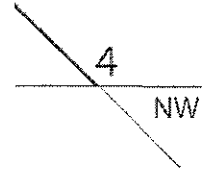


1093

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



Dennis Smith
Strategic Planning and Development
1st Floor Waterside House
Sale Waterside
Sale
M33 7ZF

Our Reference: DP 46

Your Reference: CS/PrefOpt

10th August 2009

Dear Mr Smith,

Consultation –Trafford MBC, A Preferred Option.

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

As you will be aware, the Regional Spatial Strategy for the North West of England¹ was published on 30 September 2008. The plan replaces the previous RSS (formerly RPG13).

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

You will no doubt also be aware of draft legislation³ which sets out the Government's plans for each region to develop a Regional Strategy. It is intended that the Regional Strategy will in time replace the RSS and the Regional Economic Strategy (RES). The draft legislation identifies that the Secretary of State will direct which parts of the current published RSS and RES in each region will be deemed to form the Regional Strategy at the time the legislation is enacted. An important point to note is that the Regional Strategy will be part of the development plan.

In advance of the legislative framework, regional agencies are developing a non statutory version of the Regional Strategy for the Northwest. This will help give the

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

² (link to submission documents website)

³ Local Democracy, Economic Development and Construction Bill (Part 5 of the Bill)

region a head start in the development of a statutory Regional Strategy once the emerging primary legislation is in place. To keep updated on Regional Strategy progress please visit the website <http://www.nwregionalstrategy.com/> and register to receive the regular email newsletters.

Comments

4NW recognise that some of the comments in our response on the issues and options stage have been taken on board within the production of the preferred options document. However we still have various comments and issues we would like to raise at this stage and these are as follows –

In terms of the Preferred Option document, we recognise that the policy direction is generally in line with the RSS, we would like to emphasise the importance of taking into consideration the RSS Spatial Framework; RDF1 states that the second priority for development should be in the inner areas surrounding the regional centres, in this case Manchester. It also states that Altrincham is a third priority town for development. The development principle policies are also key and these are as follows - DP1, DP2, DP3, DP4, DP5, DP6, DP7, D8, DP9 and include spatial principles, promoting sustainable communities, promote sustainable economic development, making best use of existing resources and infrastructure, managing travel demand, increasing accessibility, marrying opportunity and need, rural issues, promoting environmental quality and addressing climate change. We recognise within the spatial strategy that these have been considered.

4NW would also like to state the importance of using previously developed / Brownfield land and the re-use of existing buildings is encouraged by RSS policy DP4 [we note that the Core Strategy has highlighted this and that majority of the local / smaller sites which are identified are previously developed which is in line with DP4.] [The use of previously developed land is also needed within the inner areas where the majority of development should be focused.] L1.6, Pg 31, Object. (113)

We do note that the approach to be taken allows development in and around the inner areas of Trafford, in our previous comments we stated that a combination of Options 1 and 2 would be more appropriate and we recognise that you are planning to take Option 2 forward. We note your justification for this is due to the sustainability appraisal recommendations and this also seems a more deliverable option. This could seem a less specific 'spatial option' as it does cover various areas of the Trafford Borough, however we note that the Spatial Strategy has identified key strategic site (as identified in the RSS) and we also note that apart from the Strategic sites, Altrincham as the Boroughs principal town will be second priority for development in line with RSS Policy RDF 1 and W5. (114)

[We do question the reason for including the 'smaller' development sites within the document, and the fact these are classed as 'strategic' sites, (e.g. SS5, Altair Altrincham) these sites are very localised and small in size and do not specifically fit within the spatial / strategic strategy, these sites should be accounted for within an additional document such as an allocations / site document.] We recognise that there is a focus on these smaller sites and the Council will need to ensure these are deliverable / accessible and can help to achieve the objectives of the Core Strategy, as well as the wider benefits for the city region. We would therefore encourage to consider some alternative methods for delivery of the Core Strategy should not all these sites go ahead. Strategic Sites, Object. (115)

119
Spatial Strategy
Support

The Core Strategy also fits within the spatial priorities defined in RSS for the Manchester City Region, which states plans should support interventions to achieve significant improvement in the sub regions economic performance, secure improvements including enhancement of public transport links and accommodate housing in inner areas.

In terms of Policy MCR2 which deals with the regional centre and inner areas of the Manchester City Region, (including Trafford) this states that plans and strategies should ensure that the regional centre of Manchester continues to grow as the primary economic driver providing the main focus for development, retail, culture and tourism. We note that these are accounted for within Policy W1, W2 and R6.

U1 (120)
Pg 59, Support
W2, Pg 62, Support
R6, Pg 82, Support

RSS Policy MCR2, identifies sites such as Trafford Wharfside, Pomona Docks, Trafford Park which are classed as priority for regeneration, we recognise that these are listed within the Spatial Strategy as first priority for development and investment; inline with MCR2. Policy MCR3 is also relevant here as this incorporates parts of Trafford and the need for regeneration.

SL1, Pg 89, Support
SL2, Pg 91, Support
(121)

Economy

The diversification of Trafford's current economic condition is a key issue for the Core Strategy, and this is highlighted within the spatial strategy and Policy W1. A key objective of the borough's regeneration activities is to improve the local economy by promoting and securing new development (within the strategic sites) which will also contribute to the continued economic growth of the city region. We recognise that there are 6 areas of economic growth identified for Trafford. The proposed approach is mainly consistent with that outlined in policies W1 and MCR5 of the RSS, however we do note (as mentioned above) that the approach does include some dispersed development in smaller settlements which need to be justified in terms of delivery to ensure general conformity with RSS. Pg 59, U1.6, object. (123)

(122)
Pg 59, W1.6
General Comment.

(124)
Policy W1
Support

The preferred option document recognises the importance of improving the boroughs economic performance, reducing unemployment levels and diversifying employment opportunities. This approach is supported by policy W1 of the RSS where the overarching aim of the policy is to strengthen the economy of the North West and this has strong links with the wider aspirations of policy W1 and MCR5.

W2.2, Pg 62
General Comment.
(125)

Interms of retail Altrincham is identified in RSS Policy W5 as a town / retail facility which should be enhanced and encouraged, the approach taken in policy W2 is in line with RSS as the main focus for retail will be in Altrincham, however we note that second priority is listed for Sale, Stretford and Urmston, where focus will be on convenience and comparison stores in line with RSS Policy W5 where is states that investment (of an appropriate scale) in centres not indetified (within RSS Policy W5 - table) will be encouraged in order to maintain their vitality / viability and meet local service needs.

Policy W3 of the RSS deals with the supply of employment land that is expected to be available between 2005 and 2021. Table 6.1, that features within policy W3, sets out supply and need up to 2021 for the five sub-regional areas including Greater Manchester. W3 does not provide a breakdown of these figures to District level and requires Local Authorities and other partners to work together to agree the

distribution of land within each sub-region. 4NW have also produced a note on employment land to provide further clarification on this.⁴

We do recognise that the disaggregation of the RSS sub-regional requirement is currently being considered by the Greater Manchester authorities through a study which will provide evidence to inform the amount of employment land that needs to be provided in Trafford. As there are a list of strategic sites within the document, appropriateness of these sites should be considered by the Council through the Employment Land Review.

126

Strategic Sites,
General Comment

Housing

[In relation to Housing we have the following comments – In terms of Policy L1 we note the use of the word minimum. L1.2 states the Strategy is seeking to accommodate a minimum of 11,800 new dwellings, whilst we recognise that the areas has been identified as a Growth Point, and therefore there is some 'pressure' to develop above the RSS figures, we would like to emphasise that the RSS does not express the provision figures as minimum.] The supporting text clearly states that the figures are not absolute targets and may be exceeded. However similarly the same paragraph says that some areas will achieve lower levels in earlier years (paragraph 7.19). This approach is conformable with RSS, however, RSS itself does not specify that the figures are minimum. It states that Local Authorities should seek to achieve the housing provision set out in Table 7.1 (Policy L4), and that the annual average figures may be exceeded where justified (para 7.19). [In relation to the RSS, therefore, there is no requirement to express the provision as a minimum and if the figures are to be minimum, it will be important to demonstrate that they will be deliverable on that basis.]

127
Pg 31, L1.2(a)
Object.

Table L1, which supports the policy also raises some concern. Clearly the RSS directs residential development to the regional centre (as part of mixed use employment schemes) and the inner areas. The policy in relation to the southern part of the city region (which includes those parts of Trafford outside of the Regional Centre and Inner Areas) is for residential development that supports local regeneration strategies and to meet identified local needs. [The table shows a much higher proportion of residential development in the South City region area as opposed to the regional centre and the inner areas.]

128

Table L1, Pg 34
Object.

Strategic Sites within the regional centre and inner areas which include residential development are in general conformity with RSS [however there could be an issue interms of the Trafford Quays site, as there is a proposal for 1,050 dwellings.] RSS does state that majority of development should be focused in the inner areas this is also mentioned earlier within the response so the Council will need to be content, with delivery of this amount of housing on one site.

129

SS2, Pg 117
Object.

Transport

[In terms of Transport we recognise that Core Policy L4 (Sustainable Transport and Accessibility) commits to accessible locations for development.] Many of the areas identified as strategic locations do seem to be in town centres or close to the Metrolink/public transport network, [however we would question the inclusion of Partington and Carrington. Both of these locations are only served by a single road in/out, they are 'rural' in nature and are severed from the network by the Manchester

130
9.1, Pg 41
General Comment.

⁴ 4NW Employment Note - http://www.nwrpb.org.uk/site/?page_id=537

LA. 1 (e), SL8, SL9, Pg 41, 131, 132, 133, 134, 135
Object

Ship Canal. Subsequently, SL8 (Carrington) specifically mentions the need for a new crossing over the Manchester Ship Canal in order to link to the motorway network, with little information to say how such a major structure would be funded. I'm sure the sustainable nature, or lack of, at these locations has been raised before?]

LA (7) 131, 132, 133, 134, 135
Object

We feel there is a point to raise from a regional highway perspective regarding the amount of development prioritised for the Trafford Park area. This area is adjacent to the M60, which at this particular location (around Junction 9/10) suffers from acute congestion, one main reason being the retail centre - The Trafford Centre. It would be necessary to ensure that further development does not have an adverse impact on this situation.

LA, Pg 42, Para, LA. 8, Support, 133

We would encourage the Core Strategy to have emphasis on development and proposals which will improve pedestrian and cycle access as well as provide additional bus/train services. This will further encourage sustainable travel in line with RSS policies DP5, RT3 and RT9. The importance of Travel Planning and Travel Assessments is also encouraged; the inclusion of walking and cycling to work are important modes to target.

Environment

Policy R3, Pg 74, Support, 134

4NW welcome the inclusion and promotion of multi-functional green infrastructure network within the borough, reflected within policy R3. The policy is positive, and complies with most of RSS EM3 policy. However, the policy could do more to ensure the enhancement of functionality and accessibility. It would be useful if the policy linked to climate change and promoted the positive functionality of GI for example integrating sustainable design such as SUDs. RSS policies DP9 and EM5 emphasise the importance of this approach. 135, Policy R3, Pg 74, Object

Pg 67, Policy R1, Object, 136

Within the core policy R1, reference could also be made to the Biodiversity Resource and Opportunities map within the RSS. The Trafford borough makes up an area where there exists opportunity to expand and reconnect, and expand and buffer current biodiversity resources, consideration should be made for this and how it will be carried forward with the natural environment policy. In relation to the natural environment the strategy could also state that developing a functional ecological framework to address habitat fragmentation and to identify opportunities for expansion.

Pg 48, LA, "Water Object", 137

We are largely supportive of DM3 with regards to planning and water infrastructure issues. We would also encourage Trafford to work with the Water Companies and the Environment Agency when planning the location and phasing of any development / locate development where there is spare capacity within the existing water supply and treatment infrastructure. Where this is not possible, development must be phased so that new infrastructure capacity can be provided without environmental harm.

138, Pg 67, Policy R1, Object

4NW would emphasise the importance of protecting, maintaining and enhancing the historic and natural assets of the borough. The core strategies have supported RSS Policy EM1, with the integration of policy R1 and 2. In addition, within the historic environment policy it is important to reflect upon the North West Joint Character Area Map. It is felt that the strategy could do more in terms of the landscape, to comply with the RSS policy EM1 A. Trafford should highlight this policy and the promotion of landscape character assessments and strategies.]

There is a need for new developments to take measures to ensure that they conserve energy and protect the natural environment, for example taking steps towards the Code for Sustainable Homes. It is important that the policy promotes high quality, well designed, carbon neutral homes to meet the needs of all the community. We are pleased to note that Policy L5 and L7 has taken this into account. Trafford need to make sure that these two policies work effectively together, for example the design of new homes needs to address the climate change policy.

139

Pg 47, L5-3 Support
Pg 54, L7 support

Trafford does not have a separate policy on water management, with policy L5 addressing policy EM5. The promotion of sustainable drainage systems should be encouraged, including retrofitting and future development. We note that further guidance will be given to developers as part of a Sustainability SPD. It is vital that Trafford includes that, wherever possible, new development should be located in areas where flood risk is low and that measures are to be taken to minimise the risk of flooding. Sequential tests / Strategic Flood Risk Appraisal (SFRA) should be undertaken to highlight areas of flooding and the potential levels of risk in terms of probability analysis. Development should be guided by the technical/support document and the SFRA.

141

Pg 31, L5-1 S Support

4NW's stance on sustainable waste management is a mix of policy that is set out in the RSS and also Regional Waste Strategy for the North West (RWS). In particular, EM10, EM11, EM12 and EM13 establish a framework for sustainable waste management, including dealing with its own and imported waste arisings, ensuring sufficient provision of waste management facilities and identifying suitable sites for new or enhanced waste management facilities. The approach contained within these strategies should be viewed as a whole and reflected within Trafford's Core Strategy.

I hope this is of assistance. If you require anything more then please contact me.

Yours faithfully,

Debra Holroyd
Regional Planning Officer

140
Policy L5
Pg 47, Object

142
Policy L6
Pg 52
General Comment

Trafford's Core Strategy: Further consultation on the preferred option

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STRATEGIC PLANNING AND DEVELOPMENTS

17 AUG 2009

Request for Action
 Answer
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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on the preferred option	DPDI	Page number	105-6
Core Strategy summary broadsheet		Paragraph number	24
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	SL9
		Strategic Site reference	
		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.

Development Requirements - (1) Critically important - apart from country lanes there is only the A6144 giving access to the Location from either east or west which is, at peak times, to say the least, liable to congestion. [Justification for the proposal. (5) Redevelopment of the Shopping Centre will - not 'create' but 'support' a more sustainable community.] pg 106, Justification, Object.

(102)

(103)

Name: I.M. STUART A&S CC

Trafford's Core Strategy: Further consultation on the preferred option

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Document		Section	
Core Strategy: Further consultation on the preferred option	DPDI	Page number	107-8
Core Strategy summary broadsheet		Paragraph number	24
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	SL10
		Strategic Site reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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Support	<input checked="" type="checkbox"/>	Object		General Comment	<input checked="" type="checkbox"/>
<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>Justification for the Proposal (4) ... opportunity --- to encourage cycling : to be applauded but also open to abuse. Create linkages to other employment opportunities — what, where, how?</p> <p>Potential for development within the specified boundary is very limited unless designed in green spaces are built on.</p>					
Name: I.M. STUART A88CC					

(104)

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

Trafford's Core Strategy: Further consultation on the preferred option

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Document		Section	
Core Strategy: Further consultation on the preferred option	DPDI	Page number	109-10
Core Strategy summary broadsheet		Paragraph number	24
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	SL11
		Strategic Site reference	
		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	<input checked="" type="checkbox"/>	Object	General Comment	<input checked="" type="checkbox"/>
<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>Map : Selected up-dates have been incorporated on a map which is in general about 20 years out-of-date. The P.O. relocated out of that building about 1990. Roman Road ! never heard it called that in the last forty years!</p> <p>School Road is to the east of the A56. Ashton lane is to the west of the A56, to the redesignation part of the strategy.</p> <p>Kra Street is named - Hope Road is not recognized!</p>				
Name:	M. STUART		A & SCC	

105

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Document		Section	
Core Strategy: Further consultation on the preferred option	DPDI	Page number	111-12
Core Strategy summary broadsheet		Paragraph number	24
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	SL12
		Strategic Site reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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Support	<input checked="" type="checkbox"/>	Object		General Comment	<input checked="" type="checkbox"/>
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>Development Requirements</p> <p>③ Highway improvements critical (Bridgewater Embankment & Tshaw) but difficult to deliver. Residential developments to date and planned have already resulted in problems.</p> <p>④ Protection and enhancement are important - the Luxi warehouse is decaying rapidly.</p> <p>Strategic Proposal: 2,000 sqm of office floor space. Too much emphasis is given to offices. modest workshop facilities must also be incorporated. Units of 40-60-80 sqm are too scarce.</p>					
Name:	M. STUART		A & SCC		

Please continue on a separate sheet if required

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Sustainability Appraisal	Policy number
Equality Impact Assessment	Vision reference
Other document, (please specify)	Objective reference
	Spatial Strategy reference
	Strategic Location reference
	Strategic Site reference
	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
<input checked="" type="checkbox"/>			
<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>Development Requirements: (3) Development of the 'Historic Market Quarter' must be ignited by major investment in the Market itself. (Kings Court (off Railway Street) should be added to the list.] Pg 113, SUS, object (108)</p> <p>[Delivery Mechanism and Funding (3) The most recent proposal is that the residential component for Altair be substantially reduced from the original figure of 150] Pg 114, SL13, General Comment. (109)</p>			
Name: I.M. STUART A & SC			

Please continue on a separate sheet if required

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Document		Section	
Core Strategy: Further consultation on the preferred option	DPDI	Page number	119-20
Core Strategy summary broadsheet		Paragraph number	25
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	553
		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	<input checked="" type="checkbox"/>	Object		General Comment	<input checked="" type="checkbox"/>

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.

110

General: ~~Has~~ Whilst strongly supporting the creation/enhancement of woodland/meadow provision has consideration been given to:-
 In 1989 the restricted access junction from (what is now) the M60 to Stretford Road was closed with the impending opening of the junction to accommodate the Carrington Spur. This had a negative economic impact on the western part of Stretford and the south east part of Urmston.

P.T.O.

Name: I.M. STUART A&S&C

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.

Might consideration be given to the construction of a link from the (northeast) roundabout at junction i.e Carrington Spur/M160 to meet up with Stretford Road (about Newcroft Road). A single carriageway link well flanked by trees as is, now, the Carrington Spur.

Trafford's Core Strategy: Further consultation on the preferred option

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Document		Section	
Core Strategy: Further consultation on the preferred option	DPDI	Page number	121-22
Core Strategy summary broadsheet		Paragraph number	25
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	SSA
		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	<input checked="" type="checkbox"/>	Object		General Comment	<input checked="" type="checkbox"/>

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.

Strategic Proposal: (2) - - - - - will support the redevelopment of the main local shopping centre.
 Justification for the Proposal: (4) - - - - - and will justify the improvement of public transport provision

(111)

Name:

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

Trafford's Core Strategy: Further consultation on the preferred option

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on the preferred option	DPDI	Page number	123-24
Core Strategy summary broadsheet		Paragraph number	25
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	SSP (5)
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

(112)

Do you support, oppose or have general comments about this specific part of the document?				
Support	<input checked="" type="checkbox"/>	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.

Name:

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 Tomorrow

STRATEGIC PLANNING
AND DEVELOPMENTS

17 AUG 2009

Help us shape your area - What does it mean for you?

Delivering the Vision

Rec			
Action by			
Ans			
Copied to			

The Plan sets out 8 aims in order to deliver the Vision. We want to know if these are what you would like us to achieve over the next 15 years in Trafford.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
SO1		✓			
SO2		✓			
SO3		✓			
SO4		✓			
SO5		✓			
SO6		✓			
SO7	✓				
SO8	✓				

Would you like to add any further comments?

Sites for development



The Plan sets out 5 Strategic Sites which will provide the main sites for change, development and regeneration within Trafford. We want to hear your views as to whether you agree with the sites selected.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
SS1 - Victoria Warehouse			✓		
SS2 - Trafford Quays			✓		
SS3 - Stretford Meadows		✓			
SS4 - Partington Canalside		✓			
SS5 - Altair		✓			

Would you like to add any further comments?

Priority locations for development

Along with the sites the plan also includes 13 locations which provide wider areas for change, development and regeneration. We want to hear your views on the identification of these locations.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
Pomona Island (SL1)					
Wharfside (SL2)					
Old Trafford (SL3)					
Lancashire County Cricket Club (SL4)					
Trafford Park Core (SL5)					
Altrincham Town Centre (SL13)					
Carrington (SL8)					
Partington (SL9)					
Sale West (SL10)					
Sale Town Centre (SL11)					
Stretford Crossroads (SL7)					
Trafford Centre Rectangle (SL6)					
Woodfield Road (SL12)					

pg 86, 23, SL 113
Object


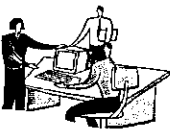

Designating
Priority Locations
as priority change
locations
is of a greater
priority 2 & 3
than those in
priority 3. Areas of
agreed
priority are
not necessarily
groupings
The intention
is to suggest
that the
groupings
are not
necessarily
groupings
Pick the designations
Drawn
Yellow

An explanation as to how the groupings were determined would have helped the reader.

Would you like to add any further comments?

Making it work

We have set out a number of policies that will be used, by the Council, to consider planning applications for development. We want to hear your views on whether, or not what we are proposing are the right policies and will address the issues the Borough faces.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
 Live Policies		✓			
 Work Policies			✓		
 Relax Policies		✓			

Would you like to add any further comments?

About you:

We need to have your details so that we can inform you of the next stage of the plan.

Please note that all comments will be held by the Council on a 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 Tomorrow

Help us shape your area - What does it mean for you?

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SO2		✓			
SO3		✓			
SO4		✓			
SO5		✓			
SO6		✓			
SO7		✓			
SO8		✓			

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SS2 - Trafford Quays		✓			
SS3 - Stretford Meadows		✓			
SS4 - Partington Canalside			✓		
SS5 - Altair		✓			

7-0/31] e b r a u t s i v d o s ?

Would you like to add any further comments?

regarding Partington, give them decent shops and other facilities (101)

Priority locations for development


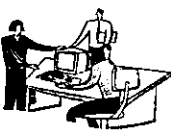

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Pomona Island (SL1)		✓			
Wharfside (SL2)		✓			
Old Trafford (SL3)		✓			
Lancashire County Cricket Club (SL4)		✓			
Trafford Park Core (SL5)	✓				
Altrincham Town Centre (SL13)		✓			
Carrington (SL8)		✓			
Partington (SL9)		✓			
Sale West (SL10)		✓			
Sale Town Centre (SL11)		✓			
Stretford Crossroads (SL7)			✓		
Trafford Centre Rectangle (SL6)			✓		
Woodfield Road (SL12)			✓		

Would you like to add any further comments?

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	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
 Live Policies			✓		
 Work Policies			✓		
 Relax Policies			✓		

Would you like to add any further comments?

policies are very well but it all depends on how they are individually carried out and how successful the long term outcome is

About you:

We need to have your details so that we can inform you of the next stage of the plan.

