

The
COAL
AUTHORITY



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Web: www.coal/services/planning.gov.uk

Mr Dennis Smith – Head of Strategic Planning & Housing Services
Trafford Council

04 December 2009

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

Dear Mr Smith

Trafford Core Strategy: Interim Consultation on Core Policies

Thank you for consulting The Coal Authority on the above.

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

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

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

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

Yours sincerely

Mark E. N. Harrison *B.A.(Hons), DipTP, MRTPI*
Planning Liaison Officer

FAO Strategic Planning and Development Team
Trafford Council

[By email to: strategic.planning@trafford.gov.uk]

16 December 2009

Dear Sir / Madam

Trafford Core Strategy – Further Consultation on Core Policies

Thank you for consulting The Coal Authority on the above.

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

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

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

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

With kind regards

Yours faithfully

David Berry *B.Sc.(Hons), MA, MRTPI*
Planning Liaison Officer

Harrison, David

From: Hubbard, Alan [alan.hubbard@nationaltrust.org.uk]
Sent: 21 December 2009 13:52
To: Strategic Planning
Subject: Trafford Core Strategy: Interim Consultation on Core Policies L2, L4, L5, W1 and R5 - Response from the National Trust
Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/Madam,

Thank you for notifying the National Trust of the above consultation.

The following comments are offered:

POLICY L2: MEETING HOUSING NEEDS

It is noted that the overall housing target for the Borough is set out in the Policy. In terms of the distribution of that development the Trust would expect this to be dealt with through the forthcoming Land Allocations DPD and in accord with a) the overall spatial strategy as set out on page 26 of the previous consultation document (consideration might be given to titling this as the Core Strategy Spatial Strategy **Policy?**); b) the Key Diagram on page 27; c) the identified Strategic Locations and Sites identified in Part D; and d) other suitable sites identified by more detailed analysis, such as Housing Market Assessment work.

PARKING EXTRACT OF POLICY L4 – SUSTAINABLE TRANSPORT AND ACCESSIBILITY

No comments to make.

POLICY L5: CLIMATE CHANGE

No comments to add to those previously submitted. The intention to produce a SPD relating to Climate Change considerations is welcomed.

POLICY W1: ECONOMY

The Trust is, in most respects, content with the approach proposed - in particular a) the reference to specific spatial locations in Policy W1 (at W1.3); b) the identified Strategic Locations and Sites identified in Part D; and c) sites identified through the forthcoming Land Allocations DPD.

However, it remains concerned about the Employment Land Study as this has not been the subject of any formal consultation and contains incorrect information - specifically in respect of land owned by the National Trust at Broadheath as investment land for disposal at the appropriate time. As drafted the Policy itself does not make reference to the Study, but it is referenced in para 5.5 with specific regard to Table W1 - it is the Trust's view that its land at Broadheath should be retained as part of the available supply of employment land at Broadheath and that there should be minor increase in Table W1 in the amount of land available at Broadheath by some 3 hectares (as there are no specific constraints on the site the land can be available in the period up to 2015/6).

Accordingly the National Trust **objects** to Policy W1 as the detailed information on which Table W1 is based is inaccurate, being based on incorrect assumptions, and has not been the subject of proper scrutiny.

It is noted that this matter has been raised with the Council and reply is awaited to the Trust's latest inquiry as submitted on 4th November 2009.

POLICY R5: OPEN SPACE AND RECREATION

No comments to make.

Regards,
Alan Hubbard

Land Use Planning Adviser (E Midlands & NW)
t The National Trust
Stamford Estates Office
18 High Street
Altrincham
Cheshire
WA14 1PH

Tel: 0161 925 4330
Fax: 0161 929 6819
Email: alan.hubbard@nationaltrust.org.uk

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Harrison, David

From: Rose Freeman [rose.freeman@theatretrust.org.uk]
Sent: 18 December 2009 16:27
To: Strategic Planning
Subject: Core Strategy Interim Consultation
Follow Up Flag: Follow up
Flag Status: Completed

Our Ref.: RF/2712

Core Strategy – Interim Consultation

Thank you for your letter of 23 November consulting The Theatres Trust on Core Policies L2, L4, L5, W1 and R5.

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

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

Policy L4 Car and Cycle Parking Standards

Thank you for including theatres in Table L4. Please note that parking for theatres should also include adequate turning and loading facilities for at least one coach and/or a 16.5m lorry.

