

1143

Trafford Tomorrow

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

STRATEGIC PLANNING AND DEVELOPMENTS

16 JUL 2009

Proc Action
By
Ans

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?

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)					

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.

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7 August 2009

Dear Sir

TRAFFORD CORE STRATEGY: CONSULTATION ON THE PREFERRED OPTION

Thank you, for the opportunity to comment on the above document.

The purpose of this statement is to identify and explain the position of the Agency on the likely impact of the document on the SRN and responds to the Local Planning Authorities consultation exercise. The recommendations take account of the Agency's policy set out in the Department for Transport (DfT) Circular 02/2007 'Planning and the Strategic Road Network'.

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

Review of the Core Strategy Preferred Option

Trafford MBC has previously consulted on their Preferred Options stage of their Core Strategy. No single option was universally supported, and as such, a hybrid option, largely based on Spatial Option 2 has now been derived. Infrastructure constraints have been identified, and phasing of development aspirations is to be used to deal with these issues.

The Agency is encouraged by the 'headline requirement' for the need for development to be accessed by 'adequate public transport', although this requirement is not fully reflected within some of the land allocations within the Strategic Sites and Strategic Locations (SS/SL).

SS+SL
Object
(133)

(132)
SA, Park
1.24
support

134

Pg 10
Spatial
Profile
Object

The Agency have no comments to make on the majority of the spatial profiles for the areas within the Borough, however [the lack of sustainable transport alternatives within Trafford Park has not been referred to within this section of the document. Trafford Park comprises a large area of the Borough, and the Agency require some surety and assurances that sustainable transport measures are to be implemented to ensure the viability of this key sub-regional asset as required.]

[With regards to Carrington and Partington, the Agency continues to have concerns over the public transport accessibility of these locations. Given this, in developing the evidence base (and Local Infrastructure Plan) to support these locations, the Agency recognises that more detailed work will need to be undertaken. This work should seek to establish the likely origin-destination travel patterns from the LDF Modelling arising from development at these locations, the level public transport infrastructure required to support these movements and the timescales over which infrastructure will be required to be provided in order to support the development quantum proposed. This will need to be supported by operational analysis to ensure that the scale of any impact at the SRN is quantified and that appropriate mitigation is put in place to keep the impact to a minima as car-based trips via the Carrington Spur will be an attractive option to people accessing new development if appropriate sustainable transport is not provided. This is a wider point also relevant to the cumulative transport impact of the strategy as a whole that the LDF modelling should help to address.]

Pg 18. Object
Pg 19. Object

135

Spatial Strategy

The Spatial Strategy has been constructed to concentrate growth towards the Regional Centre, the Inner Areas, Altrincham Town Centre and the Priority Regeneration Areas. Growth will be shared across the areas of Partington, Carrington and Sale West. More modest growth will occur in the remaining Town Centres, Woodfield Road in Broadheath and the Trafford Centre Rectangle. Elsewhere, development would be restricted to meeting local needs and supporting regeneration, with limited market activity.

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[The Spatial Strategy as drafted does not involve the release of Green Belt land.] Pg 26, Spatial Strategy
General Comment

[The Agency are encouraged that economic and housing growth is to be focused within the urban area, as the urban areas within Trafford benefit from public transport provision and interchanges, as well as good access to key services via non-car modes. Locating development in the Regional Centre conforms to RSS, and is encouraged by the Agency, albeit with a degree of caution as parts of the Regional Centre is located close to the SRN, and as such, even though it is the preferred location for development according to RSS, there may still be significant impact at the SRN. Again this should be assessed in the LDF Modelling work currently being undertaken.]

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Pg 26. Spatial Strategy
Support

138

The HA is encouraged by the first priority for locating development - Pomona Island (SL1); Trafford Wharfside (SL2); Old Trafford (SL3); Lancashire County Cricket Club Area (SL4); and Trafford Park Core (SL5). Notwithstanding that, appropriate sustainable transport infrastructure (or better links to existing infrastructure) may have to be delivered, alongside development in these locations to ensure any wider traffic impacts are not at the SRN.

SL1, Support
SL2, Support
SL5, Support
All with a general comment

139

The second priority will be Altrincham Town Centre (SL13), to support the role of Altrincham as the Borough's principal town, and at Carrington (SL8), Partington (SL9) and Sale West (SL10), to support regeneration proposals in these areas. Locating development within Altrincham Town Centre is encouraged by the Agency as it is well served by a range of public transport options, and home to key services, employment and leisure opportunities. However, any large scale development aspirations in this location will have to be reviewed by the Agency due to the likelihood of impacts on the A556 and M56 to the south of Altrincham. In addition, no transport impact justification (as is the case for the majority of the strategy) is provided for Carrington's inclusion within the second priority of development.

Pg 26, Point 2, Support

141

The Agency has previously commented on the suitability of Carrington and Partington as locations for development. If these sites can be delivered sustainably, with the appropriate transport and services infrastructure to reduce the need to travel by private car, then the Agency's concerns may be addressed subject to the residual car based impact. Conversely, if development at these locations results in large trip-generating schemes, the Agency may have to resist the development proposals at Carrington and Partington. However, no individual or cumulative transport impact evidence to support these proposals has been presented as part of the Strategy.

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143
Pg 26
Point 3
Support

The third priority will see growth at Sale Town Centre (SL11), Stretford Town Centre (SL7), the Trafford Centre Rectangle (SL6), and Woodfield Rd, Broadheath (SL12). The Agency is encouraged by such an approach on the whole as it aims to locate development in established town centre / urban areas. Given that parts of the Trafford Centre Rectangle site is within an AQMA area, it should be noted that the Agency have concerns regarding the placing of sensitive receptors (such as residential development) in AQMA's.

144

The transport impact of the Trafford Centre Rectangle location (along with all of the Strategic Sites and Locations) as it is currently envisaged in the strategy will be tested as part of the LDF modelling work.

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Outside of these areas new growth will be focussed on meeting local needs, particularly for affordable housing, with general 'market housing' (in sustainable locations, well served by public transport) supporting local needs and regeneration priorities. The Agency encourages Trafford's aspirations to locate additional development in sustainable locations as this will reduce the need to travel by private car.

146

The Agency are keen to work with Trafford in interpreting the outputs from the LDF Modelling, on an individual and cumulative basis, to inform the transport evidence base and Local Infrastructure Plan as it is progressed in preparation for publication.

Core Policies

The policy section as it currently stands appears to ignore the work done (or to be done) in the LDF Modelling exercise and appears to cover wider development within Trafford that does not form part of the SS/SL. As set out in the accompanying "Issues to be addressed in the Local Infrastructure Plan (IAR)", the LDF Modelling evidence base will be used to identify mitigating transport infrastructure and delivery timescales that underpin the strategy. For this reason, the Agency recommend that the Core Policies should be linked to the LIP (when complete) for the strategic sites and locations identified in the strategy. This will give a more certainty to the sites and locations identified in the strategy as major transport infrastructure will have been identified at this early stage not at application stage.

Pg 30, Core Policies, Object.

147

L1 – Land for New Homes

Table L1 sets out the schedule for the development of Trafford's housing aspirations over the plan period by location. Over 1,000 dwellings are to be located within the Trafford Centre Rectangle, and although this is a 'third priority' location in terms of locating development, this location aims to deliver almost 10% of the housing provision across the Core Strategy. A development quantum of 1,000 dwellings in a location close to the SRN causes the Agency some concern, unless sound transport evidence is provided to support the development aspirations at this location.

Pg 34, Table L1, SL6, Object

148

In addition, 3,900 dwellings out of the 11,800 total are to be delivered in 'Other South City Region Sites', although locations are not specified within the document, these dwellings do not appear to be located within Strategic Sites or Strategic Locations, therefore they will have to be delivered in other areas across the Borough. The Agency will continue to work with Trafford to ensure any sites which emerge to accommodate these dwellings are sustainable and do not impact upon the operation and safety of the SRN predominantly through the planning pre-application and application process. However, the Agency will discourage any large scale housing developments close to the SRN which may impact upon the SRN, unless it is demonstrated within the supporting evidence base, that the impact on the SRN can be minimised through the use of sustainable modes. In addition, there should be stronger links between Core Policy L1 and the delivery of housing outside of the Strategic Sites and Strategic Locations as this may trigger (depending upon scale and location) a review of the Local Infrastructure Plan, to ensure these new sites can be delivered sustainably. The mechanism for such a review needs identifying in the LIP and reflected in the Core Policies.

Table L1, 'Other South City Regions' General Comment

149

L2 – Meeting Housing Needs

150
Quality
Type
Size
Object

[With regard to this policy it is worth noting that appropriate housing types should be located in appropriate locations to ensure the operation and safety of the SRN is not compromised by unsuitable land allocations.]

L3 – Regeneration and Reducing Inequalities

151
Pg 39
Policy L3
Object

[Whilst the Agency is encouraged by Trafford's intention to regenerate deprived areas, this should not be at the expense of unsustainable land allocations being brought forward with inappropriate or insufficient infrastructure. [The Agency is also encouraged that Core Policy L3 aims to improve access to employment opportunities and community facilities. Moreover the Agency would state that access should be improved by focusing on or promoting sustainable modes of travel in the first instance.] Pg 39, L3.2(c), Support.

100

L4 – Sustainable and Transport Accessibility

152
Pg 41
LA-1
Support

[The Agency is encouraged by the principles set out in Core Policy L4 as it aims to improve and enhance existing public transport networks and routes, as well as ensuring new development is delivered with infrastructure which will improve accessibility and sustainability.]
[However the Agency suggests that this should focus upon ensuring access to sustainable choices rather than overall accessibility. The Core Policy supports all aspects of sustainable travel, and if it can be delivered and implemented alongside Trafford's development aspirations, then sites should emerge on a sustainable basis, and not adversely affecting the SRN.] Pg 41, L4, Object

153

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

[The Council will not grant planning permission for new development that is likely to have a significant adverse impact on the safe and efficient operation of the highway network unless and until appropriate transport infrastructure improvements and/or traffic mitigation measures and the programme for their implementation are secured.] Pg 41, L4.3, Support.

154

155
Pg 41
LA-1
Object

[In order for Core Policy L4 to benefit the Agency in terms of the SRN, the wording of Core Policy L4 should be altered to explicitly reference the 'Strategic Road Network' within its wording to ensure that planning permission is not granted for new development that is likely to have a significant impact on the SRN. [Also distinction should be made to sites within the SS/SL (with specific reference to the LIP and its infrastructure measures) and developments that are as yet unidentified. Such a worded policy would give the Agency some surety that development both within and outside of the SS/SL will come forward on a sustainable basis.] Pg 41 Object

156

L5 – Climate Change

The Agency are concerned that there is no assessment of the impact of the Strategy upon climate change in transport terms. Changes in transport carbon emissions as a consequence of the strategy should form part of the LDF Modelling and evidence base. If the bias towards a sustainable modes suggested by Trafford is carried through into the LIP then this should have a positive influence. It is not possible for this cumulative assessment to be undertaken at planning application stage, once sites have been allocated for development.

(157)
Pg 47
L5
Object.

This will also be the case for Air Quality. In the policy it is stated that developers should not propose development that will worsen air quality, this is welcomed by the Agency however the cumulative Air Quality assessments of the Strategic Sites and Strategic Locations should form part of the evidence base at this stage.

(158)
Pg 47
L5
Object.

L6 – Waste

The Agency will comment on the Greater Manchester Joint Waste Development Plan Document as Trafford are working jointly with other Greater Manchester districts, through the Joint Waste Development Plan Document, to develop detailed waste policy and identify sites for a range of facilities across the county.

(159)
Pg 52
L6
Council
Commad

L7 – Design

With regard to this policy it is recognised that this aims to 'Provide safe, convenient links to public transport and community facilities' and the HA is encouraged as this should help reduce the need to travel by private car.

(160)
Pg 54
L7
Support

L8 – Planning Obligations

The Agency is encouraged by this policy that aims to improve public transport, and such improvements should be able to be secured through Core Policy L8. However, identifying the level of contributions to provide the required level of infrastructure should not be left until the planning application stage to avoid the possibility of a funding shortfall, thus making the strategy incomplete. The Agency recommend that this should therefore be covered in some detail in the funding section of the LIP.

(161)
Pg 57
L8
Support
in
Principle

W1 – Economy

The Agency has not responded on this Core Policy as more detailed policy and site-specific information is provided later in this response. [However, Policy W1.9 should include the statement that 'sites are accessible by a range of alternative modes other than the private car'.

(162)
Pg 59
W1.9
Object.

W2 – Town Centres & Retail

The Agency is encouraged by the sequential nature of Core Policy W2, as it clearly identifies a hierarchy of how Town Centres within Trafford should be developed. By locating development in Altrincham (the principal town centre), then other town centres (Hale, Sale Moor and

163
Pg 62, W2-2
Support

Timperley), followed by the local centres, there is a sequential policy in place for developing town centres within Trafford. In addition, this is in accordance with Government Policy.

164
Pg 63
W2-10
Support

The Agency are encouraged by the presumption against Out-of-Centre Development, as new development located away from town centres / urban areas is more likely to impact upon the SRN due to its location.

W3 – Minerals

The Agency will respond to the wider consultation of the Greater Manchester Joint Minerals Development Plan Document (GMJMDPD), and as such, will not be making comments on Core Policy W3.

Pg 65, W3, General Comment

165

R1 – Historic Built Environment

The Agency has no comment to make on this Core Policy.

R2 – Natural Environment

The Agency has no comment to make on this Core Policy.

R3 – Green Infrastructure

The Agency are encouraged by Core Policy R3 as it will promote the use of cycle ways and greenways, which are more sustainable forms of travel resulting in less use of the private car to make journeys.

Pg 74, R3, Support

166

R4 – Green Belt and Other Protected Open Land

The Agency are encouraged by the content of Core Policy R4 as it aims to protect green belt and other protected open land as development in these locations / re-designation of land could impact upon the SRN.

Pg 76, R4, Support

167

R5 – Open Space and Recreation

The Agency has no comment to make on this Core Policy.

R6 – Culture and Tourism

The Agency has no comment to make on this Core Policy.

Strategic Locations

It should be noted that all of the comments regarding strategic sites and strategic locations are made without sight (both for the Agency and Trafford) of the LDF Modelling Outputs and as such the comments are subject to results and subsequent discussions to produce the LIP.

Pg 66
Object

168

SL1 Pomona Island

The development proposals at Pomona Island are mixed use and aim to provide up to 1,500 residential units, commercial office accommodation (up to 8,000sqm), hotel, leisure and small scale ancillary retail, restaurant, café/bar, and community facilities.

The site is accessible via public transport and sustainable modes, as it is located within the Regional Centre. As such, the Agency are encouraged by mixed-use development in this location, as it can make best use of existing public transport and sustainable modes infrastructure to ensure travel by private car is minimised. Additional pedestrian and cycle links are identified as requisite within the 'Development Requirements' for the site, and as such, these should be encouraged.

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Pg 89
SL1
support

SL2 Trafford Wharfside

The Core Strategy Preferred Option aims to provide a mixed-use redevelopment of the Trafford Wharfside area, including:

- In the Media City UK area: a high quality mixed-use development of commercial office accommodation (of up to 10,000sqm) centred around digital, media and tourism industries and residential development (up to 900 units);
- In the Manchester United stadium area: development that supports the existing football stadium and associated hospitality, conference, retail and visitor facilities;
- East-west along the Ship Canal and north-south along Waters Reach and Sir Matt Busby Way, the creation of a high quality public realm area that will be a key element of the visitor experience and will link to existing and future public transport infrastructure improvements and canal crossings; and
- Agreement and implementation of appropriate bridge crossings at Mediacity and Clipper's Quay.

Trafford Wharfside is located on the edge of the defined Regional Centre and is well located in terms of public transport, and access via sustainable modes. Notwithstanding this, the scale of the development may impact upon the M602, as Junction 1 of the M602 is located close to the western edge of the Regional Centre boundary. [As such, the development must be brought forward sustainably, and the Agency encourages joint working with Salford City Council to ensure the overall development scheme at Media City UK does not impact upon the operation and safety of the M602, as well as ensuring public transport and sustainable links work with regards to cross-boundary movements.] Pg 91, SL2, General Comment

170

SL3 Old Trafford

Strategic Location SL3 aims to provide a housing-led redevelopment to promote development and change within the Old Trafford Neighbourhood by improving the quality and diversity of the housing stock, access to the Regional Centre and Trafford Park and the provision of

further commercial, cultural and community facilities. In terms of new development quantum, the development in Old Trafford aims to provide up to 1,000 (net) new residential units, 1,400 sqm of office floor space and small scale retail facilities, to meet local needs.

As this redevelopment and generation of new housing units is on a local scale, with existing public transport routes and a generally good accessibility to core services, it is felt that the Agency does not need to comment on the development proposals at Strategic Location SL3.

SL4 Lancashire County Cricket Club Area

Provision of a redeveloped and much improved LCCC sports stadium and ancillary sports and leisure facilities as a key element of the comprehensive regeneration of the area which will also deliver a mix of business and retail floor-space and new residential accommodation (up to 900 units), improvements to education facilities and the creation of a high quality public realm area along Warwick Road and Brian Statham Way that will be a key element of the visitor experience and will link to existing and future public transport infrastructure improvements

It is noted within the development requirements that public transport infrastructure improvements may be required to cope with the increased capacity at LCCC. Currently the site is well served by public transport, however an increase in capacity at the site may induce network impacts further afield, and as such the Agency will encourage and support any public transport infrastructure improvements which will mitigate these impacts as identified by the LIP. Pg 95, SL4, Dev. Requirements, Object.

(171)

SL5 Trafford Park Core

Redevelopment to:

- Sustain and improve this key location for industry and business activity within the Manchester City Region. Inner Area as the principal location for employment development in the Borough focussing on the provision of modern industrial, storage and distribution and, where appropriate, supporting commercial office accommodation; and
- Improve the public transport infrastructure to provide an integrated, frequent public transit system linking the location with surrounding residential and commercial areas.

Trafford Park is an established regional location for business and industry, and as such, currently impacts greatly on the M60, M62 and M602. Notwithstanding this, locating new development within / redeveloping the core areas of Trafford Park should be welcomed, especially if this at the expense of developing the fringes of Trafford Park where public transport penetration may not be as great. [The Agency welcomes and encourages the aspiration to deliver associated public transport infrastructure improvements alongside the

delivery of additional floor space, to ensure workers can access Trafford Park on a sustainable basis rather than using the private car.] Pg 97, SLS, Support.

(172)

[Any significant development proposed that is not covered in the LDF Modelling work should be undertaken using a master plan approach to ensure that public transport improvements are in place before new developments / floor space is occupied at this location. Pg 97, SLS General Comment.

(173)

SL6 Trafford Centre Rectangle

Mixed-use development to provide:

- Substantial new residential (apartment and family) accommodation (up to 1,050 units at Trafford Quays) and, where appropriate further commercial office, hotel and leisure (including museum) accommodation in other locations; and
- Significant improvements to public transport infrastructure including an integrated, frequent public transit system linking the location with surrounding residential and commercial areas.

Development in this location is viewed as the 'third priority' by Trafford MBC, as stated within their Spatial Strategy at the start of the document. [However, as mentioned previously within this response, the Trafford Centre Rectangle site is partially within an AQMA, and as such, the Agency would caution against residential development within that part of the location.] Pg 99, SL6 Object.

(174)

[Notwithstanding this, the Trafford Centre Rectangle site is identified as having a mixed-use (non-residential) development quantum. Development in this location will impact upon the SRN, and as such, any development needs to be supported by extensive public transport improvements to ensure the impact on the SRN is minimised. The Agency will expect to see supporting sound transport evidence for the site, as well as being clearly demonstrated within the Local Infrastructure Plan that the site can come forward on a sustainable basis.

Pg 99, SL6, Object.

(175)

SL7 Stretford Crossroads

Regeneration of town centre and adjacent area to provide:

- New / improved retail floorspace to enhance the offer of the town centre, in particular within Stretford Mall and immediate vicinity;
- New / updated commercial office and leisure accommodation;
- New residential (apartment and family) accommodation (up to 250 units); and
- Public realm enhancements and accessibility improvements around the A56 Chester Road – A5145 Edge Lane / Kingsway junction and between the town centre and the Metrolink station.

The policy also states encouragement will be given to proposals which would secure the active reuse and preservation of the Essoldo building.

The Agency encourages development in this location due to its town centre location and public transport accessibility characteristics.

Pg 101, SL7, Support

7
176

SL8 Carrington

Development and redevelopment to provide:

- Significant new storage, distribution and industrial accommodation;
- Ancillary business park accommodation to support the above;
- New elements of and improvements to the highway and public transport infrastructure to improve the accessibility of the location; and
- A new crossing over the Manchester Ship Canal and associated infrastructure provision to enhance linkages to the M60.

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*Pg 103
SL8
concern*

Residential development will only be supported where it can be demonstrated that the housing targets within Policy L1 cannot be delivered on land available for development that accords with the priorities set out in that policy and that it meets the housing needs identified in Policy L2, and that it is consistent with all other policies in the Development Plan.

The Agency is concerned by the Preferred Option's development aspirations for Carrington due to its poor public transport accessibility and potential impact on the SRN. In addition, 'associated infrastructure provision to enhance linkages to the M60' cannot be supported by the Agency if this is predominantly for car based commuting as this would impact upon the operation of the SRN. Furthermore, no other options are suggested as an alternative to this mitigation scheme, and as such, an iterative process should be undertaken to identify a more suitable measure to improve public transport accessibility to the site. Also the Agency has some concerns regarding the ten additional crossing of the Ship Canal. Any requirement for this major piece of infrastructure should be fully justified within the LDF Modelling work and subsequently in the LIP.

Pg 103, SL8, Object

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In addition, the Agency will continue to provide input where possible into the 'Carrington Transport Feasibility Study or such other relevant reports that may be adopted by the Council', however the LDF modelling should cover the potential transport impacts on the SRN and major mitigation measures required for its delivery.

SL9 Partington

Development and redevelopment to support the regeneration of the Partington township to provide:

- Substantial new residential (family) accommodation (up to 850 units);
- A redeveloped local shopping centre; and
- Improvements to open space and amenity areas in terms of quality and access.

Partington and Carrington have similar characteristics, in that although they are not close to the SRN, their poor public transport accessibility means that the use of the private car is a highly viable option to accessing these locations. As such, it is likely that development in these locations will impact upon the M60 and M6. [However, the Agency welcome the 'development requirement' for the Partington area is to 'improve public transport accessibility and usage in the area'.] Pg105, SL9, Dev. Req, Support.

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[Notwithstanding this, until a sound transport evidence base is developed via the LDF modelling and LIP to support the development aspirations at this location, the Agency holds similar concerns for the Partington site as those held for Carrington.. Pg105, SL9, Object.

180

SL10 Sale West

Development and redevelopment to support the regeneration of this former Council estate focusing on improvements to the residential mix and quality, the neighbourhood centre, the public realm and access to employment opportunities. The Council will seek the net addition of 100 residential units during the Plan period as part of the regeneration proposals for the location.

[Due to the edge of Town Centre nature of the site, combined with the relatively small amount of development at this site, the Agency are less concerned by the proposed scheme identified within Strategic Location SL10. Pg107, SL10, General comment.

181

SL11 Sale Town Centre

Redevelopment to promote the consolidation and improvement of the town centre to provide:

- Improvements to the mix and quality of the existing retail offer;
- New retail floorspace which improves the quality of the retail offer (up to 4,000sqm);
- New commercial office accommodation (up to 3,000sqm);
- Additional leisure and community facility development; and
- Additional residential accommodation (up to 100 units)

[Due to the edge of Town Centre nature of the site, combined with the relatively small amount of development at this site, the Agency encourages the development aspirations at Strategic Location SL11. Pg109, SL11, Support.

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SL12 Woodfield Road

The development aspirations at Woodfield Road aim to redevelop redundant industrial premises in this 'most accessible location' for residential-led mixed use development, including up to 400 residential units and 2,000sqm of office floorspace.

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The Woodfield Road site is accessible via sustainable modes, and due to its location and relatively small development quantum, it is felt that the Agency can encourage the proposed development quantum at this location. Pg 111, SL12, Support.

SL13 Altrincham Town Centre

Regeneration of town centre to maintain and enhance its status as the principal town centre in Trafford and a sub-regional commercial hub. Further development to provide:

- Up to 20,000sqm of retail floorspace;
- Up to 10,000sqm of office floorspace;
- Significant new leisure and hotel facilities;
- Up to 250 residential units;
- Improved public transport interchange;
- Enhancements to the public realm; and
- Improvements to pedestrian routes to encourage better circulation, particularly in an east-west direction across the Town Centre

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Pg 113
SL13
Support

The Agency is encouraged by the concentration of development in Altrincham Town Centre as it benefits from established public transport links to local and regional centres via a number of differing modes, and also plays host to a number of key services, retail, leisure and employment opportunities. However, locating significant amounts of development in this location may see demand for the Junction 6 and 7 of the M56, and as such, development pressures may impact upon the operation of these junctions. However any large-scale development aspirations in this location will need to be brought forward sustainably to minimise any impact at the SRN. Any large-scale development sites should be supported by the appropriate infrastructure and sound evidence bases to ensure any impact at the SRN is minimised. Pg 113, SL13, Object.

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Strategic Sites

SS1 Victoria Warehouse

A high quality, high density, multi-storey mixed-use redevelopment of a prominent long-standing, under-used, 1.4 hectare site located at the Trafford Wharfside / Trafford Park eastern gateway. The mixed-use redevelopment to comprise:

- Residential apartments (up to 400 units);
- Commercial office accommodation (up to 15,400 sqm);
- Hotel accommodation (up to 8,200sqm);
- Ancillary leisure and retail accommodation (up to 2,300 sqm)

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Pg 115
SS1
Support

Development in this location will benefit from accessibility via public transport, as well as being located on the edge of the Regional Centre. With regard to the Regional Centre, the

comments made previously within this response regarding development in the Regional Centre remain valid for Strategic Site 1. [However, the proposed development uses are complimentary to the nearby uses, and as such, the site should benefit from linked trips. As such, it is not felt that the Agency needs to respond regarding Strategic Site SS1, subject to results of the transport evidence base and Local Infrastructure Plan required to demonstrate that the site can be delivered on a sustainable basis.]

pg 115, SS1, General comment

187

SS2 Trafford Quays

A high quality residential led mixed-use development on a substantial greenfield site located at the Trafford Centre/Trafford Park western gateway.

- The mixed-use development to comprise:
- Residential apartment and family accommodation (up to 1,050 units);
- Commercial office accommodation which is supported by a full PPS6 (or its replacement) assessment; and
- Ancillary retail, leisure and education accommodation

[As with development at the adjacent Trafford Centre Rectangle site, development in this location will impact upon the SRN, and as such, any development needs to be supported by extensive public transport improvements to ensure the impact on the SRN is minimised. These public transport improvements should be identified and programmed within the supporting Local Infrastructure Plan to justify the deliverability of the site, ensuring it comes forward on a sustainable basis.] [The Agency welcomes that 'significant measures to improve public transport accessibility' have been identified as important to delivering the site for development, however these need to be explicitly identified with mechanisms put in place to ensure they are delivered before the site is operational through the LDF Modelling and LIP. Until the evidence and infrastructure information is presented, the Agency cannot form a view regarding the aspirations at this location.]

pg 117, SS2, Support in principle

189

SS3 Stretford Meadows

Development of a 50 hectare Green Belt former landfill site as an informal woodland / meadow recreation area – providing for walking, cycling, horse riding and other informal recreation uses. – which will contribute to the Strategic Green Infrastructure of Greater Manchester linking The Mersey Valley with Salford and Manchester.