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Trafford's Core Strategy: Further consultation on the preferred option

Comment Form – June 2009

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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 23
Core Strategy: Further consultation on the preferred option	X	Page number 23 3+5
Core Strategy summary broadsheet		Paragraph number 1.13 and 1.22
Sustainability Appraisal		Policy number
Equality Impact Assessment		Vision reference
Other document, (please specify)		Objective reference
		Spatial Strategy reference
		Strategic Location reference
		Strategic Site reference
		Table/Figure reference
		Other (including omissions and suggestions for alternative approaches)

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Trafford's Core Strategy: Further consultation on the preferred option

Comment Form – June 2009

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

Support		Object	X	General Comment	
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For a Core Strategy to be found sound by the Planning Inspectorate must be assured that the Core Strategy is effective, justified, and consistent with national policy (Para 4.52 of PPS12). In turn, for a Core Strategy to be "justified", it must be founded on a robust and credible evidence base, and must be the most appropriate strategy when considered against the reasonable alternatives (Para 4.36 of PPS12).

Generally, we are concerned that the definition of a Strategic Site/Location remains undeveloped and is not robust (see Para 1.13 and 1.22 of FC). We suggest that a generic designation is not appropriate. Compliance with PPS12 and the regulations involves testing "reasonable alternatives". Representations made by APSL Partnership (A joint venture of Muse (formerly Amec) and Royal London Asset Management) on previous drafts of the Core Strategy have highlighted our concern that Trafford have not undertaken sufficient examination of reasonable alternatives to spatial development in the borough. For example, each of the three preferred options (July 2008) featured the same 11 Strategic Sites; APSL and others (including the Greater Manchester Chamber of Commerce) made representations at this stage expressing concerns that the three options were rigid and showed limited variety between them. The Sustainability Appraisal to the current "Further Consultation" draft of the Core Strategy does not consider any additional sites to the 18 proposed Strategic Sites/Locations – except for Davenport Green.

We are concerned about 1) inconsistencies between several aspects of the evidence base and 2) the robustness of the Core Strategy, and accompanying Sustainability Appraisal, in terms of the testing of reasonable alternatives for spatial development in Trafford. Specifically, Davenport Green has not been included in any of the three preferred options (July 2008) nor in the preferred option for further consultation (July 2009). Davenport Green remains the only site/location which has been subject to assessment which has not been designated as a Strategic Site/Location in each of the three preferred options and the preferred option for further consultation. At the very least, other employment sites allocated in the UDP should have been subject to a similar assessment as Davenport Green; we are unaware of Trafford Council making available a "long-list" of sites/locations which were considered and assessed for their potential to meet the criteria for, or definition of, a Strategic Site/Location. There is no available evidence that the 11 Strategic Sites at the Preferred Options stage (July 2008) were the best 11; nor that 11 was an appropriate number of sites; nor that together these provided the appropriate capacity for development over the plan period. The same concern exists for the 18 Sites/Locations put forward in the Further Consultation on the Preferred Option (July 2009).

Name: Strategic Planning Advice on behalf of APSL

Please continue on a separate sheet if required

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Trafford's Core Strategy: Further consultation on the preferred option

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What are you commenting on?			
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Document		Section	
Core Strategy: Further consultation on the preferred option	X	Page number	23
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)	X	Objective reference	SO3
Employment Land Study		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Trafford's Core Strategy: Further consultation on the preferred option

Comment Form – June 2009

Do you support, oppose or have general comments about this specific part of the document?					
Support		Object	X	General Comment	
<p>Trafford's objective SO3 in the Core Strategy is to meet employment need. A key part of the evidence base, which is used to inform the policies designed to achieve this objective, is the Employment Land Study (ELS). However, the ELS considers this a purely quantitative exercise: which are the most attractive sites to meet the forecast demand for 170ha of employment land over the plan period? Although the ELS does purport to consider the proportion of economic growth forecast by sector (office/industrial/warehousing) and use class (B1/B2/B8) it is not specified which proportion is forecast for each sector. Furthermore, the majority of the 49 assessed sites are specified as being suitable for B1, B2 and B8 uses, so it is unclear which sites are most suited to accommodate the forecast growth in each of the different economic sectors.</p> <p>In conclusion, the ELS applies a single set of criteria in order to assess the suitability of a site for aggregated employment need; across all sectors. In reality, "employment need" is multi-faceted. In order for the Core Strategy to create a policy framework in which the range of sectoral needs can be met – and therefore to achieve objective SO3 – the ELS needs to consider that some forms of employment development will have specific needs which may only be met by certain sites. For example, it is unlikely that many sites in Trafford, other than Davenport Green, would be able to accommodate high-end office occupiers making regionally-significant scale investment (see UDP excerpt below). Therefore, site-specific attributes such as scale and proximity to Manchester Airport should be considered as positive advantages in relation to this specific sub-sector of the B1 employment need.</p> <p style="text-align: center;">"Part II Proposal E14 – Major High Amenity Site – Davenport Green</p> <p>The Council will permit the development of a strategic high amenity employment site on 36.4 Ha (90 acres) of land within a 135.6 Ha (335 acre) estate at Davenport Green, Hale (both areas of land being as defined on the Proposals Map) provided that: -</p> <p>i. The development is restricted solely to use for the following activities within Class B1 of the Town and Country Planning (Use Classes) Order 1987: -</p> <ul style="list-style-type: none"> - High quality, science based/high technology industry; - Research and development activities; - Headquarters office activities; <p>ii. The occupation of the buildings is at all times restricted by legal agreement to companies of national or international importance whose occupation of the scheme would give rise to substantial new employment activities which would otherwise be lost to Greater Manchester.</p> <p>..."</p>					
<p>Name: Strategic Planning Advice on behalf of APSL</p>					

Please continue on a separate sheet if required

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Trafford's Core Strategy: Further consultation on the preferred option

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What are you commenting on?			
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Document		Section	
Core Strategy: Further consultation on the preferred option	X	Page number	26-27
Core Strategy summary broadsheet		Paragraph number	1.20
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	
		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

Generally, we are concerned that many consultation respondents may not read the Core Strategy: Further Consultation alongside the Sustainability Appraisal (SA). The Plan Making Manual specifies that "in commenting on options it would help the public if the performance of different options in the sustainability appraisal is indicated. This is so that they can then see (with the benefit of technical evidence) how different options fare and can in turn use this to assist their own feedback on the options." (<http://www.pas.gov.uk/pas/core/page.do?pagelId=64506>; updated 4 June 2008; accessed 31 July 2009). In reference to the current consultation, neither Trafford BC's website, nor their Statutory notice, make clear that representations are invited on the SA in parallel with the Core Strategy: Further consultation which the SA supports. This is despite the fact that within the Core Strategy: Further Consultation, Para 1.20 describes the SA as an accompanying document. A link to download the SA is provided on the Trafford BC Core Strategy web page under the heading "A range of other supporting documentation has also been prepared and can be downloaded". We have confirmed by email that Trafford BC *is* soliciting consultation responses on the Sustainability Appraisal. However, we remain concerned that 1) the Core Strategy: Further consultation quotes selectively from the SA, without making this quotation explicit; and 2) the consultation arrangements for the Core Strategy: Further consultation have not made it clear that representations are invited on the SA, which is an accompanying document to the Core Strategy: Further consultation.

Name: Strategic Planning Advice on behalf of APSL

Please continue on a separate sheet if required

1072

Trafford's Core Strategy: Further consultation on the preferred option

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on the preferred option	X	Page number	87
Core Strategy summary broadsheet		Paragraph number	23.9 – 23.11
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Trafford's Core Strategy: Further consultation on the preferred

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

Option	Comment Form – June 2009		General Comment
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We are concerned that "questions" relating to deliverability, and compliance with national and regional policy, are not explored or detailed in the Core Strategy: Further Consultation or the accompanying Sustainability Appraisal (SA). Questions are quite different from evidence and carry correspondingly less weight. The Employment Land Study (ELS) provides a cursory assessment of Davenport Green against planning policy in its Appendix. We are also unclear which "emerging spatial strategy" para 23.11 is referring to; the Regional Spatial Strategy for the North West was published in September 2008. Finally, in stating that Davenport Green is "not required" we can only assume para 23.11 is drawing on the ELS, which recommended that Davenport Green be released from Trafford's stock of employment land (as stated at Para 14.5 of the Core Strategy: Further Consultation). Pg 87, 23.11. Object.

105

Development at any site will have both positive and negative impacts. The SA to the Core Strategy: Further Consultation assesses social, environmental and economic impacts, to give an overall assessment of the sustainability of development (see below). We are unfamiliar with the term "positive sustainability impact". Rather, the sustainability of a site for development should be judged once positive and negative impacts are taken into account. Para 23.10 directly quotes from the SA in listing negative impacts; evidence for these potential impacts is to be found in the Appendix to the SA. We suggest that the public should be given a summary of positive impacts as well as negative impacts, in order to be able to respond usefully to this Para. Pg 87, Para 23.10. Object.

106

Regarding Para 23.11, we note that issues of deliverability were considered in Trafford BC's own assessment of employment sites, as part of the Employment Land Study (Para 6.1 of the ELS). If we assume (see note below) that deliverability relates to the "planning policy" and "market attractiveness" aspects of this assessment, detailed in Appendix D of the ELS, then Davenport Green does not score significantly better or worse than a number of other sites, including strategic sites and other sites located within strategic locations. The average score, out of 70, for "planning policy" and "market attractiveness" combined was 51. Davenport Green scored 47 and 17 of the 48 other sites scored lower.

107

Pg 87, Para 23.11 Object

Para 23.11 is not explicit in stating the basis upon which it is "clear" that "the proposal is not required in order to meet employment or housing needs." As the ELS establishes, there is a need for 100-170ha of employment land from 2007 to 2026. None of the sites, individually, are strictly "required" to meet this need. Rather, the Council's responsibility, as part of the Local Development Framework, should be to identify which sites offer the best potential for sustainable economic development, and create a policy framework in which sufficient sites can be expected to come forward for employment development over the plan period (as provided for in PPS12 Local Spatial Planning). Again, the contrast between the Council's proposed policy, and the Council's existing policy framework, for Davenport Green – Policy E14 of the UDP – is striking. The supporting text in the UDP to justify Policy E14 clearly articulated that Davenport Green was an allocation designed to meet a need which exists the regional and sub-regional scale. Hence the allocation of Davenport Green was in addition to employment land allocations at the local scale, to meet local demand. Furthermore, the policy framework for Davenport Green was designed to ensure that Davenport Green complemented employment sites within the existing urban areas, as explained in the excerpt from the UDP below:

108

Pg 87, Para 23.11 Object

"The development of Davenport Green for the activities identified in the Proposal will revitalise the sub-regional economy by attracting wealth-creating/exporting business which might otherwise be attracted elsewhere. It will complement the development of sites in existing urban areas, and thereby promote urban regeneration, by stimulating indirect and spin-off development and jobs in other parts of the conurbation."

(Note: Para 6.1 of the ELS claims that "For this employment land study, Trafford Council have carried out a detailed assessment of the current and potential employment land sites within Trafford. This was completed in terms of location, availability and deliverability". However, location is not an explicit category in the assessment (detailed in Appendix D to the ELS). Location is considered *within* the "sustainability" set of criteria. Availability is considered *within* the "market attractiveness" set of criteria; Davenport Green scores 3/5. Deliverability is not explicitly mentioned.)

1072

Trafford's Core Strategy: Further consultation on the preferred option

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What are you commenting on?			
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Document		Section	
Core Strategy: Further consultation on the preferred option		Page number	Appendix D, p.27-30
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)	X	Objective reference	
Employment Land Study		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

ELS

o

Trafford's Core Strategy: Further consultation on the preferred option

Comment Form – June 2009

Do you support, oppose or have general comments about this specific part of the document?				
Support		Object	X	General Comment
<p>The Core Strategy: Further Consultation states at Para 14.5 that the Employment Land Study (ELS) concludes that retention of Davenport Green is not necessary to meet Trafford's contribution to sub-regional need for employment land. We are concerned that the ELS does not form a robust and credible evidence base. - CS, P61, para 14.5 <i>object</i> + ELS, <i>object</i> p27-31. (110) (109)</p> <p>It is unclear how Trafford BC have defined or assessed "environmental impact". Davenport Green is assessed as having a "high" environmental impact and receives a score of 0/5. The ELS assesses 8 sites within Strategic Location 8 – Carrington. The scores for the 8 sites are either 0, 3, or 5 out of 5. The diversity of scores indicates that Trafford's assessment may be subject to at least one of two concerns: either the assessment only considers environmental impacts at the local scale, which is against Government Guidance (see note below); or – since environmental impacts are typically correlated with scale of development – the assessment is biased toward smaller sites (and fails to take into account cumulative impacts; a large number of small sites in the same locality each with a small impact does not necessarily perform better as an overall strategy than a small number of large sites, each with large impacts).</p> <p>Table 2 attached illustrates a number of inconsistencies. Standard practice in environmental assessment is to consider impacts as either positive, neutral, unknown, or negative. The magnitude of impact may be minor, moderate, or major. In the Trafford ELS assessment, negligible impacts produce a score of 5/5 for one of the SL8 Carrington sites, while no impacts result in scores of 3/5 for two sites.</p> <p>The discrepancy in sustainability scores in the ELS is pronounced and unjustified.</p> <p>(Note: The Government's Guidance Note on preparing Employment Land Reviews (ODPM, December 2004) offers indicative criteria for site assessment of 'high quality' allocated employment sites (Table 4.6). Both on and off-site environmental impacts are considered important (criteria 2.1).)</p>				
<p>Name: Strategic Planning Advice on behalf of APSL</p> <p>Appendix D, Davenport Green MAP, <i>object</i>, p27-31. (111)</p>				

Please continue on a separate sheet if required

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Trafford's Core Strategy: Further consultation on the preferred option

Comment Form – June 2009

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Appendix D, P27-31, Object

There are several other aspects of the Davenport Green assessment about which we are concerned. They relate to our concern, expressed in previous consultations, that it may not be appropriate to apply the same criteria to all types of employment site (large, small, brownfield, greenfield, town centre, high amenity). For example, any development at Davenport Green would involve the creation of pedestrian and cycle links. It is inappropriate to penalise Davenport Green – in an assessment designed to assess potential for future employment use – for a lack of existing pedestrian and cycle links. Draft PPS4 explains that the government's objective is to "improve accessibility, ensuring that existing or new development is, or will be, accessible and well-served by a choice of means of transport including reducing the need to travel and providing alternatives to car use" (Para 6). Draft PPS4 continues: "In assessing whether locations are accessible, local planning authorities should have regard to: whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car and the impact on car use, traffic and congestion" (Policy EC7.5)(our emphasis). The Section 106 agreement between Trafford Council and the developers of Davenport Green is an example of how transport improvements can be guaranteed within the planning consents to ensure that new developments will be accessible upon occupation. Policy E14 of the UDP states that development at Davenport Green must comply with the planning brief (Appendx G of the UDP). The Planning Brief specifies that at Para 2.6:

"The Development Area shall be served by public transport.

The developer shall satisfy the Council that there is a strategy for the provision of public transport to serve the development and that adequate public transport services will be provided when any part of the development is first open. A reasoned estimate of the catchment area for bus borne passengers in a form that will enable the Council to agree the areas to be served and the frequency of the service shall be provided. This process shall be reviewed in the light of the programme to implement Metrolink through the site to Manchester Airport.

The minimum requirement is that public transport shall provide a direct link to Manchester City Centre and the corridor to the site serving Fallowfield, Newall Green, Wythenshawe Centre, Sale, Altrincham, Hale, Timperley and Manchester Airport.

The adequate service provision shall provide an agreed capacity on each bus for site employees such that the projected passenger demand can be met throughout the day. "

Furthermore, if the ultimate objective is to encouraging commuters and visitors to the site to walk and cycle, factors other than the presence of existing links will be important; such as proximity of housing and the ability of employment development to deliver a site-wide travel plan. Davenport Green benefits from ready accessibility to very diverse labour markets to the south and north of the site.

Trafford's Core Strategy: Further consultation on the preferred option

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on the preferred option		Page number	Appendix D, p.31
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)	X	Objective reference	
Employment Land Study		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	
		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	X	General Comment
				<p>The Core Strategy: Further Consultation states at Para 14.5 that the Employment Land Study (ELS) concludes that retention of Davenport Green is not necessary to meet Trafford's contribution to sub-regional need for employment land. We are concerned that the ELS does not form a robust and credible evidence base.</p> <p>We are concerned that Trafford BC's assessment of Strategic Sites/Locations, which forms Appendix D of the ELS which provides evidence to support the Core Strategy, is inappropriate for the diversity of sites/locations which are included. This was a concern we raised during the Key Strategic Site consultation in January-February 2009. For example, the type of employment development which Davenport Green is intended to provide – high quality R&D/HQ office space – is most typically provided on large Greenfield sites, which offer greater flexibility in creating bespoke premises and lower construction costs; this case was fully accepted by Trafford BC when Davenport Green was first designated by the Council and the Council has not demonstrated that circumstances have changed since that time..</p> <p>At present "location type" only appears in the sustainability section of the assessment. Given the fundamental importance of location, it is appropriate that "location type" also be considered in the "market attractiveness" section of the assessment.</p> <p style="text-align: right;">Appendix D, P31. Object</p>
Name: Strategic Planning Advice on behalf of APSL				

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

There are several other aspects of the Davenport Green assessment about which we are concerned. They relate to our concern, expressed in previous consultations, that it may not be appropriate to apply the same criteria to all types of employment site (large, small, brownfield, greenfield, town centre, high amenity). For example, any development at Davenport Green would involve the creation of pedestrian and cycle links. It is inappropriate to penalise Davenport Green – in an assessment designed to assess potential for future employment use – for a lack of existing pedestrian and cycle links. Draft PPS4 explains that the government's objective is to "improve accessibility, ensuring that existing or new development is, or will be, accessible and well-served by a choice of means of transport including reducing the need to travel and providing alternatives to car use" (Para 6). Draft PPS4 continues: "In assessing whether locations are accessible, local planning authorities should have regard to: whether the site is or **will be** accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car and the impact on car use, traffic and congestion" (Policy EC7.5)(our emphasis). The Section 106 agreement between Trafford Council and the developers of Davenport Green is an example of how transport improvements can be guaranteed within the planning consents to ensure that new developments **will be** accessible upon occupation. Policy E14 of the UDP states that development at Davenport Green must comply with the planning brief (Appendix G of the UDP). The Planning Brief specifies that at Para 2.6:

"The Development Area shall be served by public transport.

The developer shall satisfy the Council that there is a strategy for the provision of public transport to serve the development and that adequate public transport services will be provided when any part of the development is first open. A reasoned estimate of the catchment area for bus borne passengers in a form that will enable the Council to agree the areas to be served and the frequency of the service shall be provided. This process shall be reviewed in the light of the programme to implement Metrolink through the site to Manchester Airport.

The minimum requirement is that public transport shall provide a direct link to Manchester City Centre and the corridor to the site serving Fallowfield, Newall Green, Wythenshawe Centre, Sale, Altrincham, Hale, Timperley and Manchester Airport.

The adequate service provision shall provide an agreed capacity on each bus for site employees such that the projected passenger demand can be met throughout the day. "

Furthermore, if the ultimate objective is to encouraging commuters and visitors to the site to walk and cycle, factors other than the presence of existing links will be important; such as proximity of housing and the ability of employment development to deliver a site-wide travel plan. Davenport Green benefits from ready accessibility to very diverse labour markets to the south and north of the site.

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Document		Section	
Core Strategy: Further consultation on the preferred option		Page number	36
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)	X	Objective reference	
Employment Land Study		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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

Support		Object	X
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The Core Strategy: Further Consultation states at Para 14.5 that the Employment Land Study (ELS) concludes that retention of Davenport Green is not necessary to meet Trafford's contribution to sub-regional need for employment land. We are concerned that the ELS does not form a robust and credible evidence base.

The ELS states:

"As part of the consultations, there was also discussion on the potential for the development of Davenport Green, which is a 36.4 Ha Greenfield site located in the Green Belt allocated in the Trafford UDP and identified for business park development off Junction 6 of the M56. The nature of the proposed business park is for a very specific form of employment development with significant requirements/ conditions relating to the design, landscaping and management of the surrounding rural park area any future development would be set within. Trafford Council have suggested that of the 36.4 Ha only 7.28 Ha is capable of being occupied by buildings in order to provide a high quality landscaped setting. The majority of the site will remain greenfield and within the greenbelt comprising a rural park of approximately 99 Ha. Uses within the site are heavily restricted to providing high quality, science based/high technology industry units ; Research and development activities and Headquarters office activities. There are also issues with accessing the site, as Manchester Airport controls the land required to develop a new access point.

The site is currently owned by Muse Developments and despite being allocated through the previous plan period; it has not yet come forward for development. The owners of the site have also been consulted, who feel that the site still offers an opportunity to build a mix of high quality employment floorspace incorporating offices and industrial development. These types of uses are not identified as permissible uses within the revised Trafford UDP."

The ELS is incorrect in this final sentence above. The revised Trafford UDP (adopted 14 June 2006), includes saved Policy E13, which retains Davenport Green as a Major High Amenity Site, as one of 11 of high quality strategic employment opportunities. The assessment that "only" 7.28 Ha is "capable" of being occupied at Davenport Green is (at least) a misconception. The scheme approved by Trafford for 7.28 Ha was designed specifically to attract high end occupiers and hence to provide a high quality landscaped setting. This is unrelated to the theoretical capacity of the site for buildings, and is a fundamental mistake in the ELS. Section 2.3 i) of the Planning Brief for Davenport Green (Appendix G of the UDP) specifies:

"No more than 20% of the Development Area (i.e. approximately 7.28 ha. (18.0 acres)) shall be occupied by buildings (including above ground car parking structures) to secure that: -

- The buildings will have a generous landscape setting;
- A substantial measure of openness will be retained;
- Key landscape features of ecological or visual importance will be retained in situ (as listed in Annex A)." - P.36, Davenport Green Section, Object

Name: Strategic Planning Advice on behalf of APSL

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on the preferred option		Page number	61
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)	X	Objective reference	
Employment Land Study		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Trafford's Core Strategy: Further consultation on the preferred option

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Do you support, oppose or have general comments about this specific part of the document?				
Support		Object	X	General Comment
<p>Para 8.8 of the Employment Land Study (ELS) states:</p> <p>“A key site put forward by developers in Trafford is Davenport Green which is located within the Green Belt and performs poorly in planning policy and sustainability terms from the site assessment undertaken by Trafford Council. Based on the site assessments Trafford Council considers that this land should be released from its current, allocated employment use.”</p> <p>This is an incomplete description and misleading:</p> <ul style="list-style-type: none"> - Davenport Green is a site allocated in Trafford's existing statutory development plan, which justifies its release from the Green Belt based on exceptional circumstances; as highlighted by NWDA in their representation to the Preferred Options consultation, reversion to Green Belt is itself a proposal, promoted by Trafford Council. - Historically, it has been put forward jointly by Muse (formerly Amec) and Trafford Council as a site which can deliver benefits to the borough and the region. - It is up to Trafford Council to demonstrate that circumstances have changed since the designation of Davenport Green to such an extent that its designation can no longer be justified. <p>In their representation to the Preferred Options Consultation, 4NW stated that any de-allocation of an employment should be backed up by an evidence base. Overall, we are not satisfied that the ELS provides a robust and credible evidence base against which the Core Strategy can justify de-allocation of Davenport Green. P 61, Para 8.8, Object</p>				
Name: Strategic Planning Advice on behalf of APSL				

Please continue on a separate sheet if required

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Document		Section	
Core Strategy: Further consultation on the preferred option	X	Page number	23
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)	X	Objective reference	SO3
Employment Land Study		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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

Support		Object	X	General Comment
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Trafford's objective SO3 in the Core Strategy is to meet employment need. A key part of the evidence base, which is used to inform the policies designed to achieve this objective, is the Employment Land Study (ELS). However, the ELS considers this a purely quantitative exercise: which are the most attractive sites to meet the forecast demand for 170ha of employment land over the plan period? Although the ELS does purport to consider the proportion of economic growth forecast by sector (office/industrial/warehousing) and use class (B1/B2/B8) it is not specified which proportion is forecast for each sector. Furthermore, the majority of the 49 assessed sites are specified as being suitable for B1, B2 and B8 uses, so it is unclear which sites are most suited to accommodate the forecast growth in each of the different economic sectors.