We have no comments to make on the other policies but look forward to being consulted on the submission stage of the Core Strategy and any town centre Area Action Plans.

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

planning@theatretrust.org.uk

 Learn more about theatres with our online resource '[Exploring Theatres](#)'

Check out your local theatre on The Theatres Trust [Theatres database](#)'

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29/12/2009

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 Save energy and paper.



Trafford's Core Strategy: Further consultation on Core Policies and Statement of Community Involvement Draft Review

Comment Form – November 2009

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strategic.planning@trafford.gov.uk

Comment Sheet

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

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on Core Policies	✓	Page number	6
Sustainability Appraisal		Paragraph number	2-14
Statement of Community Involvement Draft Review 2009		Policy number	L2 (HOUSING NEED)
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?				
Support		Object		General Comment
	✓			

Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.

The problem could be in ensuring that the affordable housing remains affordable to subsequent occupiers, especially if the private landlord/developer sector is providing the buildings.

Public finance must not be exploited to finance the profits of the building providers s/or first owners.

Please continue on a separate sheet if required
 Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

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Document		Section	
Core Strategy: Further consultation on Core Policies	✓	Page number	7
Sustainability Appraisal		Paragraph number	2.10
Statement of Community Involvement Draft Review 2009		Policy number	L 2 HOUSING NEEDS
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?

Support	Object	General Comment
✓		

Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.

I agree with more residential development in the town centres of TMBC'S area. If / When money gets tight in the next few years, I suspect this policy may come under pressure to be dropped, in favour of building on greenfield sites so as to avoid the clean up costs of brown field sites.

Please continue on a separate sheet if required

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on Core Policies	✓	Page number	12
Sustainability Appraisal	✓	Paragraph number	3.2
Statement of Community Involvement Draft Review 2009	✓	Policy number	L 4 (TRANSPORT)
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?

Support	Object	General Comment
✓		

Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.

Although some parking space is needed to make a development work, this emphasis on encouraging a modal shift away from car usage is welcome and necessary.

The ridiculous ideas of the 1950's + 1960's which saw the car as the solution to all transport problems + therefore we could let buses + trains just wither away are still present in many people's minds; any resurgence of these must be resisted, and the thinking behind 3.2 defended.

Please continue on a separate sheet if required .

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Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on Core Policies	✓	Page number	21-28
Sustainability Appraisal		Paragraph number	WHOLE SECTION
Statement of Community Involvement Draft Review 2009		Policy number	L5 (CLIMATE CHANGE)
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?

Support	Object	General Comment
		✓

Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.

Much detailed work has clearly gone into this section. If the measures it seeks are all implemented, the benefits should be considerable.

However I am concerned by the seemingly complete omission of aviation, because the environmental impact of its uncontrolled growth will negate many of the gains hoped for in L5.

Air, noise and water pollution as well as road traffic (car and lorry) will all increase, thus adversely affecting directly the airport's local inhabitants in 3 council areas, as well as adding to cumulative overall emissions.

Please continue on a separate sheet if required

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on Core Policies	✓	Page number	30
Sustainability Appraisal		Paragraph number	W 1.4
Statement of Community Involvement Draft Review 2009		Policy number	W 1 (ECONOMY)
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?

Support	Object		General Comment
		✓	

Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.

I object to the phrase "including development proposed to support economic activity associated with Manchester Airport." Why is the Airport specifically mentioned here? It is outside the Trafford MBC boundary. This statement should say that any development proposals in TMBC's area associated with Manchester Airport will not be given any special or exceptional treatment. Such wording would protect Trafford residents from the alarming spatial demands of an unrestrained unregulated aviation industry.

Please continue on a separate sheet if required

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Trafford's Core Strategy: Further consultation on Core Policies and Statement of Community Involvement Draft Review

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on Core Policies	✓	Page number	32
Sustainability Appraisal		Paragraph number	5.5
Statement of Community Involvement Draft Review 2009		Policy number	W.1 (Economy)
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?

Support	Object	General Comment
		✓

Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.

This comment is prompted by the phrase: "... without the need to retain the historic UDP allocation for a high amenity employment site at Davenport Green."

As is most welcome news, so I consider that this historic UDP allocation should now be dropped from the LDF.

Davenport Green must be protected from any development which prevents it being used for agriculture or horticulture (including allotments worked by people living locally).

