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	Yes	Page number	109			
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	SL11			
		Strategic Site reference				
		Table/Figure reference				
		Other (including omissions and suggestions for alternative approaches)				

Do you support, oppose or have general comments about this specific part of the document?								
Support	Object	General Comment	Yes					
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The following comments are made in response to the consultation exercise on the Trafford Metropolitan Borough Council Core Strategy: Further Consultation on the Preferred Option.

SL11 - Sale Town Centre

We wish to support the Council's identification of Sale Town centre as a Strategic Location (SL11) within the draft Core Strategy. However, we feel that the policy should provide for "strengthening and enhancement" of the centre, rather than the "consolidation and improvement" which is proposed. This approach would provide increased economic and social benefits for the centre and assist in achieving the stated Development Requirement of positively enhancing the vitality and viability of the centre. — P109, SLII, Support in Proposed would be proposed when the proposed would be provided increased.

In regard to the Strategic Proposal criteria, we support an improvement to the mix and quality of the existing retail offer; however we believe that the new retail floorspace proposed should be focussed around 'The Square' and serve to improve the quality of both convenience and comparison provision within the centre, which can be achieved through increasing the scale of the unit shops and enlarging the Tesco foodstore. As such, a maximum level of retail floorspace should not be contemplated, as it may unnecessarily restrict the appropriate level of development required. — Plog, Sull, Strategical Charles (102) Proposal, Support in Port + Proposed Charles

The Strategic Proposal for new commercial office accommodation, additional leisure and community facility development and additional residential accommodation is also supported, although a maximum level of commercial floorspace or number of residential units should not be specified within the policy, as it may unnecessarily restrict the appropriate level of development required. — PID9, SUII, STOREGIC PROPOSAL, SUPPOSAL PROPOSAL

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In terms of the Development Requirements, we strongly support the first criterion that development should enhance the vitality and viability of the town centre. PIDG, SLII, Dev Req., Pour I, Support . (04)

We suggest that the second criterion should be amended to state that "Development proposals in Sale Town Centre which front onto the A56 should accord with the development guidelines set out within the A56 Corridor SPD", in order to ensure that this requirement does not apply to development which has no frontage onto the A56. Pipq, Sull, Dev Control of Sport 2, De

With reference to the justification for the proposal, the enhancement of Sale Town Centre fully accords with Policy W5 of the Regional Spatial Strategy (RSS) which seeks investment of an appropriate scale within defined centres to maintain and enhance vitality and viability, and also does not conflict with Policies MCR1 and MCR3 in the RSS. Pioq, SCII

We agree that Sale Town Centre is located in a most accessible location due to its excellent links to public transport including bus and tram services. - Proq. Sull, Justification, Pount 2, General .

However, the third bullet point should be amended in order to maximise the benefits for the vitality and viability of the partre, such that it states "the proposed development will allow for enhancement of the town centre to strengthen the mmercial and civic focus – providing convenient services to local people and contributing to economic growth". – PID9

It is suggested that the final bullet point for the justification of the proposal, which refers to the conclusions of the Trafford Retail Study (TRS) should be deleted, because the recommendations of the TRS did not take account of the potential for the enhancement and strengthening of Sale Town Centre.

Therefore, this point should be written more positively to read "The emphasis should be on quantitative and qualitative expansion of the town centre for both convenience and comparison goods through the redevelopment of the square and surrounding units, along with the extension of the Tesco foodstore". This will allow for the creation of larger footplate units which are better able to attract national multiple retailers, and also modernise the Tesco store which is some 30 years old, such that the range and choice of goods available can be expanded in order to improve the level of provision available to local shoppers. This approach will serve to positively enhance the vitality and viability of Sale Town Centre.

We agree with the Delivery Mechanism and Funding section - PHO, SLII, Delivery + Pount 4, Object Funding, Support

In regard to Development Phasing, we suggest that this is deleted as it is not possible to predict with any accuracy when elements of the development will be provided. PHD, SLII, Development Phasing Phasing Phasing Phasing

Accordingly, we consider that the Sale Town Centre Strategic Location should read as follows:

Redevelopment to promote the strengthening and enhancement of the town centre to provide:

- Improvements to the mix and quality of the existing retail offer;
- New retail floorspace focussed around the Square to increase the range and size of the unit shops, and extension of the Tesco foodstore to improve the quality and choice of the retail offer;
- New commercial office accommodation;
- Additional leisure and community facility development:
- Additional residential accommodation.

Development Requirements

- Development should positively enhance the vitality and viability of the existing town centre.
- Development proposals in Sale Town Centre which front onto the A56 should accord with the development guidelines set out within the A56 Corridor SPD.
- A review of impact of the proposed development on flood risk related to the adjoining Bridgewater Canal to be undertaken when the findings of the Level 2/ Hybrid SFRA for Manchester, Salford and Trafford are published.

Justification for the Proposal

• The proposal is in accordance with the RSS policy framework for the Manchester Region area as set out in policies MCR1, MCR3 and W5.

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- Sale Town Centre is located in a most accessible location with excellent links to public transport services such as Metrolink and bus services.
- The proposed development will allow for enhancement of the town centre to strengthen the commercial and civic focus providing convenient services to local people and contributing to economic growth.
- The emphasis should be on quantitative and qualitative expansion of the town centre for both convenience and comparison goods through the redevelopment of the Square and surrounding units, along with an extension to the Tesco foodstore.

Delivery Mechanism and Funding

- The area is in a mix of private and public sector ownership.
- The proposals will be delivered principally by private sector land owners and development partners.

Please continue on a separate sheet if required

Comment Form – June 2009

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Additional Comment Sheet

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

What are you commenting on?			
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Document		Section	
Core Strategy: Further consultation	Yes	Page number	62
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Core Strategy summary broadsheet		Paragraph number	W2.3
Sustainability Appraisal		Policy number	W2
Equality Impact Assessment		Vision reference	
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Do you support, oppose or have general comments about this specific part of the document?							
Support		Object		General Comment	Yes		

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Part C of the draft Core Strategy sets out the Core Policies against which new development proposals will be judged and the production of future DPDs and SPDs will be guided.

W2

Draft Policy W2 concerns to Town Centres and Retail, and paragraph W2.3 refers to other town centres which include Sale, Stretford and Urmston. It is suggested that this paragraph should be amended to state that:

"Within these centres, as a minimum there will be a focus on the consolidation and improvement of the convenience and comparison retail offer, with the potential to strengthen and enhance the retail offer where suitable, as well as diversification to other uses such as offices, leisure, cultural and residential as appropriate".

This approach will better serve to maintain and enhance the strength, diversity, vitality and viability of the town centres.

plaz, Policy W2, para W2.3, Object

Name: Mike Baker

Please continue on a separate sheet if required

1167

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Comment Sheet

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Core Strategy: Further consultation on the Preferred Option	1	Page number	11			
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Support		Object	General Comment	Yes			

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Part A: Key Issues and Place Objectives for Old Trafford

Part A of the Consultation document sets out a spatial portrait of the Borough. It identifies Old Trafford as one of the 10 locally distinct places that make up Trafford and highlights the key issues and place objectives which are relevant to this particular area.

LCCC and Tesco support the place objectives for Old Trafford, in particular the need to maximise the potential of Lancashire County Cricket Club as a visitor attraction and recognise its potential to lead major regeneration in the area. As is made clear in Policy W2.13, the Council is committed to the provision of a new foodstore on Chester Road in Old Trafford in order to address long standing deficiencies within the Old Trafford area. The provision of a large superstore (this term is used to reflect the nature of the need and the terminology of PPS6) is clearly a key issue to Old Trafford and should be referred to under the **Live** heading in the following terms:

 To meet the retail needs of the area by provision of a large superstore on the Stretford Playing Fields site.

+ P62-63, Policy W2, para W2. 13, Support (101

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.

+ SL4, pgs, support (102)

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Document		Section				
Core Strategy: Further consultation on the Preferred Option	1	Page number	22			
Core Strategy summary broadsheet		Paragraph number	3.1			
Sustainability Appraisal		Policy number				
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Part B: The Vision for Trafford



Part B outlines the vision for Trafford as set out in the revised Sustainable Community Strategy that has been endorsed by the Council following consultation with local stakeholders. This vision highlights the need for Trafford to consolidate and build upon the reputation of its renowned world class attractions which include Lancashire Cricket Club in order to provide a "breathtaking mix of cultural, sporting, heritage and natural attractions together with vibrant town and shopping centres".

LCCC and Tesco support this vision and welcome the acknowledgement in the consultation document of the status of the Old Trafford Cricket Ground as a world class attraction.

Please continue on a separate sheet if required

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Comment Sheet

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Core Strategy: Further consultation on the Preferred Option	1	Page number	63
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	W2.13
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Part C: W2.13

P62-63, POLLCY NZ, Para N2.13, Object.

LCCC and Tesco support the Council's commitment in the first sentence for the provision of a new foodstore on Chester Road in Old Trafford in order to address long standing deficiencies within the Old Trafford area. However, we would propose that it be amended to refer to a large superstore instead of a new foodstore to reflect the nature of the need and the terminology used in PPS6. In order to maintain consistency with Policy SL4, the policy should also make clear that the superstore would be cross-funding the redevelopment of LCCC cricket ground. The final sentence should be deleted since it is unnecessary to refer to PPS6. The sporting, community, economic and retail benefits which the scheme would bring are consistent with national policy.

Please continue on a separate sheet if required

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Core Strategy: Further consultation on the Preferred Option	1	Page number	95
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	SL4
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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.

Part D: Strategic Locations and Sites

Part D of the consultation document identifies 13 Strategic Locations within Trafford that 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 Lancashire County Cricket Club Area is identified as one such strategic location. Draft Policy SL4 sets out the strategic proposal for this area. LCCC and Tesco are supportive of this proposal subject to a number of revisions being made to the Strategic Proposal and Development Requirements parts of the draft policy.

Strategic Proposal

The proposal needs to be amended to reflect the requirement for the improvements to the Cricket Ground to be cross-funded by the provision of a superstore.

