of Davenport Green provides an opportunity to accommodate high quality employment land, preventing this potential displacement. Such displacement would lead to development pressures elsewhere, and could result in a need to release greenfield sites for industrial development.

4. GREEN BELT CONSIDERATIONS

- 4.1 The part of the site proposed for development in Policy E14 if the UDP is not within the Green Belt. It was removed from the Green Belt and allocated for employment purposes. The Core Strategy proposes to return the site to a Green Belt designation.
- 4.2 We strongly object to this. At the very least, should it be de-allocated, the site should be designated as safeguarded land.
- 4.3 For the site to be returned to Green Belt, the council must be able to demonstrate that the site meets the criteria for including land within the Green Belt, as defined by paragraph 1.5 of PPG2. However, these criteria would have been assessed during the previous allocation of the site, and it has been deemed that the material considerations are sufficient that the land should not be included within the Green Belt.
- 4.4 Paragraph 2.7 of PPG states "*Where existing local plans are being revised and updated, existing Green Belt boundaries should not be changed unless alterations to the structure plan have been approved, or other exceptional circumstances exist, which necessitate such revision.*" We are not aware of any material changes in Green Belt policy any other policy, that would support the re-designation of the site as Green Belt.

5. MANCHESTER AIRPORT

- 5.1 Davenport Green offers a unique opportunity to provide high quality employment land in close proximity to Manchester Airport. RSS Policy RT5 identifies that "*Plans and strategies should support the economic activity generated and sustained by the Region's airports, in particular, the importance of Manchester Airport as a key economic driver for the North of England*".
- 5.2 RSS Policy RDF4 identifies that LDFs may provide for detailed changes in Green Belt boundaries to accommodate the expansion of Manchester Airport. Para 5.26 states:
- "Although no exceptional substantial change to the Green Belt is envisaged at this time, other more location specific detailed boundary changes may be required to meet exceptional purposes. Where such changes would not require a reconsideration of wider green belt boundaries through a strategic study and would comply with guidance in PPG2, they should be dealt with through the LDF process, subject to early consultation with, and the agreement of, the Regional Planning Body. Policy RDF4 confers that agreement in respect of specific changes to meet operational infrastructure requirements at Liverpool John Lennon and Manchester Airports, and to provide for an inter-modal freight terminal at Newton-le-Willows."*
- 5.3 This site has already been tested in terms of its removal from the Green Belt. Continued allocation of this site could avoid the need for Green Belt release over the plan period.

- 5.4 Davenport Green provides an outstanding opportunity to extend the airport, and/or expand upon airport related activity and can be delivered without a need to release additional Green Belt land.
- 5.5 We consider the re-designating land surrounding Manchester Airport to Green Belts could be harmful to the future of the airport.

6. SITE SPECIFIC CONSIDERATIONS

- 6.1 The site provides a unique opportunity for the provision of high quality employment land capable of meeting regional, sub-regional and local needs. It would make a significant positive contribution to Trafford's economy.
- 6.2 We do not consider that it is reasonable to appraise the accessibility of this site against the existing infrastructure. The development of the site would be accompanied by improvements to the transport infrastructure, and once developed would represent a highly accessible location. We note that previous UDP policies have taken this into account.
- 6.3 The Employment Land Study identifies that the Airport controls land required to develop a site access. However, the site developers would be working closely with the airport during the delivery of the site, and we do not consider that this represents a genuine constraint.
- 6.4 We consider that the site is deliverable, and no constraints to development exist.

7. CONCLUSIONS

- 7.1 Davenport Green is currently allocated within the Trafford UDP in order to meet regional, sub-regional and local employment needs.
- 7.2 We consider that the deliverability of the council's employment land supply is questionable. We also consider that the current employment land supply is unlikely to provide high quality employment land without displacing existing businesses. Davenport Green is a unique site in a location of national and regional importance, and would meet regional and sub-regional needs.
- 7.3 The site should be considered in the context of its location adjacent to Manchester Airport, including policies RT5 and RDF4 of the RSS.
- 7.4 Davenport Green provides a unique and outstanding opportunity to provide high quality employment land in Trafford. The allocation of the site for employment use is strongly supported.

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12 January 2010

13 JAN 2010

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FAO: Matthew Wansborough

Dear Matthew

CORE STRATEGY FURTHER CONSULTATION ON CORE POLICIES: POLICY L5 CLIMATE CHANGE

I refer to a letter sent by my colleague Becki Hinchliffe on the 22nd December, setting out representations on behalf of Peel Holdings on the draft revisions to a number of the Core Policies in the Core Strategy. In that letter we stated that Peel had concerns with regard to the draft wording on Policy L5 concerning climate change and registered a holding objection to that Policy to allow Peel to consider the possible implications of the draft policy for its land holdings and development aspiration.