This would offset future loss of UK farm land to increased flood plains or rises in sea levels.

Please continue on a separate sheet if required

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Trafford's Core Strategy: Further consultation on Core Policies and Statement of Community Involvement Draft Review

Comment Form – November 2009

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Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on Core Policies	✓	Page number	32
Sustainability Appraisal	✓	Paragraph number	5.8
Statement of Community Involvement Draft Review 2009		Policy number	W 1 (ECONOMY)
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?				
Support		Object	✓	General Comment

Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.

This paragraph does not state that M/ur Airport is outside the TMBC boundary and within the Manchester City Council area. Nor is it clear whether it refers to Airport proposals to be sited within the MCC boundary but adjacent to TMBC, or to Airport proposals to be sited within TMBC'S boundary.

This paragraph also seems to imply that whatever the Airport wants it will get, irrespective of the impact on nearby inhabitants.

This paragraph should state that any Airport-related proposals will not receive any special or exceptional treatment, and that TMBC will protect its residents from the alarming spatial demands of an airport whose parent Council seems to give it everything it demands (eg: the recent Hasty Lane planning decision).

Please continue on a separate sheet if required

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

Trafford's Core Strategy: Further consultation on Core Policies and Statement of Community Involvement Draft Review

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on Core Policies	✓	Page number	34
Sustainability Appraisal		Paragraph number	5.5
Statement of Community Involvement Draft Review 2009		Policy number	R 5 (OPEN SPACE + REC)
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?				
Support		Object		General Comment
	✓			

Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.

This policy is, I assume, designed to prevent what I believe is called "town cramming" and which is obviously undesirable.

My concern here is that, to implement this policy yet still secure the development, the rules defending open spaces in far less congested areas might be side-stepped in order to keep the offered development within the overall TMBE boundary, instead of it migrating to another Council.

Please continue on a separate sheet if required

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

Cutting, Damien

From: Graeme Scott [Graeme.Scott@traffordhousingtrust.co.uk]
Sent: 24 November 2009 09:32
To: Strategic Planning
Subject: Consultation on Core Strategy further consultation
Attachments: AdditionalCommentSheet_Nov_2009[1].doc; AdditionalCommentSheet_Nov_20092 [1].doc; AdditionalCommentSheet_Nov_20093[1].doc

Please see Comments from Trafford Housing Trust. In general support the document and seems to cover most issues just some minor concerns highlighted on the attached documents

Graeme Scott
Head of Investment and Regeneration
Trafford Housing Trust
0161 968 0099
07970094676
graeme.scott@traffordhousingtrust.co.uk

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Head Office:
Trafford Housing Trust Limited, Marshall House, 2 Park Avenue, Sale, Cheshire M33 6HE
Tel: 0161 968 0000 • Fax: 0161 968 0001
Registered In England No. 04831118 Charity Registration No: 1106967

Trafford's Core Strategy: Further consultation on Core Policies and Statement of Community Involvement Draft Review

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Ack	

Comment Form – November 2009

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Additional Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your full contact details if you are submitting all your comments at the same time, but please put your name on each additional sheet and indicate the total number of comment sheets being submitted on the contact details form.

What are you commenting on? Core Strategy Further consultation on Core Policies L2,L\$,L5,W1 & R5			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document: Development Plan		Section2	
Core Strategy: Further consultation on Core Policies	X	Page number	6
Sustainability Appraisal		Paragraph number	L2.12
Statement of Community Involvement Draft Review 2009		Policy number	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?					
Support		Object		General Comment	X
<p>Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.</p> <p>In general agree with the Cold, Moderate and Hot approach. Though the Trust has concern over Old Trafford being identified as a cold area. A Masterplan is currently looking at how we substantially change this area and improve it over the next 10 years. This will lead to substantial demolition of affordable housing and there will therefore be the need to offer replacement accommodation. A 5% contribution on new developments to provide affordable housing therefore seems to low and this may need further consideration in practice.</p>					
Name:					

Please continue on a separate sheet if required
 Thank you for taking the time to fill in our Core Strategy and Statement of Community Involvement Draft Review comments form, your comments are very much appreciated.