In conclusion, the ELS applies a single set of criteria in order to assess the suitability of a site for aggregated employment need; across all sectors. In reality, "employment need" is multi-faceted. In order for the Core Strategy to create a policy framework in which the range of sectoral needs can be met – and therefore to achieve objective SO3 – the ELS needs to consider that some forms of employment development will have specific needs which may only be met by certain sites. For example, it is unlikely that many sites in Trafford, other than Davenport Green, would be able to accommodate high-end office occupiers making regionally-significant scale investment (see UDP excerpt below). Therefore, site-specific attributes such as scale and proximity to Manchester Airport should be considered as positive advantages in relation to this specific sub-sector of the B1 employment need.

"Part II Proposal E14 – Major High Amenity Site – Davenport Green

The Council will permit the development of a strategic high amenity employment site on 36.4 Ha (90 acres) of land within a 135.6 Ha (335 acre) estate at Davenport Green, Hale (both areas of land being as defined on the Proposals Map) provided that: -

- i. The development is restricted solely to use for the following activities within Class B1 of the Town and Country Planning (Use Classes) Order 1987: -
 - High quality, science based/high technology industry;
 - Research and development activities;
 - Headquarters office activities;
- ii. The occupation of the buildings is at all times restricted by legal agreement to companies of national or international importance whose occupation of the scheme would give rise to substantial new employment activities which would otherwise be lost to Greater Manchester.

... CS, P23, SO3 ⁽¹¹⁶⁾ + ELS, P814 - B20 - See Appraisal Criteria ⁽¹¹⁷⁾

Name: **Strategic Planning Advice on behalf of APSL** Object

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Document		Section	
Core Strategy: Further consultation on the preferred option		Page number	Appendix D, p.8-11
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)	X	Objective reference	
Employment Land Study		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

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Do you support, oppose or have general comments about this specific part of the document?				
Support		Object	X	General Comment
<p>The Employment Land Study (ELS) assess five sites which lie within the Wharfside area designated as a "sub-regional site" in the Unitary Development Plan (UDP). Like Davenport Green, none of the five sites has attracted employment development since their allocation in the UDP. It is therefore curious that each of the sites is assessed at the maximum 5 out of 5 points under the "commercial viability" criterion. Davenport Green is scored at 1 out of 5, justified by the statement that "there has been no market interest in the site for the uses identified in the UDP".</p> <p>For two of the sites, this score is considered to be justified by the granting of a previous planning permission. For two other sites, the development at MediaCity:UK (located in Salford, north of the Manchester Ship Canal from Trafford Park) is listed as being a factor demonstrating commercial viability. And for all but one of the sites, "location in the regional centre" is listed as a factor in commercial viability. We question the relevance of 1) MediaCity:UK and 2) location in the regional centre.</p> <p>1. At the present time, it is uncertain whether MediaCity:UK will attract investment to nearby sites in Trafford. Since the UDP was drafted, several regionally significant investment projects have been completed at Salford Quays (the Lowry Centre and the Imperial War Museum); but these have not attracted development to the five sites. In relation to sites in the South of the borough, the continued expansion of Manchester Airport is likely to be of comparable relevance; this should be mentioned as contributing positively in relation to commercial viability at Davenport Green.</p> <p>2. Whilst location in the regional centre is relevant to development control, since the development plan (e.g. the RSS) contains policies which seek to prioritise the regional centre as a location for employment, it bears little relevance to commercial viability. A factor of greater relevance to viability is site contamination, which is a constraint identified for each of the five Wharfside sites assessed in the ELS.</p> <p>In conclusion, given the assessment afforded the five sites within the Wharfside Strategic Location (SL2), we challenge the robustness of the evidence base against which the FC pronounces, at Para 14.5, that sites other than Davenport Green are more "suitable" or "developable". We do not accept that a lack of sufficient market interest to commence development at Davenport Green justifies its de-allocation; the same has held true for several other sites allocated in Policy E13 of the UDP, and the UDP was designed to "provide the framework and priorities for the development, improvement and conservation of land within the Borough of Trafford through to the year 2016" (Para 1.5 of the UDP). There is no provision in the UDP that the allocation of sites should be reviewed during the course of the 20 year plan period.</p>				
Name: Strategic Planning Advice on behalf of APSL				

Please continue on a separate sheet if required

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

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on the preferred option		Page number	29
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal	X	Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

SA

Trafford's Core Strategy: Further consultation on the preferred option

Comment Form – June 2009

Do you support, oppose or have general comments about this specific part of the document?				
Support		Object	X	General Comment
				<p>The Sustainability Appraisal (SA) suggests measures to mitigate negative impacts, however it is unclear whether the assessment for each site is inclusive of the mitigation measures proposed. Against a number of the criteria, the SA (Appendix) envisages negative impacts from development at Davenport Green due to the lack of existing public transport (see "comments" column). However, development at the scale proposed for Davenport Green is likely to be sufficient to support new public transport links, and the site benefits from close proximity to Manchester Airport – described in the RSS as a "key international gateway" and a significant multi-modal interchange for sub-regional rail, bus and coach services, with Metrolink due to arrive in 2012. It is surprising that the SA assessment is so negative against criteria S3, S5 and EC2, given that the UDP stated – in supporting text to justify Policy E14 – Major High Amenity Site – Davenport Green – that development at Davenport Green "will further promote urban regeneration by directly creating jobs of a high quality that are readily accessible to disadvantaged communities in the former Urban Programme target areas of Greater Manchester." – SA, P104-107, (119) criteria S3, S5 & EC2, Object.</p> <p>Again, we are concerned as to whether sufficient work has been undertaken to ensure that the SA – a crucial part of the evidence base for the Core Strategy – is "robust and credible" as required by PPS12 (Para 4.36). The disparity between the level of detail contained within, and the conclusions derived from 1) the Sustainability Appraisal appendix and 2) evidence submitted by Muse (and, we assume, by other site promoters) as part of the Key Strategic Site self-assessment (January and February 2009) is striking. Table 1 attached picks out five criteria against which we think the SA makes an unduly negative assessment, drastically different from the assessment submitted by APSL as part of the Key Strategic Site self-assessment (January and February 2009). The repetitive nature of the SA comments (including the repetition of identical typos) suggest that the assessment has not been sophisticated, for example in only considering the impact of travel patterns on reducing climate change (criteria E3; see attached table). Appendix, P104-107, Object. (120)</p> <p>We have confirmed with Trafford Council that there are no additional supporting documents. We therefore have a further concern that consultation responses received by Trafford BC as part of the Key Strategic Site self-assessment (January and February 2009) have been incorporated into the evidence used to compile the Core Strategy and accompanying Sustainability Appraisal. We therefore request that the Council explains how our comments were taken into account, as the Council has committed to doing in the Statement of Community Involvement (Para 4.35 and bullet 5 of the Council "pledge"), and as required by regulations. We are aware that Trafford will, at submission stage, have to produce a statement (relating to new Regulations 25 or 26) setting out: 1) who was invited to make representations; 2) how they were invited; 3) a summary of the main issues raised by any representations received; and 4) how any representations have been taken into account – P29, Davenport Green Para, Object. (121)</p> <p>We sympathise with the view expressed at the Community Group workshop, conducted as part of the Preferred Options consultation, that "Trafford had already decided on the Plans they wished to take forward, before the start of the consultation period." – General comment. (122)</p>
Name: Strategic Planning Advice on behalf of APSL				

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on the preferred option		Page number	26-27
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal	X	Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	
		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	X	General Comment
				<p>It appears that the summaries within the SA main report, which summarises the detailed content in the Appendix, are inconsistent between sites. In the summaries for SL5 Trafford Park and SL6 Trafford Centre Rectangle (pages 26 and 27 of the SA), the SA notes that "key mitigation actions relate to improving access by public transport" and "improving public transport access will be a key mitigation measure", respectively. No such assurances are provided in the summary for Davenport Green (page 29 of the SA), despite the existence of a Section 106 agreement between Trafford Council and the developers guaranteeing public transport improvements before occupation of development (see Table attached to our representation submitted in relation to page 29 of the SA). Our concern is more general: that the Council have not in their evidence against Davenport Green identified any new issues that were not considered and addressed in the relevant UDP policy and in the planning consent for the development of the site.</p> <p>P26 - 27 + P29, object 123</p>
Name: Strategic Planning Advice on behalf of APSL				

Please continue on a separate sheet if required

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Table 1: Comparison of Muse self-assessment and Trafford Council assessment of Davenport Green for five Sustainability Criteria

Key for effects

++ major positive; + minor positive; 0 neutral; - minor negative; -- major negative; ? uncertain

Trafford Sustainability Criteria/SA Objective	Muse submission to Trafford Council as part of Key Strategic Site Assessment (January-February 2009): score and comments	Trafford Core Strategy Further Consultation on the Preferred Option Sustainability Appraisal: score and comments	Trafford Core Strategy Further Consultation on the Preferred Option Sustainability Appraisal: Mitigation	Mitigation measure established in UDP (Policy E14 – Major High Amenity Site – Davenport Green) or Section 106 (dated 03/01/01)
S3. Enhance transport infrastructure; improve accessibility and quality of life to all communities	++ Extensive proposals for improving access, by public transport, on foot and by cycle, are linked through the s.106 agreement, to the existing planning consent. The preparation of the Core Strategy and the identification of Key Strategic Sites provides an appropriate opportunity to review the proposals to ensure they meet current standards.	- [high certainty] The site is located outside of the Regional Centre and the Inner Area. It is within the Green Belt, inaccessible by public transport and not located close to existing amenities. As a consequence, the location is incompatible with the objective of improving accessibility	Secure significant public transport improvements to improve links to the more deprived areas in Trafford	Policy E14 of the UDP states that development at Davenport Green must comply with the Planning Brief (Appendix G of the UDP). The Planning Brief specifies that at section 2.6: "The Development Area shall be served by public transport. The developer shall satisfy the Council that there is a strategy for the provision of public transport to serve the development and that adequate public transport services will be provided when any part of the development is first open. A reasoned estimate of the catchment area for bus borne passengers in a form that will enable the Council to agree the areas to be served and the frequency of the service shall be provided. This process shall be reviewed in the light of the programme to implement Metrolink through the site to Manchester Airport.

				<p>The minimum requirement is that public transport shall provide a direct link to Manchester City Centre and the corridor to the site serving Fallowfield, Newall Green, Wythenshawe Centre, Sale, Altrincham, Hale, Timperley and Manchester Airport.</p> <p>The adequate service provision shall provide an agreed capacity on each bus for site employees such that the projected passenger demand can be met throughout the day. "</p> <p>Furthermore, Section 3.8 of the Planning Brief makes provision for 1km of new footpaths, 1.8km of new bridleways, and 0.7km of new cycleways.</p> <p>The Section 106 agreement includes a commitment by the Developer to Employment and Training Initiatives (Para 3.7)</p> <p>Schedule 7 of the Section 106 agreement details these initiative as comprising:</p> <ul style="list-style-type: none"> - training and development - awareness - recruitment - communication and marketing to potential occupiers
<p>S5. Reduce poverty and social exclusion</p>	<p>++</p> <p>Some 3500 jobs are expected to be created across a wide range of skills, including high technology and senior management skills. The jobs will be highly accessible to adjacent communities, including Wythenshawe where a dedicated regeneration team is in place. The nearest area of multiple deprivation in Trafford is approximately 2km north east of Davenport Green, as indicated in the Tackling Disadvantage chapter within the Trafford Economic Development</p>	<p>?</p> <p>[low certainty]</p> <p>The scheme would contribute the the generation of a significant number of jobs. However the site is located outside of the Regional Centre and the Inner Area and is not accessible to Traffords more deprived areas where the need for jobs is greatest.</p>	<p>Secure significant public transport improvements to improve links to the more deprived areas in Trafford</p>	

	<p>Plan.</p> <p>The preparation of the Core Strategy and the identification of Key Strategic Sites provides an appropriate opportunity to review the proposals to ensure maximum benefit to disadvantaged communities.</p>		<p>Secure significant public transport improvements to the more deprived areas in Trafford</p>	<p>see above, in row relating to sustainability objective S3</p>
<p>E1. Reduce the effect of traffic on the environment</p>	<p>0</p> <p>The site is located in close proximity to Manchester Airport, which is identified in the RSS as a key public transport interchange within the region's infrastructure.</p> <p>The proposals include measures to reduce motorised traffic, congestion and emissions:</p> <ul style="list-style-type: none"> • Support for improved public transport • Highway improvements • New pedestrian and cycle links to the site <p>The preparation of the Core Strategy and the identification of Key Strategic Sites provides an appropriate opportunity to review the proposals and update the measures to reduce traffic, congestion and emissions.</p>	<p>[high certainty]</p> <p>The site is located outside of the Regional Centre and the Inner Area. It is within the Green Belt, inaccessible by public transport and not located close to existing amenities. As a consequence, the proposals would result in unsustainable patterns of transport</p>		

<p>E3. Reduce contributions to climate change</p>	<p>+</p> <p>Efficiency in the use of energy and the potential for the use of energy from renewable sources will be explored at the detailed design stage. The large area of open land included in the scheme acts as a carbon sink; the proposals will ensure that this part of the site remains open, green and a carbon sink in the long term</p>	<p>-</p> <p>[high certainty]</p> <p>The site is located outside of the Regional Centre and the Inner Area. It is within the Green Belt, inaccessible by public transport and not located close to existing amenities. As a consequence, the proposals would result in unsustainable patterns of transport</p>	<p>Secure significant public transport improvements to improve links to the more deprived areas in Trafford</p> <p>Encourage new buildings to be built to high BREEAM standards</p>	<p>see above, in row relating to sustainability objective S3</p>
<p>EC2. Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage</p>	<p>++</p> <p>The development will:</p> <ul style="list-style-type: none"> • create some 3500 jobs with a wide range of skills • provide a training programme to assist those in deprived communities to access the new jobs • support additional bus services, footpaths and cycleways which will improve access to the jobs from communities undergoing regeneration, 	<p>?</p> <p>[low certainty]</p> <p>The scheme would contribute to the generation of a significant number of jobs. However the site is located outside of the Regional Centre and the Inner Area and is not accessible to Traffords more deprived areas where the need for jobs is greatest.</p>	<p>Secure significant public transport improvements to improve links to the more deprived areas in Trafford</p>	<p>see above, in row relating to sustainability objective S3</p>

Table 2 - Environmental assessment scores for eight employment sites in Carrington
Source: Trafford Council Employment Land Study (ELS; May 2009) and SPA

Site (Reference) [Size] ELS	Environmental Impact ELS	Score (0-5) ELS	Comments SPA
Carrington Business Park (32005/00) [5.8ha]	None	3	<i>If it is true that there will be no environmental impacts from development at this site, a score of 5 would be more appropriate, as was assessed for the "Former Gas Works" site.</i>
Former Powergen Site - Phase 1 (32012/01)[16.54ha]	High - detrimental impact on SBI and potential impact on canal and watercourses.	0	
Former Carrington Power Station (32020)[5.19ha]	Moderate - site is partially covered by woodland and wildlife corridor policies and is adjacent to the River Mersey.	3	<i>We are concerned that moderate impacts are given the same score as "no" environmental impacts.</i>
Shell Chemical Works (32008/00)[4.5ha]	Moderate - area is currently greenfield.	3	<i>Greenfield is a planning category, with only indirect correlation to environmental impacts</i>
Former BP Terminal (32013/03)[2.09ha]	-	3	<i>If it is true that there will be no environmental impacts from development at this site, a score of 5 would be more appropriate, as was assessed for the "Former Gas Works" site.</i>
Former BP Terminal (32013/04)[27.17ha]	High - negative impact on SBI. Part of site is covered by UDP environmental policies - protected open space	0	
Former Gas Works (32019/00)[27.6ha]	Negligible - site is already an existing employment area and contains no protected or designated areas.	5	<i>Cf Carrington Business Park and Former BP Terminal</i>
Land at Carrington (32132)[176.9ha]	High - much of the area is undeveloped and borders onto SBI and candidate SSSI.	0	

STRATEGIC PLANNING AND DEVELOPMENTS			
30 JUL 2009			
Rec			
Action by			
Ans			
Copied to			



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28th July 2009
Our Ref: P-07-289/Trafford

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

Dear Sirs

PLANNING & COMPULSORY PURCHASE ACT 2004
Local Development Framework for Trafford
Core Strategy Preferred Options Further Consultation July/August 2009.

1. Introduction and Background

We act as planning consultants for Barclays Bank plc ("the Bank") in respect of the Local Development Framework (LDF) for Trafford and this letter forms the Bank's response to the above document. As a long-established business, the Bank has made a substantial contribution to the vitality and viability of the Borough over the years that it has traded and as a significant stakeholder within the Council's area it is therefore concerned that development plan policies should not fetter the important contribution that it makes to the vitality and viability of town centres. Financial services retailers generally (and the Bank in particular) play a key role in promoting town centre health through high attraction of footfall and as a result, the provision of financial services should be allowed to improve and evolve alongside the significant improvements to shopping provision envisaged over the proposed plan period. Although there are no firm proposals as yet, it is likely that the Bank's representation within the Borough will need to evolve over the life of the LDF.

We responded on behalf of The Bank to the Issues & Options stage of the Development Management and Core Policies in November 2007 and to the Preferred Options stage of the Core Strategy in August 2008 (Your ref: PO1082). In those responses we emphasised that banks are important contributors to town centres and significant attractors of visitation and that this critical role in underpinning town centres and assisting in regeneration should be recognised in all policies on the matter of promoting town centre vitality and viability within the LDF. On behalf of the Bank we have examined the current consultation document, together with a number of background documents and we set out our representations below.

106

P62
W2 Policy
General

107

P62
W2 Policy
General

2. Representations on the Consultation Documents

108

The draft Core Strategy follows the expectation in the Regional Spatial Strategy that Altrincham will be the primary focus for retailing. Strategic Objective SO4 of the Core Strategy sets out the Council's intention to revitalise town centres and Core Policy W2 proposes a continued focus on maintaining and enhancing the role of Altrincham as a main town centre, promoting it as a focal point for further development and diversification. The Bank agrees that maintaining the vitality and viability of Altrincham will be an important part of this process but as we have previously pointed out, the delivery of that aim will largely depend upon major financial investment by private sector stakeholders. It is therefore critical that planning policies do not discourage that investment.

P23
Table 1
SO4
+
Pb2
Policy W2
Para W2.2
Support

109

In our previous representations we criticised some of the retail policies in the Trafford UDP and expressed hope that such outmoded thinking would not be carried forward into the policies in the LDF. We continue to be particularly concerned that a background document for the LDF, the November 2007 Borough Retail and Leisure Study, should be perpetuating the outmoded thinking behind those UDP Policies about non-A1 uses within primary and secondary frontages. The Grimley study suggests that SPD should be prepared to control percentages of uses within frontages. Firstly the use of SPD to set out policy is of course contrary the Government's clear guidance which requires all such policies to be within Development Plan Documents to enable them to be subject to proper examination (PPS12). We note that Policy W2.9b of the Core Strategy does now make brief reference to changes of use from A1, although in the absence of the boundaries which are to be set in the Land Allocations DPD it is not clear what form any policy will take.

Pb3
Policy W2
Para W2.9b
Object
+
Evidence Base
Retail Study
Para 15.7

110

112

Secondly, the suggestion in the 2007 Grimley study appears to be a reaction to "the perceived concentration of non-retail (class A3-A5) uses" in particular locations and does not appear to stem from perceptions about A2 uses. Maintaining quality and diversity in town centres is critical for the Council's intention to promote the vitality of Trafford but the Bank is concerned that the 2007 Retail Study does not reflect the important role played by financial services retailers in promoting vitality, underpinning town centres and assisting in regeneration. By definition, uses that fall within Part A of the Use Classes Order are appropriate in town centres as they are "shopping area uses" and are acceptable without any need for qualification. Whilst local planning authorities may distinguish between primary and secondary frontages within development plans, such designations should be "realistically defined" (PPS6, paragraph 2.17) having regard to such matters as rental levels and yields.

Pb3
Policy W2
Para W2.9b
Object
+
Evidence Base
Para 15.7

113

114

The LDF seeks improvements in shopping provision in town centres and the Bank considers that these should be matched by commensurate improvements to financial services provision. Policy SL13 on Altrincham Town Centre requires development to "positively enhance the vitality and viability of the existing town centre" but this is not compatible with seeking to limit other than A1 uses in primary shopping frontages. The implication that only A1 uses are appropriate derives from very outmoded and discredited thinking that other uses such as A2 detract from the vitality and viability of town centres. The Bank would argue that greater encouragement should be given to the financial services sector because of its contribution to the vitality and viability of town centres. As we have previously drawn to your attention, Government Policy in Circular 03/2005 ("Changes of Use of Buildings And Land" which accompanied the last major revisions to the Use Classes Order) is clear that this sector is "very much a part of the established shopping street scene, and which is expanding and diversifying.....[being] ...uses which the public now expects to find in shopping areas". The wider role played by town centres than a pure shopping function is also recognised throughout PPS6.

P113
Policy SL13
+
Pb2
Policy W2
Para W2.9b
Object

115

116
P62
Policy W2
Para
W2.9 b
Object

The LDF provides an opportunity to revise out-of-date planning policy. The Bank is concerned that unjustified restrictions on A2 uses should not be continued in Trafford's DPDs as this is likely to work against the Government's and the Borough's objective of promoting vitality and viability in town centres. Banks are actually the subject of high levels of visitation and many increasingly present an interesting and varied visual aspect to the street frontage. The Bank has undertaken a number of footfall surveys in connection with its current acquisitions programme at its branches in various towns and cities in the UK. These conclusively show that the levels of footfall associated with bank branches is commensurate with, and often higher than, the best known national multiple Class A1 traders. Class A2 retailers such as the Bank routinely experience very high levels of customer visitation, contributing significantly towards pedestrian movement and therefore the vitality and viability of town centres. Banks have also moved away from the traditional style of frontage for their premises, preferring to have an open, visually interesting and attractive face to the 'high street'. The Bank has become increasingly retail in its presentation and has recently introduced an innovative branch design, which has been developed in association with its customers, to transform banking into what it terms as "a retail focused experience".

117
P62
Policy
W2
General

The Bank estimates that 10 million customers use its branches each week and through listening to their feedback, a design has been developed that meets their requirements for modern banking and provides branches similar in appearance and operation to retail shops. An important focus has been to install technologies to reduce queue times and waiting times for consultation, including new offerings such as Foreign ATMs, new queue call systems, and what is termed the 'Specialist Lounge', for the Bank's Premier customers. Whilst the design of every new branch has to be flexible in order to be sensitive to the requirements of each building occupied, the aim is generally to ensure that at least 80% of the internal space at ground floor is accessible to customers.