Old Trafford Cricket Ground is the only venue in North West England where international-standard cricket matches can be played. These matches provide significant income to LCCC and the wider regional/local economy as well as considerable profile to Trafford, Manchester and the North West Region. However, the Cricket Ground has fallen below the standards required to host test matches and requires an upgrading of its facilities in order to stage international cricket in the future.

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Urgent action and considerable investment is needed to upgrade and modernise facilities to ensure Old Trafford regains its test match status and its profile as one of the world's great cricketing venues. This will have a highly beneficial effect on the area and enable it to build upon its reputation as a world class attraction as sought by the Vision for Trafford.

Cross-funding is required to finance most of the necessary works. A superstore will cross-fund the works needed to upgrade the ground to meet Test match standards. This will result in sporting, community and cultural benefits being achieved.

There is also an acknowledged need for a large superstore in the Old Trafford area and this can be provided at the Stretford Playing Fields site where food retail development has previously been permitted. A superstore will deliver retail employment and economic regeneration benefits for the area in keeping with national policy objectives.

The combined stadium and superstore development will contribute to the comprehensive regeneration of the area by improving the attractiveness of the location to new investors and helping to stimulate new commercial, residential and educational development in the remaining area.

The proposed change would involve deleting the reference to retail floorspace being delivered and replacing it in a re-formatted policy with the following text:

 Provision of a large superstore on the Stretford Playing Field site to meet the recognised need in the Old Trafford area and to cross-fund the stadium redevelopment works being undertaken.

A need and a strategy for the creation of a high quality public realm along Warwick Road and Brian Statham Way has not been demonstrated. This part of the Strategic Proposal should therefore be deleted.

P95, SLY, Smaregic proposar, Object (105)

Development Requirements

LCCC and Tesco support the first, fourth and sixth Requirements. - P95, SL4, Devolopment Req. 15t, 4th, 16th pound Support

In response to the second Requirement which indicates that an increased capacity at the cricket ground has the potential to exacerbate congestion on the highway network and overcrowding on Metrolink at peak times, the capacity of the cricket ground will not change significantly following redevelopment. As a result, there will not be a marked increase in the number of spectators attending test matches. In any event, due to the timing of cricket matches, most spectators do not travel to or from the ground in peak periods. Consequently, the redevelopment of the ground will not exacerbate any congestion on the highway network and overcrowding Metrolink that may occur at peak times. The first sentence should therefore be deleted.

The words "where appropriate" should be added at the start of the second sentence to reflect the fact that the requirement for any contributions must take account of the circumstances of each case. This sentence also requires adjustment to reflect the proposed deletion of the first sentence. - Pas, Sur, Dev lea, Poul 2

The third Requirement should be deleted as PPS12 advises that it is unnecessary to reiterate national policy in a Development Plan document. In any event, the sporting, community, economic and retail benefits that the scheme will bring are consistent with national policy. — PQ5, SLW, Dev Roq, Poure 3, Object

The fifth Requirement should be amended to insert the words "fronting the A56" after the words "development proposals" to reflect the provisions of the SPD. - Pas, Suy, Dev Rea, Pourt 5, Object

The amended Policy SL4, taking account of the above proposed revisions would read as follows:

Strategic Proposal

The comprehensive regeneration of the area will be delivered by:

 Provision of a redeveloped and much improved LCCC sports stadium and ancillary sports and leisure facilities:

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- Provision of a large superstore on the Stretford Playing Field site to meet the recognised need in the Old Trafford area and to cross-fund the stadium redevelopment works;
- Business floorspace and new residential accommodation (up to 900 units);
- Improvements to education facilities; and
- Public transport infrastructure improvements as necessary.

Development Requirements

- Development Proposals must demonstrate a positive contribution to the delivery of the comprehensive regeneration of the area as set out in the strategic proposal.
- The setting of the Grade II listed Trafford Town Hall should be protected and, if possible, enhanced.
- Development proposals fronting the A56 to accord with the development guidelines set out within the A56 Corridor SPD.
- Where appropriate, development proposals should include Combined Heat and Power systems or alternative methods of sustainable energy generation/conservation.

Justification for the Proposal

- The proposal is in accord with the RSS policy framework for the Manchester City Region area as set out in policies MCR1, MCR2, W3 and W6.
- Redevelopment to upgrade and modernise facilities at the Old Trafford Cricket Ground will enhance Trafford's reputation as a location for national and international sporting events and directly and indirectly deliver additional employment opportunities and sporting and community benefits for local people.
- There is an acknowledged need for a large superstore in Old Trafford and its provision will cross-fund the upgrading and modernising of the Cricket Ground's facilities.
- Proposals will focus significant business and housing regeneration schemes in the Gorse Hill, LCCC and Trafford Town Hall area and incorporate improvements to the education facilities in the area, high quality public realm and active street frontage improvements.
- The proposals will promote the regeneration and development of an area that is highly accessible by a choice of modes of transport with access to the Metrolink and bus services linking the location to the wider area.

Delivery Mechanism and Funding

- The location is in a mix of private and public sector ownerships.
- Funding and delivery of the proposal principally will be the responsibility of the private sector and development partners.

Development Phasing

Housing element to commence post 2011/2 with 35% built by 2015/6, 65% by 2020/1 and 100% by 2025/6.

P95, SLY, Suggested renording

Please continue on a separate sheet if required





200 Lichfield Lane Berry Hill Mansfield **Nottinghamshire NG18 4RG**

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01623 637 119 (Planning)

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Email: planningconsultation@coal.gov.uk

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

10 August 2009

Mr Dennis Smith - Head of Strategic Planning & Housing Strategy Trafford Council

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

Dear Mr Smith

<u>Trafford LDF Core Strategy – Preferred Options Consultation</u>

Thank you for consulting The Coal Authority on the above.

uB Having reviewed your document, I confirm that we have no specific comments to make on it at this stage. The most northerly part of the authority area does fall within our defined coalfield; however, our records indicate that there are no mining legacy issues or coal resources capable of extraction by surface mining methods in Trafford. Comment

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

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

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

Yours sincerely

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

In line with Government led initiatives the Coal Authority is committed to the delivery of efficient, high quality services supported by information technology. To support this we prefer communication in electronic format wherever possible.

CBRE CB RICHARD FILLS

CB Richard Ellis Limited Kingsley House Wimpole Street London W1G ORE

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Our Ref

jill.mcgregor@cbre.com TCE-Altrincham

17 August 2009

Strategic Planning & Policy Planning & Development Trafford Borough Council 1st Floor Waterside House Sale Waterside Sale M33 7ZF

By Post

Dear Sir/ Madam

TRAFFORD CORE STRATEGY FURTHER PREFERRED OPTIONS

CB Richard Ellis is instructed by The Crown Estate, the freeholder of Altrincham Retail Park and land south of George Richards Way, Altrincham to prepare representations to the Trafford Council Core Strategy Further Preferred Options (June 2009).



object

Policy W1: Economy

The Crown Estates supports Policy W1 but considers that the key economic growth sectors identified in W1.3, in accordance with the classification of economic development within draft PPS4, should be expanded to include retail and leisure development as these provide employment opportunities and generates wealth and economic output.

Policy W2: Town Centres and Retail

The Crown Estates supports the overall objectives of Policy W2 and the Council's identified hierarchy of centres, however it objects to the policy guidance for out of centre development in paragraphs W2.10 and W2.12 for reasons set out below.



Object.

The Council's Borough Retail and Leisure Study (2007) identified that Trafford has a wide geographical spread of out-of-centre retail/ leisure park provision with Altrincham (Broadheath) Retail Park serving the Altrincham and Sale catchments, White City Retail Park (Old Trafford) serving the north of the borough and the Trafford Retail Park (Urmston) serving the west of the borough.

With regard to the Crown Estates landholdings, the Altrincham Retail Park was identified as a popular retail destination comprising a mix of non-bulky (high street) and bulky comparison good units within a wider mixed use area.

Given the role that these centres clearly provide within the borough, and national policy guidance in PPS4 which emphasises and supports development that provides employment opportunities and achieves sustainable economic growth, we consider that there should be a presumption for development at these locations where the policy tests in PPS6 can be demonstrated. This view is further supported by the Council's



(03) P62-6 Retail Study which considered that expansion of out of centre retail parks should be considered in accordance with PPS6 guidance - draft PPS4 also maintains this policy position.

Policy W2 Para. W2.12

object

-63 The scope of the policy guidance in paragraph W2.12 as currently drafted goes beyond national policy guidance in PPS6 and PPS4, NWRSS policy 5 and UDP policy S1 which supports new development in accordance with PPS6.

The Crown Estate considers it inappropriate to limit further development within Altrincham Retail Park and the borough's existing retail warehouse parks to the sale of bulky comparison goods only where such sites are located in accessible mixed use areas.

Altrincham Retail Park is surrounded by residential development within the Broadheath area and the site provides a local shopping role within its immediate catchment.

Further development at this location, near to Altrincham town centre, accessible by public transport and walkable from the surrounding densely populated residential areas, provides the opportunity for linked trips within the local area and its existing retail provision and is clearly preferable, in sustainability, vitality and viability terms to other isolated, out of centre locations. The site characteristics of Altrincham Retail Park are not consistent with the broad definition/understanding 'out of centre' as the site is well related to the town centre and the surrounding residential area.

P62-63 Policy W2 Para N2.12 The limitation of goods sold should be left to the demonstration of the case for development against national PPS1, PPS6 criteria. The Crown Estate recommends that 'Any further development within the retail warehouse parks...' is therefore removed from paragraph W2.12.

Yours faithfully

JILL MCGREGOR PLANNER

Cc J Mulligan - The Crown Estate P Kentish - Paul Kentish & Co



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Document		Section	
Core Strategy: Further consultation on the Preferred Option	X	Page number	22 – 23
Core Strategy summary broadsheet		Paragraph number	3.3
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	X
Other document, (please specify)		Strategic Objective reference	
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Do you support, oppose or have general comments about this specific part of the document?				
Support	Object	X	General Comment	
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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.

It is considered that the Vision has developed in a positive way since the last consultation and that it does now provide a more apt direction for Trafford's future. However, there are two dimensions that it is considered remain inadequately addressed in the latest text. - p22, para 3.3, General.