Trafford's Core Strategy: Further consultation on Core Policies and Statement of Community Involvement Draft Review

Comment Form – November 2009

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What are you commenting on? Core Strategy Further consultation on Core Policies L2,L\$,L5,W1 & R5			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document: Development Plan		Section2	
Core Strategy: Further consultation on Core Policies	X	Page number	6
Sustainability Appraisal		Paragraph number	L2.13
Statement of Community Involvement Draft Review 2009		Policy number	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?					
Support		Object		General Comment	X
<p>Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.</p> <p>I would like to reiterate earlier comments that a 50:50 split on affordable housing between intermediate accommodation and rented may be far too aspirational in the current climate. Due to difficulties around mortgages and finance the Trust as an affordable housing provider would be very reluctant to develop a scheme on this basis. A 70:30 rented to intermediate split would be much more practical.</p>					
Name:					

Please continue on a separate sheet if required
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Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document: Development Plan		Section2	
Core Strategy: Further consultation on Core Policies	X	Page number	16
Sustainability Appraisal		Paragraph number	3.3
Statement of Community Involvement Draft Review 2009		Policy number	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Do you support, oppose or have general comments about this specific part of the document?					
Support		Object		General Comment	X
<p>Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.</p> <p>Agree with the proposals around having maximum car parking spaces for residential properties but this needs to be seen a maximum guidance and not what should be provided. Some concern over having 3 maximum spaces on 4 bed properties as this can impact heavily on a developments viability and on an affordable housing development can reduce the number of homes which can be provided for this reason.</p>					
Name:					

Please continue on a separate sheet if required
 Thank you for taking the time to fill in our Core Strategy and Statement of Community Involvement Draft Review comments form, your comments are very much appreciated.



4 South Park Court
Hobson Street
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W: www.epp-planning.co.uk

Representations to
Trafford Council Local Development Framework

DPD1: CORE STRATEGY: FURTHER CONSULTATION ON THE
CORE POLICIES L2, L4, L5, W1 AND R5

EPP reference: Reps5-DPD1-7393-ct

December 2009

CONTENTS:

1.	INTRODUCTION	1
2.	RESPONSE TO CORE STRATEGY	1

1. INTRODUCTION

- 1.1 These representations are submitted in connection with issues identified in the Trafford Council Local Development Framework Core Strategy Further Consultation on Core Policies L2, L4, L5, W1 and R5.
- 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 and representations to the further consultation on the Core Strategy Preferred Option in August 2009.

2. RESPONSE TO CORE STRATEGY

- 2.1 Our representations are set out below with reference to the chapter, page or paragraph numbering of the Core Strategy Preferred Option document.

L1.2 - Meeting housing needs

Affordable housing

- 2.2 Policy L1.2 proposes an affordable housing target of 40% in Altrincham, Mersey Valley and Rural Communities Places. This is to apply to housing schemes of 5 units or more.
- 2.3 We dispute the application of the 40% target to schemes of 5 units or more. This would mean that 2 units of a 5 unit housing scheme would need to be affordable. This would potentially render many smaller schemes unviable. The 40% target should only apply to schemes of 15 dwellings or more.
- 2.4 The requirements and thresholds for the cold and moderate zones are supported.

Older persons accommodation

- 2.5 The policy specifies that 500 units for the frail elderly will be provided within the overall housing land supply.
- 2.6 It is not considered that it is necessary to specify a level of units for the frail elderly. The RSS does not set such a target and there is no requirement within the RSS to do so.
- 2.7 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.
- 2.8 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 households a year over the 18 year period from

2008 to 2026. It is not explained on what basis this has been calculated and this seems very low for the entire plan period.

- 2.9 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.
- 2.10 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.
- 2.11 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:-
- (a) this should be omitted from the policy; or
 - (b) 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 L4 - Sustainable Transport and Accessibility

- 2.12 Three areas are listed for which different parking standards will apply. It is considered that a plan should be prepared to show the boundaries of these areas for clarification. Alternatively, it should be clarified that reference to town centres means the town centres as defined on the proposals map.

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. RSS requires targets for decentralised and renewable or low-carbon energy sources to be set in plans and this is supported.
- 2.14 It is however, considered that the targets set out in the policy are not transparent. The questions on page 26 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. It is not therefore clear how these targets were derived or what public consultation they were subject to. The evidence base must be robust and transparent.

R5 - Open Space and Recreation

- 2.16 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.
- 2.17 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.
- 2.18 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.
- 2.19 We also object to the requirement to contribute to the provision of cemeteries and burial areas as there is insufficient justification for this.
- 2.20 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.
- 2.21 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.