118
P62
Policy
W2
General

The Bank believes that there is no good planning reason to restrict the presence of banks at ground floor level in shopping frontages and that the Council should recognise the important contribution of financial services such as banks in both bringing investment and acting as attractors for investment by others, in the wording and application of policies in all the relevant LDF documents. In order to achieve the vision of town centres that offer a wide range of opportunities and activities it is important to recognise the benefit of A2 uses in fostering footfall and pedestrian activity. Planning policies should make it clear that Class A2 financial services retailers such as banks and building societies will be appropriate uses within all shopping frontages and should encourage flexibility to allow changes of use between the A1 and A2 use classes.

119
P62
Policy
W2
General

Furthermore, vibrant centres depend upon major financial investment by private sector stakeholders and in order to maximise such investment the Bank believes that improvements to shopping provision should be matched by commensurate improvements to financial services retailing. There would be considerable benefit to shopping centres in seeking to attract A2 users such as banks who provide a high level of investment in, and maintenance of, their premises resulting in active and attractive street frontages and who also foster very significant footfall and pedestrian activity. This can only assist in providing the confidence and commercial viability necessary for a programme of regeneration and investment that the Core Strategy envisages.

120
P62
Policy
W2
General

The revision to the Core Strategy provides the opportunity to revise out-of-date elements of Trafford's retail policy that are likely to work against the Government's and the Borough's objective of promoting vitality and viability in town centres. Failure to do so risks DPDs being found unsound at examination. The Bank therefore considers that as the Core Strategy will set the direction for other DPDs, it should make it clear that in pursuing the aim of enhancing vitality and viability, both A1 and A2 uses are appropriate in all shopping frontages.

3. Closing Comments

The Bank trusts that the above representations are helpful and that full regard will be taken of them in the preparation of the next stage of the Trafford Core Strategy and in other relevant LDF documents. The Bank reaffirms its commitment to being involved in the preparation of the components of the LDF and in that regard we shall be grateful to be notified of details of all the emerging LDDs.

Yours faithfully

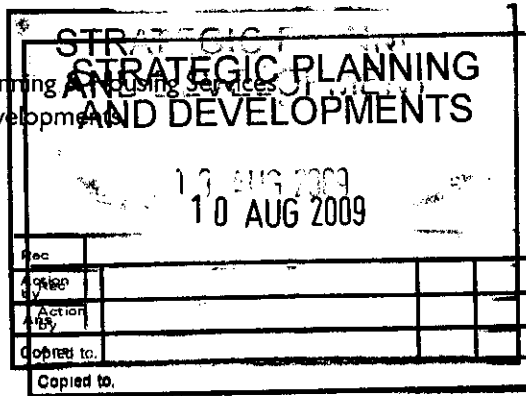
Michael Fearn of Shireconsulting
On behalf of BARCLAYS BANK PLC

1040 - Core Strategy



Date: 06 August 2009

Dennis Smith - Strategic Planning
c/o Strategic Planning & Developments
Trafford Council
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By Hand & Email

Dear Mr Smith

CORE STRATEGY PREFERRED OPTION & 2009 SHLAA - CONSULTATION

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

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

As you can see, we have been and remain actively interested in the Trafford area although given extremely limited resources, rely upon these previous comments along with the following update, given the state of the residential development industry:

1. Existing commitments – our experience is that you will need to assume that many higher density schemes (apartments especially) will not be developed, given the poor state of this market. You might need to discount commitments by in excess of 50% (depending upon the proportion of apartments) to reflect this. Furthermore, due to contractions in the capacity of the house building industry, other commitments should also be discounted, as Developers now have significantly lower expectations based upon much lower sales over the past 12-18 months or so. Failure to make these adjustments will inflate your commitments beyond what will actually be delivered;
2. Following Point 1 above, the Council's 5 year supply will need to be amended accordingly to reflect current market conditions. This will have implications for your SHLAA as sites might need to be brought forward earlier than previously envisaged;
3. As a consequence of the above, there will be greater pressure to identify within your SHLAA sufficient (new?) sites for the Core Strategy period;
4. We remain concerned that the Core Strategy relies too heavily upon those Strategic Sites (Chapter 23) which, whilst important regeneration priorities, will not provide the amount of new homes envisaged. Many of these sites are included for higher density residential use (some as part of mixed use schemes) which are unlikely to come forward in the short term. The commercial market is equally depressed so these schemes will be slower to materialise. We therefore ask that the Council's policies allow for residential development (at lower

140
P 31-33
Policy L1
Object

141
Policy L1
P 33, para
6.11
Object

142
P 86
CHAPTER 23
Strategic Sites
& Locations
Object

densities) elsewhere outside of these areas and that they are not refused for not being within these areas or for prejudicing the delivery of these developments. We otherwise support the policy approach to selected areas and support their regeneration, but simply wish to be realistic in this tough market. If these sites do not deliver, we simply need policy to support (or not obstruct) other sites that can deliver the RSS target for new homes;

5. Trafford is a sustainable location with good connections to the City Region. The above approach does not compromise the Council in delivering sustainable communities;

(143)
P31 Policy
L1
General

6. We ask that Council-owned land and surplus property be positively utilised to deliver new homes and recommend a coordinated approach (Estates and Planning) be adopted. We remain interested in discussing such opportunities with the Council;

P35 Policy L2
General
(144)

7. Affordable homes – with a reduction in completions, the number of affordable homes delivered (almost regardless of policy) will decline. Linked to 6 above, the Council to consider the terms of disposal of their own land in order to achieve the delivery of affordable homes in Trafford (at appropriate locations). Bellway Homes has good relationships with local RSLs and has delivered hundreds of units in the NW Region;

Policy L1
P31-32
para L1.8
(145)

8. PDL – we are still experiencing resistance from landowners to sell PDL at an appropriate value: their expectation is that values will rise and this is halting the release of PDL for development. Any policy / strategy must take this into account. An over-reliance on PDL could jeopardise the delivery of RSS targets (as well as Growth Point uplift for the City Region). We do not have any green field interest in Trafford so have no vested interest.

We consider the above comments to be a realistic reflection of current concerns that need to be reflected in the Core Strategy and SHLAA. We do not believe these to be passing concerns but will have a major impact in the first 5-10 years of your plan period. Nevertheless, we remain actively committed and seek new opportunities, and look forward to working with the planning authority in progressing policy and sites in the plan period.

Regards.

Yours sincerely

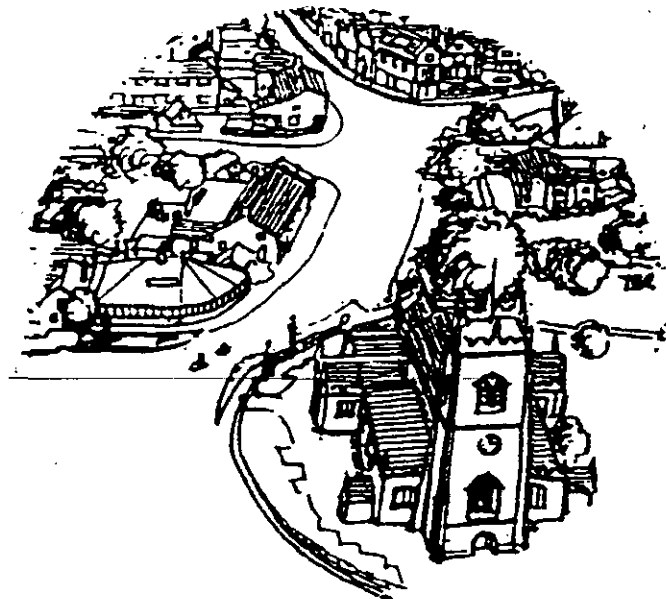
Simon Artiss
Planning Manager
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(Mobile 07855 337232)

BOWDON CONSERVATION GROUP

Registered as a charity since 1973. Reg. No. 502689

Hon Sec: Christine Bainbridge
43 Stamford Road
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0161 941 2006
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Chairman: Alan Bradley



10 August 2009

Strategic Planning & Developments
1st Floor Waterside House
Sale Waterside

Dear Sirs

Trafford Core Strategy: Further consultation on the Preferred Option

In response to your letter of 25 June, we have pleasure in sending the following comments.

105

P31-34 Policy L1
6 L1 - Land for New Homes

Table
L1
Object

We are concerned that Trafford appears to be committed, and without any public consultation to our knowledge, to an uplift of 20% to its minimum housing target set out in RSS Policy L4. Table L1 shows a Policy L1 Allocation total of 11800 units compared to a total of 9300 units in the comparable table in the Preferred Options (July 2008) document albeit the latter figure seems to be for 2 years less. A significant cause of the higher figure is the 20% voluntary uplift in the housing target. Furthermore Table L1 shows that all of this increase of 2500 units from the July 2008 document is to be built in 'Other South City Region Sites' which is to provide 33% of the total units. The Spatial Strategy sets out the Council's priorities in line with RSS for the North West and Table L1 accommodates all these priority sites (or Strategic Locations as they are described) but it still leaves 33% of the total to be built in the South City Region. We consider this results in the following:-

1. The council is not following properly the spatial planning framework set out in RSS for the North West.
2. There will be immense pressure to release sites or units in places which are not priority areas as described in the Spatial Strategy so that the character and appearance of places such as Bowdon will be threatened. We trust that the various guidelines will be adequate to protect the Conservation Areas but it is these and the areas around them which together make up the character of places such as Bowdon and which are an asset to Trafford which could be destroyed.

If the Council cannot find, as it would appear from the document, sufficient units within the Strategic Locations to accommodate the voluntary uplift of 20% then we consider the voluntary uplift should be abandoned.

106

4 Spatial Strategy

p26
4-4

4.4 We would like to see an additional sentence at the end of 4.4 to read 'Urban areas of character value in the south of the Borough would be protected from development.'

107

p26
4-5

4.5 To the sentence in 4.5 we would like added the words 'or playing fields or open land used for formal and informal recreation purposes'.

108

12 L7 - Design

Policy L7
p54
L7.2

In L7.2 we would like included a cross reference to 17 R1 - Historic Built Environment so it is quite clear that development within Conservation Areas and the areas adjacent to them (as per PPG15) has to meet the special design qualities and requirements for Conservation Areas.

109

Page 16 Altrincham & Neighbouring Communities

p16

Key issues
+ place
Objectives

Under Key Issues & Place Objectives - Live, we would like the following clause added 'To ensure new development reflects the characteristics of the areas, in particular the historic buildings in the town centre, the historic parks and conservation areas and the relatively low density suburban family housing neighbourhoods in the south of the area.'

Thank you for including us in the consultation process. If you wish to discuss any points arising from the letter the writer can be contacted on 0161 941 5077.

Yours faithfully

Alan Bradley
Chairman

Trafford's Core Strategy Preferred Options Comments Form
29th June - 10th August 2009

Comments Sheet

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

What are you commenting on? Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.

Document		Section	
Core Strategy: Further consultation on the Preferred Option	<input type="checkbox"/> YES	Page number	113-114
		Paragraph number	
Core Strategy summary broadsheet	<input type="checkbox"/>	Policy number	
Sustainability Appraisal	<input type="checkbox"/>	Vision reference	
Equality Impact Assessment	<input type="checkbox"/>	Strategic Objective reference	
Other document, (please specify)	<input type="checkbox"/>	Strategic Location reference	SL13
		Strategic Site reference	
		Table/Figure Reference Number	
		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 continue on a separate sheet if required

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 this document.

ALTAIR

Apart from the ice rink and hotel, we wish to object to the proposed Altair scheme, as the retail and restaurant aspect will act as a bull shoot and draw business away from the main town centre streets. The latter is dwindling with shops closing and businesses struggling. Any new development should be concentrated in the existing town centre, including Railway St and the old Altrincham General Hospital site and only when there is a need to expand further, should an extension be considered, certainly not beforehand. The town will be split in two and both sides will dwindle.

ALTAIR SCHEME ARCHITECTURAL STYLE

The architect of the Altair scheme is noted for his highly modern and "statement" glass buildings, which are totally inappropriate for the historic market town character of Altrincham, being primarily built of brick, stone and terracotta. The listed Stamford House building, the station and the Bonson Warehouse are all in close proximity to the Altair site and any form of glass and steel building will not be in keeping nor enhance the character of the town, going against all the proposed new policies. Unless the style in the revised Planning Application is compatible with the historic fabric of the town, it should be rejected.

MARKET

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

pg 123,
SSS
object

ALTAIR

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101

pg 123
SSS
object

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102

MARKET

There is no mention in the document about the declining state of Altrincham Market, which is at the core of the town's existence. The roof structure, stone paving patched with black tarmac and grills are all tatty and unsightly. The lower market is equally uninviting and grotty. The market is dying and is no longer a tourist or visitor attraction. Money needs to be spent on the infrastructure and a program put in place to attract more traders and to hold events to encourage people back to the market and consequently the town centre.

103

The poor state of the market is of great concern to residents, Councillors, ATCP, A & S Chamber of Commerce and the various groups and societies, yet there is no mention of it at all in this document. There should be a specific paragraph outlining the problems and suggesting solutions.

TREES & GREEN SPACES

There is no mention of the severe lack of green space and trees in the town centre. Areas such as Central Way, Shaw's Rd, George St, Denmark St and Lloyd St would all look more prosperous and attractive if planted with trees, providing additional much needed environmental benefits.

Again, this lack of greenery is of concern to residents, Councillors, ATCP, A & S Chamber of Commerce and the various groups and societies, yet there is no mention of it at all in this document. There should be a specific paragraph outlining the problem and suggesting solutions.

ALTRINCHAM GENERAL HOSPITAL

There is no mention of the building of a new Altrincham General Hospital and redevelopment of all or part of the old site, both of which will be significant developments in the town. The preferred bidder will be chosen in January 2010, with building starting later that year on one of 3 sites. There should be some mention of that happening.

Trafford's Core Strategy Preferred Options Comments Form
29th June - 10th August 2009

Comments Sheet

Please complete a separate comments 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.

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Document	Section	
Core Strategy: Further consultation on the Preferred Option	<input type="checkbox"/> YES	Page number <input type="text" value="67"/>
		Paragraph number <input type="text"/>
Core Strategy summary broadsheet	<input type="checkbox"/>	Policy number <input type="text" value="R1"/>
Sustainability Appraisal	<input type="checkbox"/>	Vision reference <input type="text"/>
Equality Impact Assessment	<input type="checkbox"/>	Strategic Objective reference <input type="text"/>
Other document, (please specify)	<input type="checkbox"/>	Strategic Location reference <input type="text"/>
		Strategic Site reference <input type="text"/>
		Table/Figure Reference Number <input type="text"/>
		Other (including omissions and suggestions for alternative approaches) <input type="text"/>

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

Support Object General Comment

Please continue on a separate sheet if required

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 this document.

104

We support the intention to carry out Conservation Area Appraisals, as currently they are very out of date, too general and inadequate. Unlike Trafford, most other Boroughs have undertaken professional and comprehensive Appraisals within the last 5 years and it is time we caught up, as they are essential tools in protecting the vulnerable and eroding character of the Conservation Areas.

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



1055

STRATEGIC PLANNING AND DEVELOPMENTS			
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Action by			
Ans			
Copied to: Email: justin.cove@dtz.com			

Dennis Smith
 Strategic Planning and Developments
 1st Floor, Waterside House
 Sale Waterside
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 M33 7ZF

Direct Tel: +44 (0)161 4553761
 Direct Fax: +44 (0)161 834 2055

Our ref:
 Your ref:

7 August 2009

POST AND EMAIL

Dear Dennis

Trafford LDF - DPD1: Core Strategy - Further Consultation on the Preferred Option

We have been instructed by Brixton plc to submit representations in relation to the above document. Our client is a major landowner in the Trafford Park area and their portfolio includes 22 properties covering over 2.4 million sq ft of employment space. Brixton realises the local and regional importance of Trafford Park and where opportunities arise will seek further investment and development opportunities.

Our representations will follow the format of the published document.

Chapter 2 - Trafford Park Spatial Profile

Brixton agree with the context of the Spatial Profile provided in Section 2. Trafford Park already has an extremely strong economic profile that extends far beyond Trafford. The potential to build upon Trafford Park's past success should not be overlooked, and the Key Issues and Place Objectives identified recognise the significant opportunity that is available to create a place to live, learn, work and relax.

(145)
 Pg 10 Spatial Profile, Supp A

Wharfside and Trafford Quays have been singled out as areas appropriate for sustainable residential development, which is an approach that we support. However, the re-use or redevelopment of unused, under-used or derelict land is also identified as an opportunity to develop sustainable residential areas and as such other peripheral sites within the Trafford Park Core should also be considered for appropriate residential development, providing that the integrity and function of Trafford Park as a significant employment destination is not jeopardised. The Spatial Profile needs to reflect this stance.

(146)
 Pg 10. LIVE SUPP A.

Pg 10, LIVE, Object (147)

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Chapter 4 - Spatial Strategy

Brixton welcome the inclusion of Trafford Wharfside (Site SL2) and Trafford Park Core (Site SL5) as first priority sites for development and their inclusion within the defined Regional Centre and Inner Areas as detailed in Figure 4.

Fig 4, Pg 27
SL2, Support

Fig 4,
Pg 27
SL2,5
Support

Pg 28, Para 4.8
Support
in principle

149

Paragraph 4.8 clearly sets out the potential for the Regional Centre and Inner Areas to cater for appropriate residential development, expansion of the knowledge economy and the provision of new communities. Again, this is a principle that Brixton are supportive of. However, there appears to be a conflict between the broad message being conveyed in this chapter, and the prescriptive nature of Chapter 6, which deals with land for new homes.

Chapter 6: Policy L1 - Land for New Homes

The advice set out in PPS3 requires that deliverable sites identified as being suitable for housing, at the point of adoption of the relevant Local Development Document be available, suitable and achievable (reasonable prospect that housing will be delivered on the site within five years). There is also recognition by the Government that there is a limit to the extent local planning authorities can predict the future of their local economies and so a flexible approach to the supply and use of land will be important.

150

When considering the national planning policy basis for the supply of land for housing, we consider the housing figures set out in Table L1 to be too site specific. For example, the 900 units identified within the Trafford Wharfside Strategic Location directly relate to two specific sites identified in the Trafford SHLAA (June 2009) – 1450 Victoria Warehouse (400 units) and site 1609 Wharfside, Trafford Park (500 units). So despite the Spatial Profile stating that Trafford Wharfside as a whole is to be the focus for sustainable residential development, just 2 sites in single ownership have been identified in this location to deliver housing until 2026. In effect, by including the specific targets for each Strategic Location in Table L1, the Core Strategy has introduced a series of Strategic Sites, which requires a substantial set of criteria to be fulfilled.

Table L1
Pg 34
Object

We therefore question whether Table 1 in its current form is the most appropriate format for the Core Strategy and suggest that parameters for broad locations should be introduced rather than a direct correlation between individual sites contained within the June 2009 SHLAA, which is to be updated on a regular basis in any case. The emerging Trafford Park Masterplan would appear to be the most appropriate forum for the analysis of Trafford Park and its environs in respect of the potential for alternatives uses such as residential to be introduced on individual sites.

151

Chapter 9: Policy L4: Sustainable Transport and Accessibility

Brixton fully support the principles set out in the above policy. In order to ensure that Trafford Park continues fulfil its role as part of the Regional Centre and attract investment and development, further investment should be concentrated on the Strategic Highway Network, Integrated Public Transport Network and Freight Transport Network. Without continued support, the aims and objectives for Trafford Park as set out in the Preferred Core Strategy will struggle to be realised.

Pg 41, LA
Support

Chapter 14: Policy W1 - Economy

Brixton welcome the inclusion of Wharfside (SL2), Trafford Park Core (SL5) and Trafford Centre Rectangle (SL6) as Strategic Locations for the focus of economic activity in Policy W1. The obvious strengths these locations can offer should be built upon and further growth should be supported by the Council.

152
W1.6, Pg 59
Support.

Chapter 24 Strategic Locations

SL2 Trafford Wharfside

The Strategic Proposal relating to this site does not go far enough to help achieve the mixed use redevelopment potential that has been earmarked for Trafford Wharfside as referenced throughout the document.

153
SL2, Pg 91
Strategic
Proposal
Object.

Residential development has been restricted to land directly alongside the Ship Canal in relation to the Mediacity development (400 units are also allowed for at Victoria Warehouse under Strategic Site SS1 in Chapter 25). We are in agreement that this is an opportunity that should be taken, however to limit residential to two specific sites limits the potential to achieve a comprehensive mixed use developments throughout Trafford Wharfside. The opportunity to assess proposals on a site by site basis should be catered for and the development of initiatives such as the Trafford Park Masterplan will provide an appropriate vehicle for this to happen. This should be the aim of the Strategic Proposal for this location.

154
SL2, Pg 91
Support
in principle
Object to
limitations of
sites.

SL5 Trafford Park Core

Brixton are keen for Trafford Park to retain its status of national significance and continue to be regarded as the key location for industry and business activity in the Manchester City Region. They are therefore supportive of the stance taken in the Strategic Proposal for Trafford Park Core.

155
Pg 97, SL5
Strategic Proposal
Support

Particular support is given to the proposal to 'improve the public transport infrastructure to provide integrated, frequent public transit system linking the location with surrounding residential and commercial areas.' There is however some uncertainty as to the form of improvements and exactly how they are to be delivered. Delivery of this key transport infrastructure is essential if Trafford Park and the immediately surrounding area is to realistically achieve the sustainable mixed use development referred to throughout the Core Strategy document.

156
Pg 97, SL5
Support.

Pg 97, SL5 Object. 156

SL6 Trafford Centre Rectangle

Brixton support the inclusion of Trafford Centre Rectangle as a Strategic Location and have land holdings immediately adjacent to the Strategic Location that could make a significant contribution towards the sustainable mixed use development included in the Strategic Proposal.

157
Pg 99, SL6
Support

Again, some further clarification may be required with regard to the 'significant improvements to public transport infrastructure' in particular the timing and method of delivery.

Pg 99, SL6
Strategic
Proposal
Object.

Chapter 25: Strategic Sites**SS1 Victoria Warehouse**

There appears to be an error with regard to the site boundary for the Victoria Warehouse Site. Brixton are in ownership of the site referred to as 'Land West of Victoria Warehouse', which was considered as part of the Trafford Employment Land Study (Ref: 70125). The site was subsequently considered as part of the SHLAA, and Page 6 of that document demonstrates that the site was included as part of the Victoria Warehouse site (Ref: 1450), as does Map 2 on Page 110.

In addition to the site's inclusion in the SHLAA, an outline planning application for a comprehensive mixed use development that included Brixton's site in addition to Victoria Warehouse was submitted and a resolution to grant approval (subject to the agreement of a Section 106) was reached at Committee on 11 May 2006. The application comprised of the following:

'Outline application for mixed use development between six and twenty storeys in height comprising 388 residential units, 8,230 sq m hotel use, 15,369 sq m B1 office use, 1,491 sq m D1 leisure use, 876 sq m A1/A2/A3 retail use, 820 sq m community use, 561 underground car parking spaces. Consent sought for siting and means of access, all other matters reserved.'