Provided development at this location is purely leisure based, with no ancillary, trip-generating uses, the Agency will not object to the development proposals at this site. However, this site should come forward with cycling and walking infrastructure to ensure the site is permeable by non-motorised modes to reduce the need to travel by private car to the site. Pg 119, SS3, support in principle (190)

SS4 Partington Canalside

Development of a significant substantially vacant/unused 16 hectare green-field site adjacent to the Manchester Ship Canal to provide a residential development of 550 units. The development of this new housing scheme will facilitate the redevelopment of the main local shopping centre in Partington – to provide and sustain improved retail/service facilities for the local population. Provision of a 'green loop' to connect existing areas of green space to create an accessible, attractive route around Partington.

[Comments made regarding SL9 Partington apply to SS4 Partington Canalside.] Pg 121, SS4, Object. (191)

SS5 Altair Altrincham

A high quality, high density multi-storey mixed-use development on a 3 hectare brown-field town centre site immediately to the east of the Altrincham transport interchange.

The mixed-use development to comprise:

- Retail, café, bar, and restaurant accommodation (up to 15,000 sqm);
- Commercial office accommodation (up to 8,500 sqm);
- Hotel accommodation (up to 7,700 sqm);
- Ice Rink and other leisure development (up to 11,600 sqm);
- Residential apartment accommodation (up to 150 units) to provide a mix of sizes and tenures;
- New areas of public realm; and
- Improvements to pedestrian linkages to the rest of the town centre, in particular a new pedestrian bridge link between the Site and the Interchange

[The comments made regarding SL13 Altrincham Town Centre earlier in this document also apply to SS5 Altair Altrincham due to their similar locations. Pg 123, SS5, General comment. (192)

[As a general point in regard to the Strategic Sites and Strategic Locations, where development is to be phased, the support infrastructure to support this development must be also be phased to ensure sustainable development comes forward. This should be reflected within the transport evidence base and Local Infrastructure Plan. Pg 8, General comment. (193)

Implementation

Core Policy L4 Sustainable Transport and Accessibility has identified the Highways Agency as a delivery agent, alongside the Public Sector, Private Sector and GMPT. However, DfT Circular 02/2007 sets out that:

The Agency cannot be expected to cater for unconstrained traffic generated by new development proposals. Such growth would be unsustainable and would restrict opportunities for future development where available capacity is limited. Development should be promoted at sustainable locations, and the Agency will expect to see demand management measures incorporated in development proposals

As such, the Agency will expect to see development aspirations being promoted through the Core Strategy go through an iterative selection process in conjunction with being supported by a transport evidence base incorporating the LIP (as set out in the IAR) that ensures a minimal level of highway based mitigation. Such a process will examine the transport impacts of each site in detail as well as examining the cumulative impact within Trafford and be consistent with emerging cross boundary infrastructure requirements for the neighbouring Boroughs and GM as a whole. This will allow unsustainable and unsuitable sites to be either reconsidered, relocated to more sustainable locations and/or have the appropriate sustainable infrastructure identified and promoted through the LIP.

194
Pg 126
objed

Moreover, it is fundamental that the LDF Core Strategy and Local Infrastructure Plan are not developed as if mutually exclusive of each other if the LDF is to have a sound evidence base. The Core Strategy should recognise that the ultimate success of the LDF process will be dependent on identifying existing constraints, determining resultant impacts of the broad land allocation options, identifying mitigation measures, establishing the effectiveness the mitigation measures and deriving appropriate solutions (transport emphasis).

195
Pg 126

Having been identified as a delivery agent within Core Policy L4, the Agency are happy to assist in this iterative process to ensure that development identified within the Trafford LDF is located in the most sustainable places and can be delivered, whilst having minimal impact on the operation and safety at the SRN.

196
Pg 126
Gen. comm.

As often stated in this response, there must be consistency between the information which is being used in the emerging LDF Modelling work and the development aspirations presented within the Core Strategy Preferred Option to ensure that the Core Strategy is assessed accurately. If this information is not consistent, then the modelling work will have to be revisited if the Agency is to have confidence that the impacts predicted by the model are reflective of the current Strategy.

197
Pg 126
Gen comm.

Whilst the Agency appreciates that the LDF Modelling work is ongoing and that outputs from the model are unavailable at the current time, this work should be referenced within the Core Strategy Preferred Option, with a clear commitment of using the model outputs to inform the LDF evidence base (transport emphasis) and shape the land-use aspirations of the Trafford LDF where appropriate.

198
Pg 126
objed

Once this work has been done, a programme of delivery should be adopted. This will subsequently inform the phasing of the proposed SS/SL in the Strategy.

199
Pg 126
Gen. comm.

200
on page 5

The Agency suggests that frequent meetings be arranged over the next few months between the Trafford LDF team, Trafford Highways and the Agency to interpret the results of the LDF Modelling and production of the LIP.

Conclusions

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

The priority for locating development as set out within the Spatial Strategy is welcomed by the Agency, as it provides a clear sequential approach to the land allocations priorities within the Borough. Notwithstanding this, not all of Trafford's RSS housing allocations are within the Strategic Sites or Strategic Locations and as such, irrespective of the priorities of development, all Strategic Sites and Strategic Locations will have to be delivered to ensure that Trafford's RSS housing requirements are delivered.

The Agency is encouraged by a number of the Core Policies that have been developed by Trafford MBC to develop their spatial planning policy aspirations. For Core Policy L1, more information is required to understand how an additional 3,900 dwellings can be delivered in the South City Region, outside of the Strategic Sites and Strategic Locations explicitly identified within the document. In addition, it is recommended that Core Policy L4 be adjusted to include the term 'Strategic Road Network'.

Some of the Core Policies contain elements that have been discouraged by the Agency at this time, however if detailed and robust transport evidence emerges, in conjunction with a sound Local Infrastructure Plan, then the Agency would be in a position to take a view on the suitability of the 'remaining' Core Policies. Should a sound transport evidence base and Local Infrastructure Plan not be forthcoming, then the Agency will not be able to support the Core Strategy.

With regards to the Strategic Sites and Strategic Locations, the Agency are encouraged that Trafford MBC have identified the need for new and improved public transport infrastructure in order to deliver some of the land allocations aspirations. However, these will have to be identified within the transport evidence base and Local Infrastructure Plan in order for the Agency to take a view on the suitability of the Strategic Sites and Strategic Locations. In

addition, the Agency recommends that an 'iterative process' identified in the implementation section of this response is adopted in order to ensure only the most sustainable and suitable sites emerge through the LDF process.

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

I trust the above information is helpful. Please do feel free to give me a call should you wish to discuss any of the issues raised further.

Yours sincerely

Mrs Lindsay Alder
Strategic Planning Team North West
Email: lindsay.alder@highways.gsi.gov.uk

1158

TRAFFORD CORE STRATEGY: FURTHER CONSULTATION ON THE PREFERRED OPTION (JUNE 2009)

REPRESENTATION ON BEHALF OF HOMESTAR INVESTMENTS LIMITED

I write on behalf of Homestar Investments Limited to submit an objection in respect of Policy R4: Green Belt and Other Protected Open Land.

(101)
R4, Pg 76
Object.] It is considered that the policy should allow for local detailed boundary changes where it would support development that meets specific local need. Providing development close to existing urban areas and in areas of need is likely to prove to be the most sustainable way of achieving the Core Strategy's wider objectives and in supporting regeneration.

Regional Spatial Strategy for the North West allows Local Planning Authorities to examine local detailed boundary changes through their Local Development Frameworks (Policy RDF4).

The proposed Core Strategy Spatial Strategy recognises that outside of the Regional Centre, Inner Area and a number of other locations, that: "... new growth will be focused on meeting local needs, particularly for affordable housing ..." (page 26) and it is noted within the Spatial Profile for the Sale area (including Ashton Upon Mersey) that "The area is tightly constrained to the north and west by the Green Belt in the form of the Mersey valley and Carrington Moss." (page 15).

(102)
Pg 37, para 7.5
General Comment] It is also noted in the Preferred Option consultation that the greater need for affordable housing falls within the Southern Housing Sub-Market (paragraph 7.9).

R4, Pg 76
Object.] In order to meet local affordable housing need, it is considered essential that flexibility to amend the Green Belt boundary to allow for the development of new affordable housing is retained within the Core Strategy and other Local Development Framework documents. Development of affordable housing on sites of sufficient size is considered more likely to be successful in the current housing market than piecemeal provision on smaller sites.

It is therefore requested that Policy R4 be amended to allow for local detailed Green Belt boundary changes in the Sale area (inc. Ashton Upon Mersey) to allow for the provision of development to meet specific local housing need.

Please also see a related representation in respect of land off St Martin's Road, Ashton Upon Mersey, made in respect of the Trafford Strategic Housing Land Availability Assessment – 2009 Review.

Agent:
David Golden, MPSL Design

10 August 2009

12 AUG 2009

~~1036~~
1036



Rec			
Action by			
Ans			
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Our ref PG/MW/066598

Via Post and Email

10 August 2009

Dear Sir / Madam

**Comments on Core Strategy Further Consultation on the Preferred Option
 Land at Woodfield Road, Broadheath, Altrincham**

On behalf of our client L&M Limited, we write to provide our comments on Trafford Council's "Core Strategy-Further Consultation on the Preferred Option" paper, published in June 2009.

These comments should be read in conjunction with the comments provided to the Council in February 2009 on behalf of L&M Limited in response to the Core Strategy Key Strategic Site Assessment.

L&M Limited own a parcel of land to the west of Woodfield House at Woodfield Road, Broadheath, Altrincham, which is approximately 5 hectares in size. The site is located between the Bridgewater Canal and Norman Road, and is currently occupied by the L&M works and other light industrial units.

Our comments on the current consultation document are provided as follows:

Part A: Spatial Portrait of Trafford

Part A of the consultation paper provides a spatial portrait of the Borough, identifying Altrincham and its neighbouring communities (including Broadheath) as one of the ten locally distinct places that make up Trafford.

We support the objectives for Altrincham, which seek to effectively manage high levels of residential development pressure and ensure that residents in Altrincham and neighbouring communities are able to access jobs in areas including Broadheath. We anticipate that the future redevelopment of the L&M Limited site will assist in achieving these objectives.

Part C: Spatial Strategy

The Spatial Strategy identifies the Woodfield Road site as falling within one of the third priority sites for development within the Borough, after the Regional Centre/Inner Area and key regeneration sites, which are identified as the first and second priorities for development respectively.

L&M Limited supports the identification of the land in its ownership as a priority site for redevelopment, however steps should be taken to ensure that the Core Strategy does not preclude the potential for third priority sites to be brought forward for redevelopment in advance of first or second priority development sites, particularly in the instance of highly sustainable third priority sites such as the land at Woodfield Road.

Part C: Housing

Draft Policy L1 identifies the sites where new housing is to be directed in the Borough and indicates that the Woodfield Road Strategic Location could accommodate up to 400 units during the lifespan of the Core Strategy. It is estimated that 100 residential units could be delivered on the site by 2011 and a further 300 units by 2016.

PI6 (102)
 Key issues
 and place
 objectives
 support

(103)
 P26
 Spatial
 Strategy
 page 3
 Object

(104)
 P31-34
 Policy
 L1
 Table 1.
 Object

The land at Woodfield Road is well located in relation to public transport and is surrounded by existing residential areas, which make it an appropriate location for new housing as part of a wider mixed-use development and L&M Limited supports the principle of delivering new housing here.

However, L&M Limited considers that the site has the potential to accommodate more than 400 units. This potential is recognised in Trafford's "Strategic Housing Land Availability Assessment: 2009 Review", also out for consultation at the present time, which indicates that Woodfield Road could accommodate 478 new residential units, including 243 on the land owned by L&M Limited. On this basis, we suggest that Draft Policy L1 should be revised so that it more accurately reflects the capacity for new housing on the site.

Part D: Strategic Location

Part D of the Preferred Option Paper identifies 13 Strategic Locations which are defined as wide areas for change which will play a key role in delivering development and regeneration across the Borough during the plan period.

The L&M site forms part of the wider Woodfield Road Strategic Location.

Draft Policy SL12 sets out a strategic proposal for this Strategic Location which is as follows:

"Redevelopment of redundant industrial premises in most accessible location for residential mixed use development, including up to 400 residential units and 2,000sq.m of office floorspace."

L&M Limited supports the identification of the wider Woodfield Road site (including the land within its ownership) as a Strategic Location, which is appropriate given the significant redevelopment opportunities which the site offers. However, the strategic proposal should be revised to reflect the potential that exists for the site to accommodate more than 400 residential units, as outlined above. In addition, it should acknowledge that any residential-led mixed use development of the site may comprise a range of other uses in addition to new housing and offices such as, for example, ancillary retail.

We understand that the "Strategic Locations" will set the framework for future land allocations, including those that are brought forward within the Council's "Land Use Allocations Development Plan Document" or via Area Actions Plans at a later date. L&M Limited fully support this approach.

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

Yours faithfully

**Philip Grant
for DRIVERS JONAS LLP**

philipgrant@driversjonas.com
Tel: 0161 247 7303 Fax: 0161 236 8420

Cc: M Barrett - L&M Limited

Dear Dennis/Gary,

Please see below the Labour Group response to the Council's Core Strategy consultation. If you need to ask any questions about our response please feel free to do so. I will be away on holiday from the 8th August until the 15th August, but I will be around anytime after that date if you need to speak to me.

I should be grateful if you would acknowledge receipt of this email.

Best wishes
David
Leader of the Labour Group

101

AFFORDABLE HOUSING

P35 Policy L2
Paras L2.5 - L2.7
● L2.7
Object

There should be a higher percentage figure, that of which is presently recommended in the strategy for Affordable Homes built in any new Housing to be developed in the Borough. It's essential with over 12,000 people now on Trafford housing waiting list that new housing is developed for rent, to buy, and shared ownership schemes, all of which should be affordable. The main groups of people needing housing are families and single people.

102

P35 Policy General L2

It is important the Council defines what it is meant by "Affordable Housing".

L2.5 - L2.7
226, Spatial Strategy
Para 4.5 Support

GREEN BELT/GREEN OPEN SPACE LAND

P79 Policy R5
Para R5.2
Support

It's important we protect all Green Belt Land and Park Land in the Borough. We should protect our Green Open Spaces, particularly in our Town Centres and heavily populated areas. We would also aim to help and support community use of such areas and involve stakeholders in their development.

P79, Policy R5, Object, Ref to Town Centres

104

ROAD & ROAD SAFETY

P41-42 Policy L4
Para L4.6 - L4.8
● L4.8 Support

Cycle lanes should be considered where possible throughout the borough. There should be more emphasis on improved road safety schemes in the Borough to protect pedestrians, cyclist, and all road users.

P64 Policy W2
Object
+ P91, SL2
+ P99, SL6
+ P117, SS2

TRAFFORD/WHARFSIDE/PEEL HOLDING LAND -- It's important to protect our existing Town Centres and therefore we need to state clearly that the land around the Trafford Centre where it's proposed to develop housing, should not be designated a "Town Centre". Also we should put a higher figure on the number of new dwellings built which should be affordable in this area.

P117, SS2, Strategic proposal, Object

108

P11, Old Trafford Key Issues + Place, Obj Support

OLD TRAFFORD NEIGHBOURHOOD AREA -- As the area of Old Trafford is heavily populated it's important to protect the green open spaces in the area. There is a need for more open spaces for recreational use ie football, cricket, netball, tennis etc. It is also important to work towards protecting and enhancing the local shopping parades in Old Trafford which are the life blood of the community.

P62 Policy W2, + P93, SL3, Object

111

P79, Policy R5, Para R5.3
Object

There is need for improved youth and community facilities.

P79, Policy R5, R5.2 f- Support

112

110

STRETFORD NEIGHBOURHOOD FORUM AREA -- There is a desperate need for the Council to develop a "Comprehensive Stretford Town Centre Plan" which develops first class shopping, leisure, recreation and job opportunities for the people of Stretford. The Council will further help support regeneration of the Town Centre

SL3

Object

113

recognising it's 10% stake in the Mall and how this can be best used towards such regeneration projects, and would seek to involve all local stakeholders.

114

P95, SL4 - Support

Need to protect both Town Halls. (TTH & Altrincham)

116

& SL13
P95, SL4

The Tesco land on Chester Road at the rear of Stretford Leisure Centre should not be allowed to increase it's present planning permission size of 48,000 sq ft Store [this is in line with previous planning permission and that of the planning inspector, decided at a public enquiry]. Anything above this size would have a detrimental impact on Stretford Town Centre and other Centres in the Borough.

P62-63
Policy W2
para 1
W2.13 -
Object

115

P95, SL4 -

There is a need to protect the small shopping parades in communities - P62, Policy W2

118

117

There is a need for improved youth and community facilities. - P79, Policy R5

119

There is a need for improved Health care facilities in Lostock and Stretford. - ? LIP?

120

121

P35, Policy L2

SALE NEIGHBOURHOOD FORUM AREAS -- There is a need for affordable housing in Sale. Should be definite statement to work towards supporting and enhancing Sale Town Centre. - P109, SL11

122

Sale Waterside arts centre should continue to be managed by the council for the benefit of local community and arts organisations as well as holding professional events.

P82, Policy R6

123

Need to protect small shopping parades in communities. - P62, Policy W2

124

P105, SL9

PARTINGTON NEIGHBOURHOOD AREA -- Town Centre shops need redeveloping as a matter of urgency. There's a real need to develop a better mix of Social/Private Housing. A comprehensive strategy is needed to address the isolation of Partington [Road and Public Transport] More job opportunities need to be created for the people of Partington.

P39, Policy L3
Para L3.2 b
Support

P121, SS4
+

P62, Policy W2
Support

126

That said, and very much aware of 50 years bitter experience, it is we feel, essential that the necessary services, facilities and opportunities are either in place, or irrevocably committed, before any significant new build of residential property. Most of Partington's problems, even now, can be seen to stem from over rapid housing provision, almost entirely extempore. We urge, that the benefit of hindsight, the strategy be reworked to put the horse before the cart and services, roads, places of employment and recreation et-al be established in readiness.

P41, Policy L4
Para L4.1 e
Support

The Council should not agree to building houses on Peel owned land in Partington until they begin to renew the Shopping Centre which they own.

129

P103, SL8

CARRINGTON -- Community Centre and youth facilities needed. Improved Public Transport needed.

130

P41, Policy L4, para L4.1 e
Support

131

P123, SS5

ALTRINCHAM NEIGHBOURHOOD FORUM AREA -- It's important to continue the development of Altrincham Town Centre. There is a need for affordable homes to enable people to stay in the area they grew up in. Need to protect the small shopping parades in the communities. P35, Policy L2, P62, Policy W2

133

P113, SL13
+

P26 Spatial Strategy
POLNE 2

132

URMSTON NEIGHBOURHOOD AREA -- It's important to continue to develop Urmston Town Centre. Need for affordable housing. Need for Youth and community facilities. Need to protect the small shopping parades in the communities

134

P62, Policy W2
P35, Policy L3
P79, Policy R5

DEPRIVED AREAS

Needs to be much more emphasis on the Borough's more deprived area's such as :- Sale West, Sale Moor, Lostock, Broadheath, Old Trafford, Partington, Lostock,

P39
Policy L3
Para L3.3
Object

135

Broomwood. There should be improved Environment, Youth, Leisure, Education, Health, Community facilities, jobs and support for those neighbourhoods.

136

P 62-63
Policy W2
Para W2.10-

. OUT OF TOWN SUPERSTORE'S -- Superstores should not be supported outside of our Town Centre's

. NEW DEVELOPMENTS -- Any new development within the Borough should be augmented with Trees & Shrub Planting , to improve our environment

137
P 71, Policy R2

→ L7?

138

P 57
policy L8

. COUNCIL SUPPORT FOR EVENTS/FESTIVALS -- A proportion of the 106 Monies from planning developments should be set aside for local Events/Festivals/Padgents etc within the Borough.

139

. OLD TRAFFORD FOOTBALL & CRICKET STADIA

There needs to be much more consideration for residents living near to Sporting Stadia on match days and event days [a committment needs to be made by the Council to limit the adverse effects of anti-social behaviour, noise, litter, traffic and parking problems etc]

SL4



140

. HISTORICAL & BUILDINGS OF GREAT INTEREST IN THE BOROUGH

There needs to be a policy which supports our building heritage, historical buildings and buildings of great interest where we can protect and preserve, [for example one such building which is currently under threat is the Sale Hotel]. The Council should do all in it's power to protect this building and that of similar importance within our Borough.

The historic environment gives our towns, and villages a unique sense of identity , we need as a council therefore to incorporate heritage into mainstream activities as a way of delivering core indicators and objectives. Strong management of the historic environment can have an extremely positive effect on resident satisfaction and community cohesion and will ensure that important assets receive the best possible protection.

The Council will consult with local people and organisations and examine proactively the case for establishing further Conservation Areas in the Borough.

P 67
Policy R1

141

LOCAL SHOPPING PARADES

We would like to see the council's core strategy recognise the value and contribution that local neighbourhood shopping makes to community wellbeing; those small concentrations perhaps as few as three shops together, often with a shared forecourt.

Most wards have quite a few concentrations of them and together they probably add up to a greater retail space than the 'primary' retail centre of Altrincham but they are conspicuous by their absence from the strategy document.

Often these shops set the tone for an entire neighbourhood, it's where people meet and chat, much more than the town centres or in the aisles of a superstore. And there's a number of threats facing them:

- the easier profits arising out of take-aways, which then encourage litter, parking problems and an association with anti-social behaviour. Clearly there's a number of these concentrations where the balance has gone completely awry.

P 62
Policy W2
Para
W2.7

- There's often an uneasy relationship with the car. By definition most customers come by foot and there isn't any organised parking provided for other modes, so cars end up on the forecourt, and there's conflict with deliveries.
- Some of the back street shopping parades have seen the boards go up and only one or two shops survive, perhaps detrimentally affected by the closure of adjacent units, and often with a tendency to put prices up, or sail close to the wind as far as trading standards are concerned. And the neighbourhood goes down with them.

142

Object
W2

It's striking that both the Trafford community and its council have not always been as proactive in coming forward to take over these vacant properties for community use as perhaps other areas. Probably the lower external funding compared to other authorities is part of the reason but it may also be affected by local social norms.

We believe there would be an argument for a page of the core strategy stating the case for the balanced provision in these locations but more importantly listing the locations. Identifying a thing exists is often the most vital first step and if all these local shops were gathered up and placed together they'd not just be recognised, they'd be strategic!

As it is, places as vibrant as Ayres Road, with shoppers coming from miles, just doesn't get recognised. It could lose it's shops in a weekend. We appreciate planning would have a say on individual changes of use, but the argument is still valid. To the people who live in the proximity, the Woodsends, the Nags Heads, Humphrey Parks, the Norris Roads are just as important as the primary town centres and we believe that their contribution to the vitality of a neighbourhood is disproportionately positive compared to their initial appearance.

P 62
Policy W2

143

HEALTH CARE PROVISION

The Council fully supports the developments of Stretford Memorial, Trafford General and Altrincham Hospitals. We also support improved localised healthcare provision within our communities which bring healthcare closer to local people. A prime example where it's desperately needed is Lostock, however there will be other community locations where they are also important. P14, Maisey Valley, Key issues + objectives

P12 - Stretford
Key issues +
Place objectives

P13, WINSTON
Key issues +
Objectives

146

145

YOUTH AND COMMUNITY PROVISION

There is real need to develop improved and new youth provision in key areas of the Borough where there presently isn't adequate provision. This is crucially important to ensure we maintain and enhance cohesive communities. There is a real lack of youth facilities in Old Trafford, Stretford, Lostock, Urmston, Flixton and Davyhulme, Sale and other areas of the Borough.

P79 Policy
R5. ?

148

David Acton
Leader of the Labour Group

- P16 Altrincham
Key issues + place objectives

149

- P12 Stretford
Key issues + place objectives

150

- P15, Sale, Key issues + place objectives

151

147

P18, Parangton " "



10 August 2009

LDF Team
Strategic Planning & Development
Trafford Borough Council
First Floor
Waterside House
Sale Waterside
Sale
M33 7ZF

STRATEGIC PLANNING AND DEVELOPMENTS			
12 AUG 2009			
Rec			
Action by			
Ans			
Copied to:			

Dear Sir,

Further Consultation on the Preferred Option

I refer to your recent further consultation document dated June 2009.

The thrust of our response remains the same as that set out in our letter of 27 August 2008 in respect of your original consultation. We would, however, like to re-emphasise and reinforce some of the points made in that submission.

108
Pg 9, Para 2.20
Support
109
Object

We welcome the recognition (at para 2.20) of the joint working arrangements that are now in place on airport related LDF matters.

We are, however, disappointed that the Core Strategy contains no aspiration to either improve access to/from the airport or to take advantage of the proximity of the airport which would enable the Borough to capitalise on the economic activity arising from having a major gateway airport on its boundary.

In that respect we think the Core Strategy is still rather inward looking and does not fully reflect emerging thinking for the Manchester City Region and the case for sustainable economic growth arising out of such work as the Manchester Independent Economic Review. Both of these see the airport as one of the major assets of Greater Manchester and with considerable potential to stimulate economic activity which is even more pressing given the current economic conditions. Trafford is extremely well placed to accommodate both our immediate supply chain activities and also those activities which find it necessary or beneficial to be located very close to a major international airport.

We set out our initial thinking on this subject in our last response and, as you will be aware, we have now progressed those ideas as part of the "Airport City" work. That work has confirmed that a significant opportunity does exist for a major air freight logistics operation. This was first set out in our Masterplan 2030 and again in our initial response letter to you of 27 August 2008. We remain of the view that the LDF process should consider the allocation of land for this type of strategic economic development. For the reasons previously explained, we believe this has to be a 'near airport' location, with suitable convenient access to the Airport site.

110
Object

Contd



INVESTOR IN PEOPLE

You may be aware that we made representations to the NWDA in respect of its recent Review of Strategy Sites and we suggested that the Airport and its environs be designated as a new Strategic Site. We had expected that the future of Davenport Green Site would have been looked at as part of this proposal. However we understand that the RDA are conducting a separate review into the new sites that have been proposed (including that at the Airport) while also having taken an initial view on the original list of site (including Davenport Green). It is our view that these two streams of work need to be brought together.

As our thinking has now moved on since our previous letter we would like to work with you over the next few weeks to see how this may influence the emerging Core Strategy. The new working arrangements are especially helpful in this regard so that work on the Manchester LDF and the Trafford LDF proceed in unison. We will be in touch shortly to request dates for meeting with you.