Since issuing that holding objection we have sought to obtain a copy of the AGMA Decentralised Energy Report which is referred to at paragraph 1.14 of the November Interim Consultation Paper, in order to assist Peel's understanding of the draft policy, the targets set out and the justification for these.

However, this document has proved not to be available either on the Council's website or that of AGMA and, in an email received from your colleague, Amargit Doow, we have now been informed that the Council does not know when this document will be made available to those wishing to make representations to the Core Strategy.

It is clear that the Council relies heavily upon the AGMA report both to inform and justify draft Policy L5 and that it will be a key part of the Evidence Base for the Core Strategy. Hence, its lack of availability to interested parties during the public consultation is, in our view, most unsatisfactory and calls into question the validity of that consultation insofar as policy L5 is concerned.

Peel's position is that it is not possible for the Company either to assess or make comment on the draft policy and its associated text without having first had sight of the AGMA report. The Council should, therefore, treat this letter as registering a formal objection to draft Policy L5. This objection will be maintained until further written notice.

I would be grateful if you would acknowledge receipt of this letter.

Yours sincerely

Paul Singleton 
Director

cc: D Thompson
B Jeeps

Peel
Stephenson Harwood

Name: Councillor Bernard Sharp

Date received: 27/11/09 (Telephone conversation between Cllr Sharp and Clare Taylor-Russell)

Table R5

Paragraphs 6.12-6.14

There is a need to plan for burial grounds over the Plan period. In particular there is a need to plan for sufficient numbers of segregated burial grounds, to accommodate different faiths.

As a result Table R5 needs to be more explicit in terms of meeting the burial ground needs of all faiths over the plan period.

Trafford Core Strategy – Interim Consultation on Core Policies L2, L4, L5, W1 and R5

Introduction

We are instructed by Shell International Ltd to make representations to the above document and the proposed amendments to the five policies as set out.

Our first general comment relates to the principle of issuing a consultation on five Core Policies in isolation from all of the other related policies in the Core Strategy and the difficulty that brings when trying to comment upon the proposed revisions in context. We must therefore object to the principle of this consultation exercise and question its value when there will be a further opportunity for the Council to consult upon the whole of the Core Strategy early in the New Year.

We would suggest that this whole 'interim consultation' process is scrapped and the revisions proposed to Policies L2, L4, L5, W1 and R5 be deferred until the publication of the Core Strategy in the New Year when there will be an opportunity to review the proposed policy revisions within the context of the whole plan.

Policy L2 - Meeting Housing Needs

This policy should be read in association with Policy L1 and cannot be reviewed in isolation. There are substantial revisions proposed to Policy L2 and it is not clear from the policy how all new residential development proposals are to be assessed unless they are to be 'tested' against all of the points contained in the policy. The policy itself is not clear and would be better broken down into separate policies to deal with Affordable Housing, Old Persons Accommodation and, Gypsy, Roma and Traveller Communities and Travelling Show People. The use of "cold", "moderate" and "hot" market conditions is not clear and could change should for example the proposed mixed use sustainable community at Carrington go ahead. The Core Strategy is supposed to be a spatial strategy for the Borough and it is not therefore appropriate to include such *prescriptive* and inflexible policies in a Core Strategy. Despite its shortcomings the wording of Policy L2 in the June 2009 version of the *Core Strategy* is a more appropriate policy. We therefore object to the wording of this policy.

Policy L4 – Parking

A detailed land use policy in a spatial strategy is inappropriate. There is no need to include Borough wide parking standards, these should be more appropriately incorporated into a DPD following the approval and adoption of the Core Strategy. We would also question the appropriateness of these minimum standards across the Borough in the absence of a commitment to the delivery of high quality public transport infrastructure and, the individual needs of a business that may employ a number of people from outside the Borough who, because of working patterns and lack of alternatives to the car, find that the car parking standards do not allow sufficient on-site parking for essential staff. The wording of the policy should allow for some flexibility and not seek to impose rigid standards regardless of the circumstances of the particular case. We therefore object to the wording of this policy.

Policy L5 – Climate Change

The proposed policy is far too complex and should form a separate DPD outside of the Core Strategy. As drafted it is far too complicated and in our opinion because of this virtually useless as a policy that everyone will be able to understand and implement. Any thresholds should only relate to the standards in place at the time and which can be implemented with the technology available and at a reasonable cost. To ask for anything else, whilst laudable, is unrealistic and the policy as drafted is far too complicated with the justification running into 5 additional pages. Once again this is a very detailed policy inappropriate to a spatial strategy that could be more appropriately incorporated into a DPD. We therefore object to the wording of this policy.