Brixton are extremely keen to pursue their interests in this site and continue to build upon the extensive work that has already been undertaken in association with the owners of the Victoria Warehouse. [As such, we request that the SS1 boundary be amended to include our clients land as per the SHLAA. Its inclusion allows for more options to be considered as it provides additional land on what is essentially a tightly constrained site.]

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

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

Yours sincerely

Justin Cove
Consulting - Development, Planning and Economics

cc Alex Kington, Brixton plc



embrace the revolution
www.embracewind.com

1164

BWEA
BWEA

Delivering the UK's wind, wave and tidal energy

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Dennis Smith
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STRATEGIC PLANNING AND DEVELOPMENTS			
14 AUG 2009			
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10th August 2009

Dear Mr Smith,

RE: Trafford Council – Core Strategy Preferred Options

BWEA welcomes the opportunity to provide comments in relation to the Council's revised Core Strategy Preferred Options Document and provides this submission on behalf of the UK wind energy industry.

BWEA was established in 1978 and is the representative body for companies active in the UK wind, wave and tidal energy market. Its membership has grown rapidly over recent years and now stands at over 500 companies.

The UK has a rich variety of renewable energy resource, including 40% Europe's wind resource. This resource will need to be utilized if the UK is to deliver its share of Europe's 20% renewable energy target by 2020. Given the UK's low base-line levels of renewable heat, the majority of this target will need to be met through onshore wind. It is therefore important to support and encourage the growth of the sector if the UK is to meet its national and European renewable energy and carbon reduction targets.

In representing the wind industry, BWEA is in a unique position to comment on the circumstances which affect the future growth and development of the sector. BWEA would be pleased to clarify any issues raised and offer any further information which may be required.

Thank you for the opportunity to submit comments on the Core Strategy Document. If you have any queries please do not hesitate to contact me.

Yours sincerely,

Gemma Grimes
Planning Advisor
BWEA
020 7901 3023

Trafford Council – Core Strategy Preferred Options – Comments from BWEA

BWEA welcomes the preparation of the Council's Local Development Framework (LDF) and wishes to emphasise the important contribution that the Council's policies can make in contributing to both the national and regional targets for renewable energy generation. [BWEA strongly recommend that the Council introduce specific policies designed to deliver greater production of renewable energy and increased levels of energy efficiency, in order to minimise the impacts of climate change.]

101

General Comment

Minimising Environmental Impact

BWEA strongly recommend that the Council avoid using generic phrases which simply seek to encourage the use of energy efficiency, renewable energy and the minimisation and management of waste and pollution, for example, as such phrases lack the detail and commitment necessary to ensure that such aspirations are achieved. BWEA therefore strongly recommend the inclusion of an overarching climate change policy within the Core Strategy document, addressing the above issues, and the inclusion of discrete, proactive policies on energy efficiency, renewable energy, sustainable design and construction, within the Development Control Development Plan Document, in order to provide detailed policy direction on each issue and to ensure that such environmental measures are delivered.

102

Policy LS

Pg 47
General Comment

Renewable Energy Policy

The LDF should include a robust criteria based policy that will be used to assess all applications for renewable energy developments. It is important that the Plan presents a positive, objective and robust approach to renewable energy for the wider and local benefit. As such, [BWEA recommend that the Council include specific development control policy on renewable energy, focusing on the key criteria that will be used to judge applications, and providing direct reference to PPS22.] More detailed issues may be appropriate to supplementary planning documents, and guidance on these issues can be found in the Companion Guide to PPS22.

103

LS, Pg 47
General Comment

Planning Policy Statement 22 states that local development documents should contain policies designed to promote and encourage, rather than restrict, the development of renewable energy resources. [BWEA therefore recommend that policies designed to safeguard the character and setting of listed buildings, conservation areas and greenbelt, for example, have regard to the positive contribution that renewable energy can play in reducing the Council's overall CO2 emissions and in mitigating against the environmentally damaging effects of climate change.]

104

LS PPS 22
General Comment

Landscape and nature conservation designations should not be used in themselves to refuse planning permission for renewable energy developments. [Planning applications for renewable energy developments in such areas should be assessed against criteria based policies set out in local development documents, including any criteria that are specific to the type of area concerned. Local authorities should ensure that any local approach to protecting landscape and townscape is consistent with PPS22 and does not preclude the supply of any type of renewable energy other than in the most exceptional circumstances.]

105

LS, Pg 47
General Comment

[Planning authorities should not make assumptions about the technical and commercial feasibility of renewable energy projects (e.g. identifying generalised locations for development based on mean wind speeds). Technological change can mean that sites currently excluded as locations for particular types of renewable energy development may in future be suitable. Similarly, local planning authorities should not require applicants for energy development to demonstrate either the overall need for renewable energy and its distribution, nor question the

106

LS Pg 47
General Comment

energy justification for why a proposal for such development must be sited in a particular location.

(107)

Policy L5
Pg 47
General
Comment

All information requested of applicants should be proportionate to the scale of the proposed development, its likely impact on and vulnerability to climate change, and be consistent with that needed to demonstrate conformity with the development plan and the Climate Change Supplement to PPS1. Specific and standalone assessments of new development should not be required where the requisite information can be made available to the planning authority through other submitted documents – for example, as part of a Design and Access Statement, or Environmental Impact Assessment.

An applicant for planning permission to develop a proposal that will contribute to the delivery of the Key Planning Objectives set out in the Climate Change Supplement to PPS1 should expect expeditious and sympathetic handling of the planning application.

Practical guidance and support for the implementation of the policies in the Climate Change Supplement to PPS1 can be found in its companion guide.

Low and Zero Carbon Developments

The planning system needs to support the delivery of the timetable for reducing carbon emissions from domestic and non-domestic buildings, and local planning authorities are expected to actively encourage smaller scale renewable energy schemes through positively expressed policies in local development documents, as stated in PPS22. Alongside criteria-based policy developed in line with PPS22, the Climate Change Supplement to PPS1 recommends that local authorities consider identifying suitable areas for renewable and low-carbon energy sources, and supporting infrastructure, where this would help secure their development.

(108)

Policy L5
Pg 47
General
Comment

BWEA emphasises the contribution that small renewable systems can make, and strongly urges the Council to implement a policy for the mandatory requirement of onsite renewables, as requested by Yvette Cooper, the Minister for Housing and Planning, on the 8th of June 2006¹. Such a policy would require onsite renewables to provide electricity for at least 10% of all new buildings' needs (including refurbishments), in addition to stringent energy efficiency/building performance requirements. Recent research by the Department for Communities and Local Government found that around a third of Local Authorities surveyed are introducing such policies within Development Plans². Following this research the Government has urged all Council's to include such policies in their Local Plans³.

The following wording is highlighted as an example:

'All non-residential or mixed use developments (new build, conversion, or renovation) above a threshold of 1,000m² will be expected to provide at least 10% of their energy requirements from onsite renewable energy generation.'

All residential developments (new build, conversion, or renovation) of 10 or more units will be expected to provide at least 10% of their energy requirements from onsite renewable energy generation.'

While building regulations will be strengthened over the next decade, BWEA recommend the inclusion of a discrete policy on sustainable design and

¹ <http://www.themertonrule.org/>

² <http://www.communities.gov.uk/index.asp?id=1500549>

³ <http://www.communities.gov.uk/index.asp?id=1002882&PressNoticeID=2167>

(109)

Policy L5
Pg 47
General
Comment

construction methods, and the introduction of minimum efficiency standards for extensions, change of use conversions, and refurbishments / listed building restorations.] Such a policy would help ensure increases in energy efficiency within the existing building stock, as well as in new build development. BWEA recommend looking at the Renewable Energy Toolkit for planners, developers and consultants, developed by the London Energy Partnership for further guidance⁴.

Policy L5
Pg 47
General
Comment

(110)

In accordance with the Climate Change Supplement to PPS1, planning authorities should have an evidence-based understanding of the local feasibility and potential for renewable and low-carbon technologies, including microgeneration, to supply new development in their area. Drawing from this evidence-base, local authorities should:

1. Set out a target percentage of the energy to be used in new development to come from decentralised and renewable or low-carbon energy sources, where it is viable. The target should avoid prescription on technologies and be flexible in how carbon savings from local energy supplies are to be secured,
2. Where there are particular and demonstrable opportunities for greater use of decentralised and renewable or low-carbon energy than the target percentage, bring forward development area22 or site-specific targets to secure this potential; and, in bringing forward targets,
3. Set out the type and size of development to which the target will be applied; and
4. Ensure there is a clear rationale for the target and it is properly tested.

(111)
Policy L5
Pg 47
General
Comment

In addition, BWEA recommend that the development plan provide a brief outline of the different renewable energy generation technologies, and equally encourage and promote all forms of renewable energy (solar, biomass, wind, geothermal, hydro etc). The potential for an Energy Services Company and site-wide CHP should also be considered for inclusion.

Thank you for the opportunity to submit comments on these documents. BWEA looks forward to future opportunities to participate in this consultation. If you have any queries please do not hesitate to contact BWEA.

⁴ http://www.london.gov.uk/mayor/environment/energy/docs/renewables_toolkit.pdf

1156

10th August 2009

Matthew Wansborough
Senior Regeneration Officer
Planning Department
Trafford Borough Council
Sale Waterside
Sale
Greater Manchester
M33 7ZF

carrington
BUSINESS PARK

STRATEGIC PLANNING AND DEVELOPMENTS			
17 AUG 2009			
Rec			
Action by			
Ans			

Dear Sirs,

Core Strategy Preferred Option.

We are writing to register our support for the comments submitted by Shell in respect of the land at Carrington.

We have been in discussion with Shell as part of the preparation of their Vision for Carrington and fully support the proposal to create a mixed use sustainable community at Carrington. For some years now the petrochemical operations on the Carrington site have been reducing and there now is a real opportunity through the Local Development Framework process to secure the long term future of this large brownfield site.

Having regard to the national and regional planning policy framework there is in our view a real opportunity to deliver a sustainable new community on the Shell land based around the existing residential community at Carrington and the businesses such as our own that successfully operate from the site. [Like Shell, we are disappointed that the Council have published the Preferred Option and have made no reference to the potential for a mixed use development at Carrington, notwithstanding the discussions that have taken place over the past 12 months.] Pg 103, Strategic proposal, SL8, Object - (101)

[Whilst we are not in a position to offer the detailed critique of your policies that have been submitted by DTZ on behalf of Shell, we do support the general thrust of their objection and would urge the Council to reconsider the proposals for the land at Carrington, expanding the allocation from employment to a mixed use sustainable community as illustrated by Shell's masterplan Vision.]

I look forward to receiving an acknowledgement of this letter and receiving future notification of changes made to the plan.

Yours Faithfully

Janet Smith
General Manager

- OFFICE
- CONFERENCE
- WORKSHOP

(102)
SL8, Pg 103
Object

1153

Cutting, Damien

From: audrey.carter1@ntlworld.com
Sent: 10 August 2009 15:57
To: Strategic Planning
Subject: Trafford Core Strategy: Further Consultation on Preferred Option

Follow Up Flag: Follow up
Flag Status: Red

Dear Sirs > SL7, Pg 101, General Comment. (101)

(102)
SL7
Pg 101
Strategic
Options
Support

In reply to your letter of 25 June I have read most of the first part of your document with interest. This is a thoroughly thought out paper on the Borough as a whole, but as a resident in Stretford living near the centre I feel that this part of the town needs careful consideration. The Shopping Mall at the moment is not very enticing as so many units are unlet, most likely due to the economic situation. I appreciate this is privately owned. [The Essoldo Cinema has been in private ownership for some years and work in progress is very slow.] Recently a few bricks were replaced at roof level. I know that it is difficult to persuade the owner to 'get a move on', but something needs to be done as this listed building is not being used to its full potential.]

(103)
SL7
Pg 101
General
Comment

Reference is made to Stretford Crossroads Strategic option in relation to housing. Certainly this area needs improving to make more attractive and safer. Cyclists using the pavements in Stretford instead of the cycle path are a menace, as bikes don't have bells these days you can't hear them.

We definitely need a good restaurant. Sale, Urmston and Altrincham have plenty, so why can't we?] SL7, Pg 101, Object.

(104)

These are small points but justified I think.

Yours faithfully

Audrey Carter (Miss)

Delivering the Vision

Although agree to all objectives it is difficult to prioritise as all impact on each other. It is also hard to understand the needs of existing communities and those of the future; who will they be? young people; may not fully understand the impact of current plans and decisions. How does the local core strategy fit in with surrounding authorities including their own priorities and creating a wider reflection/complimentary core plan.

102

Sites for Development

SS3 would like to see more natural safe but challenging play spaces on these plans inc picnic/family dedicated areas. SS4 Partington Not sure how additional housing will help regeneration when there are issues with employment and transport. In each of the planned sited for development there is no mention of schools and/or childcare provision. There is a gap in childcare provision in areas of deprivation evidenced in the Trafford Childcare Sufficiency Assessment Plan 2008. The local authority has statutory responsibility to take a strategic lead and facilitate the childcare market. This is proving very difficult due to the lack of, or extreme costs of venues across the borough. This makes it difficult to attract and develop local accessible childcare for families and employers thus creating a problem for regeneration plans.

103
104

105

Priority locations for development

As raised above these locations for change bring an opportunity for developing spaces/sites for childcare in or around schools and larger commercial business areas. Childcare does need to be sustainable before it can be successful (chicken and egg) and therefor needs to be part of strategic planning process.

106

Making it work

community housing and work/relaxation policies need to work closely and must not be seen as distinct. Need more family friendly work, housing and play spaces to encourage all families and extended families to spend quality time at affordable costs. Although I understand all ages need some space and peace we are not always promoting and encouraging child friendly places within a wider child friendly realm.



ENGLISH HERITAGE

NORTH WEST REGION

STRATEGIC PLANNING AND DEVELOPMENTS			
12 AUG 2009			
Rec			
Your ref:			
Our ref:			
Telephone:	0161 242 1423		

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

10th August 2009

Dear Sir / Madam

Trafford LDF DPD1 Core Strategy: Preferred Option

P22
 paras 3.2-3.3 +
 p23, Table 1 support

(124)

Thank you for consulting English Heritage on the above document. The Core Strategy Vision and Strategic Objectives are supported. I make the following additional comments in order of the document.

P35
 policy L2
 L2.2c
 object

(125)

Policy L1 sets the framework for the supply of land for new housing and includes reference to the conversion and sub-division of existing properties at L1.3. Policy L2 sets out criteria for new development including L2.2c that development will be required not to harm the character or amenity of the immediately surrounding area. Whilst there is of course a need to read the document as a whole and the policies on design and the historic environment will be relevant I suggest that in addition to the surrounding area the criteria could also apply to the site itself.

P54
 Policy L7
 paras 12.3 - 12.4
 object

(126)

Policy L7 Design is supported and the justification text on design quality could also refer to the CABE English Heritage guidance *Building in Context*. I also note that later in the document reference is made to tall and iconic buildings. The CABE English Heritage *Guidance on Tall Buildings* recommends a development plan-led approach to tall buildings and I ask whether a tall buildings policy needs to be included in the LDF. The guidance sets out the steps needed to develop such a policy.

We note the proposed preparation of SPD for Policy L8 on planning obligations and anticipate that this will address those circumstances where the historic environment will need to be covered.

P67
 Policy R1
 support / General

(127)

Policy R1 for the Historic Built Environment is strongly supported for its comprehensive treatment of the historic environment. The justification will require some updating following the publication of the draft PPS 15. Reference to the Urban Historic Landscape Characterisation Report is welcomed and it would be useful to refer to this when developing GI proposals.

P74
 Policy R3
 para 23.1c
 Support

(128)

The references to the historic environment in Policy R3 and its justification are welcomed



(129)

P 82 Policy R6

SUPPORT Policy R6 on Culture and Tourism is supported and refers to planning obligations relating to the historic environment, see above comment.
Para R6.3

(130)

Chap 23+
24, All
Sites + Locations
General

Part D on strategic locations and sites now includes reference to some of the heritage assets included in my previous letter. However as a general comment I suggest that the development requirements should include a more pro-active approach to securing the conservation and enhancement of these assets.

(131)

P 95 SL4
Devel Req
Point 4
Object

Whilst SL2 requires the protection and enhancement of the setting of the listed Town Hall a development requirement should include securing an appropriate use for the building in order to safeguard its long term future. This should be part and parcel of the strategic proposals for the area and merits specific mention in the CS.

(132)

P 99, SL6
Devel Req
Object

SL 6 includes a Grade I church within its boundaries and the need to safeguard and enhance its setting should be included in the development requirements.

(133)

P 101, SL7
Justification
Object

SL 7 makes reference to the listed Essoldo cinema under the justification for the proposal and refers to funding for its re-use. It would be better if the development requirements section set out more clearly the mechanisms to achieve this.

(134)

P 103, SL8
Object

Site SL8 includes a II* Church this should be referred to in the development requirements section of the policy for the same reasons as mentioned above.

(135)

P 111, SL12
Object

We welcome the reference in SL 12 development requirements to the setting of the listed buildings. However the policy should go further than this and address the future of the buildings themselves, how will they be safeguarded for this and future generations.

(136)

P 113, SL13
Object

Policy SL 13 is supported, given the significance of the town centre's conservation areas it is suggested that this area is prioritised for the preparation of Conservation Area Management Plans if this is not already the case.

(137)

P 115, SS
Object / suggested change

SS1 see reference above to tall buildings.

(138)

P 117, SS2
Object

SS2 the reference to the listed buildings in the development requirements section is welcomed. It is suggested that a similar and consistent approach is taken to heritage assets in or adjacent to the sites and locations throughout this section of the document.

Yours sincerely

Judith Nelson
Regional Planner

1096

creating a better place

STRATEGIC PLANNING AND DEVELOPMENTS			
13 AUG 2009			
Rec			
Action by			
Ans			
Copied to.			



Environment Agency

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

Our ref: SO/2006/000285/CS-
 01/PO4-L01
 Your ref:
 Date: 10 August 2009

PLANNING & BUILDING CONTROL			
13 AUG 2009			
C.P.O			

Strat Planning

Dear Sir/Madam

CORE STRATEGY: FURTHER CONSULTATION ON THE PREFERRED OPTION

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

Evidence Base

We are currently involved in the work being undertaken as part of the Level 2 Strategic Flood Risk Assessment and note that this has been referenced within the Core Strategy DPD.

As advised previously, although we support the work being undertaken we would expect that this is completed by the final submission stage as this will inform the sustainability appraisal of the DPD and ultimately the application of the exception test (PPS25).

P26 Spatial Strategy object + (124)

Until this is completed we are unable to endorse the preferred option at this time as the flood risks associated with the preferred option / strategic sites are not fully understood.

Policy 15 P47 Para 15.15 + 15.16 Object + (125)

We are keen to continue to work closely with AGMA in respect of ensuring the completion of the final stage of the SFRA as early as possible.

Chap 23 + Chap 24 - All strategic sites + Locations object + (126)

For information we will also likely to be adopting a similar position to other authorities who do not have a complete SFRA at the preferred options stage of their Core Strategy.

Notwithstanding the above comments, we would also like to make the following comments in relation to the rest of the Core Strategy document:

(127)

Environment Agency
 Appleton House, 430 Birchwood Boulevard, Birchwood, Warrington, Cheshire, WA3 7WD.
 Customer services line: 08708 506 506
 Email: enquiries@environment-agency.gov.uk
 www.environment-agency.gov.uk

Cont/d..



INVESTOR IN PEOPLE

Part C - Section 5: Core Policies

Policy L5: Climate Change

With regards to paragraph L 5.15, we would wish to see an emphasis on avoiding developing in areas of high flood risk. As submitted the current policy only relates to mitigation of flood risk (i.e. submission of flood risk assessments).

We note United Utilities have highlighted sewer capacity and drainage issues (E.g. Partington, Carrington and Media City). As significant developments are planned for those areas these issues will need very careful consideration in any planning applications and developments.

The management of water resources is crucial in ensuring that development is sustainable. An integrated approach towards the management of all aspects of the water cycle; water demand, water supply, water quality and flooding should be adopted as per the Governments vision published in Future Water (2008).

This can be demonstrated via the water cycle study which would contribute to the monitoring and implementation of sustainable development principles.

Under the requirements of the Water Framework Directive (WFD), the draft North West River Basin Management Plan has recently been published for consultation. The draft River Basin Management Plan describes the main issues for each river basin district and highlights some key actions proposed for dealing with them. The Core Strategy should consider the outputs from this document to help achieve the objectives of the Water Framework Directive.

The NW River Basin Management Plan comes into effect in December 2009. Further information on this can be found on our website:

<http://wfdconsultation.environment-agency.gov.uk/wfdcms/en/northwest/Intro.aspx>

The Environment Agency has recently published a strategy for water resources within England and Wales entitled 'Water for People and the Environment'. This strategy sets out how we believe water resources should be managed throughout England and Wales to 2050 and beyond to ensure that there will be enough water for people and the environment. The strategy takes a forward look at the uncertainties the country faces in the face of climate change, increase in population and changes in lifestyle.

A copy of the strategy can be found at the following link:

<http://publications.environment-agency.gov.uk/pdf/GEHO0309BPKX-E-E.pdf>

Policy L8: Planning Obligations

We would encourage the use of planning obligations to fund measures to combat climate change. In particular we would suggest this policy could be used to drive the provision of Green Infrastructure (GI) within the borough.

Policy L6 Waste

Whilst recognising many good sustainable waste management practices and

principles, this policy does not appear to capture the requirement in the NW Regional Spatial Strategy regarding the provision of accessible recycling facilities both for residents within Trafford and in the design of new residential properties.

P52
Policy
L6
Object
(134)

The RSS Policy EM11 states that every type of development, redevelopment and regeneration project, should: provide infrastructure that facilitates and meet the needs of local residents, business and industry for segregated storage, collection and recycling of waste materials; incorporate sufficient space to separate and store segregated waste streams waste and enable kerbside collection of materials.

(135)
P52
Policy
L6
Para L6.2

Policy L6 does require the use of site waste management plans for all major construction projects however the RSS Policy EM11 goes further than this to say that every type of development, redevelopment and regeneration project, should: adopt best practice techniques to prevent and minimise waste during the design and construction phases of development.

Object

More emphasis should be placed upon this within Policy L6 in order that waste can be 'designed out' of a development tackling the minimisation of waste and which can compliment an 'end of pipe' solution like a site waste management plan.

P12
Policy R2

Policy R2: Natural Environment

Within the justification of this policy reference is made to Traffords Climate Change Strategy which encourages returning watercourses back to their old state. This could include opening culverts and pulling development back from the river frontage. We would support further reference to this document within the policy wording itself.

Para
18-11
General
(136)

One of the aspirations for the River Basin Management Plan (North West) is to facilitate the opening up of culverts within the region. Not only is there a flood risk and biodiversity benefit, water quality can also be improved.

(137)
P74

Policy R3: Green Infrastructure

We support the policy for Green Infrastructure (GI).

The Environment Agency recognises the importance of GI and supports the development of GI networks. These can help deliver a range of Environment Agency objectives including Water Framework Directive, as well as wider community benefits.

Identifying land as GI where there is a high level of flood risk (I.e. functional floodplain) will provide opportunities to mitigate against flooding and provision of additional compensatory flood storage. This may reduce flood risk at a strategic level and enable development to take place elsewhere. We would recommend that the findings of the SFRA are used to inform the issue of flood risk and GI.