Yours sincerely

John Twigg
Group Planning Director

Direct Tel # 44 (0) 161 489 2206
Direct Fax # 44 (0) 161 489 3812
Email john.twigg@manairport.co.uk

(11)

General
Comment
(Policy
W1??)
Para 25.9
Pg 87.

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	x	Page number	35
		Paragraph number	
Core Strategy summary broadsheet		Policy number	L2
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.

P35
Policy
L2,
Para
L2-8
Gen

Whilst welcoming the inclusion of a section within the policy considering the provision of older persons accommodation, this should seek to positively promote the further provision of a range of forms of housing for the elderly in terms of both type and tenure. The increase in the elderly population has been well documented and the Core Strategy should seek to reinforce the message set out in the Government's publication entitled, "Lifetime Homes, Lifetime Neighbourhoods - A National Strategy for Housing in an Ageing Society" that there is a need for good quality specialised housing to promote greater choice for the elderly. Stay put and adapt is not a solution for all and can lead to the inefficient use of the housing stock with the under-occupation of inappropriately located accommodation.

(101)

P35
Pol L2
Para
L2-4
object

Para L 2.4 within the Policy refers to smaller units of accommodation and reference is made to the need for special justification to be put forward in terms of demonstrating a need. Given that specialised accommodation for the elderly often involves the provision of small units (e.g. sheltered housing) and the Government encourages the provision of a range of types of accommodation for this sector of the community, the Policy should be clarified to make it clear that special justification does not need to be provided for such schemes. In other words, this aspect of the policy should only relate to open market (i.e non age-restricted) smaller units and this should be made explicit within the policy text.

(102)

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

Trafford Tomorrow

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

STRATEGIC PLANNING
AND DEVELOPMENTS
11 AUG 2009

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?

I AM STRONGLY AGAINST ANY IDEA OF DEMOLISHING VICTORIA WAREHOUSE. ALREADY A SURFEIT OF FLATS IN LOTS OF THESE AREAS.

101

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)		✓			

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?

R1 IS PARTICULARLY IMPORTANT. (02)

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.



Planning Partnership



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Representations to
Trafford Council Local Development Framework

DPD1: CORE STRATEGY: FURTHER CONSULTATION ON
PREFERRED OPTION
(GREEN BELT ISSUES)

EPP reference: Reps4a-DPD1-7393-Green Belt-ct

August 2009

CONTENTS:

1.	INTRODUCTION	1
2.	POLICY CONTEXT	1
3.	RESPONSE TO CORE STRATEGY	2

1. INTRODUCTION

- 1.1 Representations have been submitted on behalf of a number of clients in connection with general housing and development issues identified in the Trafford Council Local Development Framework Core Strategy: Further consultation on the preferred option.
- 1.2 These representations are made on behalf of our client Mr J Kennedy and relate specifically to Green Belt issues identified in Chapter 20 of the document with particular reference to Brooks Drive, Hale Barns.

2. POLICY CONTEXT

National planning guidance

PPG2: Green Belts (2006)

- 2.1 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and to protect the countryside. The 5 purposes of Green Belts are given at paragraph 1.5. These are:-
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns from merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- 2.2 Paragraphs 2.6 to 2.11 of PPG2 deal with defining boundaries of Green Belts. It considers at paragraph 2.6 that once a Green Belt has been approved, it should only be altered in exceptional circumstances. Notwithstanding this, paragraph 2.8 states that Green Belt boundaries should be carefully drawn so as not to include land which it is unnecessary to keep permanently open.
- 2.3 Paragraph 2.11 explains how development plans should treat existing villages in Green Belt areas. It allows for settlements to be 'inset' thus allowing limited development (more than infilling) to take place. Alternatively, it allows for settlements to be 'washed over' and listed in the development plan. The development plan can then include policies to ensure that any infill does not have an adverse effect on the character of the village concerned.

identified in the development plan as an area in which limited infilling can take place in accordance with the text at 2.11 of PPG2.

3.8 PPG2 recognises circumstances where existing villages may be situated within the Green Belt. In such cases, the Green Belt can 'wash over' the settlement but the settlement can be listed within the development plan to state that limited infilling will be permissible in this location.

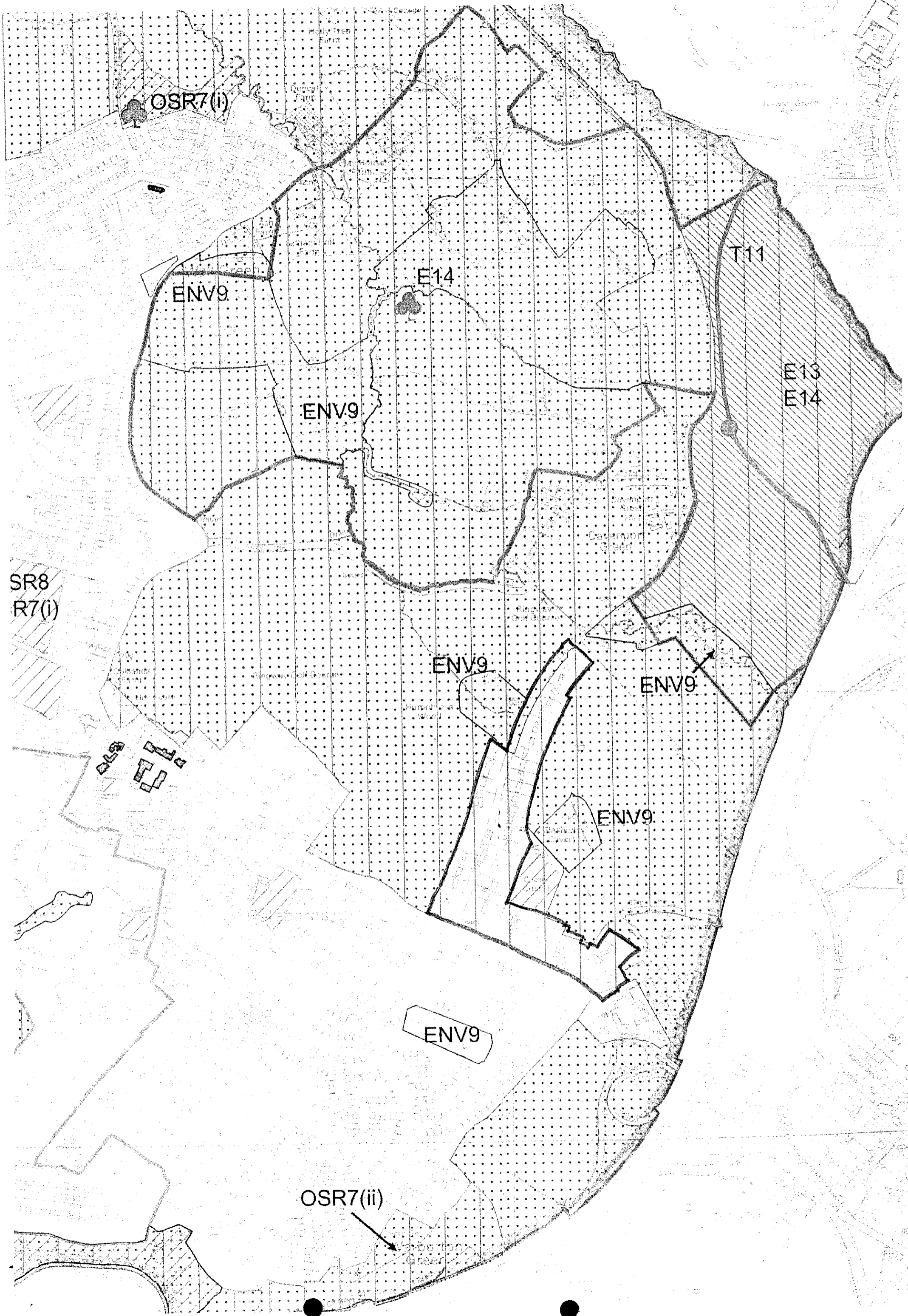
3.9 It is considered that a further paragraph should be added to policy R4 which would identify Brooks Drive as being washed over within the Green Belt on the basis that it comprises a ribbon of development. The policy should also state that the first four categories of appropriate development set out at paragraph 3.4 of PPG2 would be acceptable along Brooks Drive

3.10 In summary, Brooks Drive should be removed from the Green Belt. Should the council not consider it appropriate to remove Brooks Drive from the Green Belt, it is considered that it should be identified as being 'washed over' by the Green Belt and that in this location, infilling should be allowed.

105

P 76

Policy R4
Suggest additional
Paragraph



OSR7(i)

ENV9

E14

T11

E13
E14

ENV9

SR8
R7(i)

ENV9


ENV9

ENV9

ENV9

OSR7(ii)

Trafford's Core Strategy: Further consultation on the Preferred Option

Comment Form – June 2009  **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
strategic.planning@trafford.gov.uk

Comment Sheet

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

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Core Strategy: Further consultation on the Preferred Option		Page number	
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	L1
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Strategic Site reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

(10) P31, Policy L1, support

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.					

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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Les Morris
Land and Development Team
Town Planner
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Direct tel +44 (0)1926 653172
Direct fax +44 (0)1926 656574

www.nationalgrid.com

5 August 2009

Dear Mr Harrison

Trafford Council

Core Strategy: Further Consultation on the Preferred Option (Local Infrastructure Plan)

Thank you for your letter dated 25 June 2009 regarding the above. Having reviewed the documents we would like to make the following general and specific comments and also take this opportunity to emphasise the role of National Grid and to highlight areas and issues where we feel consultation with National Grid would be appropriate in future Development Plan Documents (DPDs).

Overview – National Grid

National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below.

Electricity Transmission

National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity.

National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses. Please see the enclosed leaflet for more information on who to contact regarding electricity distribution issues in your area.

To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply.

Gas Transmission

National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances.

New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.

Gas Distribution

National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London – almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.

111

National Grid and Local Development Plan Documents

SPATIAL STRATEGY P.26
GENERAL COMMENT
(PO DOCUMENT)

The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:

- An expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations).
- New forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).

Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.

112

(PO DOCUMENT)

We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues;

SPATIAL STRATEGY P.26
GENERAL COMMENT

- Any policies relating to overhead transmission lines, underground cables or gas pipeline installations
- Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines
- Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations
- Any policies relating to the diverting or undergrounding of overhead transmission lines
- Other policies relating to infrastructure or utility provision
- Policies relating to development in the countryside
- Landscape policies
- Waste and mineral plans

In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.

National Grid infrastructure within Trafford Council's administrative area

Electricity Transmission

National Grid's high voltage electricity overhead transmission lines / underground cables within Trafford Council's administrative area that form an essential part of the electricity transmission network in England and Wales include the following:

- ZQ line - 400kV route goes from Daines substation to Tottington Tee
- ZZN line - 275kV route from Daines substation in Trafford to South Manchester substation in Trafford
- ZE line - 400kV route from Carrington substation in Trafford to Drakelow substation in South Derbyshire.
- ZO line- 400kV route from Carrington substation to Deeside substation

The following substations are also located within the administrative area of Trafford Council:

- South Manchester substation - 275kV
- Daines substation - 400kV
- Carrington substation - 275kV

National Grid has provided information in relation to electricity transmission assets via the following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW>

Gas Transmission

National Grid has the following gas transmission assets located within the administrative area of Trafford Council:

Pipeline	Feeder Detail
1030	4 Feeder Plumley / Warburton
1031	21 Feeder Warburton / Pickmere
1032	4 Feeder Warburton / Partington
1039	15 Feeder Warrington / Warburton
2616	21 Feeder Warburton Fenceline / Warburton
2617	21 Feeder Warrington / Warburton Fenceline

- add to LIP.

National Grid has provided information in relation to gas transmission assets via the following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW>

Gas Distribution

National Grid Gas Distribution owns and operates the local gas distribution network in the Trafford Council area. If you require site specific advice relating to our local gas distribution network then information should be sought from:

Plant Protection Team
National Grid Gas

113

(LIP)

PARA 8.5 P.27

GENERAL COMMENT

Lakeside House
The Lakes
Bedford Road
Northampton
NN4 7SN

114

(Po DOCUMENT)

Specific Comments

P 127

PARA 26.15

Infrastructure Provision

As indicated in the Core Strategy Preferred Option document and Local Infrastructure Plan, the spatial strategy for Trafford will not present a major supply issue for National Grid's gas and electricity transmission networks.

115

(LIP)

P 27-29

GENERAL COMMENT

The Local Infrastructure Plan has outlined the future proposed works at National Grid's substations in the Trafford Council area, and I can confirm the following requirements:

116

(LIP)

P 28

PARA 8.10

GENERAL COMMENT

- Daines – no further development foreseen at present
- South Manchester – System reinforcement may be required
- Carrington – potential requirement for new 400kV substation within the confines of the substation

Green Belt Policy

National Grid's Carrington and South Manchester substations are located in areas identified as Green Belt in the Preferred Option document.

117

(LIP)

P 27-29

GENERAL COMMENT.

Substations are vital to the efficient operation of our electricity transmission network for switching circuits or transforming voltage. Both substations are an essential part of the transmission network and have an important role to play in maintaining the supply of electricity to the local distribution network operator and therefore ultimately to homes and businesses throughout Trafford and the wider area

118

(Po DOCUMENT)

P.76

POLICY 24

The sites are therefore "Operational Land" and, as outlined above, there is a need for further essential utility development at the sites in the future. This essential utility development may need to take place outside National Grid's existing landholding and therefore Permitted Development rights may not exist for extensions to the substations.

We therefore request that both substations are identified as major developed sites in the Green Belt.

119

(Po DOCUMENT)

Strategic Sites

P.119

SS3

Stratford Meadows has been identified in the Preferred Option report as a potential location for an informal recreation woodland / meadow area. National Grid's ZNN 275kV overhead electricity transmission line runs from Daines substation to South Manchester substation crossing through the south eastern corner of the Stratford Meadows site.

National Grid does not object to the proposals outlined, however the following points should be taken into consideration:

GENERAL COMMENT

- National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential operators of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ because of the strategic nature of our national network. We advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning a development.

- Statutory electrical safety clearances must be maintained at all times. These distances are outlined at the following webpage:
http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/appendixIII/appIII-part2
- Further guidance is available here: http://www.nationalgrid.com/NR/rdonlyres/C185DC83-F57F-41A6-B4F1-6E28B3510E59/18654/APTElectricityOHLGuidance_2_.pd

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from our web site or by contacting the team below:

- National Grid Electricity Transmission plc, Electricity Act 1989 – Schedule 9 Statement, preservation of amenity
- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations – Requirements for Third Parties
- A sense of place – Design guidelines for development near high voltage overhead lines

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database;

National Grid
Land & Development Stakeholder and Policy Manager
Land & Development Team
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6TG

Tel: 0800 7312961
www.nationalgrid.com/uk/landanddevelopment

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours sincerely,

Les Morris
Land and Development Team
Town Planner

(Via email)

1049

Our Ref: EW

3rd July 2009-07-03

strategic.planning@trafford.gov.uk

Strategic planning and development
1st floor, Waterside House
Sale Waterside
Sale
M33 7ZF

Direct Dial 0161 245 3411

Email address: Emma.E.Williams2@atkinsglobal.com

Dear Sir/Madam

TRAFFORD LDF – Further preferred options on the Core Strategy

I am writing in relation to your emerging LDF on behalf of the National Offender Management Service (NOMS) which incorporates HM Prison Service. NOMS would wish to be involved with the LDF process within your district. I would be grateful if you would address future correspondence on this matter to Lambert Smith Hampton on behalf of NOMS / HM Prison Service *

PPS12 'Local Development Frameworks' notes that the core strategy development plan document should set out broad locations for delivering the housing and other strategic development needs such as essential public services. Paragraph 4.1 encourages early involvement of government agencies in the preparation of LDFs while paragraph B3 requires local planning authorities to develop a strategic approach to infrastructure provision (including community facilities) when preparing local development documents.

Circular 3/98 'Planning for Future Prison Development' highlights the continuing overcrowding within the prison estate and the need to replace outdated and inadequate facilities. Specifically there is a need to identify more sites for new prisons. The Secretary of State expects that local planning authorities will work together with the Prison Service to identify land for new prisons through the development plan process. The Circular advises that in order to enable authorities to make provision for prisons within their development plans the Prison Service will consult with authorities about likely areas of future need (paragraph 7).

Circular 3/98 recognises at Paragraph 2 that there should be guidance in development plans on community facilities and infrastructure requirements and also that they should take account of the need for new prison developments, which should be identified through the planning system.

The Circular notes that in identifying potential prison sites, the Prison Service has to take account of local and regional requirements for additional prison places, the court catchment areas served and the relationship of the site to nearby population centres. It goes on to specify a number of other site development considerations and also recognises that the objectives of sustainable development and in particular the need to reduce unnecessary travel should apply to site selection. Prisons should not be located too far from the centres of

population they serve and there should be reasonably good accessibility to public transport services.

The Circular also recognises that new prisons have potential for a substantial and beneficial impact on the economy of a local area. New jobs are created on site (both during construction and permanent jobs), goods and services are purchased in the community and extra local income is generated as a result of the disposable income of prison staff.

In recent years there has been a significant increase in the prison population. In the 1970's the prison population in England and Wales was in the order of 40,000; in July 2005 that figure had risen to 76,538.

The prison estate is experiencing serious overcrowding. NOMS is doing everything it can to maximise capacity at existing prisons by bringing buildings back into use through refurbishment, new house blocks, temporary units and 'ready to use' units. However, many prisons are already operating at capacity and there is limited potential to significantly increase the number of places at existing prisons. The prison system is therefore heavily dependent on new prisons to provide the additional places.

While there are no specific proposals for new prison development in your district at present nor specific sites identified, in line with Government guidance NOMS requests that you consider the inclusion of a criteria based policy to deal with a firm prison proposal should it arise during the plan period. I would be pleased to propose a detailed policy for inclusion in your Development Plan Document and would welcome your views on how this proposal should be taken forward.

Yours sincerely

Emma Williams

cc Les Manton, NOMS

(102)
26.11.14 kme/ctio
Pg 128
Para 26.19
Obje



HOW

1152

HOW Planning LLP

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Manchester M2 5GP
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Your ref:
Our ref: LA/JS/459B

Coped to:	
Ans	
by	
Action	
Pre	

11 AUG 2009

STRATEGIC PLANNING AND DEVELOPMENTS

10/08/09

I Ferguson Esq.
Strategic Planning and Developments
Trafford Council
Sale Waterside
Sale
M33 7ZF

Dear Mr Ferguson

TRAFFORD CORE STRATEGY PREFERRED OPTION (JUNE 2009)

On behalf of our client Nikal Limited, please find enclosed representations towards the Council's Core Strategy Preferred Option (June 2009) in respect of the Altair site which is located within Altrincham Town Centre.

As you are aware, in August 2008 Trafford Council granted outline planning permission (LPA ref: H/OUT/68603) for the demolition of existing buildings and replacement with a comprehensive mixed use development. The uses permitted include: a new ice rink; retail (food and non-food); health / leisure; hotel; offices; residential accommodation, café / bar / restaurants, climbing wall, car parking, associated plant and service areas, improvements to highway arrangements and creation of new areas of public realm.

Since then, a revised mixed use scheme has been worked up which comprises all the uses approved as part of the original outline application described above as well as a new hospital facility. Pre-application discussions have taken place with Simon Castle, Gary Earnshaw and Michelle Zenner and it is proposed that a revised outline application will be submitted in September of this year.

Spatial Strategy

The Preferred Option report explains that the Spatial Strategy is the cornerstone of the Core Strategy and it has been developed to concentrate growth towards specific areas. The first priority of the Spatial Strategy will be to direct development to the north east of Trafford, within the Regional Centre and the Inner Areas. The second priority will be Altrincham Town Centre (Strategic Location 13) to support the role of Altrincham as the Borough's principal town. Priority three relates to the remaining strategic locations including Sale Town Centre and Stretford Town Centre. The fourth explains that outside of these areas, new growth will be focussed on meeting local needs with market housing in sustainable locations well served by public transport.

In respect of Altair, support is given to the Spatial Strategy which identifies SL13 as the second priority for development in the Borough, within which the Altair strategic site (SS5) is located. Directing growth to this area will assist in contributing to the

(101)
P113
Strategic
Location
SL13
Support + P123 - SS5 support +

(102)

Planning and Environmental Advisers

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(103)
P123 SSS
SUPPORT



regeneration of Altrincham Town Centre by encouraging businesses and shoppers to locate there. Presently, the Altair site which is located within SL13 makes no contribution to the character or well-being of the town centre. The site is located within a prominent gateway position next to Altrincham's Transport Interchange and is in need of investment and development. The Altair scheme will include the demolition of all existing buildings and replace them with a comprehensive regeneration scheme for a mix of high quality uses. In addition to the facilities proposed, the scheme will also provide a high quality public realm with street furniture and art work to attract members of the local community.

Core Policies

This section provides comment on the relevant Core Policies against which new development proposals will be judged.

Policy L1: Land for New Homes

The policy sets out the scale and distribution of new housing development. In terms of scale, the policy identifies that up to 2016 the Council will seek to deliver high quality housing in line with RSS Policy L4 i.e. 11,800 new dwellings including a 20% uplift (until 2018) on the RSS Policy L4 minimum to accommodate the Housing Growth Point status. Nikal supports this part of the policy as the Altair scheme is considered both developable and deliverable in accordance with PPS3. This site constitutes previously developed land in a highly sustainable location and as a result can make a valuable contribution towards Trafford's housing requirements.

Policy L1 seeks to direct significant new housing development to certain locations / sites and this is set out in Table L1. The table demonstrates that a significant proportion will be directed to the Strategic Location, which for Altrincham Town Centre comprises 250 units to be provided within the plan period. Support is also given to this approach and it is worth noting that the Councils draft SHLAA forecasts 150 residential units to be provided at Altair.

Policy L2: Meeting Housing Needs

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

In terms of dwelling type and size, the policy explains that the provision of smaller units of accommodation, particularly 1 bedroom accommodation, will only be acceptable for schemes that support the regeneration of Trafford's town centres and the Regional Centres. In all circumstances, the delivery of such accommodation will need to be justified in terms of a clearly identified need. The reasoned justification explains that the Greater Manchester SHMA recognised that alongside a sustained emphasis on family

(104)
P 31
Policy
L1, para
L1.2
SUPPORT

(105)
P 34
Policy L1
Table L1
SUPPORT

(106)
P 35
Policy L2
para
L2.4
General

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

●
↓

Policy W1: Economy

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

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

●

Policy W2: Town Centres and Retail

Policy W2 sets out a strategy for town centres within the Borough. Altrincham is identified as the principal town centre which will be the main focus for quality comparison retail supported by a range of retail, service, leisure, tourism, office and other such uses including residential.

Support is given to the recognition of Altrincham town centre as the principle town centre within the Borough in accordance with Policy W5 of RSS which identifies the centre as a location where comparison retailing facilities should be enhanced and encouraged.

The Altair site is situated within Altrincham Town Centre boundary as defined by the Revised UDP proposals map. The site is specifically allocated for mixed use regeneration in the UDP and now benefits from outline consent for the mix of uses described on page 1, led by the provision of a new ice rink.

Altair is recognised as one of the most important regeneration sites in the town and represents an opportunity to enhance the town centre's viability and contribute towards

(107)

P59
Policy
W1
Support

(108)

P62
Policy
W2
Support

Altrincham's role as a sub-regional centre. The mixed use regeneration of the site will encourage shoppers and businesses to Altrincham, which will assist the local economy, provide local job opportunities and provide enhanced facilities for local people. A Retail Marketing Statement was submitted as part of the outline application. The report advised the scheme on the retail strategy and market and in respect of the residential units, to ensure the scheme offers a combination of high quality and best in class retail, that compliments the Stamford Quarter and therefore increases the overall spend and time spent within Altrincham Town Centre.

Strategic Sites

This section of the report provides policies for each strategic site and sets out a strategic proposal for development / regeneration. It details development requirements and how and when change will be delivered.

SS5 - Altair, Altrincham

At present the strategic proposal for SS5 is to comprise:

- Retail, café, bar and restaurant (up to 15,000 sq m);
- Commercial office accommodation (up to 8,500 sq m);
- Hotel (up to 7,700 sq m);
- Ice rink and other leisure (up to 11,600 sq m);
- Residential apartments (up to 150 units) to provide a mix of sizes and tenures;
- New areas of public realm; and
- Improved pedestrian linkages to the town centre, in particular a new pedestrian bridge between the site and the Interchange.

Whilst we support the development parameters of the uses listed above in line with the outline planning permission (LPA ref: H/OUT/68603), a variety of other uses are also suitable for the town centre site, such as a hospital or other public buildings, for example. It is important therefore to maintain flexibility within SS5 and not to limit the site solely to the approved uses. As highlighted above, a revised outline application will be submitted shortly for the regeneration of the site for the mix of uses approved as part of the original application in August 2008 as well as a new hospital facility. Simon Castle has confirmed that the inclusion of a new hospital facility is acceptable in line with site specific UDP Proposal S6. As a result, it is requested that sufficient flexibility is built into the policy to enable other uses to come forward including a new hospital facility.

I trust you will find the representations in order, but should you have any queries please do not hesitate to contact me on the details below, or my colleague Lauren Ashworth on 0161 831 5874.

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

p123
SS5
object /
Suggested
change

(109)

Yours sincerely

JON SUCKLEY

PRINCIPAL PLANNER

Direct Line: 0161 831 5878

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Cc. J Wrigley Esq. – Nikal Limited

STRATEGIC PLANNING AND DEVELOPMENTS			
- 7 AUG 2009			
Rec			
Action by			
Copied to.			



Steven Broomhead
Chief Executive

Mr Dennis Smith
Head of Strategic Planning & Housing Strategy
Trafford Council
1st Floor
Waterside House
Sale Waterside
Sale
M33 7ZF

Our Ref. SB/JL/2129
Your Ref. CS/PrefOpt
6 August 2009

Dear Mr Smith

Trafford LDF Core Strategy: Further consultation on Preferred Options

Thank you for your letter dated 29 June 2009 inviting comments on the above. The Northwest Regional Development Agency welcomes the opportunity to respond.

Our detailed comments are attached. In overall terms, we consider the Preferred Options paper to be much more focused and coherent than the version issued in 2008. Whilst we are generally supportive of the draft strategy, some of the key points raised in our response are as follows:

- 1. P22 chap3
- Para 3.1 - 3.3 Object
- P26 Spatial Strategy
- Point 1. Object
- P26. Spatial Strategy - Object
- Policy W1. P59
- Para W1.1 Object
- P87 chap 23
- Para 23.9 - 23.11 General
- P76 Policy R4
- Para R4.5 Object

- the draft vision does not, in our view, adequately reflect the Council's ambition to grow and diversify Trafford's economy;
- the prioritisation of strategic locations within the regional centre and inner areas within Trafford might benefit from further clarification;
- there appears to be a tension between the spatial strategy and Policy L1's Policy L1.8 approach to greenfield development, particularly with regard to the greenfield strategic sites at Trafford Quays (SS2) and Partington Canalside (SS4);
- additional work is needed to quantify the Borough's employment land requirement in the context of the sub-regional requirement for Greater Manchester as set out in the Regional Spatial Strategy;
- both Davenport Green and the former Carrington inter-modal freight terminal site have recently been removed from the Agency's list of strategic regional sites; we note the Council's intention to delete the existing employment allocation at Davenport Green; and
- the Strategy's approach to farm diversification may need to be revised to reflect the more flexible approach advocated in the recent consultation draft PPS 4.