The first of these is the landscape character of the Borough. Trafford has a number of distinctive landscape types, such as those associated with its important river valleys and the mosses. These are important for the natural environmental resources that they contain, but in addition they also represent an important layer of landform that has shaped and defined the Borough, its communities and its character. At present this element is missing from the Vision. It is suggested that the final paragraph is re-worded to make specific reference to landscape, e.g. "We will protect and enhance our historic, built and natural environment, and landscapes (including strategic Green Infrastructure), to improve ... " P22, para 3.3, frair para, object

Secondly, the draft Vision remains silent on how the Borough will ensure the prudent use of natural resources this might best be addressed by adding a new paragraph relating to sustainable construction, e.g. "All new development will encompass the principles of sustainable construction, and in particular will ensure that the recycling of materials is maximised and that natural resources are used prudently." p 22, Pouc 3.3

Object

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Core Strategy: Further consultation X	Page number	23
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Te Strategy summary broadsheet	Paragraph number	
Sustainability Appraisal	Policy number	
Equality Impact Assessment	Vision reference	
Other document, (please specify)	Objective reference	SO2
	Spatial Strategy reference	
	Strategic Location reference	
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The Objective should seek to pursue a more integrated approach to sustainable development, in particular it should embrace the benefits to disadvantaged communities of improvements to their environmental resources – not just the physical appearance but also the cultural and natural environment attributes. It is requested that the Objective is supplemented to make specific reference to the "physical, economic, environmental and social fabric of disadvantaged communities…"

Name: Alan Hubbard, the National Trust

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Whereas other Strategic Objectives make appropriate reference not only to the protection but also the enhancement of other environmental resources this is not the case at present with the historic environment. Whilst 'protecting' and 'valuing' are key areas to be addressed there are also a number of opportunities for enhancement whether through heritage-led regeneration initiatives, the encouragement of heritage based tourism or its role in making Trafford's landscapes distinctive. It is therefore requested that the Strategic Objective is broadened so that the wider potential of the Borough's heritage resources is realised, e.g. "Make the most of, protect, enhance and value the Borough's heritage...".

Name: Alan Hubbard, the National Trust

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It is considered that the Strategic Objectives are lacking an appropriate climate change dimension. Given that this is one of the greatest challenges that we currently face and that planning has a key role to play in addressing it, there should be a separate Strategic Objective that specifically relates to this matter.

SO7 is limited in its aspirations in respect of climate change and as worded only considers the 'reducing emissions' element of climate change, not how Trafford will adapt to those impacts of climate change that are now unavoidable. — P23, So7, Dolect



Name: Alan Hubbard, the National Trust

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Core Strategy summary broadsheet		Paragraph number			
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Overall it appears that the preferred spatial strategy has taken appropriate account of the adopted RSS and relevant characteristics of the Borough.



Name: Alan Hubbard, the National Trust

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Core Strategy: Further consultation X	Page number	47 - 48
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Gre Strategy summary broadsheet	Paragraph number	
Sustainability Appraisal	Policy number	L 5
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The incorporation of a specific policy on climate change is welcomed. The Policy as worded is considered to suitably address climate change reduction issues and also provides some appropriate guidance in terms of adaptation measures – although these also need to be adequately considered in terms of the impacts upon specific topic areas such as nature conservation.

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Name: Alan Hubbard, the National Trust

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Core Strategy: Further consultation X	Pa	ge number		51
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Core Strategy summary broadsheet	Pa	ragraph number		10.27
Sustainability Appraisal	Po	icy number		L5.
Equality Impact Assessment	Vis	ion reference		
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The reference to Stamford Brook in the context of water issues is appropriate and welcomed. It is noted however that this development has adopted a more holistic approach to the water environment than is set out here; for example, measures have been introduced to reduce the use of water, and also to achieve environmental benefits whilst reducing flood risk as a result of the major (and award winning) river restoration project that has been undertaken.



Name: Alan Hubbard, the National Trust

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Core Strategy: Further consultation X an the preferred option	Page number	52
Tore Strategy summary broadsheet	Paragraph number	
Sustainability Appraisal	Policy number	L6
Equality Impact Assessment	Vision reference	_
Other document, (please specify)	Objective reference	
	Spatial Strategy reference	
	Strategic Location reference	
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	Other (including omissions and suggestions for alternative approaches)	

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Support	Object	General Comment

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In terms of those matters that are covered by the Waste Policy as drafted these are supported by the National Trust.

However, it is considered that there are waste related issues in respect of sustainable development that have not been picked up here or in the policies relating to climate change or design. Specifically, more encouragement should be given to reducing the impact upon natural resources during construction, e.g. by greater use of recycled materials, including those generated on site as part of the development through demolition works.

Name: Alan Hubbard, the National Trust

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Core Strategy: Further consultation X on the preferred option	(Page number	54 – 55
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	L7
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
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The policy as drafted satisfactorily addresses a number of key issues, and in particular those relating to Design as set out in the Annex to PPS1 in respect of design quality.



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Core Strategy: Further consultation X	Page number	62
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Bre Strategy summary broadsheet	Paragraph number	
Sustainability Appraisal	Policy number	W2
Equality Impact Assessment	Vision reference	
Other document, (please specify)	Objective reference	
	Spatial Strategy reference	
	Strategic Location reference	
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Support	Object	General Comment	X

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.

No objection to the Policy wording but in terms of Local Centres it is important that these are clearly defined somewhere. At present it is unclear which locations are being classified as Local Centres (although the intention to define their boundaries in the Land Allocations DPD is noted it is considered that they need to be identified by name/general location at this stage). From the National Trust's perspective it is considered that the new retail and related facilities at Stamford Brook do constitute a Local Centre.

(133)

Name: Alan Hubbard, the National Trust

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Core Strategy: Further consultation on the preferred option	X	Page number	67 – 68
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	R1
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
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At R1.3 the draft Policy fails to recognise that the influence of Conservation Areas extends beyond their boundaries and (as per PPG15 and draft PPS15) the wider setting – including views to and from a Conservation Area – are also important. It is important that this dimension is not missed in the preparation of schemes and their assessment by the Local Authority. Accordingly it is requested that the wording is amended and it is suggested that the wording "Within these areas the Council will:..." is replaced by "In respect of these Areas and their wider settings the Council will:...". Given the nature of many of the Conservation Areas in the south of the Borough it is considered that the impacts of development upon trees is a particular issue of relevance within Trafford and it is suggested that this is identified as a particular consideration. – Para Risa particular consideration.

(H)

Similarly at R1.6 and R1.7 the historic assets all have wider settings that need to be considered, protected and enhanced – not just Listed Buildings – in accordance with national advice. From the National Trust's perspective this is especially true in the case of the Historic Park and Garden at Dunham Massey and its designed vistas. It is requested that specific reference to settings is added to each of the bullet points at R1.6 b, c, d and e, and at R1.7- which should also include particular reference to Schedule Ancient Monuments (currently – I understand – this is solely that at Watch Hill). Similar additions are needed to the supporting text.



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The proposed Policy is considered to be appropriate to the specific natural environment attributes of the Borough. The reference to wider surroundings at R2.1a is particularly apposite.



Name: Alan Hubbard, the National Trust

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Core Strategy: Further consultation	Χ	Page number	74
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Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	R3
Equality Impact Assessment		Vision reference	
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Support	X	Object	General Comment	

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The overall approach appears to accord with adopted RSS and adds an appropriate local dimension.



Trafford's Core Strategy: Further consultation on the Preferred

Option

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re Strategy: Further consultation	Χ	Page number	76 - 77
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Core Strategy summary broadsheet		Paragraph number	R4.4 - R4.
Sustainability Appraisal		Policy number	R4
Equality Impact Assessment		Vision reference	
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Support	X	Object		General Comment	

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The National Trust especially welcomes the recognition in the latest document of the role of agriculture within the Borough and the need to look positively at opportunities for rural diversification (especially if viable uses are to be found for important historic and vernacular buildings in such areas).

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Sustainability Appraisal		Policy number	R6
Equality Impact Assessment		Vision reference	
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Whilst the inclusion of Dunham Massey as a cultural and tourism resource is welcomed it is noted that, as per earlier submissions, the significance is wider than just the Hall and Registered Park & Garden –rather it encompasses the significance of the wider agricultural estate (including related buildings) and the ownership interests in the settlements of Dunham Town and Dunham Woodhouses, as well as related features such as the Mill at Bollington, the Estate Office in Altrincham and woodland areas.



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Core Strategy summary broadsheet	Paragraph number	23.4
Sustainability Appraisal	Policy number	
Equality Impact Assessment	Vision reference	
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The reference to environmental management and mitigation in the seventh bullet point is too limiting and should be broadened to encompass opportunities for enhancement, e.g. through heritage-led regeneration or the promotion of tourism opportunities.

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Core Strategy summary broadsheet		Paragraph number	23.5
Sustainability Appraisal	,	Policy number	
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Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.

The reference to environmental management and mitigation in the fifth bullet point is too limiting and should be broadened to encompass opportunities for enhancement, e.g. through heritage-led regeneration or the promotion of tourism opportunities.



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Core Strategy summary broadsheet	Paragraph number				
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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.

In general terms the National Trust is content with this proposal, but it does have specific concerns about the allocation of undeveloped land south of the former railway line, and about the form of any new development on developed land south of the former railway line. In parts this land is little more than 100 metres from the historic agricultural estate that is part of the Trust's land holdings at Dunham Massey. Accordingly the impacts upon the wider landscape and its historical importance require more detailed consideration.



In particular it is requested that the Development Requirements are supplemented to ensure that development proposals consider their impact upon the landscape character of the surrounding area. including the historic Dunham Massey Estate and are designed accordingly.

Trafford's Core Strategy: Further consultation on the Preferred Option Office Use Only Comment Form - June 2009 A PLEASE SUBMIT ELECTRONICALLY Date strategic.planning@trafford.gd

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As with Site SL8 this identified area is close to the wider Dunham Massey Estate - on this occasion within less than 50 metres. Accordingly the impacts upon the wider landscape and its historical importance require more detailed consideration.



In particular it is requested that the Development Requirements are supplemented to ensure that development proposals consider their impact upon the landscape character of the surrounding area, including the historic Dunham Massey Estate and are designed accordingly.