Policy W1: Economy

This policy does not consider the wider sustainability criteria for employment uses and the opportunity that exists to create a mixed use sustainable community at Carrington. It continues to see Carrington as purely an employment allocation and, for all the reasons advanced previously to the Council and, having regard to the 2 previous years of discussions with officers we must object to this policy as drafted. To a greater extent the success of employment generating development will not be influenced by such a planning policy which in some regard is negative in its wording but by market conditions prevalent at the time and the availability of land. Once again this is a very detailed policy much of which could be included with a subsequent DPD. We object to the policy as drafted in so far as it does not recognise the major brownfield mixed use sustainable opportunity at Carrington.

Policy R5: Open Space and Recreation

This policy seeks to impose standards rather than adopt a spatial approach to open space and recreation and one of the major issues is one of on going maintenance of open space and facilities rather than provision. A major opportunity exists at Carrington to release, as part of the mixed use sustainable development, a major area of open space with public access that will have both sub-regional and local significance however there is no mention of this opportunity in the policy. This policy is weak as drafted and offers no thought or ideas to the longer term provision and maintenance of open space and recreation facilities in Trafford. For these reasons we object to this policy.

Conclusions

The revised policies as drafted are in the main far too detailed and have very little to do with a Spatial Strategy for the Borough. Most of the very fine detail contained within them should be included within DPD's rather than a Core Strategy and, despite detailed discussions with the Council, we are disappointed that no reference or recognition is made to the significant role Shell's landownership at Carrington can make to the delivery of the Council's strategy.

Andrew Thomson
BNP Paribas

21.12.09

From: Stephen Hughes [mailto:Stephen.Hughes@sportengland.org]
Sent: Tuesday, March 16, 2010 12:17 PM
To: Franklin, Lesley
Subject: RE: Interim Consultation on the Open Space and Recreation Policy R5 of Trafford's Core Strategy

Dear Lesley

Apologies for the delay in getting back to you on this but I have now managed to review the proposed policy being put forward as part of the Core Strategy and some of the evidence base that sits behind the policy. I have provided my initial comments below: -

Sport England do welcome the inclusion of a specific policy within the Core Strategy (Policy R5) that relates directly to the protection, enhancement and additional provision of existing indoor and outdoor sports facilities to meet residents needs, as required by PPG 17. We do however have some concerns about the evidence base which has been used to develop this policy and have provided some specific comments below in this respect: -

Outdoor Sports Facilities Study – An Assessment of Need March 2009

The study sets out the Council's approach to assessing the quantity, quality and accessibility of outdoor sports provision typology within the Borough and although reference is made to the use of Sport England's methodology for the production of playing pitch assessments (Towards a Level Playing Field), and whilst it does provide useful information relating to some quality issues relating to sites it excludes a crucial element of the approach set out in this document – assessing demand information. This is a critical element of identifying whether there are surpluses or deficiencies of outdoor sports provision within a Borough, without which it is not possible to say with any degree of certainty whether there is sufficient provision to meet current and future demand for pitches within the Borough.

The study itself does not factor in future demand for pitches, which again raises concerns given that the Core Strategy is planning for housing growth of 11,800 new homes up to 2026. This level of growth is likely to result in additional demand for outdoor sports facilities, which improvements to quality alone are unlikely to address. The reasoned justification supporting the policy states that the existing standards contained within the UDP will be carried through into the Core Strategy – again without any robust information/data relating to current demand it is not possible to determine whether the current UDP standards of provision are adequate and equally this UDP standard was not based on the new levels of housing growth set out in RSS which the Core Strategy will need to deliver.

Other areas of concern relating to the study are that it excludes hockey in the list of sports which have been assessed (but includes STP's) and it only seems to have assessed publicly accessible sites. TALPF makes it clear that all sites need to be included in the audit stage and then only those with secured community use in place to be assessed as part of the playing pitch model. The omission of private sites and education sites from the assessment causes problems for the operation of Policy R5 as it could be argued that private sites containing playing fields and those on education sites are afforded little or no protection.