Policy L1. P32
para L1.8
Object

LIP
Para 6.7

We note that the Council has updated its Infrastructure Capacity Assessment and has also produced a Local Infrastructure Plan 'Issues' document. We have no substantive comments on either document. However, on a point of detail we suggest that the Greater Manchester Transport Fund is added to the list of potential funding sources at paragraph 6.7 of the Issues paper.

I trust this is helpful and, in due course, look forward to seeing both the Submission Draft Core Strategy and the Council's assessment of the infrastructure required to support new development in the Borough.

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

Yours sincerely

Steven Broomhead
Chief Executive

Encs.

Trafford LDF Core Strategy: Further Consultation on the Preferred Options Comments from the Northwest Regional Development Agency

Chapter 3: Vision and Strategic Objectives

We are pleased to note that the consultation paper now sets out a specific vision, for the Core Strategy, rather than simply reiterating that from the Sustainable Community Strategy. Our only comment on the draft vision is that it does not reflect the ambition, set out in paragraph 14.1, to grow and diversify the Borough's economy. We suggest it is amended accordingly.

We note that the strategic objectives have undergone further revision and are now thematic rather than place-specific. We have no specific concerns about these as currently drafted.

Chapter 4: Spatial Strategy

Our only comment on the draft Spatial Strategy relates to the first clause. This establishes the regional centre and the inner areas as the first priority for development (thus reflecting RSS). However, it then says that within these areas development 'will be directed to' the five strategic locations SL1 – 5. It thus appears to give these locations a higher level of priority than the rest of the regional centre and inner areas within Trafford.

It may be appropriate to replace 'In particular, development will be directed to ...' with 'Within these areas, the Council particularly wishes to promote development and change at ...'.

Chapter 5: Core Policies

Policy L1 – Land for New Homes

We have no concerns regarding the scale of new housing provision proposed. However, as the figure of 11,800 is net of clearance replacement (reflecting RSS) it would be helpful for the supporting text to explain that additional provision to take account of clearance activity will be taken into account through the annual monitoring report.

With regard to the prioritisation of brownfield sites in L1.6, clause (b) cross-refers to Policy L3 on regeneration, but not the wider spatial strategy. As a result, Old Trafford (SL3), Partington (SL9) and Sale West (SL10) are identified as priorities, whereas the spatial strategy's focus on Carrington (SL8) and town centres such as Altrincham (SL13), Sale (SL11) and Stretford (SL7) is lost.

Clause L1.8 sets out the exceptional circumstances under which greenfield housing development will be considered. It makes no reference to the proposed greenfield allocations at Trafford Quays and Partington Canalside (SS2 and SS4) and is therefore unclear how these sites might be phased relative to other brownfield housing sites.

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Policy L3 – Regeneration and Reducing Inequalities

The policy is intended to regenerate disadvantaged communities and reduce inequalities in accordance with Strategic Objectives SO2. However, rather than supporting and encouraging regeneration as suggested in L3.1, the rest of the policy imposes additional information requirements on developers wanting to build in these areas. Some of these requirements (e.g. L3.6) are not expressed very clearly. We suggest that the policy requires substantial revision to positively encourage the types of development from which the regeneration areas would benefit, rather than adding to the burden of information on prospective developers.

P 39
Policy L3
Para L3-1
+
L3.6
object

129

Policy L4 – Sustainable Transport and Accessibility

On a point of detail, both L4.1(d) and L4.4 refer to 'SPD1'. We understand that this is the Council's approved SPD on Developer Contributions to Highway and Public Transport Schemes but this is not clear from either the policy or the supporting text. We suggest it is amended accordingly.

P 41 Policy
L4
L4.1 d §
L4.4
object

130

Policy L5 – Climate Change

The Agency generally welcomes and supports much of the proposed draft policy. However, clause L5.11 says 'Proposals for new sources of renewable energy generation will be encouraged where it can be demonstrated there are to be no adverse impacts on the local environment ...'. National planning policy, as set out in PPS22, calls for local development documents to promote and encourage, rather than restrict, the development of renewable energy sources. Because such proposals will, almost inevitably, have some adverse impacts we consider L5.11, as drafted, to be unduly negative. We suggest it is amended to 'Proposals for new sources of renewable energy generation will be supported except where they would have an unacceptable impact on the local environment ...'.

P 47
Policy L5
Para L5.11
object

131

Policy W1 – Economy

Neither the draft policy nor the supporting text set out the amount of employment land to be provided over plan period. We are aware that the Greater Manchester authorities have commissioned work to apportion the GM sub-regional employment land requirement in RSS Policy W3 across the ten districts. This should inform the quantum of employment land to be provided in the submission draft Core Strategy.

P 59
Policy W1
W1.1 object

132

A number of the strategic locations highlighted in clause W1.6 are identified for a mix of employment, residential, retail and other commercial uses. The contribution of these sites towards the Borough's housing and employment land requirements therefore needs to be assessed and quantified. We suggest that submission draft Core Strategy provides a clear indication of the relative balance between numbers of residential units and hectares of employment land in each of these locations.

P 59
Para W1
W1.6
object

133

The supporting text (paragraph 14.5) refers to the Trafford Employment Land Study and its finding that a sufficient supply of sites exists without the need to retain Davenport Green. This is allocated in the adopted UDP as a high amenity site employment site. The supporting text to Policy R4 (paragraph 20.9) adds that the site will be retained within the Green Belt. Paragraphs 23.9 to 23.11 also refer to the site, outlining a number of potential negative impacts of carrying forward the Davenport Green allocation in the Core Strategy.

P 61
Policy W1
Para 14.5
+

134

P 87
paras
23.9-23.11
General

135

P 84
para
23.9 -
23.10
General
+
P 103, SL8
General

Davenport Green and Carrington were designated as strategic regional sites in 2001. Both were identified as strategic regional sites in the 2003 and current (2006) Regional Economic Strategies. As you will be aware, the Agency has recently undertaken a review of its strategic regional sites and, in July, our Board resolved to delete both Davenport Green and Carrington from the list. (For the avoidance of doubt the strategic regional site at Carrington is that previously considered as a potential inter-modal freight terminal, not the one now being proposed as Strategic Location SL8).

136

P 76 Policy
R4,
para R4.5
+ R4.4
Object

Policy R4 – Green Belt and Other Protected Open Land
Whilst Clause R4.4 concerns the protection of Trafford's best agricultural land, R4.5 relates to farm diversification. We suggest this is broadened out to cover diversification of the rural economy, and moved to form part of Policy W1 on the economy.

138

P 76 Policy
R4
para R4.5
Object

As you will be aware, Government has issued a new consultation draft PPS 4. In relation to farm diversification, this says that planning authorities should 'support diversification for business purposes that are consistent in their scale and environmental impact with their rural location'. It thus removes the current PPS 7 requirement (as reflected in R4.5) that farm diversification schemes should help to sustain the agricultural enterprise. We appreciate that PPS 4 is currently only a consultation draft but, nonetheless, it indicates latest Government thinking in the light of Matthew Taylor's review of rural housing and economic development.

139

Chapters 23
+ 24.
P 115, SS1
P 117, SS2
P 121, SS4
P 123, SS5
Object

Chapters 23 and 24. Strategic Locations and Strategic Sites
We have few specific comments on the sites and locations identified. We note that four of the five strategic sites (SS1, SS2, SS4 and SS5) lie within the proposed strategic locations. Where this is the case, it would be helpful to clarify whether the indicative housing numbers and floorspace figures given for the strategic locations include the contributions from the strategic site; e.g. does the housing figure of 850 units at Partington (SL9) include the 550 units proposed at Partington Canalside (SS4)?

140

P 95
SL4
General

With regard to the Lancashire County Cricket Ground Area (SL4) the Agency has already funded improvements to the cricket ground and is involved in ongoing discussions regarding the regeneration of the surrounding area.

Trafford's Core Strategy: Further consultation on the Preferred Option

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Comment Form – June 2009  **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
strategic.planning@trafford.gov.uk

Comment Sheet

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

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Core Strategy: Further consultation on the Preferred Option		Page number	
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	SL3
		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>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>				
<ul style="list-style-type: none"> • P. Fahey and Sons is a well established enterprise in Old Trafford that has operated since the 1950's and intends to continue to provide services and employment at the local and national levels. • We consider, in general, that the draft objectives and policies now being consulted upon in the Preferred Option for the Trafford's Core Strategy document are a compromise that will provide the basis for spatial planning guidance for the future development proposals throughout the Borough. • In our view, the present buildings and the full site occupied by the enterprise are a key location in the Old Trafford neighbourhood and have strategic potential for its future development and regeneration. • Our specific objection relates to: <ol style="list-style-type: none"> 1) the Development Requirements (SL3 Old Trafford) being subsumed into a generic requirement that states that development proposals must be in accordance with an agreed "Masterplan for Old Trafford", or otherwise, development proposals might be refused on the grounds of prematurity if they would compromise the deliverability of a Masterplan. 2) the reliance placed on the provisions of the "Masterplan for Old Trafford" is unsound, as that 				

Trafford's Core Strategy: Further consultation on the Preferred Option

Comment Form – June 2009  PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO: strategic.planning@trafford.gov.uk

document, as we understand the process of its preparation, is not yet adopted by the Council for spatial planning purposes, guidance and delivery of strategic development proposals in the narrowly defined area of the much larger Old Trafford neighbourhood. It is presumed that adoption of this Masterplan might be only a formality. This process is contrary to the guidance provided in the PPS12 paras 1.4 and 5.2(4) for the preparation of the development plan documents, and specifically the core strategy documents.

102
Para 23.4
Object

3) the statement in paragraph 23.4 of the consultation document states that, beside the Preferred Option for Trafford's Core Strategy, consideration may also be given to the production of other planning guidance for development and regeneration. This paragraph goes on to identify, inter alia, "Location Masterplan" as an informal type document. It is not clear, therefore, what status is carried presently by the "Masterplan for Old Trafford" and the process of its preparation. As an "informal" type document, it is not covered by the criteria set out in the PPS12 guidance for the preparation of a Core Strategy document as well as contradicting the importance that is attached to the Preferred Option document defined in paragraph 1.5

- 4) the chosen delineation for the "Masterplan for Old Trafford" area and its boundary, as a strategic location within the wider, historic Old Trafford neighbourhood, is not substantiated elsewhere in the consultation draft Preferred Option document. It is not clear, therefore, as to why only this location was defined as a special case for the "Masterplan for Old Trafford" purposes in the spatially much wider and complex neighbourhood.
- 5) the emergent "Masterplan for Old Trafford" document is not a public document at the time of this consultation on the Preferred Option. Therefore, our knowledge of it provides only an unreliable and scant source of its content due to the lack of engagement with us, as a land owner and economic enterprise stakeholder in prior consultation on local needs and issues. This is further evidenced by the exclusion of us as a stakeholder in the Old Trafford neighbourhood that is evidenced in the Statement of Community Involvement in the local community engagement and consultations. This also is counter to the guidance provided in PPS12, paras 4.20 , 4.25 and 4.27

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.

1045

Received 07/08/09

PEEL GROUP

TRAFFORD CORE STRATEGY

**REPRESENTATIONS ON THE PREFERRED
OPTION DRAFT DOCUMENT - JUNE 2009**

Chapter 2: A place to Live, Work, Learn and Relax

With reference to paragraph 2.21 Peel confirm that there have been ongoing discussions between MSCC and Warrington Council in respect of operational issues. However, they suggest that the text at paragraph 2.21 should be expanded to state that the enhanced role and capability of inland waterways, including the MSC, for freight distribution and the ensuring environmental benefits and positive implications in terms of climate change and reduced lorry miles should be considered to be of overriding benefit. [This same comment also applies to paragraph 9.15.]

Reference is made in the Spatial Profile for Trafford Park to the Park being home to major visitor attractions such as Manchester United and the Imperial War Museum North. Given that it attracts over 30 million visits per annum Peel request that the Trafford Centre should be added to this list. This would make the reference in the Spatial Profile Column of the table consistent with that in the Key Issues and Place Objectives column which does include that of maximising the potential of visitor attractions such as the Trafford Centre and the War Museum. [Peel support that objective.] [Peel also consider that the reference in the Spatial Profile to the Barton Swing Bridge being a proposed World Heritage Site is inappropriate and misleading and should, therefore, be deleted.] The potential WHS covers a much more extensive area and has not been progressed despite first being contemplated many years ago.

Reference should also be made in the Key Issues and Place Objectives for Trafford Park and for Carrington to the existence of berthage and adjoining land holdings which could provide opportunities for the sustainable and efficient movement of freight.

[Reference is made in the Key Issues and Place Objectives for Urmston to an objective worded as being to manage "the congestion associated with the Trafford Centre." As in respect of the previous draft document Peel object to this reference and request its deletion since there is no evidence that the Trafford Centre is a cause of any significant or regular traffic congestion either in the immediate vicinity of the Trafford Centre or in Urmston.]

Junction 10 of the M60, the main Urmston access for the motorway, will be significantly improved with the introduction of WGIS, both generally due to traffic flow changes and specifically for Urmston due to the widening of the Barton Road entry. In busy periods, the forecast future queues are approximately halved on this approach. Local journey times generally improve with WGIS and more local demand can pass through the area without delay. These improvements were recognised in the positive Committee Report prepared by Trafford's Officers for the WGIS planning application and in the Council's decision to grant planning permission for the WGIS proposals.

177
Pg 9
Para 2.21
Object

178
Pg 45, Para 9.15
Object

179
Profile
Pg 10, Spatial Profile
Trafford Park
Object

Pg 10, Trafford Park
Place objectives
Support
180

181
Pg 10
Trafford Park
Profile
Object

Pg 10, Trafford Park
Spatial Profile
Key Iss.
Object
182

Pg 13, Urmston
Key Iss. + Objectives
Object
183

184
Pg 13, Urmston
Spatial Profile
General comment

In the Key Issues and Place Objectives for Carrington there is reference to investigating the merits of providing a direct link across the Manchester Ship Canal. As operators of the MSC, Peel have no knowledge of such a proposal, and whilst not wishing to object in principle, would emphasise that any proposed bridge would need to meet all of the company's detailed requirements to ensure that there is no interference with the use of the MSC for freight and other shipping use.

185

Pg 19. Key Iss + Objectives. LIVE General comment.

Strategic

Spatial Objectives

Spatial Objective 1 should, in Peel's view, be expanded to reflect Paragraph 6.5; i.e. it should state that the CS seeks to promote sufficient new housing not only to meet the Borough's indigenous needs but also to support growth and investment in the wider City Region.

186

Pg 23. SO1 Object.

Spatial Objective 3 should be revised to acknowledge and give strong emphasis to the strategic role of Trafford Park as a sub-regional employment location. As currently drafted, the objective does not match the far more positively expressed vision which envisages Trafford being "celebrated as the enterprise capital of the North West".

187

Pg 23. SO3 Object.

Chapter 4: Spatial Strategy

With regard to Figure 4 in the draft document, Peel refer to the representations and supporting information which they submitted in response to the previous draft document in respect of the Inner Area boundary. The key points of that earlier submission were:

188
Pg 28. Fig 4. Object.

- i) That adopted RSS defines the Inner Area in Trafford as **comprising** Trafford Park and North Trafford. The Trafford Centre Rectangle has always formed part of Trafford Park (the Council again confirms in its definition and description of Trafford Park as a Place on P10 of the new draft CS) and, accordingly, any proposal to omit part of Trafford Park from the Inner Area should be supported by a clear and specific justification and evidence base. No such justification has been given by the Council.
- ii) A single option with regard to the Inner Boundary was presented in the 2008 draft and this has been carried forward into the new draft CS. Hence, no other options have properly been considered or consulted upon. Peel notes that the new draft document simply carries the previously proposed boundary for the Inner Area forward. No response to Peel's earlier objection and concerns has been given either in the CS document or through any other means and the proposed

189
Pg 28. Fig 4. Object.
(As per previous objection in Core Strategy).

boundary continues to lack any justification either within the draft document or any evidence base to support its selection.

- iii) The M60 forms the natural, established and widely understood boundary of Trafford Park and is, therefore, the logical boundary to the Inner Area in this location.

Peel maintains its view that the M60 would provide a more logical boundary for the Inner Area and consider that the Trafford Quays Delivery Report which is being submitted to the Council in support of Peel's representations to this new draft CS provides further support for this view. More importantly, in the absence of any evidence to justify the exclusion of the Trafford Centre Rectangle from the Inner Area, Peel contend that the M60 boundary is the only one that would provide for consistency and compliance with the adopted RSS.

Chapter 6 – Policy L1: Land for New Homes

Policy L1 appears to be inconsistent with other parts of the Core Strategy and in particular, with the allocation in Part D of the document of land as "Strategic Sites and Strategic Locations".

Para 4.12 of the draft document states the "Strategic Sites" are specifically defined sites which "will deliver significant development that is central to the achievement of the Core Strategy" and that their allocation on the Proposals Map will give them a "high status in decision making on planning applications". Following on from this, the allocation of Peel's land at Trafford Quays for a high quality residential led mixed use development as a strategic site clearly means that the Council considers the delivery of housing development on that site to be a key component in meeting its housing development needs and this is confirmed in the SHLAA which forms part of the evidence base. In line with the second part of paragraph 4.12 the strategic site allocation should also provide Peel as landowner with comfort that the principle of the site's development for housing should not be in question if and when a planning application is brought forward by the Company.

However, part L1.6 of Policy L1 sets out a clear order of priority for land release for development which makes no mention of the Strategic Sites that have been allocated, even though they are stated to be central to the delivery of new housing. In addition part L1.8 states that greenfield land (which most of the Trafford Quays site is) will only be released in exceptional circumstances where the housing land needs cannot be met on brownfield sites. There is not even any reference in the Policy to the PPS3 guidance that

190
Pg 28. fig 4.
Object

191
Pg 28. fig 4.
Object

192
Pg 31. L1
Object

193
Pg 29 Para 4.12
Object

194
Pg 31. L1.6
Object

195
Pg 32. L1.8
Object

greenfield sites in sustainable locations are to be preferred to unsustainable brownfield sites as locations for new housing.

In Peel's view the current wording of Policy L1 is contradictory to the allocation of Trafford Quays and other land as strategic sites and strategic locations. Peel therefore objects to the draft policy and seeks that it be amended to include Strategic Sites and Strategic Locations within the first order of priority under L1.6. L1.7 and L1.8 would also need to be amended to the effect that the allocated sites are not subject to these policies.

(196)
Pg 31/32. Policy L1
Object

Paragraph 6.5

Peel question the inclusion of the suggestion that growth in Trafford must be seen to "strengthen" the more vulnerable market areas both within and adjacent to Trafford. It is difficult to envisage how any development which is not physically within or contiguous with such areas could be shown to have a strengthening effect. Accordingly this requirement could be used to resist or call into question development proposals that are acceptable in all other respects. This should therefore be deleted from the text.

(197)
Pg 32. Para 6.5
Object.

In respect of the detailed figures in Table L1 Peel supports the total quantum of contribution assumed from the Wharfside and Pomona sites but requests that the Pomona contribution be rephrased as follows:

2008/9 – 2010/11	-	0
2011/12 – 2015/16	-	550
2016/17 – 2020/21	-	550
2021/22 – 2025/26	-	400

The capacity of the Trafford Quays site is such that it could make a larger contribution to housing development in the Plan period and the Council may therefore consider increasing this in the final version of the Core Strategy.

Policy L4: Sustainable Transport and Accessibility

In view of the uncertainty with regard to the construction of Metrolink through Trafford Park and the alternatives now being considered it is proposed that Section L4.5 be reworded to read:

"The improvement and extension of Metrolink and/or provision of some alternative more deliverable high frequency public transport option."

(198)
Pg 34. Table L1
Support ->
with recommendation

(199)
Pg 42.
Para L4.5
Object

200

Pg 42. Para Support.

L4.10

Peel support the reference in Policy L4.10(c) to the MSC and for the commitment, at paragraph 9.16, to consultation and liaison with MSCC in terms of development proposals adjoining the Manchester Ship Canal.

Policy W1: Economy

201

Pg 59. W1 Object:

Peel considers that there is a need for greater clarification within Policy W1 as to how, for the purposes of the policy, "employment uses" are to be defined and also as to how this policy should be read against the Strategic Site and Strategic Location allocations in Part D of the plan.

202

Pg 59. W1.3 Support.

[Section W1.3 provides a list of key economic growth sectors within which the Council wishes to encourage new development in the Borough and Peel support those aspirations. By implication, although not absolutely clear from its wording, section W1.6 provides positive planning support for development within these sectors which is being promoted within the Strategic Locations including Pomona, Wharfside and the Trafford Centre Rectangle notwithstanding that, some of the land uses identified within the key economic sectors do not fall within the employment uses list as normally defined by reference to the Use Classes Order. [In would be helpful, however, if the text made this completely clear. Peel support the Core Strategy's encouragement and endorsement of this wider range of economic uses in the locations listed in W1.6.]

203

Pg 59, W1.6 Object.

Pg 59, W1.6 Support.

204

Peel's main concern is with regard to Section W1.10 which sets a specific policy hurdle for the development of alternative uses on existing "employment sites". If the definition of "employment sites" in this context is those sites currently used for one of the Class B uses in Use Class Order, that part of the policy would seem to conflict with Sections W1.3 and W1.6 since development for, for example, hotel or cultural uses would consequently be regarded as an "alternative use" for the purposes of this part of the policy. As such proposals for these uses would have to satisfy the tests set out in paragraphs a-d of W1.10. [The requirements and constraints set out in W1.10 appear also to contradict the broader range of uses which the Core Strategy envisages as being brought forward in the Strategic Locations.] For the Trafford Centre Rectangle these include hotels, leisure development and residential development which Policy SL6 actively encourages. However as most of the sites that are expected to come forward for redevelopment are currently used for Class B purposes many proposals for development for these uses would fall foul of Policy W1.10.

205

Pg 60. W1.10 Object.

(Again, this appears to be an inconsistency both within and between individual policies and Peel requests that W1.10 be reworded so as to reconcile those inconsistencies.)

206

Pg 63, Para W2.11
Object.

+ para 15.6
Object.

207

Policy W12: Town Centres and Retail

Peel object to the wording of W2.11 which does not accurately reflect what is said in Policy W5 of RSS since Policy W5 confines itself to "large scale extensions" and, furthermore is caveated with the words "unless they (extensions) are fully justified in line with the sequential approach established in PPS6". There is no justification for Trafford's Core Strategy to adopt a more restrictive policy and draft policy W2.11 and the related paragraph 15.6 should be revised accordingly.

208

Pg 67, R1.2, R1.3(d)
R1.5 + R1.6
Object.

Policy R1: Historic Built Environment

Sections R1.2, R1.3 (d), R1.5 and R1.6 all state a requirement that development which affects the historic built environment should preserve **and** enhance that environment. This goes beyond what is required in national guidance and, in the absence of any justification as to why a more stringent requirement should apply within Trafford, should be revised accordingly.

209

Pg 71, R2.1(a)
Object.

Policy R2: Natural Environment

Section R2.1 (a) requires that developers should demonstrate how their proposals protect **and** enhance the character of the area covered by this policy. This goes beyond what is required in national guidance and, in the absence of any justification as to why a more stringent requirement should apply within Trafford, should be revised accordingly.

210

Pg 82, Para 22.3
Object.

Policy R6: Culture and Tourism

Paragraph 22.3 should include a reference to the Trafford Centre as a major visitor attraction to provide for consistency with the wording of draft Policy R6.

211

Pg 86, 23
Support

Part D: Strategic Locations and Sites

[Peel support the allocation of Pomona, Wharfside, Partington and the Trafford Centre Rectangle as Strategic Locations and of Trafford Quays as a Strategic Site.]

By reference to PPS12 and to paragraphs 4.11 and 4.12 of the draft CS, Peel understands that one of the key distinctions between a Strategic Location and a Strategic Site is that the strategic sites are already much more clearly defined at this stage; in respect of a site boundary, the range and mix of land uses proposed and the general scale of development likely to be brought forward on them. Hence it is both possible and appropriate to define them on the Proposals Map and in line with paragraph 4.12, this is a specific land use allocation which gives them high status in decision making on planning

Pg 86 212
Object.

applications. Given this status the allocation of a strategic site in the CS should be capable of providing a landowner with a level of certainty and confidence to invest time, and to incur architects and other fees in developing detailed proposals and submitting a planning application. However, in Peel's views this level of confidence would be undermined by the Council's proposal, at paragraph 23.5 of the draft CS that consideration will be given to the production of further planning guidance or an SPD for the Strategic Sites. Whilst this may be necessary and appropriate for the Strategic Locations where proposals are much less clearly defined, it is not necessary for the Strategic Sites. Any suggestion of such a requirement will serve simply to remove the certainty that a land use allocation should provide. Paragraph 23.5 should, therefore, be deleted.

(213)
Pg 86 Para 23.5
Object.

General Comments

"Strategic Proposal" sections: the reference to numbers of residential units in each of the Allocations and Sites should be amended to clarify that this figure reflects the assumed contribution within the plan period and does not define or seek, in any way, to limit the capacity of the site or location for residential development

In addition Peel objects to the use of the words "up to" in relation to the quoted housing numbers. This appears to imply a limit on the scale of development each site or location although the figures do not generally reflect known development capacity. More importantly, however, the setting of such limits is unwarranted since the RSS housing land requirement area not to be treated as a maximum figure.

"Development Requirements" Sections – the specific reference to CHP in each of the Development Requirement Sections may be seen to imply that this is a preferred option whereas there may be a number of equally suitable or even more preferable options in respect of these development opportunities as is recognised in Policy L5.8 of the draft CS. Hence Peel consider that the specific reference to CHP is over prescriptive and should be replaced by a more generally worded requirement for renewable energy provision.

Where references are made in the "Development Requirements" sections in respect of Strategic Sites these state the development should make a contribution to affordable housing provision "of at least" (x or y%). Peel object to the principle of this being set as a minimum requirement and do not consider that this is supported by the Economic Viability Study which expresses the various figures in its finding as "targets" and a starting point for negotiations with developers/land owners. Given the acknowledgement in the EVS that it represents a "snapshot" in time and that sites will need to be subject to reappraisal in the market conditions in which they are brought forward in planning applications and

(217)
Section 24
Dev. Requirements
Aff. Housing
Object.

(214)
Sections 24
Object.

(215)
Strategic Proposal
Sections 24 + 25
Object.

(216)
Sections 24 + 25
Object.

with regard to other costs that may apply, the setting of minimum level of affordable provision for individual sites is not appropriate at this stage.