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It appears that consideration will also need to be given to the impact of new development upon the nearby Linotype Conservation Area and its wider setting.



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Insufficient consideration has been given to the relevant historic environment resources within the identified area – these are more extensive than as listed in the third bullet point under Development Requirements. The fourth bullet point under 'Justification' provides a more accurate reference to these resources and how they should influence development proposals – it is suggested that it is moved into the Development Requirements section.



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The Trust has some concerns about the adequacy of the monitoring arrangements in respect of the historic environment. At present (as per Table 4) the indicators include simply the number of Conservation Areas present, not how many have an up to date (less than 5 years old) Appraisal and/or Management Plan. Furthermore there is no consideration of key items of the historic environment such as Listed Buildings and Registered Historic Parks & Gardens - for each there are now 'at risk' registers and the number of entries on each register would provide some indication of the condition of the Borough's historic resources.



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Cutting, Damien

From:

Rose Freeman [rose.freeman@theatrestrust.org.uk]

Sent:

10 August 2009 14:37

To:

Strategic Planning

Subject:

Core Strategy Further Consultation

Follow Up Flag: Follow up

Flag Status:

Red

Our Ref.: RF/2466

Core Strategy Preferred Option - Further Consultation

Thank you for your letter of 25 June consulting The Theatres Trust on further consultation for the Core Strategy Preferred Option.

The Theatres Trust is the national advisory public body for theatres and a statutory consultee for planning applications affecting land on which there is a theatre. This applies to all theatre buildings, old and new, in current use, in other uses, or disused. Established by The Theatres Trust Act 1976 'to promote the better protection of theatres', our main objective is to safeguard theatre use in the UK, or the potential for such use but we also provide expert advice on design, conservation, property and planning matters to theatre operators, local authorities and official bodies.

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



Policies W1, W2 and R6

We support this comprehensive document that provides protection and enhancement for your leisure and cultural facilities through policies W1 Economy which recognises that the creative industries are an important growth area; W2 Town Centres and Retail which now includes cultural facilities as contributing towards the vitality of centres; and R6 Culture and Tourism which will support improvements and expansion to your cultural offer.]



Our only comment is that Policy R6.3 mentions that planning obligations will be sought for improvements to the quality of existing facilities and for new development but planning obligations for designated cultural and tourism related buildings are not reflected within Policy L8.

We look forward to being consulted on the submission stage of the Core Strategy and any town centre Area Action Plans.

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

Fax: 020 7836 3302

planning@theatrestrust.org.uk

10/08/2009

The Woodland Trust welcomes the opportunity to respond to this consultation. The Trust is the UK's leading woodland conservation charity. We have four main aims: no further loss of ancient woodland, restoring and improving woodland biodiversity, increasing new native woodland and increasing people's understanding and enjoyment of woodland. We own over 1,000 sites across the UK, covering around 20,000 hectares and we have 300,000 members and supporters. In the North West Region we have 158 sites covering 855 hectares.

We are very grateful to you for including in the new policy wordings many of the points which we raised in our response at the previous Preferred Options stage in 2008.

There are just three further comments we would like to make at this stage.

Protection of Ancient Woodland and Ancient Trees

We are pleased that you have included ancient woodland and ancient/veteran trees in the list of assets to be protected, for the reasons which we outlined in our previous submission.

However, we are concerned by the apparent qualification in the final paragraph:

"R2.5 For the avoidance of doubt, until such time that the Land Allocations DPD is adopted,

those assets listed under a-f above that are currently protected by policies contained in

the Adopted Trafford UDP, will continue to benefit from that protection."

There is an implication here that there would be a possibility that ancient woodland could be allocated for development in the Land Allocations DPD. (As it is an irreplaceable habitat, we would ρ_2 like to see the wording of the policy strengthened to give ancient woodland absolute protection.

Link between Green Infrastructure and Health

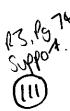
Your green infrastructure policy is very strong on the benefits of GI to wildlife and the link to enabling adaptation to climate change. There is a strong introductory paragraph in the Open Space, policy which states the benefits of access to open space in improving the health and well being of people in the local community (This is particularly true of natural green space and especially woodland so it would be good to have a mention of health/well being benefits in the GI policy

The Woodland Trust's Woodland Access Standard

We are pleased to see from the wording of the Open Spaces policy that you are developing a Green Space Strategy and an assessment of need for various different types of green space. You make specific mention of Natural England's Access to Natural Greenspace Standard.

Pg 80, Para 21.3 +21.4 support





As mentioned in our previous submission, the Woodland Trust has produced a Woodland Access Standard, which is complementary to the Natural England Standard, but deals specifically with woodland.

The Woodland Trust Woodland Access Standard recommends:

- that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size
- that there should <u>also</u> be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes

9g72 General Comment

Results show that in Trafford, only 10.2% of people have a small wood within 500m of their home and 58% have a larger wood within 4km. We supplied detailed figures and comparisons with peighbouring councils at the Issues and Options Stage and we can supply this information again if it would be helpful: the information is also available as a map in GIS format.

The standard is the result of extensive research and public opinion surveys and the results are outlined in our report Space for People which is downloadable from our website at www.woodlandtrust.org.uk.

Control of the Contro

We would like you to include our Woodland Access Standard in your Green Space Strategy and assessment of need.

For more information, please contact Nick Sandford on 01476 581111 or email nicksandford@woodlandtrust.org.uk

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Please continue on a separate sheet if required —> CONTINUED ON ONE MORE DOUBLE SIDED SHEET. Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

- @ Given the statement on page 61 at parragraph 14.5, and given that, over the past 15 years or so, no appropriate top quality "blue chip" business enterprise has emerged to show interest in eccupying an appropriate development on this site, I consider that the Major High Amenity site proposal should be formally ceased, and that this 90 acres should be returned to the Status of proteeted Green Belt.
- The Planning Inspector of the 1994 UDP Public Inquiry laid down-in his rating so many restrictions upon the sort of development on Davenport Green so as to ensure that only the highest quality client and usage could develop this area.
- (4) The past decade has seen one of the longest consistent business "booms" for many years. We are now faced with a prolonged downturn, coupled with such sophisticated telecommunications systems which make large national or regional headquarters offices a less relevant concept. It is thus highly likely that the high quality client specified in the Planning Inspector's ruling will never emerge for Davenport Green.
- (5) I do not consider that the "High Amenity" of the Davenport Green proposal has been properly emphasized or elaborated in the current LDF wording.
 - (5.1) If my objection to keeping the 90 acres out of the Green Belt fails, then I would default to objecting by asserting that the current LDF wording does nothing

to prevent a dilution or weakening of the UDP Inquiry Inspector's strict conditions.

- In short, if we must have development on this 90 acres, then it must be specifically on the terms originally specified by the UDP Inspector. The site must emphatically not be used for sheds or cheap speculative office sites.
- © I would further raise the query as to how fair into the future a planning proposal can be maintained before it lapses. A householder, having secured planning permission for same significant work, must act within a specified time period or else lose his permission. By complete condit, the threat of development has hung over Davenport Green for many years, and seems set to do so for many more. I find this situation quite intolerable, given current growing concerns over loss of agricultural land to both climate change factors (eq: flooding) and man-made factors (eq: building development).
 - (6.1) The Green Belt integrity of the totality of Davenport Green must be restored and subsequently maintained not only because of the area's inherent qualities as Green Belt, but also because this area would be a crucially useful source of local food production, should there be great changes in climatological imperatives, agricultural economics, and difficulties in the long-distance supply of foodstuffs.
 - (6-1.1) These last points may seem quite unrealistic at the present time, but I am only applying to own food supplies exactly the same concerns which politicians are today actually applying to the security of the United Kingdom's energy supplies.

Our Reference: S2.2.8/ML/JLG

10 August 2009

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

Dear Sir/Madam

Core Strategy (Consultation on the Preferred Option)

Trafford College (the College) supports and welcomes the opportunity to offer comment to Trafford Council's "Core Strategy: Further Consultation on Preferred Options."

P3103

The College acknowledges the objectives set out at Table 1 'Strategic Options' and Policy L1 (Land for New Homes), Policy L2 (Meeting Housing Needs) and Policy R5 (Open Space and Recreation).

P32 Policy L2 (104 The College supports the intent of the core strategy, but is mindful of the requirements of PPS12 to ensure that the core strategy is sound. The College offers the following specific comments to ensure that the core strategy is demonstrably effective (i.e. can deliver) and consistent with other plans, policies and guidance at a national, regional and a local level:

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Geraal

The College is of the view that the core strategy should make specific reference to the important role that Trafford College plays in the Borough. The College has recently been graded 'outstanding' by OFSTED and offers great potential to assist the Council in delivering its policies and aspirations including those within the Sustainable Community Strategy (*Trafford 2021: A Blueprint*). In particular, the College provides access to high quality training and education needs that raise the skills level of local residents to meet the demands of the local and wider regional economy. The core strategy should reflect the important role of Trafford College more specifically and allow it to continue to develop in the community.

PAS SLY

The core strategy should not undermine the potential contribution that the College can make towards widening housing choice in the Borough; and improving the quality of and access to open space.

P22 2003.3.

The Core Strategy Vision (paragraph 3.3 of the core strategy) should allow for growth of existing community services where these are outside existing town centres, Trafford Park and Carrington to ensure that the core strategy does not undermine the potential for additional investment at the Trafford College campuses.

IS VISION Object



Chap4 • Sparial Svarcgy

The Council should amend the wording of the Spatial Strategy to ensure that the potential for further investment in the campuses of Trafford College are not undermined and that the College can make best use of its assets, especially where this will allow for continued investment in education/community facilities.

If further clarification or information is required on the issues raised, please do not hesitate to contact me.

Yours faithfully

Michelle Leslie
Vice Principal Resources

Email: strategic.planning@trafford.gov.uk

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

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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.