(138)
Part D
chap 23

Part D – Strategic Sites and Locations

We note that specific reference has been made for strategic site SS5 (Altair, Altrincham) for the need to build to high quality standards under BREEAM / Code for Sustainable Homes.

We would expect that this development requirement is identified for all of the strategic sites, particularly as Trafford is part of the AGMA growth point.

Cont/d..

(139)

P 89

SL1

SL1: Pomona Island

SUPPORT

We support the development requirements of reviewing the outputs of the Level 2 SFRA and methods of sustainable energy generation.

(140)

P 91

SL2

SUPPORT

SL2: Trafford Wharfside

We support the development requirements of reviewing the outputs of the Level 2 SFRA and methods of sustainable energy generation.

(141)

P 97

SL5

OBJECT

SL5: Trafford Park Core

Development requirements should include the need to review the findings of the Level 2 SFRA. This strategic location borders both the Manchester Ship Canal and the Bridgewater Canal.

(142)

P 103

SL8

OBJECT

SL8: Carrington

As discussed in our previous consultation response, parts of this site lies within flood zones 2 and 3. Following the output from the Level 2 SFRA we would expect that the sequential approach is applied at site level so that buildings are located away from areas of risk. The principles of Green Infrastructure could be applied in these flood risk areas to provide multifunctional benefits and meet the requirements of policies L5, R2 and R3.

Where it is not possible to locate development away from flood risk areas, the vulnerability of the development should be considered. (Paragraph D6 PPS25).

(143)

P 115

SS1

OBJECT

SS1: Victoria Warehouse

We have records which show that this site is located on a former landfill. Therefore contamination may be an issue when detailed development proposals are considered.

There is an opportunity as part of any redevelopment to pull the existing warehouse back from the canal frontage. This would support policy R2 of the Core Strategy.

(144)

P 117

SS2

SUPPORT

SS2: Trafford Quays

We support the review of flood risk following the completion of the Level 2 SFRA and where applicable the application of the sequential test.

(145)

P 117

SS2

OBJECT

This site contains several ponds and land drains. We would object to any culverting as part of the redevelopment and appropriate ecological assessments should be undertaken as required under policy R2.

(146)

P 119

SS3

SUPPORT

SS3: Stretford Meadows

We support the inclusion of the Stretford Meadows site within the Core Strategy. In particular, we support the development requirements to improve drainage and provide enhancement of watercourses.

Other Issues

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

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

147
General
Comments

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

In this way we aim to deliver the economic and social benefits that sustained environmental improvements bring.

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

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

Yours faithfully

Helen Telfer
Planning Liaison Officer

Direct dial 01925 543363

Direct fax 01925 852260

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

1134

**Equality and
Human Rights
Commission**

equalityhumanrights.com

Mr Dennis Smith
Trafford Council
Waterside House
Sale Waterside
Sale
M33 7ZF

STRATEGIC PLANNING AND DEVELOPMENTS			
10 JUL 2009			
Rec			
Action by			
Ans			
Copied to.			

7th July 2009

Dear Mr Smith

Thank you for your consultation document.

We are sure you will appreciate that the Equality and Human Rights commission (ECHR) receives many such documents.

(101)

Unfortunately we do not have the resources to respond to consultations unless they concern matters which are directly related to the work of the EHRC.

Yours faithfully,

Wendy Hillyerd
EHRC Disability Helpline

Equality and Human Rights Commission Helpline England

Equality and Human Rights Commission	Freepost RRLL-GHUX-CTRX Arndale House, The Arndale Centre Manchester M4 3EQ	Tel: 0845 604 6610 Textphone: 0845 604 6620 Fax: 0845 604 6630
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1148

Trafford Tomorrow

Help us shape your area - What does it mean for you?

**STRATEGIC PLANNING
AND DEVELOPMENTS**

10 AUG 2009

Rec				
Copied to:				

Delivering the Vision

The Plan sets out 8 aims in order to deliver the Vision. We want to know if these are what you would like us to achieve over the next 15 years in Trafford.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
SO1		✓			
SO2	✓				
SO3		✓			
SO4	✓				
SO5	✓				
SO6	✓				
SO7	✓				
SO8		✓			

Would you like to add any further comments?

Sites for development

The Plan sets out 5 Strategic Sites which will provide the main sites for change, development and regeneration within Trafford. We want to hear your views as to whether you agree with the sites selected.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
SS1 - Victoria Warehouse			✓		
SS2 - Trafford Quays		✓			
SS3 - Stretford Meadows	✓				
SS4 - Partington Canalside		✓			
SS5 - Altair				✓	

Would you like to add any further comments?

Priority locations for development

Along with the sites the plan also includes 13 locations which provide wider areas for change, development and regeneration. We want to hear your views on the identification of these locations.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
Pomona Island (SL1)		✓			
Wharfside (SL2)		✓		✓	
Old Trafford (SL3)		✓			
Lancashire County Cricket Club (SL4)				① ✓	
Trafford Park Core (SL5)		✓			
Altrincham Town Centre (SL13)			✓		
Carrington (SL8)		✓			
Partington (SL9)		✓			
Sale West (SL10)		✓			
Sale Town Centre (SL11)					
Stretford Crossroads (SL7)	② ✓				
Trafford Centre Rectangle (SL6)					
Woodfield Road (SL12)					

101

① I would be happy to see Old Trafford cricket ground improved and the redevelopment of the surrounding area but not at the cost of accepting one of the largest Tescos in the UK being built on this site. They have planning permission for a medium sized supermarket. That should be sufficient for the area.


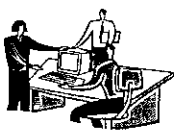

Would you like to add any further comments?

102

② Over 25 retail units and nearly all the market at the mall is now vacant.

The council should encourage investment in Salford town centre not killing any future opportunities by permitting a massive Tesco nearby. Sale, Altrincham and Urmston have had significant investment. Nothing has improved in Salford for a long time. We need a new town centre.

Making it work We have set out a number of policies that will be used, by the Council, to consider planning applications for development. We want to hear your views on whether, or not what we are proposing are the right policies and will address the issues the Borough faces. which, is not just about shops, but also a focal point for the community, a place that gives people some pride and improves their quality of life

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
 Live Policies		✓			
 Work Policies				✓	
 Relax Policies		✓			

Would you like to add any further comments?

About you:

We need to have your details so that we can inform you of the next stage of the plan.

Please note that all comments will be held by the Council on a 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 Tomorrow

Help us shape your area - What does it mean for you?

STRATEGIC PLANNING AND DEVELOPMENTS

11 AUG 2009

Rec			
By			
Attd.			
Copied to:			

Delivering the Vision

The Plan sets out 8 aims in order to deliver the Vision. We want to know if these are what you would like us to achieve over the next 15 years in Trafford.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
S01		✓			
S02	✓				
S03	✓				
S04	✓				
S05	✓				
S06	✓				
S07					
S08	✓				

Would you like to add any further comments?

① S02/3/4/6 at least all point to the need for a greater priority to be given to STRETTFORD CROSSROADS ② S04 would be in direct conflict with allowing permission for a big Texaco store ③ S06 excellent - but I must it applies to the airport.

(101)
(102)
(103)

Sites for development

The Plan sets out 5 Strategic Sites which will provide the main sites for change, development and regeneration within Trafford. We want to hear your views as to whether you agree with the sites selected.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
SS1 - Victoria Warehouse		✓			
SS2 - Trafford Quays	✓				
SS3 - Stretford Meadows	✓				
SS4 - Partington Canalside	✓				
SS5 - Altair		✓			

104

Would you like to add any further comments?

① S53 should be a much bigger area with STRETCHED TOWN CENTRES as a focus - this should stretch from Shefford Meadows via the crossroads to the canal side and as far as Woodfield Park.

105

Priority locations for development ② Partington is desperately in need of a choice of retail outlets

Along with the sites the plan also includes 13 locations which provide wider areas for change, development and regeneration. We want to hear your views on the identification of these locations.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
Pomona Island (SL1)			✓		
Wharfside (SL2)	✓				
Old Trafford (SL3)	✓				
Lancashire County Cricket Club (SL4)			✓ BUT NOT ON THE BASIS OF AN EXTENDED TESCO STORE		
Trafford Park Core (SL5)	✓				
Altrincham Town Centre (SL13)					
Carrington (SL8)	✓				
Partington (SL9)	✓				
Sale West (SL10)	✓				
Sale Town Centre (SL11)		✓			
Stretford Crossroads (SL7)	✓	THIS SHOULD BE IN PRIORITY ONE			
Trafford Centre Rectangle (SL6)		✓			
Woodfield Road (SL12)			✓		

106




(107)

Would you like to add any further comments?

① STRENGTH is the only Town Centre without recent substantial investment and should be given priority - It has become merely a main road - The underpass should be allocated to cars not people

Making it work

We have set out a number of policies that will be used, by the Council, to consider planning applications for development. We want to hear your views on whether, or not what we are proposing are the right policies and will address the issues the Borough faces.

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
 Live Policies	✓	L5: CLIMATE CHANGE policies must apply to ALL activity - Especially old buildings which need an urgent focus on insulation L4: Transport good but should therefore ensure			
 Work Policies		dump zones in all residential areas as well as no AIRPORT expansion	✓	This is vague - Shefford is the area which needs most help and more varied shopping	
 Relax Policies	✓	glad there is an emphasis on green and the environment cycling and walking Culture + HISTORY have been sadly neglected in Longford Park - "continue to support" does not apply! Hopefully this will change.			

(108)

(109)

(110)

Would you like to add any further comments?

STRENGTH must be the priority for development

(111)

About you:

We need to have your details so that we can inform you of the next stage of the plan.

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

OVERALL COMMENTS: ① This form is very badly designed - leading to mere rubber stamping
② One policy does not necessarily link across into another.

Trafford's Core Strategy Preferred Options Comments Form
29th June - 10th August 2009

Comments Sheet

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

What are you commenting on? Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.

Document	Section	
Core Strategy: Further consultation on the Preferred Option	Page number	<input type="text"/>
	Paragraph number	<input type="text"/>
Core Strategy summary broadsheet	Policy number	L2.9
Sustainability Appraisal	Vision reference	<input type="text"/>
Equality Impact Assessment	Strategic Objective reference	<input type="text"/>
Other document, (please specify)	Strategic Location reference	<input type="text"/>
	Strategic Site reference	<input type="text"/>
	Table/Figure Reference Number	<input type="text"/>
	Other (including omissions and suggestions for alternative approaches)	<input type="text"/>

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

Support Object General Comment

Please continue on a separate sheet if required

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 this document.

FFT and TLRP welcome the intention of the policy to make appropriate new provision for Gypsies and Travellers in Trafford. The need identified in the RSS Draft proposed Policy is 25 residential pitches and 10 transit pitches to 2016.

However we must object to some of the criteria contained in the policy which in our view may be ineffective and misunderstands the needs of Gypsies and Travellers.

Additionally the policy should make clear that the criteria will be used to judge applications arising from unexpected demand (though this point is covered in para 7.17).

Criterion b) is simply unnecessary - as Circular 1/2006 makes clear setting maximum numbers as a blanket policy is arbitrary and we feel that this criterion is tantamount to that. In addition the requirement that each site should be large enough to provide for adequate on-site facilities may arise from a misunderstanding of the Site Design Guidance issued by CLG, which of course is intended for RSL sites. Small family sites can and do work well in our experience and each application should be judged on its merits. Without an explanation of what adequate on-site facilities should be and their relationship to site size it is impossible to understand exactly what this part of the criterion is intending to do. We feel that a statement such as 'sites should be capable of

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

Stephen Staines

[FFT and TLRP welcome the intention of the policy to make appropriate new provision for Gypsies and Travellers in Trafford. The need identified in the RSS Draft proposed Policy is 25 residential pitches and 10 transit pitches to 2016.] However we must object to some of the criteria contained in the policy which in our view may be ineffective and misunderstands the needs of Gypsies and Travellers. Additionally the policy should make clear that the criteria will be used to judge applications arising from unexpected demand (though this point is covered in para 7.17).] Criterion b) is simply unnecessary - as Circular 1/2006 makes clear setting maximum numbers as a blanket policy is arbitrary and we feel that this criterion is tantamount to that. In addition the requirement that each site should be large enough to provide for adequate on-site facilities may arise from a misunderstanding of the Site Design Guidance issued by CLG, which of course is intended for RSL sites. Small family sites can and do work well in our experience and each application should be judged on its merits. Without an explanation of what adequate on-site facilities should be and their relationship to site size it is impossible to understand exactly what this part of the criterion is intending to do. We feel that a statement such as 'sites should be capable of being adequately serviced' seems adequate for a policy.] Criterion c) should only apply to transit sites. It would be onerous and counterproductive to require residential sites to be so located. We assume that this arises from a misunderstanding of the lifestyle of Gypsies and Travellers resident on permanent sites. It is clear that land designated for general housing is equally suitable for Gypsy and Traveller sites.] In our view this criterion should be amended so that it refers solely to transit sites.] In our view also, given the urgent need for sites, the core strategy should set out a timetable for provision. If inclusion of sites in the LADPD then the council should give consideration to preparing a site allocation DPD in parallel or in advance of the core strategy (see para 43 Circular 1/2006). The core strategy should also give consideration to likely forms of tenure of planned sites and make provision in a similar way as for affordable housing]

(102)
Pg 36
L2 L2.9
supp 20A

(103)
Pg 36, L2.9
object.

(104)
Pg 36, L2.9
(b)
object.

(105)
Pg 36, L2.9 (c)
object

(106)
Core Strategy
general
comment

From: Norman Redhead [mailto:norman.redhead@manchester.ac.uk]
Sent: 26 June 2009 15:41
To: Haslam, Rob
Subject: RE: GM Historic Landscape Characterisation

Rob

Thanks for this. Jackie Whelan, Conservation Officer at Bolton MBC, gave a presentation on the Bolton Built Environment Core Strategies policy which you might find useful. They have had preliminary discussions with a planning inspector and will submit their policies and supporting statements for validation. She can be contacted at 'jackie.whelan@bolton.gov.uk'

I just have a few comments on the draft document you sent.

- Policy R1 pg 67, General Comment*
- Policy R1 pg 68, Para 17.3, General Comment*
- Policy R1 pg 68, Para 17.3, General Comment*
- 103*
- 1) This refers to the Historic Built Environment but what about archaeology should this have a separate policy heading as much of it cannot be classified as 'built' heritage? There are a number of archaeological heritage assets across the borough (both designated and non-designated) which are below-ground archaeological remains such as Watch Hill motte and bailey castle and Timperley Old Hall Moat which contribute to the character of the borough. Should the policy just be Historic Environment?
 - 2) Under justification, a new PPS on the historic environment is due out in draft form at the end of July. This will replace PPG 15 and 16. We anticipate there being more emphasis on community benefit arising from archaeological works/surveys etc, historic landscape and local lists.
 - 3) Could you expand 1.8 to say that the HER is maintained by GMAU. *Policy R1 pg 68, Para 17.8, General Comment*
 - 4) Under 1.10 the Trafford HER comprises 1014 entries, which include 526 archaeological monument entries and 40 historic places. *Pg 69, Para 17.10, General Comment*
 - 5) 1.11 remove 'built'. Also mention that these heritage assets give a sense of place and distinctiveness and foster community pride. *Pg 69, Para 17.11, General Comment*
 - 6) 1.13 Could do with a section on the Historic Environment Record to complement the HLC data. Would you like me to provide a few sentences? *Pg 69, Para 17.13, General Comment*

Hope this helps
Norman

29/06/2009

Trafford's Core Strategy Preferred Options Comments Form
29th June - 10th August 2009

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What are you commenting on? Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.

Document		Section	
Core Strategy: Further consultation on the Preferred Option	x	Page number	52
		Paragraph number	
Core Strategy summary broadsheet		Policy number	L6
Sustainability Appraisal		Vision reference	
Equality Impact Assessment		Strategic Objective reference	
Other document, (please specify)		Strategic Location reference	
		Strategic Site reference	
		Table/Figure Reference Number	
		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 continue on a separate sheet if required

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 this document.

105

The proposed waste policy covers all the necessary issues in what looks to be a comprehensive manner yet allows scope for the JWDPD to fill in the policy detail at a later stage. The final point (vi) seems a little negative, given that the previous point refers to recognising the potential benefits of waste facilities. It is assumed that this point is to simply ensure that any negative impacts associated with Waste Developments do not cause any problems in particular areas singled out for regeneration efforts.

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

Trafford's Core Strategy Preferred Options Comments Form
29th June - 10th August 2009

Comments Sheet

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

What are you commenting on? Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.

Document	Section	
Core Strategy: Further consultation on the Preferred Option	Page number	65
	Paragraph number	
Core Strategy summary broadsheet	Policy number	W3
Sustainability Appraisal	Vision reference	
Equality Impact Assessment	Strategic Objective reference	
Other document, (please specify)	Strategic Location reference	
	Strategic Site reference	
	Table/Figure Reference Number	
	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 continue on a separate sheet if required

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 this document.

106

The proposed policy covers all the necessary issues in what looks to be a comprehensive manner, whilst allowing scope for the JWDPD to fill in the policy detail at a later stage. Formal agreement for the Joint Minerals DPD to be prepared on a joint basis has yet to be ratified by the individual authorities, however at a meeting in mid July the AGMA Housing and Planning Commission agreed the principle of GMGU preparing this document on behalf of the GM planning authorities. The next step is for this to be agreed by the AGMA Executive and then through the full council of each of the GM planning authorities.

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



e-letter

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

Our ref: P2110/4.1.2/09/001

Your ref: CS/PrefOpt

Contact: Rosie Ollé
 Senior Land Use Planner

Direct line: 0161 244 1280

Email: rosemary.olle@gmpte.gov.uk

Date: 10 August 2009

Dear Mr Smith,

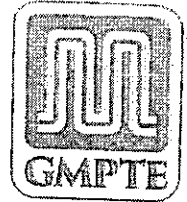
Trafford Core Strategy: Further consultation on the Preferred Option

Thank you for sending a copy of the above policy document to GMPTE.

It is important for all future developments to be located in areas of high accessibility and GMPTE welcomes the fact that the document contains a number of positive references to sustainable transport, including Metrolink. It is important that where new development is to be located in areas with low accessibility, policies should be put in place to ensure that adequate public transport is provided (this principle is set out in section 4 of GMPTE's 'Land Use Planning and Public Transport' guidance document www.gmpte.com/landuse).

The attached Accessibility Plan shows the areas of Trafford that currently meet the accessibility standards that GMPTE applies to new development (see paragraph 6.1. in GMPTE's 'Land Use Planning and Public Transport' guidance). As you can see, we have plotted Trafford's proposed Key Strategic Sites on the plan to indicate their levels of accessibility to public transport. Also attached are more detailed public transport assessments for the sites. We welcome the fact that most of the sites are accessible, but are concerned that some are located in areas that are not easily accessed by public transport. Unless the bus services required to serve these sites can be provided commercially, it may not be possible to provide them as there are no guarantees that GMPTE will be able to support them financially.

GMPTE's budget for subsidised bus services is a limited resource and is already heavily committed. However as part of the wider development of Greater Manchester's Bus Strategy GMPTE is, on behalf of the GMITA, developing a 'Target Bus Network' for delivery in partnership with bus operators, which sets out how to provide better connectivity including links with other public transport modes. Other



aspects of the Bus Strategy include service standards, fares and delivery mechanisms. GMPTE has however no immediate source of funding to finance the identified improvements, but is working with the bus operators to explore ways of implementing the network.

In some cases there may be potential to use developer contributions to establish a fund to 'kick-start' commercial bus services, but this would need to be assessed on a case by case basis.

The transport infrastructure requirements for the strategic sites have been clearly stated, but given that funding for transport is likely to be limited in the foreseeable future, delivery may well depend on the extent to which the developers themselves can provide funding. The Infrastructure Plan will need to show that the phasing of sites reflects the timescales within which any essential infrastructure can be delivered and explicitly identify how it will be funded.

SPECIFIC COMMENTS:

Trafford in Focus (pages 9-16)

Trafford Park: The Spatial Profile could refer to Metrolink serving the Wharfedale Area through existing line to Salford Quays and Eccles from stops at Exchange Quay and Mediacity.

Old Trafford: Although listed under Key Issues the Spatial profile makes no mention of Pomona and its strategic location between Salford Quays and the Regional Centre (served directly by Metrolink).

Mersey Valley: Spatial Profile could refer to the proposed Metrolink Airport Extension, a scheme progressing under the AGMA Transport Fund Programme and scheduled for completion in 2015 and supporting a number of the place objectives.

Altrincham & Neighbouring Communities: The Spatial Profile talks about the A56/A560 but fails to stress the key role that Metrolink also plays in the efficient functioning of this area linking it with the Regional Centre.

Figure 3: TRAFFORD KEY DIAGRAM (Page 27) omits the section of the South Manchester Metrolink extension located within Trafford, which commences in spring 2011. The diagram also fails to show the stretch of the existing Eccles Metrolink line, part of which is in the Trafford Borough, and is due to be connected to Media City at Salford Quays in Summer 2010.

Policy L4: Sustainable Transport and Accessibility (Page 41)

L.4.1 As already stated, GMPTE is developing a 'Target Bus Network', which will need to be adapted to meet changing land use patterns. As far as possible the network will be planned so that it can be readily adapted to serve new developments as they come on stream. It would be helpful if GMPTE could be provided with information (e.g. likely employee numbers, footfall, etc) when new developments are commenced on site so that these details can be fed into the bus planning work.



GMPTE is already consulting Trafford Council about the form of the network (our main contact has been Filipina Moore). As proposals in the LDF become crystallised we will need to work together to ensure they are served by appropriate public transport, bearing in mind any affordability issues and the need to secure S106 funding where possible.

It is anticipated that a draft Target Network will be complete by November 2009. However there are likely to be issues of affordability to resolve; also, the network is likely to change further as a result of detailed discussions with operators and further consultation with District Officers.

L4.12 Transport Assessments and Travel Plans

GMPTE is producing 'Developer Packs' offering information about public transport tailored for specific developments (a pack aimed at residential developments is already available for purchase by developers). The packs can contain travel vouchers which can be exchanged for public transport tickets. It could possibly be made a requirement of new developments to 'buy in' to this process to encourage new occupiers to use public transport.

The Local Transport Plan (page 44)

9.9 This paragraph needs to include reference to the Greater Manchester Transport Strategy approved by AGMA in July this year, as this will set the context for LTP3.

Safeguarded Routes and Infrastructure (Page 45)

9.12 The bullet pointed list should refer also to the AGMA list of Prioritised Schemes.

IMPLEMENTATION

26.7 (page 127)

GMPTE would expect funding obtained from planning obligations and the community infrastructure levy to contribute towards public transport improvements to ensure that new developments can be adequately accessed in a sustainable manner.

Transport 26.12 (page 127)

Rather than using the phrase "Transport Modelling" it is suggested that, for clarity, the name of the project is used i.e. "Modelling the Transport Impacts of the LDFs". The project has not yet been concluded but the results should be used to inform decisions on future land allocations and future transport infrastructure requirements.

Implementation Tables (Table 2)

In relation to policy L4, the 'Funding' column should include the Greater Manchester Transport Fund'.

e-letter



GMPTE's comments on the Local Infrastructure Plan consultation, which is running concurrently with the Core Strategy Consultation, will be sent as a separate response.