SL1: Pomona Island

Subject to the general comment above, Peel support the "Strategic Proposal" as set out but object to the current wording of the Development Requirement section as follows:

- Peel has already produced a masterplan setting out the general principles of how the site should be developed. The masterplan has received the Council's endorsement although it does not fully accord with the development guidelines set out in the informal Irwell City Park guidance. It is, therefore, inappropriate to include within SL1 a requirement that proposals brought forward as Pomona should accord with that informal guidance.
- Peel have repeatedly expressed concerns with regard to both the principle and the possible location of a new bridge crossing over the canal because of its potential adverse effect on the Pomona development proposals. Again, the agreed masterplan for Pomona makes no provision for such a crossing. This should, therefore, be deleted from the list of development requirements.

(218)
Pg 89. SL1
Object.
Dev. Requirements

(219)
Pg 89 SL1.
Dev. Requirements.
Object.

SL2: Trafford Wharfside

Peel objects to the setting within the Strategic Proposal section of a limit on the quantum of commercial office development at Wharfside on the following grounds:

- No work has as yet been done by Peel or, to the Company's knowledge, by anyone else to assess what the realistic capacity of Wharfside is or to assess what the most appropriate and commercially viable mix of uses might be.
- Accordingly, there is no evidence base or justification to support the inclusion of a limit of up to 10,000sqm; this figure seemingly having been plucked out of the air.
- The setting of any limit without any sound basis or evidence would be contrary to RSS which seeks to maximise economic development including offices in the Regional Centre, and with the draft Core Strategy's own stated objectives of maximising growth to support and contribute to the economic growth of the City Region.

(220)
Pg 91. SL2
Strategic proposal
Section.
Object.

221

Pg 97, SL5
Strategic Proposal
Object

SL5: Trafford Park Core

Clarification is required within the text of the Strategic Proposal of what is intended by the words "supporting commercial office accommodation" to avoid any confusion between the anticipate roles of Trafford Wharfside, the Trafford Centre Rectangle and the Core of Trafford Park. If, as Peel understand, the core is to be protected and developed for modern industrial, storage and distribution uses then this wording should be expanded to confirm that there is a presumption against general office development within Trafford Park Core which is not ancillary or directly related to a manufacturing or other industrial/storage/distribution use.

SL6: Trafford Centre Rectangle

Peel support the Strategic proposal but object to the inclusion of the words "where appropriate" in respect of commercial office, hotel and leisure accommodation. This is a meaningless caveat which could be open to many different interpretations and is likely to give rise to major difficulties in promoting development proposals. Peel request that these words be deleted and suggest that they be replaced by a reference to the need for any proposed for development in these use categories to be subject to the tests set out in PPS6 or its successor. This would also provide for consistency between SL6 and SS2 in this respect.

222

Pg 99, SL6
Strategic Proposal
Object

223

Pg 103, SL8
Object

SL8: Carrington

The Strategic Proposal text in respect of SL8 should also make mention of the role of the MSC in the handling of freight for users in this area.

224

Pg 117, SS2
Object

SS2: Trafford Quays

The text in the Strategic Proposal should be revised to make clear that not all of the Trafford Quays site does constitute "greenfield" land.

1045

Cutting, Damien

From: Paul Singleton [psingleton@turleyassociates.co.uk]
Sent: 10 August 2009 13:11
To: Strategic Planning
Cc: 'Louise Morrissey'; Georgina Crabtree; Peter Nears; 'Barry Jeeps'
Subject: RE: Trafford Core Strategy and Evidence Base - Representations on behalf of Peel Group
Follow Up Flag: Follow up
Flag Status: Red
Attachments: land east of Lock Lane, Partington A3.pdf

Further to my email of the 7th August re the above I enclose a plan showing an area of land in Partington (the "Gypsy site" and adjoining land) which Peel propose should be included within the red line boundary of the Strategic Site allocation under Policy SS4. Peel consider that the development of this site for new housing would form a logical extension to the development of the Partington Canalside land, for which the Council has already resolved to grant outline planning permission.

Peel therefore seek an amendment to the boundary of the SL4 allocation which is to be included in the proposals map and an addition to the wording of Policy SL4 to provide for the development of this additional land for new housing at a similar density to that already approved on the adjacent land, with a revision of the site area and forecast housing unit numbers being made to the text to reflect this extended allocation.

Regards

Paul Singleton
TURLEYASSOCIATES
 The Chancery, 58 Spring Gardens, Manchester, M2 1EW
 T: 0161 831 1300 | F: 0161 831 1301 | M: 07712 188 502

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From: Cutting, Damien [mailto:Damien.Cutting@trafford.gov.uk] **On Behalf Of** Strategic Planning
Sent: 10 August 2009 09:08
To: Paul Singleton; Strategic Planning
Cc: Barry Jeeps; Peter Nears
Subject: RE: Trafford Core Strategy and Evidence Base - Representations on behalf of Peel Group

Hi

Just to confirm representations have now been received and we await your Trafford Quays Delivery Report.

Thanks

Damien

From: Paul Singleton [mailto:psingleton@turleyassociates.co.uk]

10/08/2009

Sent: 07 August 2009 17:24
To: Strategic Planning
Cc: 'Barry Jeeps'; 'Peter Nears'
Subject: Trafford Core Strategy and Evidence Base - Representations on behalf of Peel Group
Importance: High

Please see attached two documents setting out representations on behalf of Peel Group on the draft Core Strategy and sections of the related Evidence Base. I would be grateful if you would acknowledge receipt of these representations in due course.

We are also proposing to submit a Trafford Quays Delivery Report in support of the Core Strategy's allocation of the Trafford Quays site as a Strategic Site. This will be submitted to the Council next week.

Regards,

Paul Singleton

TURLEYASSOCIATES

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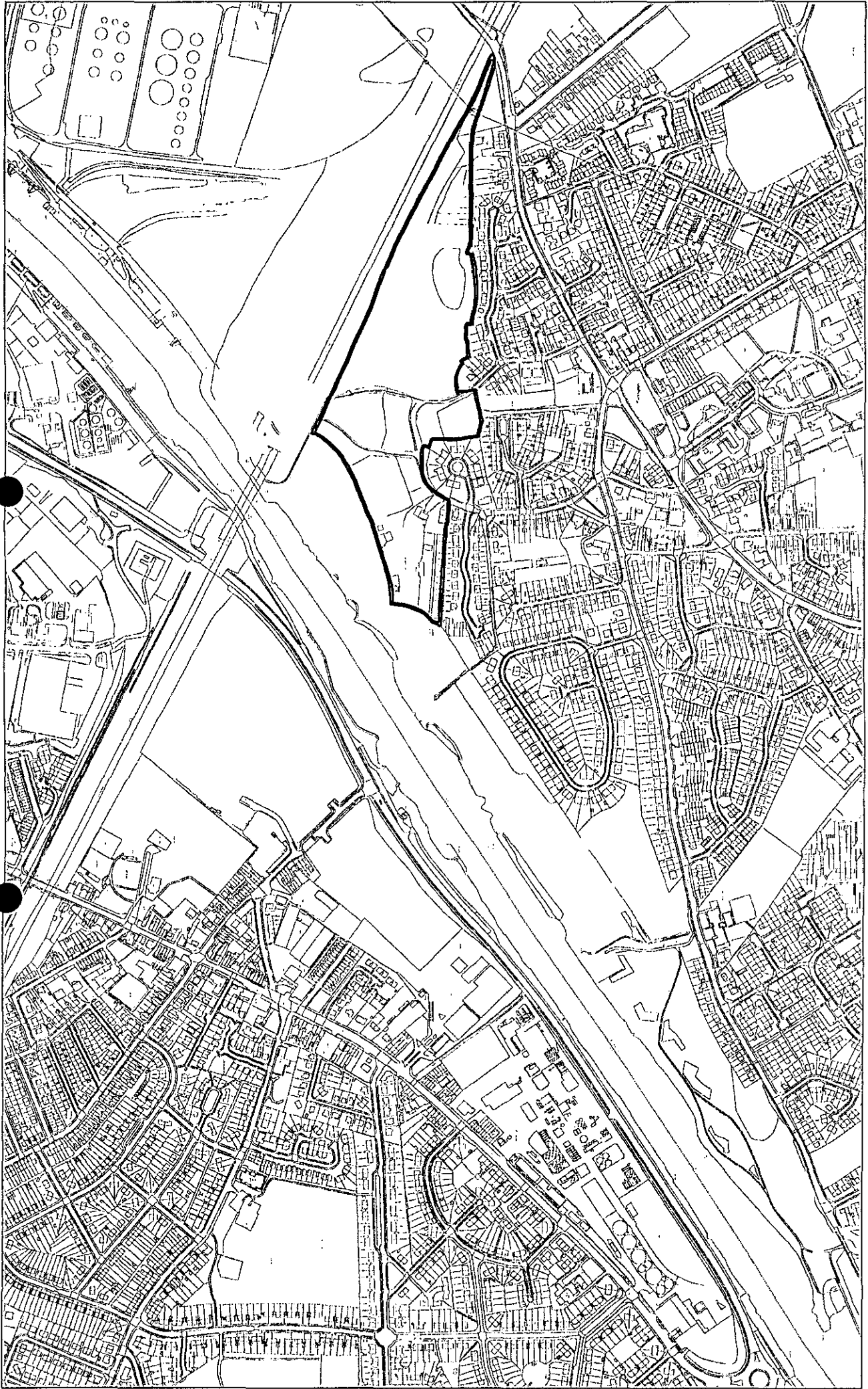
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 Ordnance Survey
Developer Partner
This drawing was last measured from the Ordnance Survey Masterplan of the City of London, 1997. OS Grid Reference: 588 987

N Scale: 1:5000

Date: 10:08:09

Lock Lane, Partington


THE PEEL GROUP

Received 07/08/09

Buses which serve the Trafford Centre Bus Station

Bus Service Number	Frequency (Buses per hour)	Operator	Destination	Origin	Financial support from GMPT
18	2	Arriva	Trafford Centre	Altrincham	Hourly from 1900 (Mon - Sat). All journeys on Sunday
23	2	Stagecoach Manchester	Trafford Centre	Stockport	NO
23A	2	Stagecoach Manchester	Trafford Centre	Stockport	Hourly from 20:40 (Mon - Sat). Hourly from 19:40 on Sunday
51A	1 service per day (Mon - Fri)	First Manchester	Trafford Centre	Cheetham	NO
57	1 (Sat only)	First Manchester	Trafford Centre	Oldham	NO
126	1	South Lancs Travel	Trafford Centre	Leigh	NO
132	1	First Manchester & South Lancs Travel	Trafford Centre	Wigan	NO
250	4	Stagecoach Manchester	Trafford Centre	Manchester	NO
300	1	First Manchester & South Lancs Travel	Trafford Centre	Bolton	NO
556	1 (Sunday only)	Arriva North West	Trafford Centre	Bolton	Services 0825,0925,1625 and 1725
ML1	3	Arriva	Trafford Centre	Stretford	NO
22	2	First Manchester, Stagecoach Manchester and Stage North West	Bolton	Stockport	NO
100	3	First Manchester	Manchester	Warrington	Services after 18:55 (Mon - Sat)
247	2	Arriva	Eccles	Altrincham	Hourly from 1700, 1918 - 2245 (Mon - Sat) All journeys on Sunday
290	2 (PM peak only)	Arriva North West	Partington	Manchester	NO
291	2 (only operates 0525 - 0815, 1310 and 2105)	Arriva North West	Flixton	Manchester	NO

Additional Buses which stop along Barton Dock Road

Bus Service Number	Frequency (Buses per hour)	Operator	Destination	Origin	Financial support from GMPT
54	3 services a day (Mon - Fri)	First Manchester & JPT	Trafford Centre	Cheetham	All journeys
241	1 Service a day	Go Goodwins	Trafford Park	Partington	All journeys
243	1 Service a day	Lainton Coaches	Trafford Park	Partington	All journeys
270	2 Services a day	Arriva North West & Stagecoach Manchester	Trafford Centre	Baguley	All journeys
272	5 Services a day	Go Goodwins, Stagecoach Manchester & Hayton's Coaches	Trafford Park	Sharston	All journeys
293	2 Services during AM and PM peaks	JPT	Trafford Park	Little Hulton	All journeys
294	2 Services a day	JPT	Trafford Park	Langley	All journeys
297	2 Services a day	Arriva North West & Wythenshawe Mobile	Trafford Park	Levenshulme	All journeys

Received 07/08/09

1045

PEEL GROUP

TRAFFORD CORE STRATEGY

REPRESENTATIONS ON EVIDENCE BASE

A) Sustainability Appraisal

Peel have concerns with regard to the overall quality and clarity of the report, in particular with regard to the many statements and assertions that seem not to be underpinned by any obvious analysis or reasoning. However we have limited the following comments to specific issues and sections.

Paragraph 4.1.

The third section of paragraph 4.1 contains a statement that the focus of development in Partington and Carrington has particular potential to exacerbate air quality issues but does not satisfactorily explain why this would be the case. This conclusion would also seem to be contrary to the long standing objective of the Council to generate new employment opportunities in Carrington and Partington such that the need for residents in this part of the borough to travel elsewhere for employment is reduced.

226

SA. P 22

Para 4.1 (3rd section)

object: Ref to

Partington & Carrington

227

Section 4.2.

P 23, SS 2

2nd para...

object.

SS2- Trafford Quays

The SA concludes that the development of TQ would have a "major negative impact" on the objective of conserving land resources but does not give any explanation or justification for this assertion save the reference to it being predominantly a greenfield site. However reference to and reasoned consideration of the 3 sub objectives of Sustainability objective E6 would suggest very little conflict with this objective. Such a conclusion could only logically be reached if there was known to be a more than adequate deliverable supply of contaminated and other brownfield land available in the borough to meet the housing development needs, whereas the allocation of TQ as a Strategic Site confirms that this is not the case. Hence it can be assumed that the Spatial Strategy in its totality is already doing everything that it reasonably can to conserve land resources and meet the sub objectives of E6 and that the development of TQ will not have any major impact on this objective at all.

228

Section 4.2.

P 23, SS 2.

2nd para.

object.

Secondly the SA's statement that the development of TQ **may also have** an adverse impact on the objective of protecting, enhancing and restoring open space, biodiversity, flora and fauna demonstrates the limited extent to which its conclusions are actually underpinned by adequate information or analysis. The TQ site does not contain any open space which would warrant any protection and previous ecological assessments have demonstrated its limited value in terms of flora and fauna. Hence the potential for adverse impact is minimal whereas the scope for enhancement of biodiversity and open space value through the development of the site is significant.

229

P 23, SS 2

Section 4.2

2nd para

Object

The SA then goes on to state that the site has poor accessibility by public transport and this assertion seems to underpin the SA's main conclusions with regard to the sustainability scoring of the TQ site. However this statement is factually incorrect and completely disregards the conclusions of the Council's own consultants in the Trafford Park Accessibility Study (which, curiously, does not seem to form part of the Council's evidence base) which found that the immediate area of the site is "well served by buses" and gave positive support to residential development at TQ because this would help to extend the service times and frequency to the benefit of the wider Trafford Park area. As demonstrated in the Trafford Quays Delivery Report and the supporting Technical Appendix in respect of Transport Considerations, which are being submitted by Peel in support of their representations on the draft Core Strategy, Trafford Quays is, in fact, in a highly sustainable location for residential and other development and further enhancements to public transport services can be achieved without significant investment in new transport infrastructure. Peel consider that the conclusions of the SA in respect of accessibility issues are fundamentally flawed and need to be revised on a more informed basis.

230

SA APPENDIX

P 16 - 20

Objectives S3, S4,

S7, S8, EC2 +

EC5 - Object

The "scoring" within the SA of the Trafford Quays site against economic and social objectives understates the contributions which its development as proposed will make to these objectives; for example to S3, S4, S7, S8, EC2 and EC5.

Partington Canalside

The SA's conclusions with regard to the development at Partington leading to the loss of a major greenfield site and having a negative impact on biodiversity, flora and fauna, appear to pay no regard to the package of mitigation and enhancement works which have been agreed as part of the S106 obligations relating to the Council's resolution to grant planning permission for the residential development proposals. Again this section of the SA should be revised accordingly.

Trafford Centre Rectangle

Again the SA's assertion that "public transport to the TCR is presently limited" contradicts all the available evidence and the conclusions of the Trafford Park and Salford Quays Accessibility Study. Given that the TCR has, at its heart, a bus station which is categorised by GMPTE as a Category B, Major Public Transport Interchange, it is very difficult to understand how the Council's consultants could sensibly come to such a conclusion or to conceive of a more accessible location amongst the other designated Strategic Locations and Sites. As in respect of SS2 Peel consider that the conclusions of the SA are flawed in relation to accessibility issues and, hence, require revision.

231

P 24, SS 4

Section 4

2nd para

Object

232

P 26, SL 6

- P 27

Object

B) Employment Land Study

The ELS considers a number of sites in Peel's ownership including 5 sites within the Trafford Centre Rectangle which is allocated in the draft Core Strategy as a Strategic Location for a range of land uses including employment, leisure and cultural and residential development. These are:

1. Kratos - Ref. 72094/00 .
2. Argos - Ref 72122
3. Containerbase - Ref 72123 .
4. Bridgewater Centre Ref 72120 .
5. Land south of Taylor Road Ref 72121 .

There appears to be some confusion in Appendix D of the ELS as to whether the Argos site is available or unavailable for new employment use as it appears in both lists; however if the test of availability is current use it should be regarded as being unavailable as it is still occupied and used by Argos at the present time. However, on the assumption that "employment use" in this context refers to those uses within Class B of the Use Classes Order, its inclusion in the Study is questionable since the Council has granted planning permission for a change of use to a museum and it is Peel's intention to implement that change of use after Argos vacate the building.

The ELS also places these sites as being outside of the Inner Area and bases its policy analysis on that premise. Peel's representations to the proposed definition of the Inner Area boundary within the draft Core Strategy do therefore have implications for the policy ranking of these key sites as well.

Peel's main concern with regard to the ELS is its proposal that these 5 sites should be retained for employment use which would appear to conflict with their inclusion within the TCR Strategic Location under Policy SL6 which clearly envisages a much broader range of uses than those covered Class B. This conflict mirrors the apparent conflict between Policy W1.10 and SL6 to which Peel have objected in their representations on the draft CS and needs to be resolved. However Peel also objects to the suggestion in the ELS that the development of any of the sites in the TCR should be "employment led". Again this is inconsistent with its allocation as a Strategic Location under SL6 and the aspiration within that allocation that the TCR should help to provide for Trafford's housing development requirements. Whilst it may be possible that residential might be brought forward in mixed use scheme there appears to be no justification as to why there should be a requirement for such schemes to be employment led. Such a restriction would limit

233
ELS - Appendix D.

Map B.

Site Ref 72122

Object

234
Appendix D.

Map A & B.

Object

235
Appendix P.

Map A & B.

Site Refs.

72094/00 .

72122

72123

72120

72121 .

Object

the scope of the mixed opportunity which the TCR presents to provide for a wide and diverse range of development needs which is complementary to those that are better suited to the Trafford Park Core or Wharfside.

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Appendix D
Map B

Suc 72094/00
object

Peel note that the site specific assessment in respect of the Kratos site in Appendix D is out of date in that it does not make reference to the second and larger scale outline permission on the site or not that this site is available.

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Appendix E
Page E5

Trafford Quays
SS2
object

Finally in relation the ELS Peel note that the table on Page E5 of Appendix E suggests that there would be concerns with regard to residential development at Trafford Quays because of its proximity to the Davyhulme WwTW. This is not the conclusion reached by Peel's consultants in the Air Quality technical appendix to the Trafford Quays Delivery Report which is being submitted to the council in support of these representations. Indeed reference is made there to the site boundary odour measurements that United Utilities have themselves carried out as part of their planning application for an Advanced Sludge Treatment Project at the Davyhulme site. UU found that "odours were not detectable beyond the site boundary" (under existing operations) and reported that few if any formal odour complaints have been received in recent years regarding the operation of Davyhulme Wastewater Treatment Works. They also concluded that odours from the proposed new plant will not exceed background levels. Given that these conclusions have been accepted by Trafford Council in resolving to grant planning permission for the sludge treatment facility there would appear to be no sound basis for the comments made regarding this in the Table at Section E5 and these should therefore be deleted.

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Appendix E
Page E5

Section E1.4
object

Similarly in respect of the Section E1.4, Peel's consultants have assessed the capacity within the utility infrastructure to support the development of TQ and have concluded that there are no significant issues in this respect; this is dealt with in Capita Symonds report which is appended to the TQ Delivery Report. Finally in respect of Appendix E, it is of concern to Peel that the section dealing with Highways Infrastructure appears to pay no regard to the WGIS proposals even though they have been in the planning system for over 5 years and now have the benefit of planning permission.

C) Local Infrastructure Plan

Peel suggest that paragraph 7.17 of the LIP should emphasise the distinction between the Trafford Centre area, including specific reference to the existence of the Trafford Bus Station, and the rest of Trafford Park. Also this part of the LIP should acknowledge the positive findings of the Trafford Park and Salford Quays Accessibility Study (which concludes that "the Trafford Centre is well served by buses") in relation to the high degree of public transport accessibility which the Trafford Centre, and hence, its

239

PARA 7.17 P.18
GENERAL
COMMENT

PARA 7.17 + 7.20
P.18
GENERAL
COMMENT

240

immediate surroundings, already enjoys. These same points apply also to paragraph 7.20 of the document.

Appendix 2; the list of bus services which use the Trafford Bus Station is incomplete. A full list of services which use the TBS is attached as Annex 1 to these representations.

APPENDIX 2 P.90-94.

GENERAL
COMMENT

241

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	<input type="text" value="35 - 37"/>
		Paragraph number	<input type="text" value="7.1 - 7.15"/>
Core Strategy summary broadsheet	<input type="text"/>	Policy number	<input type="text" value="L2"/>
Sustainability Appraisal	<input type="text"/>	Vision reference	<input type="text"/>
Equality Impact Assessment	<input type="text"/>	Strategic Objective reference	<input type="text"/>
Other document, (please specify)	<input type="text"/>	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.

1) Paragraph 29 PPS3 requires that in Local Development Documents, Local Planning Authorities should set an overall (i.e. plan-wide) target for the amount of affordable housing to be provided. The target should reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured.

Whilst an economic viability assessment has been undertaken, and identified that a range of affordable housing targets are viable within different locations in the Borough based on an examination of the housing market, there is no plan wide target as such. Furthermore, it is proposed that the definitions of these areas will be delegated to a subsequent SPD (para 7.12), as will the site size threshold (para 7.15).

Paragraph 6.1 of PPS3 advises that 'a planning authority may prepare Supplementary Planning Documents to provide greater detail on the policies in its DPD's. SPD's should not be prepared with the aim of avoiding the need for the examination of policy which should be examined'.

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

102

Policy L2
p 35-37
Para
7.1 - 7.15
Object

Neil Tatton, Pioneer Property Services

1) Paragraph 29 PPS3 requires that in Local Development Documents, Local Planning Authorities should set an overall (i.e. plan-wide) target for the amount of affordable housing to be provided. The target should reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured.

Whilst an economic viability assessment has been undertaken, and identified that a range of affordable housing targets are viable within different locations in the Borough based on an examination of the housing market, there is no plan wide target as such. Furthermore, it is proposed that the definitions of these areas will be delegated to a subsequent SPD (para 7.12), as will the site size threshold (para 7.15).

Paragraph 6.1 of PPS3 advises that ' a planning authority may prepare Supplementary Planning Documents to provide greater detail on the policies in its DPD's. SPD's should not be prepared with the aim of avoiding the need for the examination of policy which should be examined'.

Following the successful High Court challenge of Blyth Valley Councils Core Strategy affordable housing policy the Council appealed against the judgement but their appeal was dismissed. The appeal judgement stated that...'the viability assessment of any such percentage figure is a central feature of the PPS3 policy on affordable housing. It is not peripheral, optional or cosmetic. It is patently a crucial requirement of the policy'.

It is evident therefore that thresholds and targets for affordable housing provision should be subject to independent examination and inspector scrutiny, and should not be circumvented by seeking to delegate these crucial policy requirements to an SPD.

103

Policy L2
p 35-37
Para
7.1 -
7.15
Object

2) Paragraph 22 of PPS3 requires that affordable housing policies within Local Development Documents should be informed by a Strategic Housing Market Assessment (SHMA). Practice Guidance on the preparation of a SHMA was published by CLG in March 2007, and updated in August 2007.

The evidence base referred to in the Trafford Core Strategy is an HMA undertaken in 2006. Evidently this can not be considered a PPS3 compliant SHMA as it was undertaken in advance of guidance being issued. Furthermore, having examined the 2006 HMA it is not considered robust and credible and provides neither all the core outputs, or demonstrates compliance with the required process checklist in CLG guidance.

As the HMA would in any event be approximately 5 years old when the Core Strategy is likely to be adopted. Paragraph 4.37 of PPS12 states that 'Evidence gathered should be proportionate to the job being undertaken by the plan, relevant to the place in question and as up-to-date as practical having regard to what may have changed since the evidence was collected'.

A new PPS3 compliant SHMA should therefore be commissioned to inform the future development of any affordable housing policy.

Trafford Tomorrow

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

STRATEGIC PLANNING AND DEVELOPMENTS
10 AUG 2009

By: _____
Title: _____
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?

IN SECTION 2 - TRAFFORD: A PLACE TO LIVE..., TRAFFORD IN PARTNERSHIP SUB-SECTS 2-17 ONWARDS
COULD YOU INCLUDE A NOTE THAT TRAFFORD, SALFORD

109

Sites for development



AND MANCHESTER COMBINE IN A JOINT LOCAL ACCESS FORUM (TO DO

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.

WITH RIGHTS OF WAY.

	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)			✓		

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?

RE SECTION 27 MONITORING SUB SECT. 4. TRANSPORT & COMMUNICATIONS INDICATORS: -

(110)

COULD YOU ADD: PERCENTAGE OF PUBLIC RIGHTS OR WAY THAT ARE EASY TO USE WHEN MEASURED AGAINST BUPI 178.

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.

1078



Our Ref: RB/TB

21st July 2009

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

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

Dear Sirs

Re: Further Consultation on the Preferred Strategy and the Strategic Housing Land Availability Assessment (2009 Review)

SHLAA
P4
Paras
1.3-1.4
object

115

Please find enclosed Redrow's comments on the above documents. On a general note, we consider that the evidence base which supports the Core Strategy is neither credible nor robust. With particular regard to the SHLAA, there needs to be more active engagement with housebuilders as required by the Practice Guidance; a point recently emphasised by a letter to all Chief Planning Officers from Steve Quartermain. Redrow consider this is best achieved by quickly establishing a housebuilder's panel which will systematically assess the deliverability/developability of all sites already within the planning process and potential new sites.

core strategy
P35, Policy
L2

116

It is also noted that the Core Strategy attempts to delegate a number of important policy decisions to supplementary planning documents (e.g. affordable housing targets, thresholds for qualifying sites and commuted sums). This approach is contrary to both PPS 3 and PPS12 and will create unacceptable uncertainty.