As a preliminary general comment, I find it unfortunate that a consultation on a major strategy document does not provide a mechanism for commenting strategically with a general holistic approach where appropriate. The idea of shoehorning all comments into specific paragraph or policy numbers encourages too focussed and narrow an approach to consideration of the overall document and the basic underlying themes of the Core Strategy. Also there are strong links between the Core Strategy and the Sustainability Community Strategy, but it is difficult to comment on these links under the system you provide. Moreover, to fill a separate form in for each comment would, I am sure, cause a lot of interested members of the public to lose the will to live. We have tried to stick to the preferred format and focus on individual comments, but there are occasions when our views cut across policy sections and consider the lack of important linkages. We hope that this will be clear.

Feed back on format of comment form

Please continue on a separate sheet if required

Comment Form – June 2009

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Document		Section	
Core Strategy: Further consultation Y	es	Page number	
on the preferred option			
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
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		suggestions for alternative	
		approaches)	

Do you support, oppose or l	nave general comments abo	ut this specific part of the document?	
Support	Object	General Comment	Yes

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.

In the section on Spatial Profiles (pages 10 - 19) there are a number of common themes that appear and reappear, yet many of these are not followed through in any coherent pattern. In particular, whilst the Mersey Valley is noted as a major east-west corridor with significant value to the community, the Bridgewater Canal is mentioned occasionally, but not consistently. It is a major historic feature that links the Borough on a north-south axis and also provides opportunities for recreational, ecological, transport, leisure and local employment developments. It deserves a strategic focus of its own. Secondly, the problems associated with the A56 run throughout the Borough (congestion, pollution, physical barrier, etc) – but again these are not noted against all the relevant spatial profiles. Finally, there are a number of regeneration areas noted (Old Trafford, Partington etc) where the issue of affordable housing for sale is paramount, but the coverage of this issue is patchy at best.

Name: Bridget Green

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Document		Section	
Core Strategy: Further consultation	Yes	Page number	22
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Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	General
Other document, (please specify)	Yes	Objective reference	
Trafford Sustainable Community		Spatial Strategy reference	
Strategy		Strategic Location reference	
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Support		Object		General Comment	
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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.

We applaud the general Core Strategy Vision. We would however like to see greater clarification that the vision of sustainable patterns of living applies across the Borough and is not just confined to the deprived areas in need of regeneration. It reads a little ambiguously as it stands. This of course complements the focus of the Trafford Sustainable Community Strategy and links with the themes of safety, reassurance, affordability, environmentally friendly development, improved public transport, better facilities for walking and cycling, training schemes, improved public spaces, locally based employment, local facilities, and so on.

P22, 3-2-3.3 General

Name: Bridget Green

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Document	<u> </u>	Section	
Core Strategy: Further consultation Y	es	Page number	
on the preferred option			39-40
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	L3
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
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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.

We applaud the concept of reducing inequalities. We have some concerns that the reduction of inequalities appears only to refer to appropriate regeneration of disadvantages communities. This in itself is imperative. However, the reduction of inequalities can only take place if there is sufficient redistribution of resources, otherwise the gaps will remain and could conceivably worsen even if limited improvement takes place in disadvantaged areas. We would like to see a more implicit indication that sufficient local authority resources for effective regeneration will be targeted on those areas with the greatest need.

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Document		Section	
Core Strategy: Further consultation	Yes	Page number	0 151
on the preferred option			941-46
Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	L4
Equality Impact Assessment		Vision reference	
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		Strategic Location reference	
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Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.

The concept of sustainable transport must focus on reduction in private car usage. This is not made clear in the policy which indicates that highway schemes that will increase capacity may be acceptable. A successful integrated transport policy must radically switch the emphasis from car usage to a comprehensive, safe, convenient and economical system that incorporates and emphasises public transport, cycling and walking. The problem of the A56 and the way that it effectively splits communities highlights the need for a radical reappraisal of its impact and future planning. Furthermore, the local highway network needs to be placed in the context of a safe, pedestrian-friendly environment, with a commitment to 20mph zones with traffic calming.

Name: Bridget Green

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Document		Section			
Core Strategy: Further consultation on the preferred option	Yes	Page number	P47-51		
Core Strategy summary broadsheet		Paragraph number			
Sustainability Appraisal		Policy number	L5		
Equality Impact Assessment		Vision reference			
Other document, (please specify)		Objective reference			
		Spatial Strategy reference			
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Do you support, oppose or have general comments about this specific part of the document?							
Support		Object		General Comment	Yes		

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.

We believe that a core policy on Climate Change is a major breakthrough at the local level. We support the key aims and objectives of this policy – as far as they go - but we are somewhat concerned that it appears disconnected from other related policies, such as transport and design. Climate change, as evident from Central Government Policy Statements is an overarching theme, but it seems to be treated in a very narrow way in policy L5. Some explicit links with related policies is needed here.

Name: Bridget Green

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Core Strategy: Further consultation Yes on the preferred option	Page number	
Core Strategy summary broadsheet	Paragraph number	
Sustainability Appraisal	Policy number	L6 L7
Equality Impact Assessment	Vision reference	
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Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.

The concept of quality in design is important and we support the main thrust of this policy as far as it goes. We would like to see more explicit links made between quality design and climate change through consideration of the inclusion of energy-efficiency construction, innovative eco-friendly designs, links with micro-generation of energy, and traffic calming. Again the links with other policies needs to be clarified – eg links with policies L4 and L5 are paramount here. The policies cannot work separately and independently – cross referencing may be an idea?

Name: Bridget Green

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Document	Section	
Core Strategy: Further consultation Yes on the preferred option	Page number	59-61
Core Strategy summary broadsheet	Paragraph number	
Sustainability Appraisal	Policy number	W1
Equality Impact Assessment	Vision reference	
Other document, (please specify)	Objective reference	
	Spatial Strategy reference	
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Do you support, oppose or I	nave general comments	s about this specific part	t of the document?	
Support	Object		General Comment	Yes

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.

We are in agreement with much of this policy, but we believe that there should be more emphasis on encouraging small scale enterprise in a more dispersed way around the Borough. By focussing on major employment sites this encourages more travel to work and travel over greater distances. This runs counter to sustainability principles as outlined in other policies where mention is made of the need to locate employment, amongst other uses, in accessible locations. The most accessible type of location is close to the home, and many new small scale industries can be located in residential areas. For the sake of creating a more sustainable pattern of living, more emphasis on dispersed employment opportunities is needed here. Note again the links with your policy on climate change in this subject.

Name: Bridget Green

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Core Strategy: Further consultation	Yes	Page number	P67-70
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Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	R1
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
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Support	Yes	Object		General Comment	1

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

The historic environment of Trafford is what makes it distinctive. Our local heritage must be protected and enhanced. We would like to see the Bridgewater Canal emphasised as a key unifying feature of the Borough's built environment. Its capacity to be a major corridor for recreation, wildlife and transport needs to be recognised, and its historic significance as a working canal underpinned with a Borough-wide strategy that protects its heritage aspect.

Name: Bridget Green

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

Comment Form - June 2009

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Core Strategy: Further consultation	Yes	Page number	
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Core Strategy summary broadsheet		Paragraph number	
Sustainability Appraisal		Policy number	
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	Stretford
		_	Crossroads
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Support		Object		General Comment	Yes

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.

Following major developments in Sale, Altrincham and Urmston Town Centres, Stretford is the only one of the major centres still to be considered. We are concerned that proposals appear to be targeted at some relatively distant point in time. The potential to create something fine for Stretford is not fully covered and cannot be delayed this long. Certain issues need to be stressed: The A56 is a major barrier between the shopping centre and other strategic parts of the centre, including the canal, the Metro and the Essoldo; thought must be given to strategic redevelopment to unify the centre, including sinking the crossroads and giving the ground level to pedestrians; more emphasis needs to be placed on the corridor linking the shopping centre with Longford Park; the Bridgewater Canal needs to be linked to the centre and made a major feature to include recreation, leisure and canal-based commercial activity; cycle storage/hire/repair facilities need to be added to the Metro station and bus stops to create a truly sustainable transport interchange. A wider, more strategic vision is needed to re-join the two halves of the centre and regenerate it as a community-based entity.

Name: Bridget Green

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Core Strategy: Further consultation on the preferred option	Yes	Page number		
Core Strategy summary broadsheet		Paragraph number		1
Sustainability Appraisal		Policy number		1
Equality Impact Assessment		Vision reference		1
Other document, (please specify)		Objective reference		1
		Spatial Strategy reference		7
		Strategic Location reference	Partington	ไร
		Strategic Site reference		1
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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.

Partington desperately needs resourcing to create a more vibrant community. Perhaps more emphasis on training programmes to help local residents into new, local employment could be given. Partington is an isolated community and it needs local jobs, shops and facilities to avoid locals having to travel long distances, which in itself would be unsustainable and undesirable. With the surrounding agricultural area, perhaps Partington could pilot schemes based upon local food production, allotments, markets etc, for consideration regarding possible cascading around the Borough?

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Core Strategy: Further consultation on the Preferred Option	X	Page number	11		
Core Strategy summary broadsheet		Paragraph number	Live/Work/learn		
Sustainability Appraisal		Policy number			
Equality Impact Assessment		Vision reference			
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		Spatial Strategy reference			
•		Strategic Location reference	Old Trafford		
. ,		Strategic Site reference			
		Table/Figure reference			
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Support	Object	General Comment	X

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

I support the inclusion of Old Trafford as a strategic location but believe the key issues and Place objectives section does not include all the relevant issues. Other areas that should be listed include:

- The enhancement of green space to make it a safe place to enjoy
- Improve road layout into Old Trafford and the specific neighbourhoods within Old Trafford to encourage permeability
- Improve access to city centre, digital city, Stretford to access jobs, employment and training

+ P93, SL3, Support



Please continue on a separate sheet if required

Trafford's Core Strategy: Further consultation on the Preferred Option Comment Form – June 2009

Comment Sheet

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Document	Document Section					
Core Strategy: Further consultation on the Preferred Option	X	Page number .	35			
Core Strategy summary broadsheet		Paragraph number	7			
Sustainability Appraisal		Policy number	L2			
Equality Impact Assessment		Vision reference	L2.7			
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The comment is in relation to that a split of 50:50 on a development between intermediate and social rented units. Whilst we are fully aware Trafford needs more intermediate units in the current market this statement could be too high because of the difficulty with gaining mortgages etc. The Trust at this point would be trying to maximise rented units on site due to the certain rent income over shared ownership. This statement therefore may need more flexibility built into it.