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

Yours sincerely

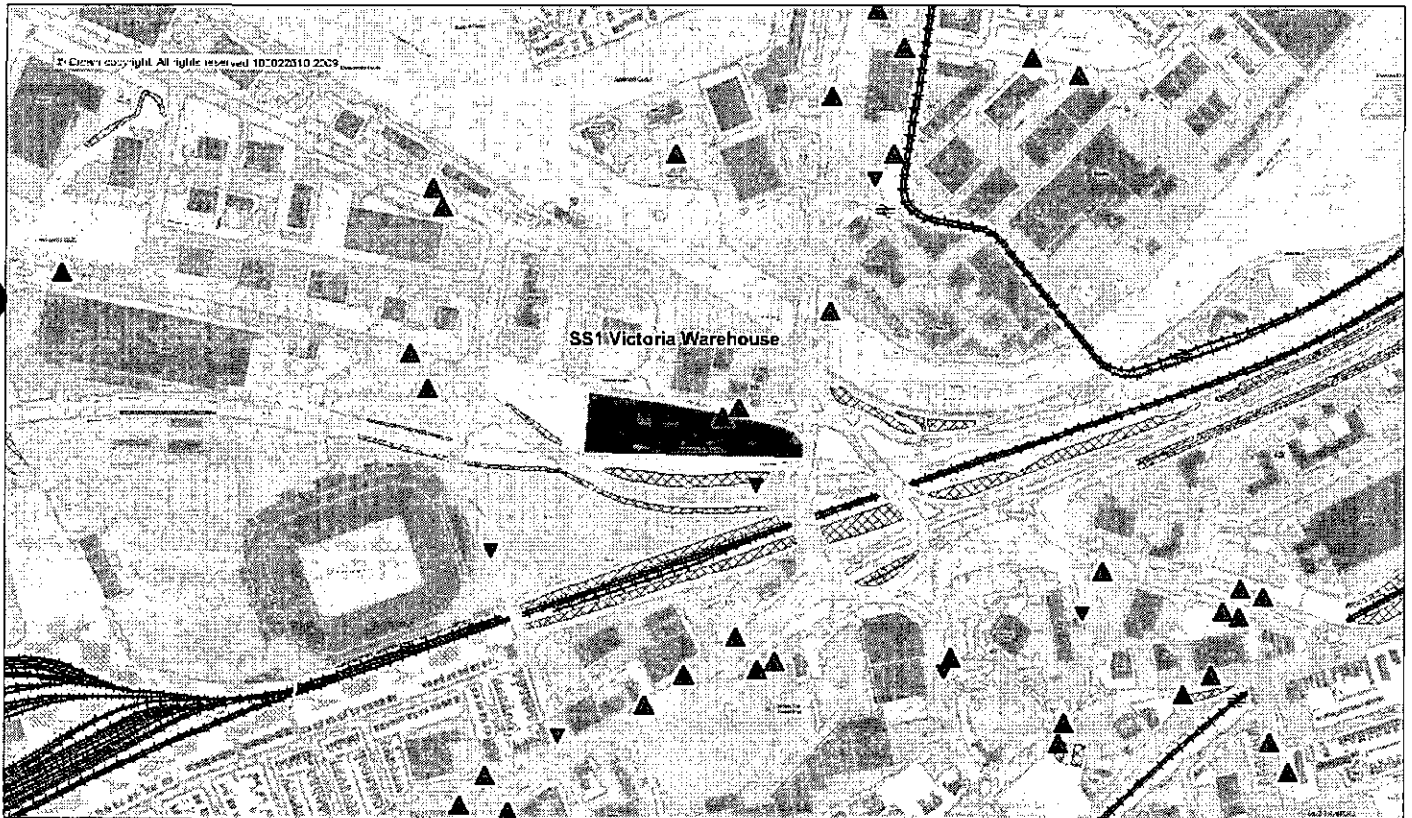
1-2 Adam Goulcher
Interim Transport Strategy Director

Site Specific Public Transport Accessibility Assessment

15th July 2009

Application No/Ref	Core Strategy: Further Preferred Options SS1
District	Trafford
Location	Trafford Wharfside / Trafford Park eastern gateway
Proposal	High quality, high density, multi-storey mixed-use redevelopment of a prominent long-standing, under-used, 1.4 hectare site

Application Map



SS1 Victoria Warehouse

Drawn By: schuetzm

Scale: NTS

Date: 15/07/2009

Existing Public Transport and Infrastructure Provision
 (all distances are appx. & measured through pedestrian access
 to the centre of the site unless shown otherwise below)

Metrolink/Train access: Is the site within 800m of a Metrolink/Rail Station? Yes

Nearest Metrolink station: Exchange Quay 470m

Nearest rail station:

Distance to nearest bus stop in use: Potentially on site

Bus service(s) from nearest stop:

Stop number : SJ1077		Stop name : Vicarage Lane/Post Office	
<u>Service</u>	<u>Dir</u>	<u>Description</u>	
246	C	ALTRINCHAM - LANGHAM ROAD - BOWDON VALE Circular	

Bus Service - Frequency:

246 - 30min	-	-	-	-
-	-	-	-	-

Bus access from nearest stop: Every 15mins daytime within 400m? No
 or
 Every 30mins daytime within 250m? Yes
 and
 Is there a weekend service? Sat & Sun

GMPTTE considers good accessibility to public transport to be:

Service Type	Distance to / Frequency	Distance to / Frequency
Buses	400 metres / 15min or higher frequency service	250 metres / 30min or higher frequency service
Trams	800 metres	
Trains	800 metres	

Additional Comments

Reasonable access to bus services and Metrolink.

The bus service capacity would be challenged once the development is fully occupied therefore developer contributions for service improvements would be reasonable to include in the Development Requirements of SS1.

Pedestrian permeability and access across the Bridgewater Canal are already a Development Requirement.

Pg 115, SS1, General Comment

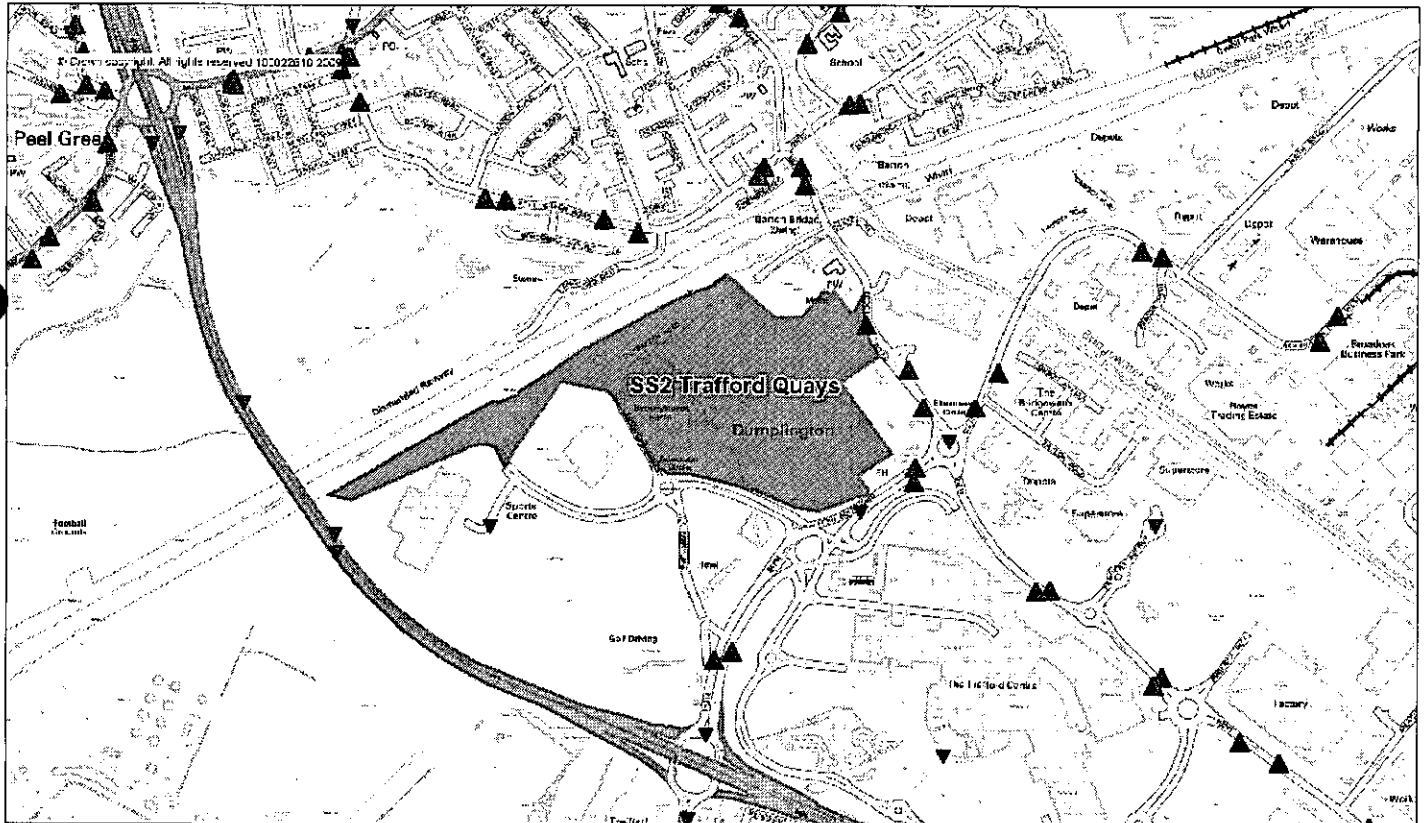
117

Site Specific Public Transport Accessibility Assessment

15th July 2009

Application No/Ref	Core Strategy: Further Preferred Options SS2
District	Trafford
Location	Trafford Centre / Trafford Park western gateway
Proposal	High quality residential led (1,050 units) mixed-use development on a substantial greenfield site

Application Map



SS2 Trafford Quays

Drawn By: schuetzm

Scale: NTS

Date: 15/07/2009

Existing Public Transport and Infrastructure Provision
(all distances are appx. & measured through pedestrian access
to the centre of the site unless shown otherwise below)

Metrolink/Train access: Is the site within 800m of a Metrolink/Rail Station? No

Nearest Metrolink station:

Nearest rail station:

Distance to nearest bus stop in use: 1.1km Western Third, 435m Mid Third, 140m Eastern Third

Bus service(s) from nearest stop:

Stop number : SJ0319 Stop name : Redclyffe Road/Church Rectory

Service	Dir	Description
22	I	STOCKPORT - CHORLTON - ECCLES - SWINTON - BOLTON
100	O	MANCHESTER - TRAFFORD CENTRE - WARRINGTON
247	O	ALTRINCHAM - SINDERLAND - FLIXTON - ECCLES
556	O	TRAFFORD CENTRE - ECCLES - FARNWORTH - BOLTON

Bus Service - Frequency:

22 - 30min	100 - 20min	247 - 30min	556 - 20min on Saturdays	-
-	-	-	-	-

Bus access from nearest stop: Every 15mins daytime within 400m? No
or
Every 30mins daytime within 250m? Yes & No
and
Is there a weekend service? Sat & Sun

GMPTA considers good accessibility to public transport to be:

Service Type	Distance to / Frequency	Distance to / Frequency
Buses	400 metres / 15min or higher frequency service	250 metres / 30min or higher frequency service
Trams	800 metres	
Trains	800 metres	

Additional Comments

Under half of the site is well served by bus services. This is particularly unfortunate considering the large amount of traffic the site will generate and the extra strains it will put on the local highway already congested by traffic to and from the Trafford Centre and surrounding developments.

Ensure that Development Proposals to 'Significantly improve public transport infrastructure including an integrated, frequent public transit system linking the location with surrounding residential and commercial areas' are ensured through commitments from Trafford MBC to secure adequate amounts of developer contributions.

118

Additional Comments

No bus service truly serves the entire site well in terms of distance from stops however the walking distances do reach part way into the site.

There are frequent bus services that connect the accessible parts of the site to areas in Manchester, Trafford, Salford and Stockport as can be seen above.

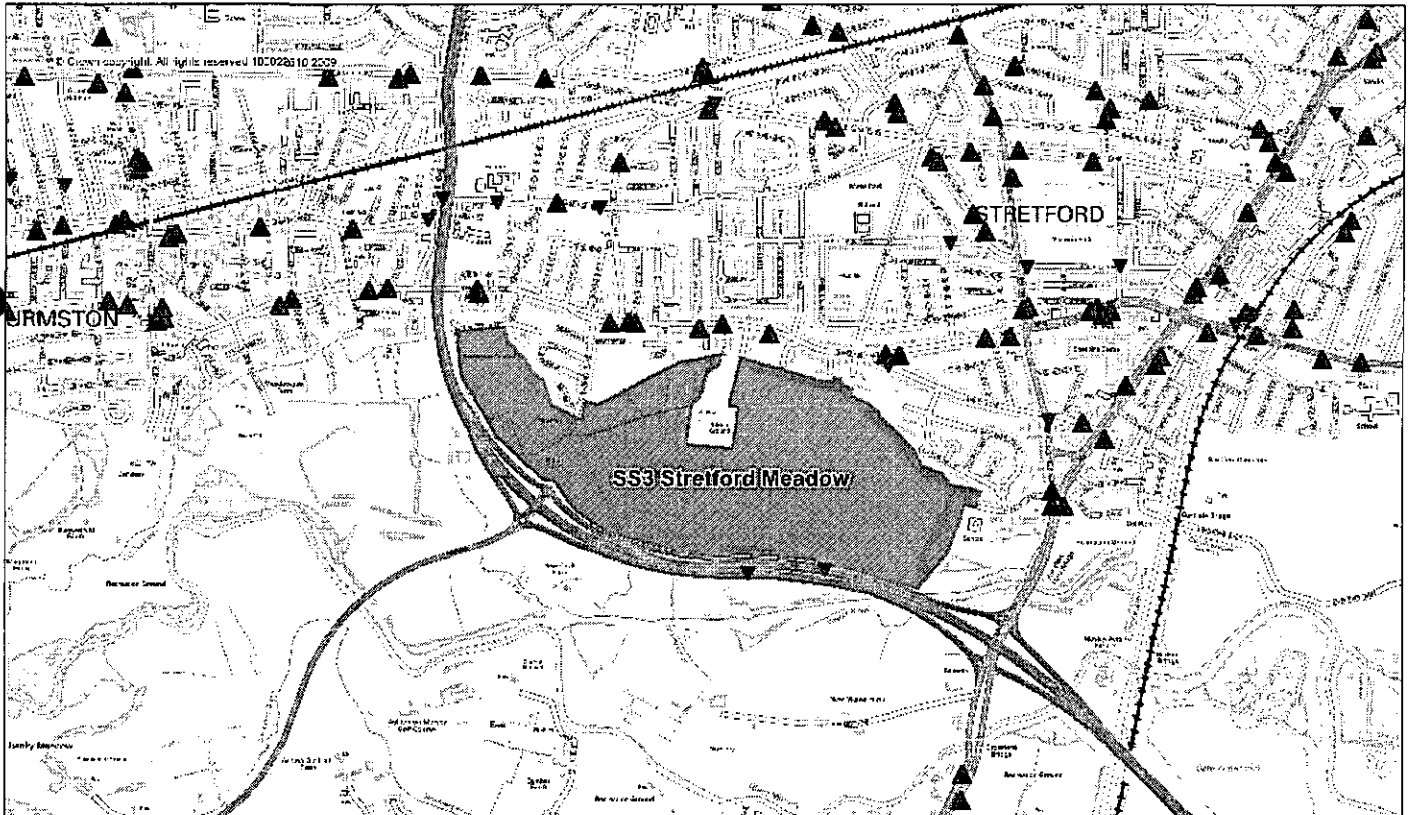
Pg 117, SS2, Object

Site Specific Public Transport Accessibility Assessment

15th July 2009

Application No/Ref	Core Strategy: Further Preferred Options SS3
District	Trafford
Location	Stretford Meadow
Proposal	Development of a 50hectare green belt landfill site as an informal woodland / meadow recreation area – providing for walking, cycling, horse riding etc

Application Map



SS3 Stretford Meadow

Drawn By: schuetzm

Scale : NTS

Date : 15/07/2009

Existing Public Transport and Infrastructure Provision
(all distances are appx. & measured through pedestrian access
to the centre of the site unless shown otherwise below)

Metrolink/Train access: Is the site within 800m of a Metrolink/Rail Station? No

Nearest Metrolink station:

Nearest rail station:

Distance to nearest bus stop in use: SJ0005 serves the eastern side of the site and SJ0125 is representative of all the stops along the north of the site

Bus service(s) from nearest stop:

Service		Dir	Description
Stop number : SJ0005 Stop name : Chester Road/Old Cook			
16	B	I	ALTRINCHAM - SALE - CHORLTON - MANCHESTER
18	B	O	ALTRINCHAM - AIRPORT - SALE - TRAFFORD CENTRE
245	I	I	ALTRINCHAM - SALE - STRETFORD - FLIXTON
263	I	I	ALTRINCHAM - SALE - HULME - MANCHESTER
264	I	I	ALTRINCHAM - SALE - STRETFORD - MANCHESTER
268	B	I	WYTHENSHAW - TRAFFORD GEN HOSP - URMSTON
272	I	I	SHARSTON - SALE - STRETFORD - TRAFFORD PARK
Stop number : SJ0125 Stop name : Stretford Road/Westwood Avenue			
Service		Dir	Description
15	B	I	FLIXTON - DAVYHULME - URMSTON - MANCHESTER
22	O	O	BOLTON - SWINTON - ECCLES - CHORLTON - STOCKPORT
23	C	I	TRAFFORD CENTRE - URMSTON - DIDSBURY - STOCKPORT
245	O	O	FLIXTON - SALE - STRETFORD - ALTRINCHAM
253	I	I	FLIXTON - URMSTON - HULME - MANCHESTER
255	I	I	PARTINGTON - URMSTON - STRETFORD - MANCHESTER

Bus Service - Frequency:

15 – 15min	16 – 30min	18 – 30min	22 – 30min	23 – 30min	-
245 – 30min	253 – 07:47 & 08:17	255 – 30min	263 – 10min	264 – 07:43, 08:01 & 09:10	-

Bus access from nearest stop: Every 15mins daytime within 400m? Yes & No
or
Every 30mins daytime within 250m? Yes & No
and
Is there a weekend service? Sat & Sun

GMPT considers good accessibility to public transport to be:

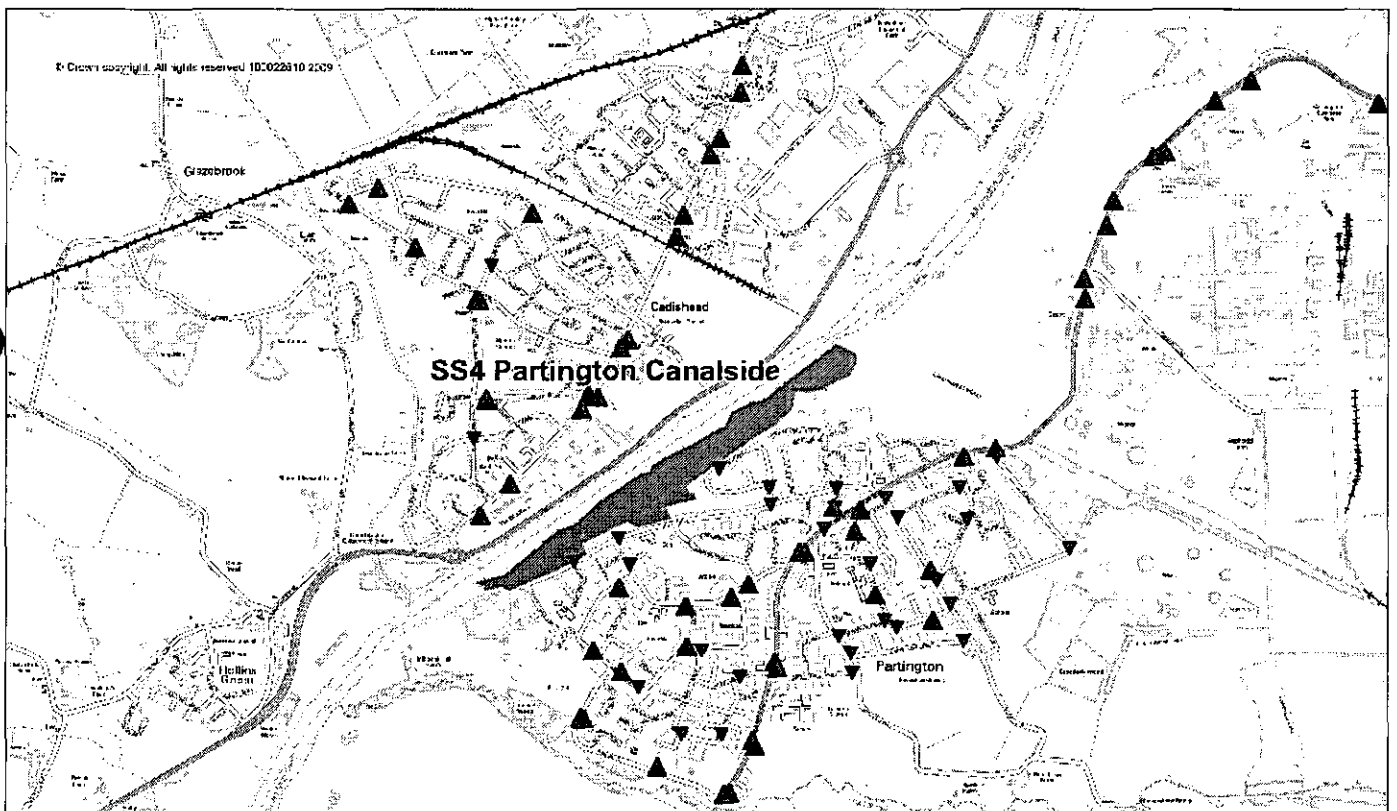
Service Type	Distance to / Frequency	Distance to / Frequency
Buses	400 metres / 15min or higher frequency service	250 metres / 30min or higher frequency service
Trams	800 metres	
Trains	800 metres	

Site Specific Public Transport Accessibility Assessment

15th July 2009

Application No/Ref	Core Strategy: Further Preferred Options SS4
District	Trafford
Location	Land adjacent to Manchester Ship Canal
Proposal	Development of 16 hectare green-field site for residential (550units) and redevelopment of the local shopping centre for retail and service facilities

Application Map



SS4 Partington Canalside

Drawn By : schuetzm

Scale : NTS

Date : 15/07/2009

Existing Public Transport and Infrastructure Provision
(all distances are appx. & measured through pedestrian access to the centre of the site unless shown otherwise below)

Metrolink/Train access: Is the site within 800m of a Metrolink/Rail Station? No

Nearest Metrolink station:

Nearest rail station:

Distance to nearest bus stop in use: 510m from mid point

Bus service(s) from nearest stop:

Stop number : 534801 Stop name : Wood Lane/Long Walk

Service	Dir	Description
241	I	PARTINGTON - FLIXTON - DAVYHULME - TRAFFORD PARK
243	I	PARTINGTON - URMSTON - DAVYHULME - TRAFFORD PARK
247	I	ECCLES - FLIXTON - SINDERLAND - ALTRINCHAM
252	O	SALE - PARTINGTON
255	O	MANCHESTER - STRETFORD - URMSTON - PARTINGTON
290	B O	MANCHESTER - TRAFFORD CENTRE - FLIXTON

Bus Service - Frequency:

241 - 06:27	243 - 07:07	247 - 30min	252 - 16:21, 17:21, 18:01 & 18:31
255 - 30min	290 - 18:35	-	-

Bus access from nearest stop: Every 15mins daytime within 400m? No
 or
 Every 30mins daytime within 250m? No
 and
 Is there a weekend service? Sat & Sun

GMPTE considers good accessibility to public transport to be:

Service Type	Distance to / Frequency	Distance to / Frequency
Buses	400 metres / 15min or higher frequency service	250 metres / 30min or higher frequency service
Trams	800 metres	
Trains	800 metres	

Additional Comments

119

Poor access to public transport services as it is outside of acceptable walking distance by a large margin.