P57 Policy
L8

117

Yours faithfully

Robin Buckley
Senior Planning Manager – Northern Region

Redrow's objection to Policy R4:-

(118)

P 76

Policy R 4

Sub para R4 6a

object

1. Insufficient land has been identified within the Plan to meet requirements and provide an element of flexibility/contingency. The land referred to in sub para R4.6a has previously been protected to provide a reservoir of suitable housing land, outwith the Green Belt, to meet Trafford's housing needs post 2016. Therefore its suitability for housing has long been established and more recent work undertaken by the GMPTE confirms it is well located in relation to frequent bus services, underlining its sustainability credentials. Development here would also significantly assist the regeneration of Partington and lead to the creation of a more balanced and sustainable community. For these reasons, the land to the north of Moss Lane and east of Warburton Road should be excluded from the Protected Open Land designation and identified as a reserve housing site, which could be released in the event of a shortfall in the deliverable housing supply.

119

Redrow's objection to Policy SL9 Partington:-

Strategic Location

SL9

1. The land to the south of Partington, currently Protected Open Land, should be included within the boundary of the Strategic Location, to recognise its future potential for housing development which would support the regeneration of the area.

P88, Fig 5

object

+

Strategic Location SL9 .

P105

object .

Redrow's objection to Table L1:-

120

The Table is based on a flawed SHLAA (see comments on SHLAA) and grossly exaggerates the deliverable and developable housing land supply. Specifically, it makes inflated assumptions about the capacity of sites and the delivery of completions, especially the Strategic Sites and Strategic Locations. Many of those sites are subject to significant constraints and the claimed capacities must assume high density development for which there is no market and no finance available, at least in the short to medium term. High numbers of apartments would also be at odds with the SHMA which identifies a need for more traditional family housing.

P34
Table H1
object

Redrow's objection to Policy L1:-

(121)

Policy L1

P.31

Sub para L1.2

Object .

1. The wording of sub paragraph L1.2 should be strengthened to give a clear and explicit commitment to meeting the minimum housing requirements set out in the RSS, plus a 20% uplift for growth over the period 2008 to 2018 as a result of the Growth Point initiative.

(122)

P.31 Policy L1.2.

sub para L1.2b

Object .

2. The proposed phasing in sub –paragraph L1.2 b is not explained or justified. In the absence of any special justification, the housing requirement for the first three years should be 2080 (3 x 694) not 1600.

Redrow object to Policy L2 for the following reasons:-

123

P35
Policy L2
Para L2.3
object

1. Sub- para L2.3 should be redrafted to require developers to demonstrate that the proposed housing mix will reflect demand, as well as local needs, as set out in the Housing Strategy and SHMA. This change would recognise that housebuilders have a role in satisfying peoples wants and aspirations, as well as their immediate housing need, if everyone is to have the opportunity of a decent home. For example, many single person households opt to purchase two or three bedroom housing, because of a desire for more space and the flexibility it offers to accommodate changing lifestyles.

124

P35
Policy L2
●
para L2.3 c

2. Delete sub paragraph L2.3c) because it is unnecessary and unreasonable to for all Developers, regardless of where a site is, to demonstrate how their particular proposal will increase the provision of family housing in the north of the Borough.

P35
Policy L2
Para L2.5
object

3. Sub paragraph L2.5 should set out an affordable housing target as required by PPS3 (para 29), based on the findings of the SHMA and having regard to an assessment of the economic viability of the land. Such fundamental policy decisions should not be delegated to SPD, which should only be used to provide greater detail and clarity.

125

P35
Policy L2
Para L2.7 a
object

4. Sub para L2.7 a) is woolly and creates unnecessary uncertainty. The words " but preferably 3 bed-roomed", should be deleted. Sub paragraph L2.7 b) is over prescriptive and will not lead to the creation of well balanced communities. Also, social rented housing has a dramatically greater impact on economic viability (contrary to the remarks at para 7.13) and it is not sufficient to say that exceptional circumstances to justify varying the tenure split will be set out SPD, because that simply creates further uncertainty. Redrow consider that the social rented requirement should be expressed as a range (e.g. 10-30% of the affordable element) to provide necessary flexibility.

P35 Policy L2
Para L2.7 b
object

126

● P37
Policy L2
Para 7.13
object

127

Redrow's objection to paragraphs 6.11 to 6.13:-

128

P33

Policy L1

Paras 6.11 to

6.13

The Plan should set out a mechanism for addressing any shortfall in housing land supply, including a trigger level (e.g less than a 6 years supply) and the approach to be taken to bringing other sites forward earlier. This will provide necessary transparency and certainty.

object .

129

Objection to Policy L5 for the following reason:-

P 47

Policy L5

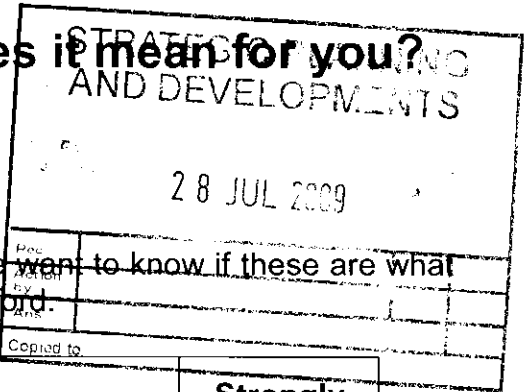
Para L5.8

object .

1. Sub-para L5.8 is too prescriptive and focussed on energy generation rather than recognising that carbon reduction can be achieved, often at much lower cost, by the use of modern construction methods and materials. In fact it is more likely that carbon reduction on a particular site will be achieved through a combination of measures, depending on local circumstances and the policy ought to be neutral on which to adopt.

Trafford Tomorrow

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



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?

Very poorly structured question - as if any sane person would disagree with for example "Meeting employment needs"

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?

- Again - ~~Strongly~~ ~~Disagree~~ & strangely worded.

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)					

Would you like to add any further comments?

*Again, partly structural. Why disagree with any of these?
 Explain why they are prioritised this way? - It would make more sense to say why they are grouped this way?*

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?

*DD to ~~the~~ comment.
 previous*

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.

PP/1106

21 July 2009

Delivered by Post

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

Our ref: SAIM0010

E: bhinchliffe@turleyassociates.co.uk

Dear Sir/ Madam

TRAFFORD CORE STRATEGY: PREFERRED OPTION

This letter details written representations made by Turley Associates, on behalf of Sainsbury's Supermarkets Ltd, in relation to the consultation on the Trafford Core Strategy: Preferred Option.

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

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

**Becki Hinchliffe
Planner**

Enc.

103

P62
Policy W2
Para W2.2
Support

Spatial Planning
Sustainable Regeneration Directorate
Salford Civic Centre, Chorley Road
Swinton, Salford, M27 5BY DX 712104 Swinton 2

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

Phone 0161 7932796
Fax 0161 7933667
Email Jimmy.mcmanus@salford.gov.uk
Web www.salford.gov.uk

My Ref Trafford/LDF
Your Ref

Date 10 August 2009

Subject: TRAFFORD CORE STRATEGY: FURTHER CONSULTATION ON THE PREFERRED OPTION

Dear Sir/ Madam,

Thank you for this further opportunity to comment on your Preferred Options Core Strategy.

We are broadly supportive of the approach set out within the Preferred Options report however we have the following detailed comments:

(102)
Policy
W1
P 59 - 61
areas
14.6 - 14.7
object

Policy W1 / paragraphs 14.6 and 14.7 – It is noted that paragraph 14.6 refers to the defined strategic development locations (Pomona, Wharfside, Trafford Park Core, Trafford Rectangle, Carrington and Trafford's Town Centres) as areas where it is intended to secure a diverse range of industrial, commercial, warehouse/distribution, service and support activities. Paragraph 14.7 then refers to areas outside of the Strategic locations and highlights the need to consider the sequential approach in PPS6. This could be read as allowing, within the Strategic Locations, office development and other uses that would ordinarily be directed towards the Regional Centre and town centres. The Core Strategy should be clear that PPS6 considerations apply equally within these strategic locations and should confirm that, within those Strategic Locations that fall outside of the Regional Centre or town centre, such uses should be highly accessible by a choice of transport modes and should only play a secondary or supporting role.

(103)
Policy
W1
P 59 +
Policy
L1
P 31
Para 6.5
Support

Policy L1 / W1 / Strategic Locations – The mix of uses to be brought forward within the Strategic Locations, particularly those within the north of the Borough, should be determined having regard to the potential impacts on regeneration priorities within Trafford and adjoining Districts, and the wider City Region. Such development has the potential to impact on regeneration priorities within Salford, such as Eccles and the Housing Market Renewal Area which are particularly vulnerable to changes in the local economy. To this end we welcome paragraph 6.5 under Policy L1 to the extent that it describes the importance of ensuring that new residential development contributes towards the regeneration objectives of the City Region, and that it complements and strengthens vulnerable market areas adjacent to Trafford.

If you have any queries, please do not hesitate to contact my colleague Jimmy McManus using the details at the top of this letter.

Yours sincerely

Chris Findley
Head of Planning and Development

1026



Coped to	
Ans	
Action by	
Rec	
10 AUG 2009	
STRAFFORD PLANNING AND DEVELOPMENTS	
Email: andrew.thomson@dtz.com	
Tel: +44 (0)161 228 7095	
Direct Fax: +44 (0)161 824 2055	

Dennis Smith
 Strategic Planning and Developments Manager
 Trafford Borough Council
 First Floor
 Waterside House
 Sale Waterside
 Sale
 M33 7ZF

Our ref: 06/10850-8
 Your ref:

7 August 2009

Dear Dennis

Trafford Core Strategy - Further Consultation on the Preferred Option

Further to our recent discussions I attach for your attention a copy of our response to the above which is submitted on behalf of our client Shell International Ltd in respect of their land at Carrington.

We believe that, as published, the Preferred Option is undeliverable and will not provide during the plan period the quantity and choice of housing required in the Borough. However, the inclusion of Shell's land at Carrington for a mixed use sustainable development, will create a real, suitable, and deliverable option that will be achieved over the plan period.

Shell, encouraged by the Council, have commissioned and consulted upon a masterplan vision for their site and have recently made a series of presentations to adjoining landowners as well as the Council's Senior Management Team and the Executive. This is an ongoing process which, to date, has been met with a positive reaction.

The Shell masterplan Vision is probably the only opportunity within Trafford to deliver a truly sustainable new community that will bring with it significant regeneration and green space benefits for the whole Borough. We would therefore ask you to revise the wording of SL8 Carrington to reflect the representations we have made and the recommendation at the end of our report.

We should be grateful if you could acknowledge receipt of this letter and would ask for the opportunity to present the case for a mixed use sustainable development at Carrington at the forthcoming Examination.

Yours sincerely

Andrew Thomson
 Director
 enc

DTZ

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 www.dtz.com/uk

A list of directors' names is open to inspection at the above address
 DTZ Debenham Tie Leung Limited Registered in England No 2757768
 Registered office 125 Old Broad Street London EC2N 2BQ



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Trafford Core Strategy

Further Consultation on Preferred Option

August 2009

DTZ
No. 1 Marsden Street
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M2 1HW
Tel: 0161 236 9595
Fax: 0161 835 2055

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2.0 The Preferred Option	4
3.0 Conclusions.....	13

1.0 Introduction

1.1 We are instructed by Shell International Ltd to act on their behalf in respect of their land holding at Carrington, and to make representations to the further consultations on the Preferred Option Core Strategy recently published by Trafford Borough Council. We will respond to the Preferred Option document in the order of topics as published.

1.2 We have been in discussion and working with the Council for the last 18 months in respect of the long term future of the land at Carrington and, in consultation with officers, have prepared a Masterplan Vision for the site. We have recently made presentations of this Vision to the Senior Officer Management Team, the Executive Members, the Carrington Liaison Group, Carrington Business Park Board, Carrington and Partington Parish Councils, Basell Polyolefins and Manchester United.

The aim of that Vision is to produce a sustainable mixed use development on this large brownfield site at Carrington over the next 25 years that is achievable and deliverable.

1.3 To understand the context of Shell's representation and the Council's formulation of their Preferred Option and the policies contained therein, it is necessary to refer to both the National and Regional policy background as well as commenting upon the strategy itself.

National Policy Context

1.4 The National Policy context is well known, however it is worth reminding ourselves of the main thrust of that policy is to **deliver sustainable development that makes the most effective and efficient use of land**. PPS3 sets out the Government's objective to ensure that the planning system delivers a flexible responsive supply of land for Local Authorities to ensure that sufficient, suitable land is available to achieve their housing and previously developed land delivery objectives. Deliverable sites should, at the point of adoption of the relevant Local Development Document, be:

- **Available** - the site is available now
- **Suitable** - the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed use communities
- **Achievable** - there is a reasonable prospect that housing will be delivered on the site within five years

The land at Carrington within Shell's ownership meets all of these criteria, with the added bonus of the opportunity to create a new sustainable community around the existing housing and employment at Carrington.

- 1.5 The recent consultation paper on Planning for Sustainable Economic Development (PPS4) points out that the planning system affects productivity and employment, the two drivers of economic growth, and influences wider economic objectives such as regeneration and the provision of new housing which contribute to the quality of life. The planning system affects investment by providing certainty of land use and improvements in infrastructure. When firms and individuals are sure of the future use of their own and surrounding land then they are more likely to commit to investment. Well planned infrastructure improves productivity, for example by cutting journey times and so increasing labour mobility, and creates environments in which people want to live and work. The Government's key policy outcomes include delivering sustainable development and building prosperous communities by improving the economic performance of local areas, promoting regeneration and tackling deprivation.
- 1.6 The Government does, however, recognise 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. It should also be noted that in the context of this advice, economic development includes housing and energy production as well as major employment attractors such as *hospitals and higher and further education establishments*. Local Planning Authorities are therefore encouraged to plan positively and proactively to encourage economic development in line with the principles of sustainable development. In particular, authorities are advised to develop flexible policies which are able to respond to economic change and the need for co-ordination with infrastructure and housing provision.
- 1.7 A recent report following research conducted by the Government's housing advisor, the National Housing and Planning Advice Unit, has said that Government forecasts for housing supply should be increased by at least 6,300 extra homes a year between now and 2031. This report was published on the 30 July 2009 and NHPAU is calling on Government to revise its housing supply by between three and five percent. It argues that at least 237,800 new homes are needed every year between now and 2031 and that these figures should be used to inform regional plans. Steve Nickell, the chair of HHPAU warned of serious economic and social consequences if the backlog of unmet housing need is not tackled. No allowance is currently made within the Core Strategy Preferred Option for this forecast increase in demand.

Regional Policy

- 1.8 The principles of promoting sustainable communities and sustainable economic development together with the marriage of opportunity and need in Policy DP1, underpin the Regional Strategy and building sustainable communities where people want to live and work is a regional priority. The Spatial Principles set out in the RSS apply to all plans and strategies in the North West. One of the priorities of the Manchester City region is to accommodate housing development in locations that

are accessible by public transport, to areas of economic growth and in the southern part of the Manchester City Region to create attractive and sustainable communities where residential development is to be allowed to support local regeneration strategies and to meet identified local needs.

Our proposals for Carrington represent an ideal marriage of opportunity and need, a large area of brownfield land becoming available in parallel with the preparation of the Core Strategy and an increase in housing numbers required by the Growth Point Agenda with the delivery of a sustainable mixed use development.

2.0 The Preferred Option

Part B - Section 3 - The Vision for Trafford

- 2.1 The Council recognise that Trafford is one of the main economic drivers in Greater Manchester sub-regional economy with major long established industrial estates at Trafford Park and Carrington. However, the nature of these areas are *rapidly changing and therefore any plan must be flexible not only to respond to the changes that are currently taking place but also to create long term certainty and sustainability in places like Carrington improving accessibility, choice and the quality of life.*
- 2.2 The Council point out that spatial planning is about producing outcomes for places and they have split Trafford into a number of places that they consider are *locally distinct*. Carrington is one of those distinct areas and its spatial profile acknowledges that the existing transport infrastructure is very limited and that it has been traditionally dominated by a long established petrochemical works that are now in decline. The profile goes on to acknowledge the scale of the brownfield land asset and its potential for economic regeneration. The associated "place objectives" seek to ensure that there is an appropriate mix of homes to meet the needs of the community, to secure improvements to public transport and to improve accessibility of the wider area by providing a link across the Ship Canal and improvements to the linkages to the motorway. The Council also wish to maximise the potential of this employment area and the re-use of the under used, unused and derelict land. It is our strongly held view that in order to achieve all of their 'place objectives', particularly the major improvements to infrastructure, then these can only be delivered by a mixed use sustainable development of the brownfield land that will also help to bring about the regeneration of Partington.
- The mixed use development of Carrington is key to delivery of the regeneration of the substantial area of brownfield land within Shell's control but also the infrastructure required to open up the wider area.**
- 2.3 "The Core Strategy Vision of the Council is to create vibrant and inclusive, prosperous and well designed residential communities within the Borough. Regenerating our most deprived areas of the Borough will play a role in supporting sustainable patterns of living and growing balanced communities.
- 2.4 We will establish a range of house types and tenures in sustainable locations ensuring good access to jobs and services appropriate to the scale of the neighbourhood.....
- 2.5 We will focus key commercial, business and community services in the town centres, Trafford Park and Carrington to establish and maintain them as places to work and to support the wider City Region economy."

It is our submission that the Council are missing a major opportunity in the Preferred Option to create a truly sustainable, vibrant, prosperous, well designed and deliverable mixed use community on the brownfield land at Carrington in accord with both national and regional policy.

Section 3 - Strategic Objectives

2.6 Table 1 in the Strategy sets out the Council's strategic objectives and it is our submission that a mixed use development at Carrington would meet six of the eight objectives as follows:

- **SO1** - The site at Carrington will provide sufficient family housing throughout and beyond the plan period to meet the Borough's needs and will create a sustainable community linking housing with employment and the supporting social infrastructure
- **SO2** - The development of a mixed use community at Carrington will have positive regeneration benefits not only for Carrington but also for Partington creating a range and choice of jobs and housing with improved accessibility and public transport
- **SO3** - Carrington can as a mixed use development deliver a range and choice of employment opportunities in this sustainable location. It is our intention to retain all of the existing jobs on site in addition to creating a range of new employment opportunities
- **SO4** - Not relevant
- **SO5** - The Shell ownership at Carrington includes a significant amount of green space which through a masterplan for the wider area be protected and enhanced increasing local accessibility but also creating linkages to the wider area
- **SO6** - The promotion of a "significant" level of mixed development on the brownfield land at Carrington will reduce the need to travel and improve accessibility
- **SO7** - The development at Carrington, because of its scale and the timescale for the overall delivery, will include new technologies such as Biomass and innovative waste management to combat climate change and to minimise the impact on Trafford's resources
- **SO8** - Not relevant

2.7 The Preferred Option Spatial Strategy is, in the Council's words, a "hybrid option" and is being advanced as the "most deliverable" option concentrating growth towards the Regional Centre, the Inner Areas, Altrincham Town Centre and the Priority Regeneration Areas. Growth will be shared across the areas of Partington, Carrington and Sale west.

(145)
P103
SL8.

Carrington is deliverable as a mixed use development, as proposed by our Vision, that will meet the majority of the Council's strategic objectives because it will be of a scale sufficient to generate the investment required to improve accessibility and the infrastructure in the area, to open up Partington for regeneration and to offer a choice and range of housing and employment opportunities within the area minimising the need to travel. Combine these factors with the opportunities for on-site energy generation, improvements to public transport, a green space strategy and technical innovation and the resulting development over the next 25 years will be at the forefront of sustainability.

Part C - Section 5 - Core Policies

Policy L1 - Land for New Homes

(146)
2.8
Policy L1, P31-34, Table L1
object.

The Council are proposing to release sufficient land to accommodate 11,800 new dwellings however this figure would appear to exclude the four strategic sites that should, in theory, deliver an additional 2,150 units totalling 13,950 dwellings. The forecasted numbers in Table 4 in the SHLAA 2009 review, which includes both the Strategic Sites and Strategic Locations the total number of units is only 7,357. - SHLAA, Table 4, P16.

(147)
2.9
Policy L1
P31-34
Table L1.
+
SHLAA
Table 4,
P16

It is worth noting that Table 4 in the SHLAA does not include SL6 Trafford Centre Rectangle which is listed in Table L1 in the Core Strategy as producing 1,050 units, however even with this addition the total figure in Table 4 only increases to 8,407, some 3,000 units less than that proposed in Policy L1. Furthermore, there does appear to be some double counting with regard to SS4 Partington Canalside and SL9 Partington. Table L1 lists a total number of units of 850 from SL9 (which includes 550 from the Strategic Site SS4). Table 4 in the SHLAA appears to indicate that a total of 1,004 units will result from the development of the Strategic Location and the Strategic Site.

(148)
object.

It is not clear from the information that is in the public domain how the site capacities have been calculated and why there are discrepancies between the figures in the Core Strategy and the SHLAA.

(149)
2.10
Policy L1,
Table L1
P34
+
SHLAA
Table 4
P16.
object.

Policy L1 indicates that of the 11,800 dwellings 42% (4956) will be provided within the Regional Centre and Inner Areas, therefore 58% (6844) will have to be provided elsewhere. Of the sites identified in the SHLAA outside the Regional Centre and the Inner Areas the total number of dwellings identified in Table 4 is 1,936 an apparent shortfall of 4,908 dwellings? Table 1 appears to indicate that some 3,900 dwellings will be forthcoming from other South City Region Sites, although these are not identified and would appear to produce a remarkably consistent 1,000 units for each period of the plan. Even if this were to be the case there still appears to be a shortfall of 1,000 dwellings between the Table L1 and Table 4 in the SHLAA.

The figures in the SHLAA, that represent a 2009 Review, do not tally with the figures in the policy and must raise questions over delivery, suitability and achievability.

(151) 2.11
CHAPTER
23 + 24
All sites
+
LOCATIONS
OBJECT.

In the Core Strategy the Council have identified 11 Strategic Housing locations and four Strategic Housing sites. Of these 15 sites, seven (46%) are in the ownership or control of a single land owner who it is anticipated will deliver 4,550 (62%) units out of the 7,300 proposed in the Strategic Locations and 1,600 (75%) of the 2,150 units on the Strategic Sites. At the top of the housing market, but particularly over the next three to five years, it is difficult to envisage a single landowner wishing to bring forward seven separate sites, probably with a similar mix of units, all of which will be in competition with each other. The Council's anticipated commencement dates on each site must be seriously questioned as is their ability with the current allocations to meet their 5, 10 and 15 year targets.

(152)
P103
SL8.

Carrington will provide an alternative location for the development of housing in association with jobs, that is achievable, available and deliverable.

Policy L2 - Meeting Housing Needs

2.12 Policy L2 requires developers to make a contribution to the creation of mixed and sustainable communities; to be adaptable to the needs of residents overtime and; to increase the provision of family homes in the north of the Borough, particularly larger properties of 3 or more bedrooms.

(153) 2.13
P35 -36
Policy L2
Para 7.3
OBJECT.

A mixed use development at Carrington will create a sustainable community that can be adaptable to the needs of residents overtime and, whilst not located in the north has the capacity to provide a range of family homes. It is difficult to interpret from the published information the mix of dwelling types proposed on each site and it is difficult to calculate comparative densities however, from the information available it would appear that in the North and Inner Areas the dwelling mix will be as follows:

- SL1 Pomona - 1,500 apartments
- SL2 Trafford Wharf - 900 apartments
- SL4 Lancashire County Cricket Club - 900 apartments
- SL6 Trafford Centre Rectangle - mix of apartments and family housing - 500 family houses and 500 apartments
- SL7 Stretford Crossroads - mix of apartments and family housing - 125 family houses and 125 apartments
- SS1 Victoria Warehouse - 400 apartments

- SS2 Trafford Quays - mix of apartments and family housing - 525 family houses and 525 apartments

2.14 Assuming this breakdown is correct, then of the 6,000 units proposed only 1,150 (19%) will be family housing. This hardly meets the requirements of Policy L2 which seeks to encourage a range of family houses. The remaining 4,850 apartments will be in direct competition not only with each other but also with the large number of apartments proposed immediately to the north in and around the Quays in Salford. There is an existing oversupply of apartments in the Manchester City region which is evidenced by the markets lack of appetite for apartments, the demise of many city centre developers and the fact that none of the major housing development companies intend to construct any apartments in the foreseeable future. In addition the large number of apartment consents in the neighbouring area around Salford Quays that have yet to be implemented and the Banks reluctance to fund such schemes brings into question the feasibility of these allocations and the delivery of this large number of apartments in the northern area of Trafford.

Contrary to the claim in paragraph 7.3 of the Preferred Option the policy as drafted with the locations and sites identified cannot and will not in our opinion deliver a balanced housing offer.

Policy L3 - Regeneration and Reducing Inequalities

2.15 Partington is effectively at the end of a cul-de-sac and its regeneration is primarily linked to land allocated for residential development and associated improvements to its shopping centre. There are no employment proposals proposed as part of the regeneration and there is no possibility of improving highway and public transport access to the area.

Carrington and its redevelopment as a mixed use sustainable community holds the key to the successful regeneration of Partington because the scale and mix of the proposed uses at Carrington can be delivered with the associated infrastructure improvements, community benefits, access to green space and the improved public transport connections.

Policy L4 - Sustainable Transport and Accessibility

2.16 The Vision for Carrington will deliver a number of transport and accessibility improvements, however we have made it clear that this site alone cannot deliver all of the improvements envisaged in the Plan. For example the new crossing over the Ship Canal is within the gift of others and will be dependent on links to the M62 and the release of land within Salford for development. In fact there are a number of developments approved or proposed in and around the Carrington area that can collectively contribute to the delivery of infrastructure. **However, the land within the ownership of Shell and included within our Vision can deliver a significant element of the infrastructure requirement that will help to regenerate Partington.**

Policy L5 - Climate Change

A mixed use development at Carrington will be sustainable and will adopt a number of measures to reduce carbon emissions. Pg 47, L5, General Comment. (157)

2.17 As well as sustainable construction there is real potential for Biomass low carbon energy generation on the site and this opportunity has already been discussed with Trafford and will be explored in greater depth by Shell over the next six weeks. We understand that there is work currently taking place on flood risk although the Shell site has not to our knowledge flooded over the past 60 years.

Policy L6 - Waste

2.18 A biomass plant has potential to use a significant amount of recycled timber and off cuts that would otherwise go to landfill and could therefore help to reduce the amount of waste generated in the region. Policy L6, Pg 52, General Comment. (158)

Policy L8 Planning Obligations

2.19 Any planning obligations must have regard to the economic viability of the scheme to which they relate and cannot be imposed on an inflexible basis as this could seriously affect the delivery of a development. The policy in paragraph L8.3 lists a large number of contributions that may be required however the scale and nature of any contribution must be reasonable and related to the development proposed. Pg 57, L8.3, Object. (159)

Policy W1 - Economy

(160)

Pg 59
W1.1
Support

2.20 [We support the Council's policy to identify sufficient quality and choice of land to deliver new employment] however would suggest that the spatial distribution of employment land should be more closely aligned to the provision of land for housing and where possible, such as at Carrington, be linked as mixed use developments in order to create the opportunities to reduce the need to travel. (161)

Pg 59
W1.1
Object.

In our view this policy should be closely linked to other policies that refer to sustainability and reducing the need to travel, two key components of our Vision for Carrington.