In addition the comment above that at least 50% of affordable housing provision will be required to be family accommodation. Whilst we agree with this sentiment would this apply if it was simply re-provision for demolished flats e.g. like for like again this needs to have flexibility built in.

On both these points it may be that a different approach is taken with an affordable developer (Housing association) than a private as a Housing Association would in the main be developing for an affordable market it already has in place.

P35, Policy L2, Para L2.7, General

Trafford's Core Strategy: Further consultation on the Preferred Option Comment Form – June 2009

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Document		Section	
Core Strategy: Further consultation on the Preferred Option	X	Page number	47
Core Strategy summary broadsheet		Paragraph number	10
Sustainability Appraisal		Policy number	L5
Equality Impact Assessment		Vision reference	
Other document, (please specify)		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
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Support	X	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.

Very supportive of the standards set around sustainable construction and that all developers would need to meet the governments code targets rather than just housing associations. This is a positive step which we would be in full support of as well as the other standards set within this section.



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Core Strategy summary broadsheet		Paragraph number					
Sustainability Appraisal		Policy number					
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		Spatial Strategy reference					
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		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?					
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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 impro the document.

I support the core strategy in principle, however I would like to make the following comments with regards to the proposals for Stretford crossroads.

A number of people have previously raised concerns over the existing underpass system linking the four areas of Stretford Crossroads. Quoting paragraph 6.6 of A56 Corridor SPD, commitment to improve crossing facilities which includes Stretford Crossroads. The response stated that pedestrian controlled crossings are not within the scope of the Core strategy but are the responsibility of the Transport Department. I suggest that all of the relevant departments of the Council liaise with the Transport department and engage in joint planning so that the preferred crossings can be installed at the same time as the re-development takes place. This would allow easier crossing, and allow development in and around the Essoldo cinema and Newton St. The underpasses may remain until such funding allows them to be filled in/closed as long as pedestrians have the option of the controlled crossing.

Increased residential accommodation further justifies pedestrian crossings and Stretford town centre regeneration to provide more local employment and easier access to the Metro link for cross city travel.

Council policies are in favour of a more cyclist and pedestrian friendly A56 and installing facilities to encourage the use of public transport. Surely installing Pedestrian crossings will encourage more use of the Metro link thus removing cars from the road as part of the Councils remit. (Cont'd next page)

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(Cont'd from above)

I also propose that Kingsway from below the car park entrance to the traffic lights on Chester road is pedestrianised, with traffic diverted along Barton Road. This would instantly rejoin two halves of Stretford crossroads safely bringing the library and clinic back into the town centre.

With the re-generation of the Stretford town centre, what are the proposed plans? The current documentation is vague. What are the exact details of the new improved floor space to enhance the offer of the town centre? What are the exact intentions regarding improvement and development in and around the Stretford Mall to improve retail facility and offer available to the local community? This could range from a fresh cover of paint to demolishment, please clarify. — PIOI, SUF, SURGESCO, PROPOSOL, GUERREL, (102)

What are the plans to increase accessibility to the Metro link? - P102, SL7, Justification, pour &

What are specific proposals for the Essoldo? - PIDZ, SLF, JUSTIFICATION, POUNT 5, GENERAL 104

The intention of Tesco to build a giant superstore on Chester Rd would have a detrimental effect on Stretford Mall and the diversity of local shops. Furthermore, this would encourage more car usage away from Stretford town centre. Out of town shopping increases car usage and congestion along the A56 corridor which is council is trying to resolve.

Why can't Tesco's be part of the re-development of the Stretford Mall? Tesco could fund some of the development costs in return for a large retail space similar to the development with Sainsbury's in Urmston town centre. This should be possible if Kingsway and the ground floor parking were included in the overall retail space of the town centre, and parking provided via a multi-storey car park. The land at Gorse Hill could then be funded externally for sport excellence activities, which is more relevant to that area.

+ P63, Policy W2, para W2. 13, General (105)

Please continue on a separate sheet if required

1142

Trafford Tomorro

STRATEGIC PLANNING AND DEVELOPMENTS

17 JUL 2009

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

Action by Ans Copied to.

Delivering the Vision

Horneb

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	V				
	SO3		V			
. [SO4	V				
- □	SO5					
Nect _	SO6		V			
	S07					
٠ [SO8					

Would you like to	o add any fur	ther com	ments?				. 0
Would you like to	To 90	5.0	→todew	10	<u> </u>	r mar Ja	21-9
evocu, hosh	-						

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	o add any fûrtl	ner comments?					
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north	at the	Baravom.					
	· 1						

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))		/	_		
Whaldside (SL2)					
<u>(EL3)</u>			/		
Lancashiro County Gricket Gub (SL41)			V		·
Tieffoid Perk Core (SL5)			<u></u>		
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 y	ou like to add	any further	comments?		• • •			(les)
	on an	rae 1	comments?	retitional	W/011	12 OC	<u>3.~ed</u> P	MARION
Kul	1 Think	Hare	berede	be d	semer)	eror	Vicos	Ite
	- طب سطار							

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					

vvoula you	like to add a	any further c	ommer	its?			
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had ,	alui	لاعتام	to-	~ an	The	te con	

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.

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	u 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	L5		
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)			

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

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



Paragraph L5.3 Code for Sustainable Homes – Code Level 6 may not be attainable without the use of rain water or grey water recycling within new homes. United Utilities Water recognises that there is a lot of interest in grey water recycling and/or rainwater harvesting. However, a lot of research studies have been undertaken, which have demonstrated that they are currently expensive to install and to maintain, often use significant amounts of energy (increasing carbon emissions) and have public health concerns. Therefore, before seeking to require developers to implement these systems, you should be aware that acceptable and sustainable use of such systems has not been proved and so United Utilities cannot endorse their use at present.

P. 47 Policy L5, Para L5.30, object.

Please continue on a separate sheet if required

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Comment Sheet

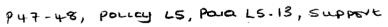
Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on 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	L5:13							
Sustainability Appraisal	Policy number								
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)								

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

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

• The Trafford Quays development Should this development proceed, account should be taken the is next to our largest Wastewater Treatment Works – Davyhulme. There is potential for nuisance impact from vibration, noise, traffic, dust etc and the site should be designed in such a way to confine the impact of nuisance in accordance with this paragraph.



PIIT, SSZ, GENERAL .

Please continue on a separate sheet if required

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

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What are you commenting on? Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Core Strategy: Further consultation on the Preferred Option	Page number		
Core Strategy summary broadsheet	Paragraph number	L5:15	
Sustainability Appraisal	Policy number		
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)		

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

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

Flood Risk Assessment United Utilities Water supports the wording in this paragraph. We are very
pleased to advise on flood risk from our assets.



P47-48, POLICY L5, POTO L5.15, SUPPERE.

Please continue on a separate sheet if required

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Comment Sheet

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document/	Section		
Core Strategy: Further consultation on the Preferred Option	Page number		
Core Strategy summary broadsheet	Paragraph number	L5.16	
Sustainability Appraisal	Policy number		
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)		

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

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

• Drinking Water Efficiency United Utilities Water supports the wording in this paragraph. We should make it clear that as the North West of England is not water stressed, the comments on rainwater harvesting and water recycling relate ONLY to outdoor uses and not within homes. We recommend that developers should pay very close attention to building design to conserve potable water. This could include water saving devices such as low volume taps, low volume showerheads, dual flush toilets, save-a-flush devices, water efficient washing machines and dishwashers.

P47-48, POLLEY LS, POLO LS. 16, GENERAL/ CLOS FROMEIOF

Please continue on a separate sheet if required

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Comment Sheet

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What are you commenting on? Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Core Strategy: Further consultation on the Preferred Option	Page number		
Core Strategy summary broadsheet	Paragraph number	L7.3d	
Sustainability Appraisal	Policy number	L7	
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)		

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

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

Utility Capacity United Utilities Water supports the wording in this paragraph. We are happy to advise if
we have capacity to serve development. Development should not be allowed until there is capacity.

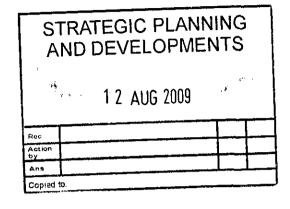
1954, poucy L7, para L7.3 d, suppore

Please continue on a separate sheet if required



By email and post: strategic.planning@trafford.gov.uk

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



United Utilities Property Solutions

Coniston Buildings Lingley Mere Business Park Lingley Green Avenue **Great Sankey** Warrington WA5 3UU

Telephone 01925 234000 www.unitedutilities.com

Direct line 01925 463 683 Direct fax 01925 464 069 andrew.leyssens@uuplc.co.uk

Your ref:

07 August 2009

Dear Sir / Madam

TRAFFORD CORE STRATEGY FURTHER CONSULTATION REPORT JUNE 2009

In respect of the above-mentioned document, United Utilities Property Solutions (UUPS) wishes to make various comments. UUPS is the strategic property arm of United Utilities with responsibilities that include the promotion of alternative uses on surplus sites as well as estate management of operational assets. You may also receive comments from the operational business of United Utilities.



The Spatial Profile and Key Issues and Place Objectives for Urmston

Within Section 2 of the consultation document there are various spatial profiles and key blectives issues and place objectives for areas within Trafford. In Urmston, UUPS wishes to support the reference to Davyhulme Wastewater Treatment Works. Support is offered for the need to determine the future land requirements of the Davyhulme Wastewater Treatment Works and identify appropriate alternative uses for any surplus land.'



Spatial Strategy



Within Section 4 is the Spatial Strategy. Point 4 states:

'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.'

object .

UUPS requests further clarification on how this will be applied to applications for new housing development. It is unclear when applications for market housing will be acceptable in these locations. UUPS suggests that this point is sufficiently flexible to allow the delivery of general market housing in sustainable locations so that all urban areas of the borough can contribute to the delivery of the housing required. It will be important to have this flexibility if it is demonstrated that the annual average dwelling requirement (as required by the North West of England Plan Regional Spatial Strategy to 2021 and the growth point status of Trafford) is not being met.