Leisure Management Review (Strategic Leisure)

Sport England have not had an opportunity to fully assess the leisure review work that has been undertaken or the methodology that has been used to inform this study (although reference is made to Sport England toolkit – it is not clear what this is referring to i.e. is it Active Places Power, Facilities planning Model etc). There are concerns about the study making reference to use of national standards in the methodology and there is very limited information presented which shows the methodology used to assess supply and demand across the Borough. In terms of the use of Active Places power, there are limitations with using this tool to assess supply and demand as whilst this will provide an overview at a Borough wide level and benchmark this against other Authorities and the North West, it does not provide a spatial breakdown of supply and demand for individual facilities, does not take into account issues of quality/condition or address cross boundary movements and should only be used to provide background information as opposed to assessing overall demand – a more detailed analysis using the Facilities Planning Model would be able to provide a more robust picture in this respect, however this does not seem to have been used as part of the study.

As such, Sport England has some concerns about references to their being an 'oversupply' of sports halls in the Borough and would like to see how this conclusion has been arrived at together with a bit more information relating to the supply and demand analysis.

In terms of the proposed policy wording, given that there is no standard included for sports hall provision in the Borough, does this mean that all sports hall buildings/sites (unless specifically allocated/designated for protection of in an Allocations DPD) are available for redevelopment or alternative use or is this explained further in the SPD?

Other comments

We would recommend that the policy include reference to sport i.e. Open Space, Sport and Recreation, given that the policy covers this topic area and just to be clear.

In terms of R5.2 the reference to specific documents against which the policy will be assessed in the policy wording could prove problematic – the Core Strategy extends to 2026 yet some of these documents will have limited shelf life's e.g. the leisure review only looks to 2018 from what I can recall – what would happen when these are no longer up to date, would you need to formally review this policy of the Core Strategy? These may be better articulated in any accompanying SPD relating to the operation of the Policy.

Similarly R5.3 and the inclusion of standards within the policy – would required changes to these standards as a result of a revised/updated study mean that the whole policy needs to be formally reviewed?

The table does not include a quality standard for the various typologies and there is question as to how quality improvements will be justified for relevant planning applications given that there is no standard to work to?

Paragraph 6.15 looks to define what an '*an unacceptable loss of open space, sport or recreation facilities*' will mean in practise. An explanation of this approach is welcomed but Sport England has concerns about references to improvements to the remaining area of a site being significant enough to outweigh any quantitative loss – this is a particular concern in relation to playing fields, as this does not follow the approach set out in paragraph 15 of PPG 17 and our playing fields policy. We would like to see this reference omitted from the explanatory text. Equally, the reference to a site being replaced elsewhere to an equivalent size would also need to factor in it being replaced to an equivalent or better quality in a suitable location.

I hope that the above comments are of some use and once again apologies for the delay in coming back to you. I'm happy to come and discuss these points further with you and colleagues if you think that would help. I've not had an opportunity to comment on the SPD as I couldn't find a copy on the website, is this something which is still in draft form?

Kind regards
Steve

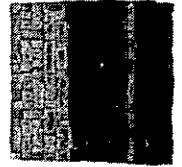
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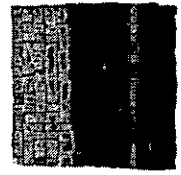


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Trafford Core Strategy: Response to Further Consultation on the Core Policies L2, L4, L5, W1 and R5

Stevenor Investments

December 2009



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Prepared by: Daniel Whitney

Version: Final Draft

Date: 18 December 2009

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Pall Mall Court

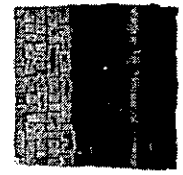
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Manchester

M2 4PD

0161 618 1014

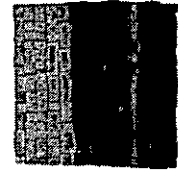
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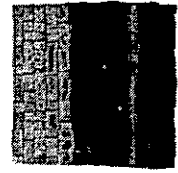
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1 INTRODUCTION

- 1.1 These representations to the Trafford Core Strategy are submitted on behalf of Stevenor Investments, which is part of the Targetfollow Group and controls land at Carrington.
- 1.2 They are intended to address issues arising from general core policy for the Economy (W1) and the amendments made to it in **Further Consultation on Core Policies L2, L4, L5, W1 and R5**. This policy is particularly relevant to our client's site at Carrington.

Client's Landholding

- 1.3 Our client's landholding consists of 18 ha. of brownfield land which was formerly part of the site of Carrington Power Station, for which it acted as the coal stocking area. It currently has a lawful use for storage and airport parking. The site has an access off Manchester Road to the south. The River Mersey meanders around the north and east side and a new power station is being developed to the west. The site remains affected by electricity infrastructure, with power lines crossing it which link electricity plant to the west with a transformer station to the east.
- 1.4 The site falls within the Carrington Priority Regeneration Area (E15) in the existing Trafford UDP despite part of it falling within an identified River Valley Floodplain.
- 1.5 It should be noted that the site is currently included in the "Preferred Options" consultation for waste treatment as part of the evolution of the Greater Manchester Waste Development Plan Document.