Policy R3 - Green Infrastructure

(162)

Pg 74
R3
Support

2.21 [We support this policy and have already discussed with the Council's Green Strategy team the opportunity presented at Carrington as a result of our Vision for a mixed use development to open up the site but also the adjoining open land to link into the wider Green Strategy Agenda in Trafford linking the Mersey Valley through to Dunham Massey. Shell have already worked with the Authorities on the Red Rose Forest initiative.]

Our Vision for Carrington as a mixed use sustainable community presents a real opportunity to deliver the Council's green strategic framework for the wider area.

Policy R4 - Green Belt and Other Protected Open Land

The proposals for Carrington do not involve any encroachment upon or intrusion into Green Belt.

2.22 However, the protected open land to the south of the Shell site is included within our long term vision. Whilst the policy in R4.6b seems to suggest that the land to the south of Shell will remain protected as open land it then goes on to state in paragraph 20.15 that the land could be used for employment use. We would recommend that there should be more certainty for the long term use of this land and provision be made in the policy wording for the open land to be include in the masterplan Vision for the site. Partly to accommodate in an early phase the proposed Biomass facility and to be used in the long term (20 years) for employment use. We therefore support the retention of the majority of the open land to the south of Carrington in the long term for employment use but would like the flexibility to accommodate the Biomass plant on part of this land in the short term..

*Pg 77, R4.6b) object.
Pg 78, 20.15, object.*

163

Part D - Strategic Locations and Sites

2.23 We have already commented on the housing allocations and the dependency of the strategy on a single landowner for the delivery of the majority of the housing units. We have also drawn attention to the discrepancies between the housing numbers in the Core Strategy and those in the SHLAA and the fact that many of the sites in the north of the Borough will be delivering apartments rather than family housing, an aim of the strategy.

2.24 In paragraph 23.5 the Council make reference to the production of planning guidance for each site and as indicated we have already commenced work on a masterplan for Carrington in consultation with the Council and have produced a Vision which has already been the subject of consultation with local Stakeholders as well as Members and Chief Officers of the Council.

164
Pg 86
Para 23.5
General
Comment

2.25 It is our intention to comment in detail upon the Carrington SL8 Strategic Location however in more general terms it should be noted that seven of the Strategic Locations are to be reviewed for the impact of flooding and this also applies to all four of the strategic housing sites. Two of the Strategic Sites are on Greenfield land, Partington and Trafford Quays whilst the Trafford Rectangle is a partial Greenfield site. The RSS policies seek to encourage the re-use of disused land and buildings, in line with national policy, and see this as being critical to improving the Region's image.

165
Pg 86
SS + SL
General
Comment

In particular Policy DP6 refers to the marriage of opportunity and need and we would advance Carrington as a real, available and achievable mixed use sustainable development on a previously used site that is within an area of need situated as it is between Partington and Sale West.

2.26 [The final general point we would make is the optimistic development phasing that the Council have assumed for each location or site, in all but two cases the Council have indicated that development will commence in 2010/11 and in the two exceptions commencement is delayed 2011/12.] In the current economic climate it is unlikely in our view that the housing market will recover until 2013 and, as stated previously, this will be a cautious recovery where developers will not be producing the historic volume of units from a site until perhaps 2015. Furthermore, the heavy reliance on sites that will be dominated by apartments is unrealistic as the market in the Manchester sub-region already has an oversupply of apartments and this market has collapsed.

Pg 86
SSTSL
Support
166

SL8 - Carrington

2.27 [Whilst we support the identification of Carrington as a strategic location, we have a number of comments to make in relation to the uses proposed and some of the infrastructure requirements set out in SL8.]

167
Pg 103
SL8
Support
in
Principle

2.28 As stated there is a real opportunity for the Council to work with a single landowner on a large (500 acre) brownfield site to deliver a sustainable community at Carrington. [We have already made representations to the Council and are preparing a masterplan in consultation with them and we are therefore disappointed that they have not taken the opportunity offered to them and included it within their Preferred Option.] However, we continue to work on the masterplan, to consult with the local community and stakeholders and work with officers to progress our long term sustainable Vision for site. We are in active negotiation with a Biomass Power Generator and are pursuing a number of other enquiries that sit within our Vision.

Pg 105, SL8
Object.
168

2.29 [In detail therefore, we have already stated that a new crossing over the Ship Canal is within the gift of others who will benefit by the release of land within Salford and whilst the provision of this bridge link is desirable, it is our submission that it is not essential for the release of the land at Carrington for a mixed use development. There are other more important local highway improvements and new roads, which are included within our Vision and that can be delivered by the scale and mix of development proposed, that will improve access into the area.] We have already made the point about the housing numbers, mix and availability and the fact that Carrington can provide a range of family housing as part of a mixed use sustainable community. There is nowhere else within Trafford, and perhaps the whole of the Manchester sub-region, where this opportunity exists.

169
Pg 103 SL8
Strategic Proposal
Point &
Object.

2.30 [We agree with the justification in policy SL8 and have used the same arguments to justify our Vision for a mixed use community on the Shell land. Pg 104, SL6, Justification, Support.]

170

Once again we would emphasise that our Vision for Carrington satisfies all of the National and Regional policies and requires the Core Strategy to be re-worded to marry the opportunity and need by creating a positive policy framework that allows the development of a mixed use sustainable community on the Shell owned land at Carrington over the next 25 years.

3.0 Conclusions

3.1 Our Vision for the land within Shell's ownership and control at Carrington is suitable, achievable and deliverable within the National and Regional Planning Policy Framework.

3.2 The Masterplan Vision for the site has been developed in consultation with Council Officers and other stakeholders and represents an ideal marriage of opportunity and need to create a sustainable mixed use community on a large brownfield site as part of the Local Development Framework process.

171

3.3
TI, Pg 23
Support

Carrington is deliverable as a mixed use development ~~in~~ that will meet the majority of the Council's strategic objectives. It will be of a scale sufficient to generate the investment required to improve accessibility and the infrastructure in the area, to open up Partington for regeneration and to offer a choice and range of housing and employment opportunities minimising the need to travel. Combine these factors with the opportunities for on- site energy generation, improvements to public transport, a green space strategy and technical innovation and the resulting development over the next 25 years will be at the forefront of sustainability.

172

3.4
Pg 86
SS + SL
Object.

There is, in our view, questions over the deliverability, achievability and suitability of some of the Strategic Sites and Locations in the Preferred Option, particularly with regard to the ownership, location and anticipated commencement dates.

Our Recommendation for Changes to the Strategic Location Policy

3.5 That the wording of SL8 is revised as follows to make reference to the opportunity to develop a mixed use sustainable community at Carrington in accordance with the masterplan Vision produced by Shell;

"Strategic Proposal

Development and redevelopment to provide;

- **A mixed use sustainable phased development of housing, employment, open space and other ancillary uses**
- **New elements of and improvements to the highway and public transport infrastructure to improve the accessibility of the location**

Development Requirements
(as drafted)
Justification for the proposal

(amend bullet point 2)

- **The location will provide the opportunity to re-develop a large area of currently under-utilised brownfield land to accommodate a mixed use sustainable development that will support the regeneration of Carrington as an economic driver in the Manchester sub-region**

Delivery Mechanism and Funding;
(Amend point one)

- **The location is in a single private sector ownership**

Development Phasing
(Amend bullet point)

The mixed use development can commence 2013/14 and beyond the Plan period."

Pg 103, SL8
object

(173)

GONW Comments on Trafford Core Strategy – Further Consultation on the Preferred Strategy

Vision

(134)
Pg 22
Para 3.1
Object

We commented on the vision at the previous preferred options stage indicating that it needed to be developed further so as to set out a more locally distinctive vision for the borough. This is still the case. It is suggested that the material in the 'Spatial Strategy' on page 26 could usefully be incorporated into the vision in order to remedy this shortcoming.

Objectives

(135)
Pg 23, Para 3.4
Table 1
Object

A number of place objectives are set out in the spatial portrait. Following this, at paragraph 3.4, strategic objectives are set out in Table 1. We previously indicated that these two sets of objectives should be integrated into a single set of objectives. This will make the core strategy more coherent and will make it easier to explain the relationship between the objectives and the policies, i.e. how the policies provide the delivery strategy for achieving the objectives.

Spatial Strategy

(136)
Pg 26
4. Spatial Strategy
Object

We have indicated above that the spatial strategy could be incorporated in to the vision. At present it is unclear what status it has in the core strategy as it is neither part of the vision, objectives or policies.

The strategy splits the strategic locations into three priorities. However, no mention is made of the strategic sites. Where do these fit in relation to the priorities?

(137)
Pg 26
Spatial Strategy
Object

The first priority includes five strategic locations. It is assumed, therefore, that the Council wishes to see the early development of these areas. If that is the case, why have they not been identified as strategic sites?

Pg 26, Spatial Strategy
Point 1.

(138)

Policy L2

(139)
Pg 35
L2, L2.5-12.7
Object

[The way in which affordable housing is dealt with needs to be considered further. The policy should set out the overall target for the amount of affordable housing to be provided. It should also set out the range of circumstances in which affordable housing will be required, including the minimum site size threshold. The policy currently fails to do all of this and relies inappropriately on SPD to handle some of these matters.] The approach to viability as set out in paragraph 7.12 should be included in the policy and the areas referred to should be identified in the core strategy. In the light of the above comments, further consultation may be necessary on this policy.] It is noted that the approach to developer contributions is set out in Policy L8.

Pg 37
Para 7.12
Object

(140)

Policy L4

(141)
Pg 43
Para L4.13
Object

L4.13 refers to the setting of maximum levels of parking. It should make clear that such standards will be set out in a DPD (PPG13 paragraph 52). It also needs to be explained that such standards will need to be in line with, or more restrictive than, the standards set out in RSS. L4.14 refers to Car and Cycle Parking SPD in a way which suggests that it already exists. Is this the case?

Pg 43, Para L4.14
Object
(142)

Policy L5

We indicated previously that the PPS1 Climate Change Supplement says that the LPA should:

- I. 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 low energy supplies are to be secured;
- II. where there are particular and demonstrable opportunities for greater use of decentralised or low-carbon energy than the target percentage, bring forward development area or site-specific targets to secure this potential;

and, in bringing forward targets,

- III. set out the type and size of development to which the target will be applied; and
- IV. ensure there is a clear rationale for the target and it is properly tested.

The policy does not deal with these issues.

On a point of detail, it is unclear what targets are being referred to in L5.6 and paragraph 10.14. Pg 50, Para 10.14, Object

Policy W1

The policy will need to set out the amount of further land that is required for economic development. This will need to be informed by the outcome of the Greater Manchester Employment land study that is examining how to apportion the RSS employment land requirement. The policy should also indicate the proposed distribution of employment land within the borough. This should indicate the percentage of the overall requirement that will be located in the various parts of the borough.

Policy W2

W2.13 is confusing. The approach needs to be plan led rather than relying on proposed floorspace additional to that already committed being in line with national policy.

Policy R4

It is unclear from R4.1 whether it is the intention to protect all Green Belt from inappropriate development. The policy only refers to Green Belt in four broad areas.

It is understood that the Council no longer wish to include Davenport Green in the NWDA's list of strategic sites for economic development. Is it proposed to add land at Davenport Green back into the Green Belt? Paragraph 23.10 implies that the site currently has green belt status. Is this correct?

Policy R5

Paragraph 21.6 refers to a Greenspace Strategy establishing local standards for open space. Paragraph 21.7 says that this document will be used to influence

(143)

Pg 47
L5
Object

Para
Pg 47, L5.6
Object
(144)

(146)

Pg 59
Policy W1
Object

(147)

Pg 63
Par W2.13
Object

(148)

Pg 76
Para R4.1
Object

Pg 76
Policy R4
Object

(149)

Pg 87, Para 23.10
Object
(150)

planning decisions and to inform the updating of SPG on Informal/Children's Playing Space and Outdoor Sports Facilities Provision and Commuted Sums.

(151)

Pg 80
Para 21.6
Object

Firstly, standards for open space should be included in development plan documents (PPG17 paragraph 8). Secondly, it would not be appropriate for the Greenspace Strategy to be used in decision making as this could be construed as wishing to circumvent the provisions for consultation and sustainability appraisal in LDDs. Neither would it be appropriate for the Greenspace Strategy to be used to inform the updating of SPG. There is no procedure for updating SPG now in any event.

(152)

Pg 80
Para 21.7
Object

(153)

Pg 86,
Para 23.4
Object

Strategic Locations and Sites

Paragraph 23.4 says that for each strategic location consideration will be given to producing planning guidance which may take the form of an AAP, Land Allocations DPD, SPD or informal masterplan. It needs to be made clear that following the identification of a strategic location in the core strategy, which would be indicated on the Key Diagram, it would be necessary to allocate the site in a subsequent DPD.

Paragraph 23.5 says that for each strategic site consideration will be given to the production of planning guidance which may take the form of SPD, a development brief or informal planning guidance. Firstly, such guidance should take the form of SPD. PPS12, paragraph 6.4, says that councils should not produce guidance other than SPD where the guidance is intended to be used in decision making or the coordination of development as this could be construed as wishing to circumvent the provisions for consultation and sustainability appraisals. Secondly, PPS12, paragraph 4.11, says that the infrastructure planning for the core strategy should include the specific infrastructure requirements of any strategic site allocated in it.

(154)

Pg 86, Para 23.5
Object

(155)

Pg 86
Object

It is unclear from paragraph 23.6 whether the flood risk issues in relation to strategic locations and sites will be addressed prior to the publication stage of the core strategy. As we indicated previously, it is necessary for the Core Strategy to reflect the Council's strategic approach to flood risk and the Council need to explain how it has informed the preparation of the Core Strategy. The PPS25 Practice Guide indicates that the LPA should demonstrate through evidence that it has considered a range of options in conjunction with the flood zone information from the SFRA and applied the Sequential Test, and where necessary the Exception Test, in the site allocation process. This can be undertaken directly as part of the SA.

Pg 86
Para 23.6
Object

It is also unclear whether the highway implications of the strategic locations and sites will be considered prior to publication. We are aware that transport modelling is currently being undertaken. It will be necessary for the results of this work to inform the core strategy. The impact of major proposed developments on the highway network will need to be understood and the measures to deal with and mitigate this impact should be set out. This is particularly important in relation to the impact of schemes on the motorway network and it is likely that you will need to engage with the Highways Agency prior to the publication of the plan to agree how this impact can be mitigated. It may also be necessary to consider how the phasing of development can ensure a good fit with planned transport infrastructure.

Pg 86
23
General Comment

(158)

Pg 89
24
Object

Strategic Locations

We were surprised to see that the strategic locations have been identified showing site boundaries on an OS base. We had previously advised that these should be shown diagrammatically on the key diagram.

(159)
Pg 89
SL1
Objed

SL1 Pomona Island

Reference is made to development proposals according with development guidelines set out in the Irwell City Park informal planning guidance and to agreement and implementation of appropriate pedestrian/cycle links and provision of a new canal crossing to be within the framework of an agreed Location Masterplan. Firstly, a site will need to be identified and allocated via a subsequent DPD. Further planning guidance could then be set via SPD. It should not be handled via informal planning guidance. It will need to be demonstrated that the proposals for hotel and leisure uses accord with sequential approach set out in PPS6 paragraph 2.44.

(160)
Pg 91
SL2 general comment

SL2 Trafford Wharfside

Will the results of the Level 2 SFRA be available before the publication version of the core strategy?

It is said that the development proposals should accord with the guidelines set out in the Media City UK and Irwell City Park informal planning guidance documents. Again, a site will need to be identified and allocated via a subsequent DPD. Further planning guidance could then be set via SPD. It should not be handled via informal planning guidance.

Pg 91, SL2
Objed
(161)

Pg 91, SL2
Objed
(162)

Office proposals will need to accord with national planning policy in terms of the need for the development (PPS6 paragraph 2.39) and the sequential approach (PPS6 paragraph 2.44).

SL3 Old Trafford

It is said that details of the amount, location and type of development will be in accordance with an agreed masterplan for Old Trafford. Again, a site will need to be identified and allocated via a subsequent DPD. Further planning guidance could then be set via SPD. It should not be handled via informal planning guidance.

Pg 93
SL3
Objed
(163)

SL4 Lancashire County Cricket Club Area

It is said that development proposals must be supported by a full range of PPS6 (or its replacement) assessments to ensure that any proposed development would not have a negative impact on surrounding areas. Given that the proposal is to identify a strategic area to accommodate a mix of uses including substantial retail development, this assessment should be carried out prior to the publication version of the plan so that its impact on surrounding town centres is clear.

(164) 1995
SL4
Objed

Again, a site will need to be identified and allocated via a subsequent DPD.

(165)

SL5 Trafford Park Core

It is proposed that the emerging Trafford Park Masterplan will provide additional guidance for development and change. This would appear to be informal planning guidance. Further guidance should be set out in an LDD. What is the scope for new development within this area? If the scope is limited, it is not clear what the purpose is in identifying it as a strategic location for new development.

Pg 97
SL5
Objed

166

SL6 Trafford Centre Rectangle

Pg 99 SL6
Object

This is said to include a mix of uses including commercial offices, hotel and leisure development. It is not clear whether this will accord with national planning policy.

Pg 99 SL6
Object

It is proposed that the emerging Trafford Park Masterplan will provide additional guidance for development and change. This would appear to be informal planning guidance. Further guidance should be set out in an LDD.

167

It will be necessary to identify and allocate sites in a subsequent DPD. It is noted that it is proposed to allocate part of this strategic location as a strategic site in the core strategy. Besides the proposed development on the strategic site at Trafford Quays and the development referred to that has planning permission, what is the scope for further development within this strategic location? If the scope is limited, it is not clear what the purpose is in identifying it as a strategic location for new development.

Pg 99 SL6
Object

168

SL7 Stretford Crossroads

Pg 101
SL7, Object

It will be necessary to identify and allocate sites in a subsequent DPD. Is it necessary, though, to identify this as a strategic location?

SL8 Carrington

Pg 103
SL8
Object

It would seem that there are major infrastructure requirements concerning highway improvements and a new crossing over the Manchester Ship Canal. Given that development is planned to commence by 2010/11, it will be necessary to indicate in some detail what infrastructure is required and how it will be provided. It will also be necessary for the impact of major development here on the highway network to be identified and it will need to be explained how this impact will be dealt with.

Pg 103
SL8
Object

Will the Level 2 SFRA be available in order to examine flood risk issues prior to the publication version of the core strategy? Again it will be necessary to indicate how flood risk issues will be dealt with given that it is proposed to commence development early in the plan period.

Pg 103
SL8
Object

It will be necessary to identify and allocate sites in a subsequent DPD.

SL10 Sale West

Pg 107
SL10
Object

It is said that the proposal will be delivered by RSL and private sector partners and that it is likely to be dependent on funding from the Homes and Communities Agency. Given that development is proposed to commence in 2010/11 it will be necessary to indicate what level of funding is required and who will be providing it.

Pg 107
SL10, Object

It will be necessary to identify and allocate sites in a subsequent DPD. Is it necessary, though, to identify this as a strategic location?

SL11 Sale Town Centre

Pg 109
SL11
Object

Given that development is proposed to commence in 2010/11 it will be necessary to indicate what level of funding is required and who will be providing it.

Pg 109
SL11
Object

It will be necessary to identify and allocate sites in a subsequent DPD. Is it necessary, though, to identify this as a strategic location?

SL12 Woodfield Road

Will the Level 2 SFRA be available in order to examine flood risk issues prior to the publication version of the core strategy? It will be necessary to indicate how flood risk issues will be dealt with given that it is proposed to commence development early in the plan period.

It will be necessary to identify and allocate sites in a subsequent DPD.

Altrincham Town Centre

This proposal includes a variety of elements including improved public transport interchange, enhancements to the public realm and improvements to pedestrian routes. It is unclear what funding will be required, when it will be needed and who will deliver it.

It will be necessary to identify and allocate sites in a subsequent DPD.

Strategic Sites

SS1 Victoria Warehouse

The proposals here for this out of centre location include offices and hotel uses. It will be necessary to show how these proposals comply with national planning policy. Has the need for new office floorspace over the plan period been assessed (PPS6 paragraph 2.39)? Has a sequential approach been applied in terms of selecting sites for allocation (PPS6 paragraph 2.44)?

Will the Level 2 SFRA be available in order to examine flood risk issues prior to the publication version of the core strategy? It will be necessary to indicate how flood risk issues will be dealt with given that it is proposed to commence development early in the plan period.

Further guidance for the development of the site can be set out in SPD. It would not be appropriate for this to be handled through informal planning guidance as has been indicated.

SS2 Trafford Quays

It will be necessary to show how this proposal accords with national planning policy. Has the need for new office floorspace over the plan period been assessed? (PPS6 paragraph 2.39). Has a sequential approach been applied in terms of selecting sites for allocation? (PPS6 paragraph 2.44). This will need to be demonstrated to support the allocation of the site rather than relying on this to be done following allocation.

It is said that improvements to public transport infrastructure may be phased over the plan period in accordance with an agreed strategy for the delivery of improvements to public transport accessibility and usage and that this will require substantial improvements to be put in place prior to the first occupation of any development at Trafford Quays. More detail is necessary to explain what improvements are necessary, when they will be delivered and who will be delivering them. Also, it needs to be clearer as to what substantial improvements need to be in place prior to the occupation of any development. More detail is also required about the impact of the development on the highway network and what improvements are necessary. It is

177
Pg 111
SL12
Object

Pg 111
SL12
Object 178

179
Pg 113
SL13
Object

Pg 113 SL13
Object 180

181
Pg 115, SS1
Object

182
Pg 115, SS1
Object

183
Pg 115, SS1
Object

184
Pg 117, SS2
Object

185
Pg 117, SS2
Object

said that development will be phased to reflect the timing of such highway infrastructure provision. Details of this phasing should be set out.

Will floodrisk information be available prior to the publication stage of the core strategy? It will be necessary to indicate how flood risk issues will be dealt with given that it is proposed to commence development early in the plan period.

The proposed phasing of the housing on this site is set out in Table L1 and housing will be provided over the plan period. Is it appropriate for housing to be developed in the early stages of the plan period given that housing here is to be developed on a green field site?

SS3 Stretford Meadows

Is it intended that this site be retained in the green belt?

SS4 Partington Canalside

Will floodrisk information be available prior to the publication stage of the core strategy? It will be necessary to indicate how flood risk issues will be dealt with given that it is proposed to commence development early in the plan period.

It needs to be explained how the development of the site is linked to the redevelopment of the shopping centre.

SS5 Altair Altrincham

Given that the site has an outline planning permission for the uses described in this proposal, is it necessary for it to be identified as a strategic site?

Implementation

Paragraph 26.3 refers to a Local Infrastructure Plan being published alongside the Core Strategy at Publication stage. It says that initial outcomes and headlines are set out but that the detail is limited at this stage but will be available by Publication stage. Whilst the detail regarding planned infrastructure can be set out in supporting evidence such as a Local Infrastructure Plan, it is essential that the key infrastructure elements on which the delivery of the strategy is dependent are embedded in the core strategy itself. PPS12 says that the infrastructure planning process should identify and have evidence for, amongst other matters, cost and funding sources. If the intention is that the development itself will fund the infrastructure, viability evidence will be needed to show that such an approach is realistic and capable of delivering the infrastructure at an appropriate time. Where proposals are intended to be implemented in the early years of the plan there is an expectation that the detailed matters such as availability and infrastructure requirements will have been resolved. It may be necessary to carry out further consultation with key stakeholders regarding infrastructure provision so that there are no surprises for those who will be involved in implementation at the Publication stage.

At publication stage the Core Strategy should include trajectories in respect of previously-developed land and the rate of housing delivery in accordance with paragraphs 43 and 55 of PPS3.

186
Pg 117, SS2
Object

187
Pg 117, SS2
Object

188
Pg 119, SS3
Object

189
Pg 121, SS4
Object

190
Pg 121, SS4
Object

191
Pg 123, SS5
Object

192
Pg 126, Para
26.3,
Object

193
Pg 126
General
Comment

Special Neighbourhood Forum - Note of meeting 21 st July 2009 – Altrincham Town Hall	
People are used to using the UDP in the plan form but it is understood that the LDF will be different, what form will the LDF take at the end of the process?	(101) - General Question
If a developer wanted to build something in a particular area, how would that be dealt with, would we go back to using the UDP proposals map?	
Surprised at how much Altrincham has changed over the last 15 years. In relation to Altair what will happen if there is a lot of opposition to the proposals?	- P123, S55 (102)
How will heritage be dealt with in the plan and what will happen to Altrincham Market?	
In relation to LCCC there is currently a consultation being carried out in relation to the proposals which include a large Tesco supermarket. This will have a huge impact on other areas in Trafford including those outside Trafford such as Chorlton, why does there need to be a supermarket in that area?	- SL4 P95 (104)
The need to reduce travel and to reduce the impact of Climate Change was mentioned in the presentation, How do you plan to do that? Is there a target in the plan for reducing CO2?	P47 (105) Policy L5
How robust is the RSS because it seems to restrict development in Trafford in relation to town centres and commercial activity and how much scope do we have to change it?	- P62, (106) Policy W2
Improvements to the market are needed as others are better (e.g. Bury). Will be surprised if anything has happened in 15 years time.	- P123 S55 (107)
Will the document have proper consideration for Conservation Areas and will they be reviewed and extended if necessary?	
Concern regarding the fate of the market and would like to see a "Friends of the Market" group to be set up. Would ask the Council not to be too prescriptive about the market until more is known about the hospital site. Whatever happens on the hospital site it will impinge on the market.	- P123 S55 (109)
There is a need to maintain facilities as there is no point in implementing them if they are not maintained.	P113, S13 (110)
Access to parking within Altrincham is poor, the main shopping centre is dying as people cannot get to it. Large supermarkets are killing small businesses and the Council should subsidise small shops. The town centre needs to have a good mix of type of shops.	- P62 (111) Policy W2
The main discussion has been regarding large development sites but what about smaller ones? 2 sites have become vacant which are Stamford Bowling Club and next to that the High Bank Adult Centre which has just been demolished. The site has been advertised for car parking which is not a very good use of the site. What is going to happen to these sites and are we considering proposals of a smaller scale?	- P113 SL13 (112)
Altrincham has deteriorated over the years. Against the Altair development. The focus has to be about redevelopment not new development. Businesses come and go all of the time as people do not visit the town centre. People don't come to Altrincham as there is the perception that there is no parking but the problem is that it is not readily accessible or seen. If we want people to come to Altrincham we have got to make it easier for them.	- P123 S55 (113)
30 years ago Altrincham was thriving; people are now going shopping elsewhere e.g. Warrington. We should rectify the problems created in the past rather than looking to the future.	- P113, SL13 (114)
Schools in Trafford are over subscribed, we should be planning towards that rather than just building more houses.	- LIP (115)

(103)

P67, R1
+ P113, SL13

(108)

P67
Policy R1

The pressure on schools is immense. People move to Trafford to obtain places in our schools. The only way to build more schools is to make a bid to the Government through 'Schools for the Future'.

- LIP (116)

Parking should be free in the Stamford Quarter and should be free on Saturdays. There are a number of sites which are empty which could be used as car parks.

(117)
- P113, SL13.