Policy L1 Land for New Homes

o bject

The sequential approach to the release of land for housing in L1.6 requires flexibility so that a هراء عمرة balance can be struck between the delivery of the housing requirements and the sequential priorities of the borough. The policy should include provision for flexibility when the minimum housing numbers are not being delivered. The application of this policy and the need for flexibility to deliver the housing numbers should be informed by regular liaison with the house building industry. The need for liaison with the house building industry should be reflected in Para 6,13 paragraph 6.13.

bolich M

L5.3

object

Policy L5 Climate Change

147-Poucy LS .

Para (122) Policy L5 Climate Change sets out various requirements for developers in respect of managing climate change. Whilst supporting the principle behind this policy, UUPS is concerned that the requirements are onerous on the developer and suggests that the whole policy is subject to a test of achievability. UUPS is concerned at:

Polcy

the requirement for all new housing developments to achieve Level 6 of the Code for Sustainable Homes by 2016; and

Para L5 8 Object

the measures which are sequentially required by L5.8.

The application of the climate change policy should be considered in close consultation with the development industry so that the delivery of development to meet the needs of Trafford is not compromised.

object.

UUPS also questions whether the policy duplicates the requirements of existing and future planned revisions to building regulations resulting in an overly complex development plan policy.



Policy R5 Open Space and Recreation

25 para Within paragraph 21.5, UUPS objects to the identification of Altrincham Sewage Works as an opportunity for a new area of open space. This is a strategic operational site and any land at strategic sites may be required for future capital investment. It is inappropriate to suggest that such strategic infrastructure has the potential to contribute to open space requirements. The reference to the site should be deleted.

object

21.5

If you have any queries regarding these comments, please do not hesitate to contact me on 01925 463 683.

Yours faithfully

Andrew Leyssens Senior Planner **United Utilities Property Solutions**



4 South Park Court Hobson Street Macclesfield Cheshire SK11 8BS T: 01625 433881 F: 01625 511457

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Representations to Trafford Council Local Development Framework

DPD1: CORE STRATEGY: FURTHER CONSULTATION ON THE PREFERRED OPTION

EPP reference: Reps4-DPD1-7393-ct

August 2009

CON	NTENTS:		
1.	INTRODUCTION	1	
2.	POLICY CONTEXT	1	
3.	RESPONSE TO CORE STRATEGY	4	

1. INTRODUCTION

- 1.1 These representations are 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 follow on from our representations to the Core Strategy Issues and Options Paper made in September and November 2007 and our representations to the Core Strategy Preferred Options made in August 2008.

2. POLICY CONTEXT

2.1 Prior to setting out our response to the Core Strategy Preferred Option, we summarise the relevant national planning guidance in respect of housing and the relevant RSS policies in respect of development in Trafford. These policies are relevant to our consideration of the Core Strategy.

National planning guidance

PPS3: Housing (2006)

- 2.2 PPS3 sets out national planning policy on housing. Key points arising from PPS3 are:
 - The key objectives for national planning policy on housing include:
 - High quality and well-designed housing.
 - A mix of housing, both market and affordable, to support a wide variety of households in all areas.
 - A sufficient quantity of housing taking into account need and demand and seeking to improve choice.
 - Housing in suitable locations which offers a good range of community facilities and good access to jobs, key services and infrastructure.
 - A flexible and responsive supply of land, managed in a way to make efficient and effective use of land, including re-use of previously developed land (paragraph 10).
 - There should be a sufficiently full range of high quality market housing addressing any shortfalls (paragraph 25).
 - A key objective should be making effective use of land by re-using land that has been previously developed (paragraph 40).
 - Local planning authorities must identify and maintain a 5 year rolling supply of 'deliverable land' for housing. When no such supply can be demonstrated, they

- should consider favourably planning applications for housing having regard to the considerations in PPS3 (paragraphs 7, 54 and 71).
- In addition to the 5 year supply, local planning authorities should identify a further supply of 'developable' sites for years 6 to 10 and where possible, years 11-15 (paragraph 55).
- In order to be deliverable, sites must be:
 - (a) available now.
 - (b) suitable now and contribute to the creation of sustainable mixed communities.
 - (c) be achievable there should be a reasonable prospect that housing will be delivered within five years (paragraph 54).
- To be considered 'developable' a site must be in a suitable location for housing with a reasonable prospect that the site is available and could be developed at the point envisaged (paragraph 56).

Regional Spatial Strategy (2008)

- 2.3 The RSS was adopted in October 2008.
- 2.4 The RSS states at paragraph 1.6 that it is to be read 'as a whole'. The core principles underpinning the RSS are set out in policies DP1 to DP9. These include seeking to promote sustainable communities where people want to live and work (Policy DP2).
- 2.5 Policy DP4 on making the best use of existing resources and infrastructure clarifies that the sequential approach to development should first, use existing buildings and previously developed land within settlements.
- 2.6 The explanatory text to the policy clarifies that using land that has been previously developed and lies within settlements, is required for all forms of development across the region (paragraph 4.5).
- 2.7 Policy RDF1 Spatial Priorities, identifies Altrincham specifically as a priority for development after the regional centres of Manchester and Liverpool and the inner areas surrounding them. Altrincham is the only town within Trafford which is specifically identified under this policy. It suggests that, as far as possible, growth should be focussed in the inner areas and centres of such locations. Development elsewhere may be acceptable is it satisfies other policies notably DP1 to DP9.
- 2.8 As Policy RDF1 is identified as the 'cornerstone' of the RSS (paragraph 5.1) the housing policies in the RSS are to be read together with RDF1 whose approach they amplify.

- 2.9 Policy L4 requires the local planning authority to monitor and manage the availability of land in order to achieve the 578 new dwellings net, required per annum in Trafford over the period 2003-2021. This is a significant increase on the level previously indicated in the adopted RPG/RSS. Furthermore, the RSS clarifies that the requirement is not to be considered as a ceiling and can be exceeded according to the supporting text by evidence of need, demand, affordability, sustainability issues and fit with local and sub-regional strategies (paragraph 7.19).
- 2.10 In particular a sequential approach should be taken, prioritising the use of previously developed land in accordance with Policy DP4.
- In the case of South Manchester, except in that part of Trafford lying within or adjacent to Manchester regional centre, monitoring and managing of housing provision will be necessary to ensure that new housing development does not result in an adverse cumulative impact on local and neighbouring housing markets. Provision should focus on meeting local and affordable housing needs and any general market housing should support local regeneration strategies. Local housing needs are explained in the glossary as applying where people choose or need to live in a particular location and accommodation is not available to them.
- 2.12 Policy MCR3 specifically relates to the southern part of the Manchester city region. The explanatory text to the policy (paragraph 10.10) clarifies that the southern area of the Manchester city region comprises Stockport, Congleton, Macclesfield and those parts of Trafford and the southern areas of Manchester City which are not in the regional centre or surrounding areas.
- 2.13 Policy MCR3 provides that plans and strategies in the southern part of the City Region should sustain and promote economic prosperity consistent with the environmental character of the area and the creation of attractive and sustainable communities by, along with other considerations, allow residential development to support local regeneration strategies and meet identified local needs in sustainable locations which are well served by public transport.

RESPONSE TO CORE STRATEGY 3.

3.1 We do not comment on every section of the Core Strategy Preferred Option. Our Updated lath representations are set out below with reference to the chapter, page or paragraph numbering of the Core Strategy Preferred Option document.

Part A

3.2

Chapter 2. Trafford: A place to live, work, learn and relax

Chapter 2 provides a spatial portrait of Trafford.

- Figure 2 identifies the places in Trafford. The identification of Altrincham town centre as a 3.3 main town centre is supported.
- 3.4 Page 16 sets out the spatial profile and the key issues affecting Altrincham. It is noted that Bowdon, Hale and Hale Barns are considered under the heading of Altrincham. It is assumed therefore that the subsequent references to Altrincham within the document also encompass Bowdon, Hale and Hale Barns. This should be clarified.

Part B

Chapter 3. The vision for Trafford

3.5 The general strategic objectives set out in Chapter 3 are supported.

Part C

Chapter 4. Spatial Strategy

- 3.6 The spatial strategy sets out the priority for new economic and housing growth.
- 3.7 The first priority for growth is within the Regional Centre and the Inner Areas surrounding it. We support this on the basis that RDF 1 identifies the Regional Centre of Manchester and the Inner Areas surrounding it as the first and second priorities for growth on a regional level.

The second priority for growth is the remaining regeneration areas in Trafford and Altrincham town centre. The identification of Altrincham town centre as a second priority is strongly supported. We consider however, that this should extend beyond Altrincham town centre to Altrincham as a whole to ensure the policy accords with RDF1 of the RSS. Policy RDF1 refers to the town of Altrincham and states that development should be focussed in and around the centres of the towns and cities. It also considers that development elsewhere within these towns and cities would be acceptable.

Reps4-7393-CT-ct

August 2009

Page 4 of 8

deve
3.9 Para
area
3.10 The

Policy RDF1 refers to the town of Altrincham and states that development should be focussed <u>in and around</u> the centres of the towns and cities. It also considers that development elsewhere within these towns and cities would be acceptable.

Paragraph 2 of the Spatial Strategy policy should read "The second priority will be the areas in and around Altrincham Town Centre..."

The wording of the third and fourth priorities is supported. In particular the fourth priority is considered to accord with Policy MCR3 of the RSS. The amendments that have been made to this approach are supported.

Chapter 6. Land for New Homes

3.11 Policy L1 relates to land for new homes.

<u>Scale</u>

The general principles of section L1.2 and L1.3 in Policy L1 are supported. It is not clear why the plan period extends from 2008 to 2026. Clarification should be provided on this.

It is also not clear why the annual requirement from 2008 to 2011 is less than the RSS annual requirement when this period is within the Housing Growth Point timeframe. It is considered that this should be adjusted to allow more dwellings to be brought forward in the early stages of the plan period.