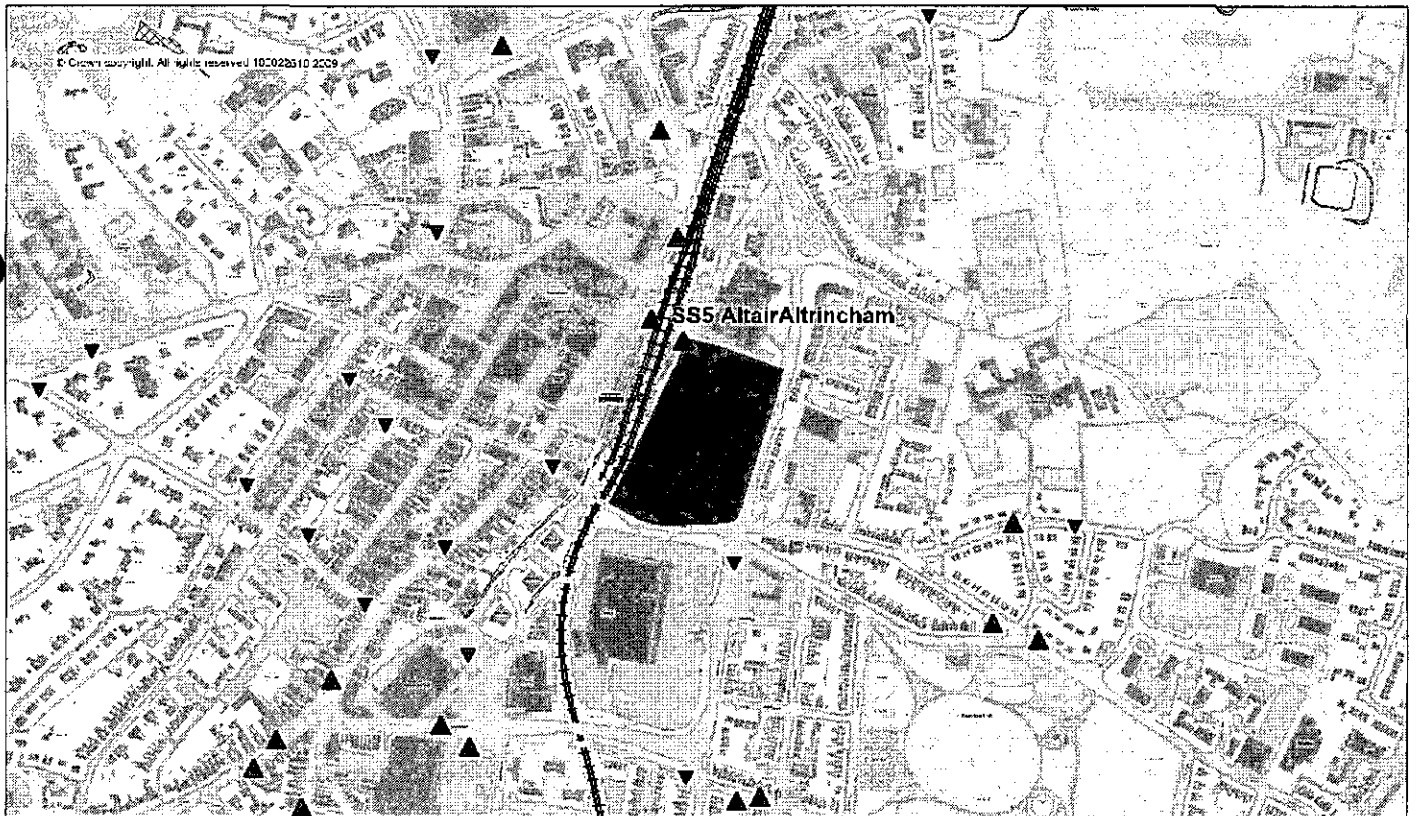
Development Requirements for this Strategic Site include 'additional contributions towards additional bus service provision' which is promising as long as it is done for every development and dependent upon how much is asked for. Pg 121, SS4, Object.

Site Specific Public Transport Accessibility Assessment

15th July 2009

Application No/Ref	Core Strategy: Further Preferred Options SS5
District	Trafford
Location	Brownfield town centre site immediately east of Altrincham Interchange
Proposal	3 hectare high density multi-storey mixed use development

Application Map



SS5 Altrincham

Drawn By: schuetzm

Scale : NTS

Date : 15/07/2009

Existing Public Transport and Infrastructure Provision
 (all distances are appx. & measured through pedestrian access
 to the centre of the site unless shown otherwise below)

Metrolink/Train access: Is the site within 800m of a Metrolink/Rail Station? Yes

Nearest Metrolink station: Altrincham Interchange

Nearest rail station: Altrincham Interchange

Distance to nearest bus stop in use: Adjacent to site

Bus service(s) from nearest stop:

Multiple travelling to areas in Manchester, Trafford, Stockport and Cheshire.

Bus Service - Frequency:

-	-	-	-	-
-	-	-	-	-

Bus access from nearest stop: Every 15mins daytime within 400m? Yes
 or
 Every 30mins daytime within 250m? Yes
 and
 Is there a weekend service? Sat & Sun

GMPTTE considers good accessibility to public transport to be:

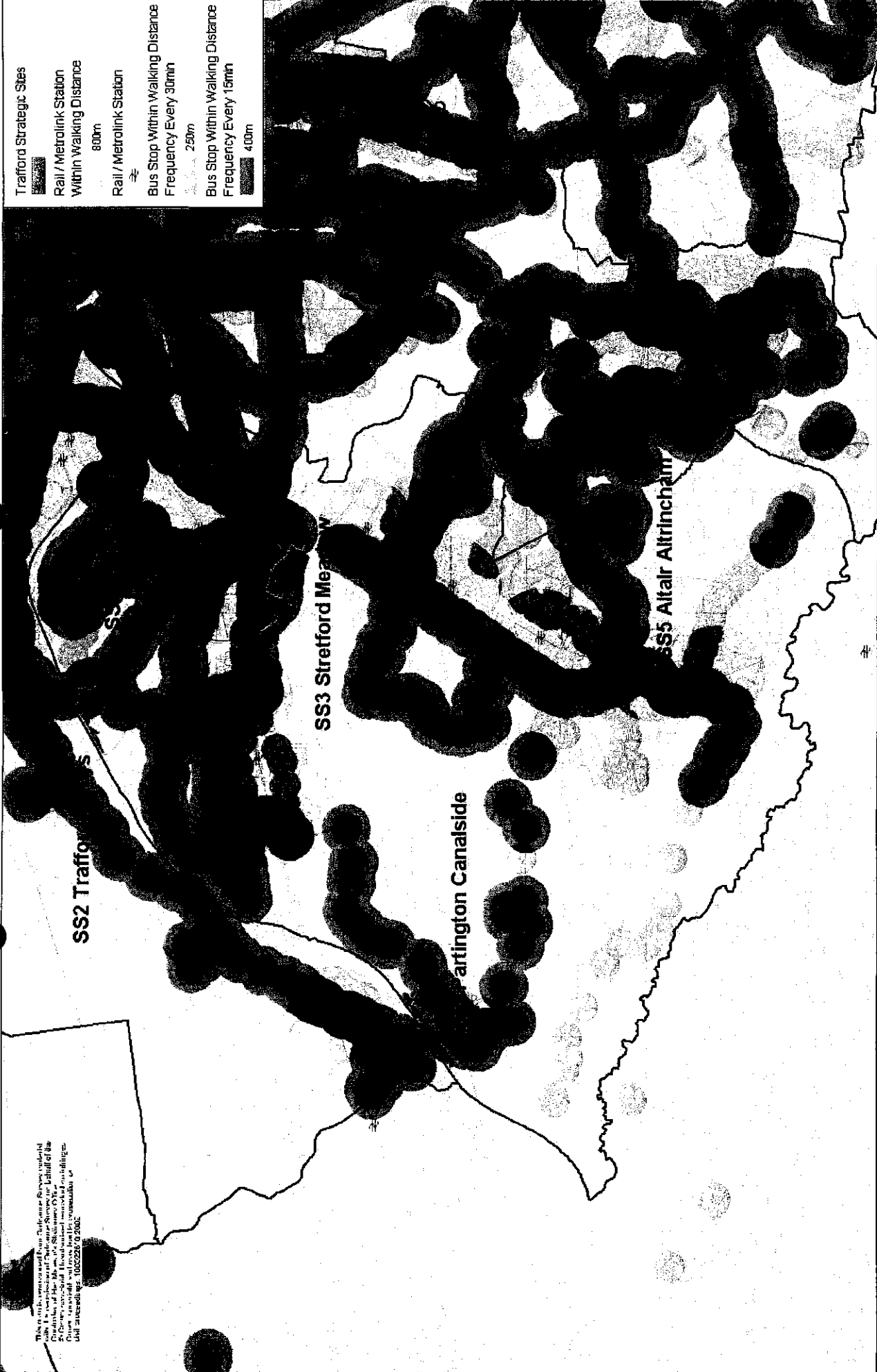
Service Type	Distance to / Frequency	Distance to / Frequency
Buses	400 metres / 15min or higher frequency service	250 metres / 30min or higher frequency service
Trams	800 metres	
Trains	800 metres	

Additional Comments

(120)

[Highly accessible by a multi-modal choice of public transport.]
 Pg 123, SSS, Support.

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Trafford Strategic Sites

Rail / Metrolink Station
Within Walking Distance
800m

Rail / Metrolink Station
Bus Stop Within Walking Distance
Frequency Every 30min
250m

Rail / Metrolink Station
Bus Stop Within Walking Distance
Frequency Every 15min
400m

Trafford Strategic Sites Public Transport Accessibility Map

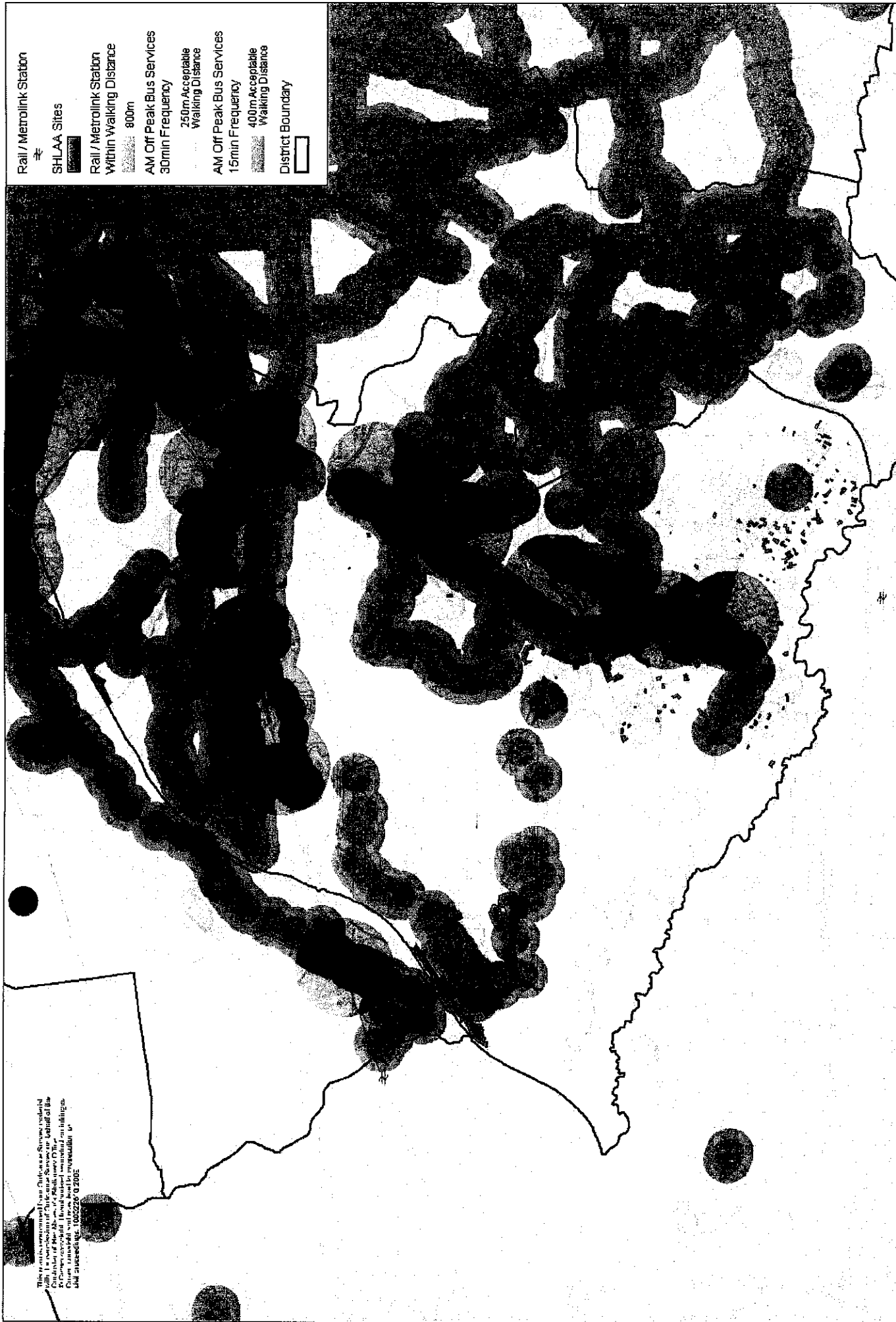
Drawn By: schuetzm

Scale: NTS

Date: 05/08/2009

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- Rail / Metrolink Station
- SHLAA Sites
- Rail / Metrolink Station Within Walking Distance
- 800m
- AM Off Peak Bus Services 30min Frequency
- 250m Acceptable Walking Distance
- AM Off Peak Bus Services 15min Frequency
- 400m Acceptable Walking Distance
- District Boundary



SHLAA Public Transport Accessibility Map

Drawn By: schuetzm

Scale: NTS

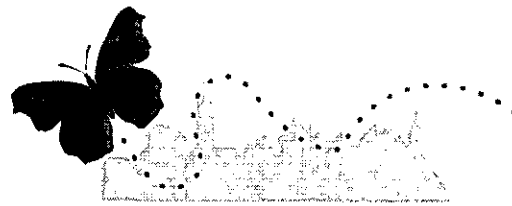
Date: 07/08/2009

Greater Manchester Ecology Unit

Ryecroft Hall, Manchester Road, Audenshaw
Manchester M34 5ZJ

Email: gmeu@tameside.gov.uk
Telephone: 0161 3719171

Principal Ecologist:
Derek Richardson MIEEM



Greater Manchester Ecology Unit

Strategic Planning & Developments
1st Floor Waterside House
Sale Waterside
Sale
M33 7ZF

Your ref : CS/PrefOpt
Our ref : SW/3/F/12/9
Doc ref : SW5-1
Contact : Suzanne Waymont
Date : 8th August 2009

Dear Sir/Madam

TRAFFORD CORE STRATEGY: FURTHER CONSULTATION ON THE PREFERRED OPTION

Thank you for your consultation on the above matter. The Ecology Unit's comments are detailed below.

119

SPATIAL PROFILE

Trafford Park – We are pleased to see the value of Trafford Park Lake recognised and other "environmental assets". We would suggest that the Bridgewater Canal be specifically mentioned as it is in other profiles, especially given its status as an SBI in this location.

P10: partial profile support/proposed addition

120 P11 issues + place objectives support

Old Trafford – We welcome the objective to maximise opportunities for green roofs and tree planting in this area.

121 P12 issues + place objectives support

Stretford – We welcome the objective to explore opportunities for green roofs and tree planting in this area. We also welcome the objective in relation to green space.

Urmston – We welcome the objectives in the "relax" section – P13, issues + place objectives support.

Mersey Valley – We welcome the objectives in the "relax" section – P14, issues + place objectives support.

Altrincham & Neighbouring Communities – We welcome the objective to protect and enhance the linear green network and wildlife corridors in this location. – P16, issues + place objectives support.

Trafford's Rural Communities – We welcome the objectives in the "relax" section. – P17, issues + objectives, support.

Carrington – We welcome the objective to protect and enhance features of ecological importance in this location. P19, issues + place objectives, support.

122

PART B

SO5 – We welcome this strategic objective

P23 Strategic obj SO5 support

GMEU provides an ecological advisory service to and on behalf of the ten district councils of Greater Manchester. The Unit is attached to Tameside as lead authority.

123 PART C

p47 - Policy L5
L5.11
Object
L5 Climate Change – We welcome the inclusion of the caveat on paragraph L5.11 that proposals for new sources of renewable energy generation will be encourage “where it can be demonstrated that there are to be no adverse effects on the natural environment”. We would also suggest that reference is made under this policy about the need for new developments to maintain links and provide space for habitats and species to adapt to climate change.

124
P54
Policy L7
Object
L7 Design – PPS9 states that “Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. When considering proposals, local planning authorities should maximise such opportunities in and around developments, using planning obligations where appropriate”. We would therefore suggest that this requirement is included in the “Design” policy to ensure that biodiversity issues, particularly creating new opportunities for biodiversity, are incorporated into the design of new developments at the earliest stage.

125
P71
Policy R2
para
18.15 -
18.16
Object // Suggested change
R2 Natural Environment – We welcome the principles outlined under this policy. You should be aware that Cheshire’s Biodiversity action does not cover Trafford and reference to this document (paragraph 18.15) should therefore be removed to avoid confusion. In addition the list of priority habitats and species has been updated. For example the number of UK priority species has increased and subsequent the number in Trafford has increased. Rather than list all the species present we would suggest that in paragraph 18.15 and 18.16 the wording be changed to “In Trafford these *include*” and “these species *occur* in the priority habitats present in Trafford *including*” respectively. Alternatively the lists of habitats and species would need to include all priority habitats and species.

Regardless of which change is made above we would suggest that Wood Pasture and Parkland is added to the list of habitats, given the national importance of Dunham Park

126
P74
Policy R3
Support
R3 Green Infrastructure – We welcome the principles outlined under this policy, in particular the prominence given to nature conservation and biodiversity.

p76
Policy R4
R4.5b
127 **R4 Green Belt and Other Protected Open Land** – We welcome the principle in paragraph R4.5c that farm diversification proposals should not have a detrimental impact on the existing ecology of an area.

PART D

p89
SL1
Object / Suggested change
128 **SL1 Pomona Island** – We welcome the statement that the proposals at this location will “include the enhancement of ... the ecological corridor running along the Manchester Ship Canal and Bridgewater Canal” but would suggest that this should be a Development Requirement rather than a Justification for the Proposal.

p93
SL3
Object
129 **SL3 Old Trafford** – Since the Spatial Profile has the objective to maximise opportunities for green roofs and tree planting in this area, we would suggest that these be included within the Development Requirements.

p10
SL7
Object
130 **SL7 Stretford Crossroads** - Since the Spatial Profile has the objective to explore opportunities for green roofs and tree planting in the Stretford area, we would suggest that these be included within the Development Requirements.

p103
SL8
Support / Suggested change
131 **SL8 Carrington** – We welcome the measure required under the last bullet point in the Justification for the Proposals but would suggest that this should be included under the Development Requirements.

GMEU provides an ecological advisory service to and on behalf of the ten district councils of Greater Manchester
The Unit is attached to Tameside as lead authority.

(132)

P111

SL12 Woodfield Road – We welcome the statement that the proposals will include enhancements of the ecological corridor running along the Bridgewater Canal but would suggest that this should be included under Development Requirements rather than as a Justification for the Proposal.

SL12

Support / suggested change

P115 (133) **SS1 Victoria Warehouse** – We welcome the requirement to provide measures to enhance the Bridgewater Canal for ecological purposes.

SS1 Support

P119, SS3 **SS3 Stretford Meadows** – We welcome this proposal.

Support (134)

P121, SS4 **SS4 Partington Canalside** – We would suggest that the need to protect the wildlife corridor along the Ship Canal be included under Development Requirements.

Suggested change

(135)

If you have any queries relating to these comments, please contact me again.

Yours sincerely

SUZANNE WAYMONT M.I.E.E.M
SENIOR ECOLOGIST

GMEU provides an ecological advisory service to and on behalf of the ten district councils of Greater Manchester
The Unit is attached to Tameside as lead authority.

BOLTON, BURY MANCHESTER, OLDHAM, ROCHDALE, SALFORD, STOCKPORT, TAMESIDE, TRAFFORD,
WIGAN.

Cutting, Damien

From: Chris Chadwick [chrischadwick6@hotmail.co.uk]
Sent: 10 August 2009 11:39
To: Strategic Planning
Subject: Consultation Core Strategy Leslie Road/Chester Road, Trafford

Dear Sir,

Further to core strategy consultation document, the Greater Manchester Waste Disposal Authority wish to register concern as to the proposals detailed in the above documents for the Leslie Road/ Chester Road Site, Trafford as we have not agreed or had consultation on these proposals with you and we feel this would affect the development potential of the site. We would wish to arrange a meeting to discuss these proposals further with you as soon as possible. Please contact us in due course on the e-mail address: neville.chadwick@unitypartnership.com or by telephone 0161-770-4514. Address: unity partnership, Henshaw house, Cheapside, Oldham, OL1 1NY.

Thanks,

Neville Chadwick

Windows Live Messenger: Celebrate 10 amazing years with free winks and emoticons. Get [Them Now](#)

Trafford's Core Strategy Preferred Options Comments Form
29th June - 10th August 2009

Comments Sheet

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

What are you commenting on? Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.

Document	Section	
Core Strategy: Further consultation on the Preferred Option	YES	Page number pp 71 - 81
		Paragraph number []
Core Strategy summary broadsheet	[]	Policy number R2, R3, R4 + R5
Sustainability Appraisal	[]	Vision reference []
Equality Impact Assessment	[]	Strategic Objective reference []
Other document, (please specify)	[]	Strategic Location reference SL13
		Strategic Site reference []
		Table/Figure Reference Number []
		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 continue on a separate sheet if required

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 this document.

Despite there being 4 Policies covering the topic of green spaces, not one of them mentions the intention to protect any of the smaller green open spaces under 2000sq metres, which are not currently protected under the UDP. We have been told that neither the Green Space Strategy, nor the Integrated Green Plan will mention them or protect them in anyway. Yet these smaller green spaces are very vulnerable to development, yet they are essential for the environment and for their visual amenity, as well as providing places for people to sit, especially in the town centres. They also make the Borough look more prosperous and welcoming.

Currently and in the future, any Planning Application to build upon them will not be able to be rejected, as no Policy protects them in any way. This is a serious oversight in the document.

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

* Treat as 5 separate objections.

R2	101
R3	102
R4	103
R5	104
SL13	105