We should be looking at making Altrincham more attractive.

P113, SL13.
(118)

Summary of Key Issues

1. Future of Altrincham Market
2. Car Parking within Altrincham town centre
3. Setting a target for the reduction of CO2 emissions
4. Heritage/Conservation Areas
5. Mix of shops and small businesses within Altrincham town centre
6. Provision of schools in Trafford

Urmston area Neighbourhood Forum – 23/07/2009

General comment received based on location of this specific neighbourhood forum. In their opinion, the NF should have been held in Stretford.

(101)

Pg 5, SL4,
Object.

Q1. In regards to the proposed Tesco store at LCCC, why was a previous application for a 50k floorspace refused and yet an application for a store more than twice this size (140k) been accepted?

- Additional concerns over whether planning permission and the details of the planning permission will be enforced in regards to floorspace for example.
- Another person noted that although she appreciates that new jobs will be provided, Tesco had a track record of exceeding original planning permission and then applying for retrospective permission.
- Concerns over sustainability of store in terms of detrimental effects on other local businesses. Concerns echoed over the future of Stretford Mall which is in a state of decay and that efforts should be focused on improving the quality and vitality of shops here.

(102)

Pg 74, R3,
General
Comment.
Pg 79, R5
General
comment.

Q2. How are greenspaces to be secured with concerns over a lack of open space and green infrastructure especially through developments such as LCCC?

- How will any new open spaces be maintained? Will findings be made available to deliver the council's 'vision'?
- Friends of the parks?
- Particular consideration needs to be given to teenagers when thinking about open spaces.
- All of which will require consultation with the local community.

(103)

Q3. How will infrastructure in the form of doctors, schools etc be catered for with new developments which will require such facilities?

Pg 126, (2c)
General
comment.

(105)

Pg 115, SS1
Object.

Q4. In regards to Victoria Warehouse, where is it and what are the future plans for it?

- Do not wish to see it demolished
- Someone else reiterated that they opposed this demolition

(104)

(106)

Pg 47, L5
Object

Q5. In relation to climate change and old developments, what will be done to improve sustainability of such developments for example, will insulation be provided, 'Home Zone' i.e. 20mph zones.

- One person in particular thought these 'home zones' were very important in both old and new developments.
- New developments should maximise sustainability
- Existing developments (brownfield) should be prioritised such as insulation.
- Trafford is not good with its services liaising with each other.
- There doesn't seem to be a mention of the Airport?

(107)

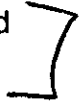
Pg 67, R1
Object.

Q6. Don't want to see Stretford Town Hall demolished, it is a listed building.

108

Pg 54, L7.2
General
Comment

Q7. Further consideration should be given to design aspects such as road materials that can help reduce noise. Church Road, that cuts through Partington given as an example of a noisy road.



109

Other
Comment

Q8. What consideration is given to the health requirements of the Borough?
• Fluoridisation in drinking water for example. The NW Health Authority are a government target area for fluoridisation

110

P62, Policy
W2

General

Q9. How are the town, district and local centres designated?
• Why are Partington, Ashton Village and Sale Moor excluded?

111

Other
Comment

Q10. Has there been any change to the raising of Hardey Lane, (Jacksons Bridge?) alongside tram link, linking Chorlton and Sale Moor?

112

Other
Comment

Q11. Can you explain where the proposed canal crossings are?

Trafford Tomorrow

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

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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO4	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO6	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO7	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO8	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would you like to add anything further?

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.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SS2 - Trafford Quays	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SS3 - Stretford Meadows	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SS4 - Partington Canalside	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SS5 - Altair	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would you like to add anything further?

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 sites for development there is no mention of schools and/or ...

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)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wharfside (SL2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Old Trafford (SL3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lancashire County Cricket Club (SL4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Trafford Park Core (SL5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Altrincham Town Centre (SL13)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Carrington (SL8)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Partington (SL9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sale West (SL10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sale Town Centre (SL11)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Stretford Crossroads (SL7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Trafford Centre Rectangle (SL6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Woodfield Road (SL12)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would you like to add anything further?

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 therefore needs to be part of strategic planning process.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 Work Policies	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 Relax Policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would you like to add anything further?

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.

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.

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

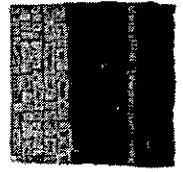
As raised above these locations for change bring an opportunity for developing spaces/sites for childcare in or around schools and larger commercial business areas. Childcare does need to be sustainable before it can be successful (chicken and egg) and therefor needs to be part of strategic planning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

106

Making it work

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1100



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Trafford Core Strategy: Response to Further Consultation on the Preferred Option

Stevenor Investments

August 2009



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Prepared by: Paul Williams

Version: Final

Date: 10 August 2009

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Pall Mall Court

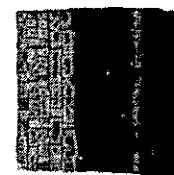
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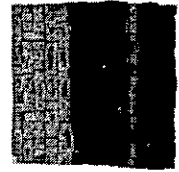
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1 INTRODUCTION

- 1.1 These representations to the Trafford Core Strategy are submitted on behalf of Stevenor Investments, which is part of the Targetfollow Group and controls land at Carrington.
- 1.2 PPS12 notes that core strategies may allocate strategic sites for development. In this case our client's land falls within a 'Strategic Location' which is already identified in the document (SL8: Carrington). We therefore do not focus on the individual landholding in detail, beyond a brief introduction, but on the planning issues and appropriate policy approach which apply across the whole of the identified Strategic Location.
- 1.3 These representations discuss the issues arising from the relevant draft core policy for SL8: Carrington, considering the economic uses which would be acceptable and whether the policy is drawn widely enough to allow for such uses as production of energy from waste or airport-related development.
- 1.4 We consider how the Core Strategy deals with objectives which in some situations cases may initially appear incompatible, such as regeneration and flood risk. Specific reference is made to general core policies for Waste (L6) and the Economy (W1), in addition to Carrington core policy SL8, as these are particularly relevant to our client's aspirations.
- 1.5 In order to explain our analysis we cite some of the national and regional policies of direct significance, and raise some of the issue arising from the Evidence Base including the consequences of the Level 2 Flood Risk Assessment not being available.

Client's Landholding

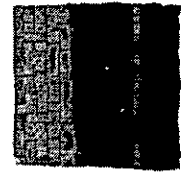
- 1.6 Our client's landholding consists of 18 ha. of brownfield land which was formerly part of the site of Carrington Power Station, for which it acted as the coal stocking area. It currently has a lawful use for storage and airport parking. The site has an access off Manchester Road to the south. The River Mersey meanders around the north and east side and a new power station is



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being developed to the west. The site remains affected by *electricity* infrastructure, with power lines crossing it which link electricity plant to the west with a transformer station to the east.

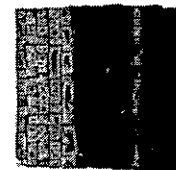
- 1.7 The site falls within the Carrington Priority Regeneration Area (E15) in the existing Trafford UDP despite part of it falling within an identified River Valley Floodplain.
- 1.8 It should be noted that the site is currently subject to the “Additional Sites: Issues and Options” consultation as part of the evolution of the Greater Manchester Waste Development Plan Document.



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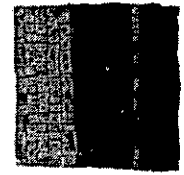
2 RELEVANT PLANNING POLICY

- 2.1 Whilst we do not propose to repeat all of the relevant national and regional planning policies in depth, we do wish to highlight certain matters which are pertinent to our submission.
- 2.2 Having referred to PPG4 and the first draft of PPS4 in our previous representations, additional reference is now appropriate to the amended draft of PPS4. It is stated on page 9 that *“The policies emphasise the need for local authorities to have proactive and flexible development plan policies aimed at supporting the start up and growth of businesses, attracting inward investment and increasing employment, particularly in deprived areas, and requires decision makers to weigh the economic costs and benefits of proposed developments alongside the social and environmental costs and benefits.”*
- 2.3 **Policy EC1.1** states 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
- 2.4 Some of the recommendations under **Policy EC1.4** are of specific relevance to Carrington and the points which we wish to make. Amongst other recommendations, local authorities through their local development frameworks should:
- prioritise previously developed land which is suitable for re-use, setting out criteria based policies. Where necessary to safeguard land from other uses, identify a range of sites, to facilitate a broad range of economic development including mixed use to meet the requirements in the regional spatial strategy
 - where appropriate, positively plan for the benefits that can accrue when certain types of businesses locate within proximity of each other or with other compatible land uses such as universities and hospitals and other high technology industries
 - seek to make the most efficient and effective use of land and buildings, especially vacant or derelict buildings (including historic buildings).



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- 2.5 Due to circumstances at our client's site and in Carrington more generally, **PPS25 Development and Flood Risk** is of particular relevance. It is stated in parag. 7 that "*flood risk should be considered alongside other spatial planning issues such as transport, housing, economic growth, natural resources, regeneration, biodiversity, the historic environment and the management of other hazards*".
- 2.6 Paragraph 14 introduces the sequential test, but does not specify the geographic area over which this should be applied other than saying that it "*should be applied at all levels of the planning process*", and paragraph 15 states that "*Local planning authorities should apply the sequential approach as part of the identification of land in areas at risk of flooding*". In recommending a sequential test, the guidance also introduces an 'exception test' which might apply where, after applying the sequential test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones of lower probability of flooding. Paragraph 19 acknowledges that there may be circumstances "*...where the sequential test alone cannot deliver acceptable sites, but where some continuing development is necessary for wider sustainable development reasons, taking into account the need to avoid social or economic blight...*"
- 2.7 Policy EM5 of North West Regional Spatial Strategy covers Integrated Water Management and states that "*Allocations of land for development should comply with the sequential test in PPS25. Departures from this should only be proposed in exceptional cases where suitable land at lower risk of flooding is not available and the benefits of development outweigh the risks from flooding.*"
- 2.8 The principles of sustainable development as set out in Appendix A include, in addition to living within environmental limits:
- **Ensuring a Strong, Healthy and Just Society** – Meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all;
 - **Achieving a Sustainable Economy** – Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which



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environmental and social costs fall on those who impose them (polluter pays), and efficient resource use is incentivised;

2.9 Appendix D sets out appropriate uses in flood risk zone 3a, which consist of the 'less vulnerable uses' in Table D2. Those of most relevance to the Carrington Strategic Location are:

- general industry; storage and distribution;
- waste treatment (except landfill and hazardous waste facilities).

2.10 It is confirmed in Table D2 that such 'less vulnerable' developments in Zone 3a do not require an exception test.

3 EVIDENCE BASE

3.1 In this section we highlight sections of the Level 1 Flood Risk Assessment and the Employment Land Study which have a direct bearing on our representations. It is not intended to provide a comprehensive overview.

Greater Manchester Strategic Flood Risk Assessment – Level 1

3.2 Appendix B of the Greater Manchester Strategic Flood Risk Assessment notes that the risk of flooding from the Manchester Ship Canal and the Bridgewater Canal is unquantified. The document also refers to much of the “*primary aspirational development areas*” being adjacent to one of the canals. In order to reconcile such potential conflicts, it recommends higher resolution and smaller scale flood maps during Level 2 Assessments.

3.3 JBA consultancy has been commissioned to undertake a Level 2/Hybrid Strategic Flood Risk Assessment and outputs are due to be received by the Council by the end of September 2009.

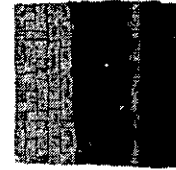
Employment Land Study Report (May 2009)

3.4 The report concludes that there is sufficient land available but highlight two key issues:

- The **geographical distribution** of sites and premises across the borough. This is a critical issue for the LDF to consider when considering the future employment allocations and subsequent retention and release of employment sites. **It will be essential for the LDF to fully explore the need for a balanced ‘spread’ of land and premises that meet different business needs and provide good accessibility to employment opportunities for communities with different levels of skills and training** (our emphasis; parag. 8.3).
- In addition, **low amenity uses** were also a key issue and it was widely recognised that these uses are a fundamental part of any local economy despite the noise, air and land pollution issues often associated with their operation. It will therefore be important for

Trafford Council to give full consideration towards the supply of suitable land and premises for these uses as it is essential that the borough provides a supply that meets the needs of a full range of business needs (parag. 8.7).

- 3.5 From the site assessments undertaken by Trafford Council, **flood risk has been identified as a potential constraints for 33 of the 49 sites assessed**. These sites amount to approximately 123ha and the food risk is either high (i.e. in Flood Risk Zone 3) or unknown due to the site's proximity to the Manchester Ship Canal and the Bridgewater Canal where Trafford Council is unable to assess flood risk because of lack of quantified data (parag 6.4.4).
- 3.6 **Carrington** is referred to as comprising 391 ha. of land centred around the now contracted petrochemical industry and including sites which are in use, with an extant planning permission or vacant. The report refers to a significant amount of interest and activity surrounding Carrington, including the Carrington First scheme, which is being brought forward by MARO developments and provide over 55,742 sq m of industrial space on a 44 ha. former power station site, and Bridestone's proposals to redevelop the former coal fired power station site for a new 860 MW gas fired power station.
- 3.7 The power station is expected to become operational in 2012/13. It is stated that *"The benefit of having a significant power generator on the site will help to attract large, power hungry companies which would have difficulty finding suitable sites elsewhere in the region"* (p. 35).
- 3.8 According to the Study, both proposals show that Carrington has the both the potential and the capacity to attract high profile users. This is complemented by the area's transport links with the wider region, particularly via the M60 and proximity to Manchester Airport. It is also hoped that the investment in the area will stimulate the upgrading the A6144 which will help to make Carrington more accessible to the motorway network and improve the image of the area, attracting further companies and opening up new development opportunities.



4 ANALYSIS

4.1 This section initially raises the current status of the evidence base, prior to a general discussion about the issue of flood risk and its relationship to regeneration. It then makes additional comments on the specific core policies for waste, economy and Carrington in the Preferred Option which are of the most interest to Stevenor Investments.

Evidence Base

4.2 PPS12 states that "Core Strategies must be founded on a robust and credible evidence base" (parag. 4.36) which should involve:

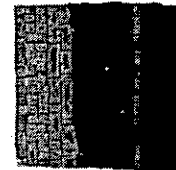
- Participation: evidence of the views of the local community and others who have a stake in the future of the area.
- Research/ fact finding: evidence that the choices made by the plan are backed up by the background facts.

It is of some concern that the Level 2 Flood Risk Assessment, which could potentially significantly affect the preferred option for the Carrington Strategic Location, is not yet available. We have been advised that this may not be published until November, at a similar time to which the Proposed Submission Core Strategy is expected. Given that the Assessment will cover three local authorities, we are unsure how detailed the findings will be in relation to our client's land or whether it will be necessary to undertake a site-specific Assessment to obtain a more useful picture. This limits the scope for the effective participation of our client, particularly as the Joint Waste DPD, which is now out to consultation, also relies on an accurate understanding of flood risk.

③
Policy L5 4.3
P47 - 51
10.23 -
Paras 10.27
object

⑪②
Policy L5 4.4
P51 - 10.23 -
10.27
+

Policy W1 - P59



113
P103
SL8
Carrington
object

4.5 We would therefore object if the Carrington Strategic Location were to be reduced in size based on the Level 2 Assessment, but would suggest that the policy is worded in such a way as to attach appropriate weight to the consideration of flood risk in further consideration of development proposals.

Flooding and Regeneration

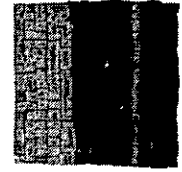
4.6 As referred to in the Statement on General Principles (annex to PPS1) *“the courts have held that the Government’s statements of planning policy are material considerations which must be taken into account, where relevant, in decisions on planning applications. These statements cannot make irrelevant any matter which is a material consideration in a particular case. But where such statements indicate the weight that should be given to relevant considerations, decision-makers must have proper regard to them. If they elect not to follow relevant statements of the Government’s planning policy, they must give clear and convincing reasons.”*

4.7 We do not seek to downplay the significance of flood risk or to deny the role of the sequential test. However, it is evident that in this particular situation there are conflicting priorities. Weight must be given to flooding issues, but they do not automatically take precedence over other material considerations, such as regeneration benefits. Indeed, PPS25 states that, as cited in paragraph 2.5 above, flood risk should be considered alongside other spatial planning issues, including economic growth and regeneration. Furthermore, draft PPS4 makes it clear that decision makers have to weigh the economic benefits of development against its environmental costs.

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P103 -
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SL8
Carrington
General
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4.8 The importance of the regeneration of Carrington, and the links between this and the regeneration of Partington, is already established in the adopted Trafford UDP. The justification for draft Policy SL8 in the Core Strategy includes reference to several regeneration benefits of the proposals for the Strategic Location:

- Redevelopment of a large area of under-utilised brownfield land



- Large scale industrial development which will support the regeneration of Carrington as an economic driver
- Increased employment opportunities with benefits for residents of nearby deprived areas including Partington and Sale West
- Although the area is in an accessible location, infrastructure investment is needed to enhance accessibility and development might help to fund these
- From the Sustainability Appraisal comes the additional benefit that *“The remediation of contaminated land is likely to eliminate any sources of contaminants for adjacent watercourses”*.

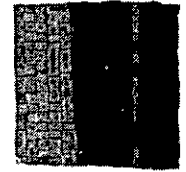


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P103
SL8
Carrington
General

4.9 The Employment Land Study goes as far as to say that the geographic distribution of sites and premises across the borough is a *‘critical issue’* for the LDF. There appears to be an overwhelming case for the regeneration of Carrington, which is supported by the Council, and which will complement the remodelling of the predominantly residential area of Partington. These benefits will not be achieved, other than in a much diluted form, by any significant reduction on the amount of economic development proposed in the Strategic Location.

4.10 We note that PPS25 in setting out the sequential test does not specify the geographic area across which it should be applied. The current Flood Risk Assessment is being carried out across three local authorities, whilst the Core Strategy identifies specific areas within Trafford in which development is desirable in principle for legitimate land use planning objectives. It is common practise for development plans to divide an authority’s housing requirement between geographic areas and, similarly, we believe that the Trafford Core Strategy should establish the principle of a proportion of economic development in Carrington. The sequential approach would then be used so that any development proposed within Carrington would be appropriate in character to the variable level of flood risk within the area.

4.11 This approach may result in certain ‘less vulnerable’ categories of development being allowed on previously developed land in Zone 3a (particularly on land with an existing lawful use within the ‘less vulnerable category’) in order to avoid social and economic blight and where a planning application is accompanied by a satisfactory site-specific Flood Risk Assessment.



It is anticipated that the exception test would not be required to be met within such suitable development categories.

116
P52
Policy L6
Support

Policy L6: Waste

4.12 Stevenor Investments wish to support Policy L6, and in particular its commitment for Trafford to work to identify and safeguard sites for waste management in appropriate locations which include Carrington.

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P52
Policy L6
Para L6.2 e
object

4.13 As a detailed point, we do consider that the term 'identified by the Council as being in need of investment' is imprecise and gives insufficient guidance to developers. The policy should preferably refer to a specific policy designation.

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Policy W1: Economy

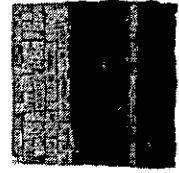
Definition of Employment Land

P59
Policy W1
W1.2 +
W1.10
Object

4.14 The policy at W1.1 cross references North West RSS, the glossary of which refers to **employment land** as 'land allocated in development plans for business, industrial and storage/distribution uses (B1, B2 and B8)'. At W1.2 the policy uses the phrase '**employment uses**' and we note that RSS defines these broadly as 'any undertaking or use of land that provides paid employment'. The policy also refers to '**economic activity**' and '**economic development**' which are not defined in RSS.

4.15 We have an interest in the precise terms used because of the circumstances at our client's site, which has an existing lawful mixed use of airport parking and storage, and which is being considered as a waste management facility with ancillary energy production. Whilst waste incineration falls within the B2 use class, this hybrid use may not do. However, it is not strictly an 'alternative' use of the type envisaged under Policy W1.10.

4.16 The potential waste to energy facility clearly falls with the scope of the Economy core policy in addition to the Waste policy of the Core Strategy. However, we believe that the policy should explicitly state that waste treatment facilities are acceptable in principle on



employment land. We appreciate that the Council may wish to qualify this by setting out the criteria which would be taken into account in looking at the suitability of individual locations.

4.17 Similarly, there are certain locations in which additional power generation facilities might be acceptable on land identified as suitable for employment purposes, as has previously occurred in Carrington which is further referred to below. We therefore consider that the draft policy should be amended to set out how further proposals for economic development outside of the standard B1, B2 and B8 use classes will be assessed.

4.18 Policy W1.11 does refer to 'bad neighbour' industries albeit it under a heading 'Hazardous Installations'. However, bad neighbour industry does not have a formal definition, and we would argue that the environmental controls attached to certain of these 'non standard' economic uses, such as modern waste to energy plants, would avoid any material harm to amenity, thus making this description inappropriate.

Airport Related Uses

4.19 Paragraph 14.8 cites Policy RT5 Airports in North West Regional Spatial Strategy. However, the draft Trafford Core Strategy only considers 'industrial, commercial, warehousing and storage uses associated with Manchester Airport'.

4.20 Policy RT5 has a wider remit as it specifically refers to the scope for relocating or developing activities or facilities off site and it also cites the White Paper 'Future of Air Transport'. As referred to in our previous representations, we consider that the Core Strategy makes insufficient reference to the importance of Manchester Airport as an economic driver, given its proximity to the Borough.

4.21 This is further considered in the next section on Carrington.

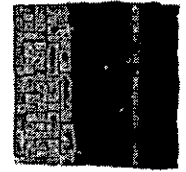
Policy SL8: Carrington

4.22 In considering the policy applicable to the Carrington Strategic Location, this section echoes some of the previous points made above with reference to flooding, waste and the economy. It

● (119)
Policy W1
P 59-60
Para W1.11
object .

(120)
Policy W1
P 61
Para 14.8

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object .



also highlights the potential to exploit linkages between development opportunities and to ensure that the policy contains sufficient flexibility.

(121)

P103-104

SL8

4.23

Flood Risk

To summarise our comments earlier, the policy should acknowledge that a significant proportion of economic development will be directed to Carrington in accordance with the proposed strategic direction, indicate that regard will be had to the sequential test in the distribution of this within the area, and state that the development of individual parcels of land will be subject to the findings of a site-specific Flood Risk Assessment.

Development
req Point 4.
+ Justification
Point 5.
Object.

(122)

P103-104

SL8

4.24

Waste

Policy L6 specifically mentions Carrington as a location in which the Council is working to identify and safeguard sites for waste management, but Policy SL8 does not explicitly allow for this, bearing in mind that such a use might well be *sui generis* rather than falling within an industrial use class.

Object

4.25

We would request that specific reference is made to the potential for a waste site in Carrington, both because this is an appropriate use in this location in principle and to ensure consistency between the Core Strategy policies.

(123)

P103-104

SL8

4.26

Power

It should also be recalled that our client's site remains affected by power infrastructure and that a power station has recently been allowed on immediately adjoining land under existing policy. Carrington continue to be a suitable location in principle for power generation as a primary use, whether or not this is allied to waste management. Therefore the policy should additionally recognise the ongoing suitability of this long established activity, subject to the suitability of individual sites within the Strategic Location for this specialised use.

Object

Linkages Between Land Uses

(124)

p 103 .
SL8 .
object .

4.27 Our client's site is substantial in scale and would only be partly occupied by the waste to energy plan under consideration. Regardless of progress with this proposal, the adjoining gas power station has already been approved. As referred to in the Employment Study, *"The benefit of having a significant power generator on the site will help to attract large, power hungry companies which would have difficulty finding suitable sites elsewhere in the region."*

4.28 Draft PPS4 encourages local authorities, where appropriate, to positively plan for the benefits that can accrue when certain types of businesses locate within proximity of each other. Policy SL8 might therefore be altered to incorporate reference to the potential for additional economic development to exploit the potential of the new power station already allowed and our client's proposed waste to energy facility. The latter would produce surplus heat which could be used by industry, district heating schemes and anaerobic digestion plants. Another option is intensive agriculture, which is also a 'less vulnerable' development in relation to flood risk.

Airport-Related Uses

(125)

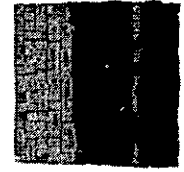
p 103
SL8
object .

4.29 Significant areas of land at Carrington area currently used for airport parking, including part of our client's site. Current UDP Policy E15 covering Carrington Priority Regeneration Area states that *"Development to provide remote off-airport car parking, passenger and baggage terminal facilities and airfreight handling facilities for Manchester Airport" will be permitted."*

4.30 Further to our general discussion about airport-related uses above, we are not aware of any change in circumstances or other justification for this policy to be now effectively dropped. On the contrary, planning permission was refused for a 1,500 space airport car park in the Macclesfield Green Belt in 2007, and this reinforces the case for accessible brownfield land to

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P61 policy
W1
para
14.8 .

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be used for such an airport-related use where the proposal is accompanied by adequate transport links.

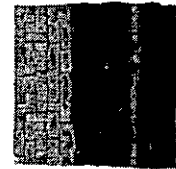
- 4.31 Furthermore, the Trafford Employment Study states that the potential of Carrington to attract high profile uses is complemented by its proximity to Manchester Airport. We therefore conclude that the Strategic Location policy should retain a specific reference to airport-related uses.

Flexibility

- 4.32 This point can be broadened out into one of flexibility. PPS12 identifies the need for flexibility in core strategies in view of their time frames and the potential for a change in circumstances (parag. 4.46). Similarly, as stated under EC1.1 of draft PPS4, there is a limit to the extent to which local authorities can predict the future of their economies and a flexible approach to the supply and use of land will be important.

- 4.33 The policy as now proposed for Carrington offers less flexibility than the old one in some respects. We agree that certain uses such as housing, leisure or retail are generally inappropriate in this location. However, the Strategic Location covers a wide area with a range of existing uses and extant permissions, including the recently approved power station in addition to airport parking. The policy should preferably increase the range of uses included in the strategic proposal or at least explain how proposals for alternative economic activities will be determined should they arise.

(127)
P103-104
SLB
object .



5 CONCLUSIONS

p103
SL8

5.1 Whilst our client is supportive of the Spatial Strategy overall, it is considered that the need to balance flood risk against the established priority of regeneration receives insufficient attention, and that the sequential test should be applied on the basis that a significant amount of economic development will be directed to appropriate sites in Carrington. The boundary of the Strategic Location should remain widely drawn so that site-specific flood risk assessments can be applied to individual brownfield sites to demonstrate their suitability or otherwise for different categories of development.

P59 (128)
Policy W1
P52
Policy L6
Object

5.2 Whilst we do not have any fundamental objections to the Core Policies on Waste or the Economy, we do believe that a degree of re-wording should be applied to address the points which we have made. However, we do consider that there is a need to revisit policy on the Carrington Strategic Location to fully exploit this area's potential.

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P103 (129)
SL8
Carrington

5.3 Our client would be happy to discuss any of the points made further, and looks forward to continued engagement with the Council as the Core Strategy progresses.