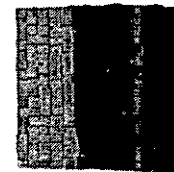
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2 RELEVANT PLANNING POLICY

2.1 We do not propose to repeat all of the relevant national and regional planning policies that were set out in our previous representations, but wish to highlight the following which is pertinent to our submission.

2.2 The amended draft of **PPS4** gives the following recommendations under **Policy EC1.4** which are of specific relevance to Carrington and the points which we wish to make. Amongst other recommendations, local authorities through their local development frameworks should:

- prioritise previously developed land which is suitable for re-use, setting out criteria based policies. Where necessary to safeguard land from other uses, identify a range of sites, to facilitate a broad range of economic development including mixed use to meet the requirements in the regional spatial strategy
- where appropriate, positively plan for the benefits that can accrue when certain types of businesses locate within proximity of each other or with other compatible land uses such as universities and hospitals and other high technology industries
- seek to make the most efficient and effective use of land and buildings, especially vacant or derelict buildings (including historic buildings).



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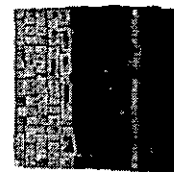
3 ANALYSIS

Policy W1: Economy

- 3.1 We would like to reiterate some of the points regarding this policy that we made in the previous consultation on the Preferred Option, taking into account the amendments that have made to it since.

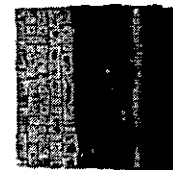
Definition of Employment Land

- 3.2 We previously noted that we had an interest in the precise terms of ‘employment land’ because of the circumstances at our client’s site, which is being considered as a waste management facility with ancillary energy production. This hybrid use did therefore fall into an ‘alternative’ use of the type envisaged in the previous version of Policy W.10.
- 3.3 The Policy has now been updated to specifically state that “*Employment uses within this Policy refer to B1 business, B2 general industry and B8 storage or distribution*” in W1.1.
- 3.4 W1.5 (previously W1.10) has now also been amended with the word ‘alternative’ replaced by ‘non-employment uses’. It is assumed that under this policy such ‘non-employment’ uses are classed as anything other than B1, B2 and B8 and that this includes a waste management facility with ancillary energy production. An application for this form of development would therefore be subject to the criteria in W1.5. We consider that this approach is fundamentally misguided.
- 3.5 The North West RSS defines ‘**employment uses**’ broadly as ‘any undertaking or use of land that provides paid employment’. We do not accept that it should be necessary in relation to our client’s potential facility to show that the site is not required for B1, B2 or B8 purposes, or that there are no suitable alternative sites for the proposed development, when the proposal would have the characteristics of an employment use in terms of appearance, economic benefits and environmental impact.



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- 3.6 We consider that that the policy should explicitly state that waste treatment facilities are acceptable in principle on employment land. We appreciate that the Council may wish to qualify this by setting out the criteria which would be taken into account in looking at the suitability of individual locations.
- 3.7 Similarly, there are certain locations in which additional conventional power generation facilities might be acceptable on land identified as suitable for employment purposes, as has previously occurred in the Strategic Location of Carrington (SL8). We therefore consider that the draft policy should be amended to set out how further proposals for economic development outside of the standard B1, B2 and B8 use classes will be assessed.
- 3.8 Policy W1.6 (previously W1.11) does refer to 'bad neighbour' industries albeit it under a heading 'Hazardous Installations'. However, bad neighbour industry does not have a formal definition, and we would argue that the environmental controls attached to certain of these 'non standard' economic uses, such as modern waste to energy plants, would avoid any material harm to amenity, thus making this approach inappropriate.



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4 CONCLUSION

- 4.1 Following the publication of **Further Consultation on Core Policies L2, L4, L5, W1 and R5**, the core policy on the Economy (W1) is the only one which our client has sought to address.
- 4.2 While the policy has been amended since our previous representations, we do not consider that it provides sufficient clarity for employment uses such as waste treatment facilities with ancillary energy production or for conventional power stations, which do not fall under the policies definition of 'employment uses'. We believe that a degree of re-wording is therefore required to provide clarity on the issues raised. This is particularly the case as power generation facilities have already been deemed acceptable on employment land within the Strategic Location of Carrington and are not adequately covered by other Core Strategy policies.
- 4.3 Our client would be happy to discuss the points made further, and looks forward to continued engagement with the Council as the Core Strategy progresses.