Notwithstanding the above, the wording of this part of the policy could be more simply explained as follows:

"Between 2008 and 2026 the Council will seek to deliver high quality housing in line with RSS Policy L4 and the spatial distribution framework set by RSS Policies MCR1, MCR2 and MCR3 by:

- (a) Releasing sufficient land to accommodate a minimum of 11,800 new dwellings net of clearance between 2008 and 2026. This includes an uplift of 20% on the RSS Policy L4 minimum (578) from 2008 to 2018 to accommodate the Housing Growth Point status.
- (b) Phasing the release of housing land to accommodate:
- 1,600 new dwellings between 2008/9 and 2010/11 (533 per annum)
- 4,000 new dwellings between 2011/12 and 2015/16 (800 per annum)
- 3,300 new dwellings between 2016/17 and 2020/21 (660 per annum)
- 2,900 new dwellings between 2021/22 and 2025/26 (580 per annum)

<u>Distribution</u>

3.15 L1.5 states that 'Table L1 demonstrates that a significant element (42%) will be concentrated within the Regional Centre and Inner Areas of the Borough in line with RSS."



3.12



3.16

It is considered that L1.5 should be deleted from the policy and included in the RSS does not make reference to any particular percentage of explanatory text. development that should be achieved in the Regional Centre and Inner Areas. The 42% is based solely on Table L1. Although many of the sites listed in Table L1 relate to allocations there is an element of the estimated housing supply that is based on windfall. There is therefore no guarantee that 42% would be achieved.

L1.6 sets out the priority for the use of land. The redevelopment of previously developed land in preference to greenfield land is supported. However, the wording of the proposed policy does not reflect the wording in Policy DP4 of the RSS. Guidance in PPS3 and the RSS encourage the re-use of previously developed land but there is no guidance to suggest that derelict, vacant or under-used land should be used as a priority over other previously developed land.

3.18

It is considered that L1.4 should be broken into 2 sections and worded as follows:

"Distribution

Priority should be given to developments in locations consistent with the Spatial Strategy set out in chapter 4.

Use of Existing Resources

To ensure that the indicative 80% target proportion of new housing provision to use previously developed land and buildings set out in RSS is achieved, development should accord with the following sequential approach:

- (a) First, using existing buildings (including conversion) and previously developed land.
- (b) Second, using other suitable infill opportunities within settlements, where compatible with other development plan policies.
- Third, the development of other land where this is well-located in relation to housing, jobs, other services and infrastructure and which complies with other policies in the development plan."

Chapter 8- Regeneration and reducing inequalities

Policy L3 relates to regeneration areas and inequalities. The identified areas have been recognised as in need of regeneration for a number of years.

3.20

3.19

The key issue in the regeneration areas is ensuring private investment that will provide investor confidence and encourage others to also invest in these areas. Investors and developers need encouragement to do this.

3.21 Our concern with Policy L3 is that it is too restrictive and will discourage developers from investing and developing in this area.

Reps4-7393-CT-ct

August 2009

Policy Object.

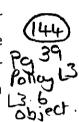
The policy sets out the council's support for the regeneration of the Old Trafford, Partington and Sale West area as a priority but then goes on to set a number of criteria which must be met for development to be acceptable.

Paragraph L3.2 of the policy is not precisely worded and is open to misinterpretation. It is also very restrictive of the types of development that will be allowed within the regeneration areas. For example the intention of the policy seems to be to restrict new development in Old Trafford to new housing, commercial, cultural and community facilities. This should be deleted from the policy.

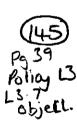
(143) 3.24 19 36 3.24 Policy Object

Paragraph L3.3 states that in 7 further locations, developers will be required to demonstrate how their proposal addresses and reduces inequalities. This is non-specific and it is not clear what is being asked of the developer in order to show that inequalities would be reduced by a proposed development. Further information should be set out either within the policy or the explanatory text.

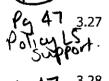
3.25 L3.6 states that where a development proposal outside an identified regeneration area would be required to provide facilities that would also be of significant benefit to one or more of the identified regeneration areas, this would be a material consideration in the determination of the application. The purpose and intention of this paragraph is not clear and it is not clear to what circumstances it relates. Furthermore, there is no explanation of what is considered to be a 'significant benefit'.



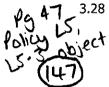
3.26 The policy states that it is the intention to prepare supplementary planning documents and development briefs for each of the identified areas. In the absence of these development briefs, it would be very difficult to show how these criteria can be achieved. It is considered that the information in L3.7 would be more appropriately set out in supplementary planning documents once these have been prepared.



Chapter 10 - Climate Change



Policy L5 is generally supported. The requirements for the use of renewable energy are consistent with the supplement to PPS1 and the RSS.



In respect of L5.3, it is considered that the words 'until a higher national standard is required' are unnecessary. If a higher national standard is introduced this would be a material consideration in its own right. There is no need to pre-empt future guidance in the policy.



We would recommend that L5.7 clarifies the level of carbon reduction that is to be achieved. It is considered that a further sentence should be added to L5.7 to state 'The energy statement should demonstrate how 10% of the predicted energy requirements would be from decentralised and renewable or low carbon sources unless it can be

es unless it can be

demonstrated by the applicant that this is not feasible or viable'. This accords with policy in the RSS.

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 way you would like us to achieve over the next 15 years in refford

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We	want to know if these	are	Wh
offo	rd		

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
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SO6					
SO7					
SO8					

Would you	like to	add any	further	comments?
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PRIGRITIES HAVE TO BE

REGENERATION FIRST THEN INEW DEVELOPMENTS LATER.

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	V				
SS3 - Stretford Meadows			V		
SS4 - Partington Canalside					
SS5 - Altair					

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

Would you like to add any further comments?		
	<u>-</u>	

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
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Work Policies					
Relax Policies	V				

Would you like to add any further comments?				
	<u></u>	<u> </u>	_	, <u>. </u>

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.

Polisola Imperior

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

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Core Strategy summ			Paragraph	number		18.10	
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Please continue on a separate sheet if required

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Core Strategy: Further consultation on the Preferred Option	/	Page number	76-78			
Core Strategy summary broadsheet		Paragraph number	3 <u>0</u>			
Sustainability Appraisal		Policy number	R4			
Equality Impact Assessment		Vision reference				
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	7	Spatial Strategy reference				
		Strategic Location reference				
		Strategic Site reference				
		Table/Figure reference				
		Other (including omissions and suggestions for alternative approaches)				

Do you support, oppose or	have general comments about the	is specific part of the document?	
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of waterd be	t also as a cont	ribuxanto the nation's l	food suppl

Please continue on a separate sheet if required

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Support	Object	General Comment
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on this specific part of the document. Please include suggestions as to how you think we can improve he document.

This should read, "land in warborton (south of Partington) as it does an page 76. R + .6, as this land is in warborton and this should be recognised as such.

Please continue on a separate sheet if required

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Core Strategy summar		Paragraph	number		L- 1.6	
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Core Strategy: Further consultation on the Preferred Option	Page number	121
Core Strategy summary broadsheet	Paragraph number	25
Sustainability Appraisal	Policy number	
Equality Impact Assessment	Vision reference	
her document, (please specify)	Strategic Objective reference	
	Spatial Strategy reference	
	Strategic Location reference	
	Strategic Site reference	554
	Table/Figure reference	
	Other (including omissions and suggestions for alternative approaches)	

Support	Object	General Comment

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

We note that phase I of the redevelopment of the shopping centre in Partington has to be completed by the time the first 250 houses of Partington canalside are completed. This is important. We also feel that phase 2 should be tied into the planning agreements more closely so that the developers don't walk away at he end leaving the retail centre redevelopment incamplete.

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.

..... Sale Waterside Display

1140

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			-	V	
SO2			/		
SO3		-	/		
SO4			V	<u>-</u>	
SO5					
SO6		√			
S07					
SO8		V			

Would you	like to add	any further	comments'
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Encourage families to share

(10)

houses or use glats and avoiding owning too large a home / more than one - it'll be easier to get houses & more

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		\checkmark			
Meadows					
SS4 -				1	
Partington			Wer	\checkmark	
Canalside			, ,		
SS5 -					
Altair					

Sale Waterside Display

Would you like to add any further comments?

Only let new independent / ethical open - No new

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))					2
Wharfside (SL2)		,	V		
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Thefford Park Gore *(SL5)			V		
Altrincham Town Centre (SL13)				/	
Carrington (SL8)			1		
Partington (SL9)				/	
Sale West (SL10)			\checkmark		
Sale Town Centre (SL11)					
Stretford Crossroads (SL7)			/		
Trafford Centre Rectangle (SL6)			Str.	/	
Woodfield Road (SL12)					

I do not like the bigger River Island in AlthirCham - they are a very unethical company.

Would you like to add any further comments?

Make ren buildings sustainable to gight waste + climate change

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
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Relax Policies					

Would you like to add any further comments?	Replace	supermarkets with	(193
independent shops! There's no gree	· · · · · · · · · · · · · · · · · · ·		- -

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.

Harrison, David

From:

Williams, Alex

Sent:

05 July 2009 15:34

To:

Strategic Planning

Subject: Comments on Trafford Core Strategy

I would like to make the following comments on the Trafford Core Strategy:

SSS, Strategisto Plapasal Support Pa 119 (102) 1

I agree that the Altair scheme is a key redevelopment scheme and is in the ward that I represent. Key strong to this redevelopment will be the provision of a permanent ice rink which is in line with our aspirations to keep an ice rink facility in Altrincham. The provision of increased car parking is also integral to boosting the local economy in Altrincham.

I am also delighted by the proposals for Stretford Meadows which will turn a former landfill site into a recreational, 'green' area.

I would highlight Lancashire Cricket Club, Trafford Park Core and Wharfside areas as key to promote (our status as the major sporting and economically active borough in the sub region.

 The continued development of Altrincham town centre is also vital as the largest town centre in the Borough and a key destination for those that live outside of the Borough in addition to visitors across Trafford.
 Pall3, SLI3, General Comment.

tat SL2 SL4, SLS General Common

Regards

Alex Williams

Cllr Alex Williams
Deputy Leader of the Council
Executive Member for Transformation and Resources
Conservative Councillor for Altrincham Ward
Tel: 07776 474655

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

Comment Form – June 2009 A PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:

strategic.planning@trafford.gov.uk

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What are you commenting on?						
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.						
Document		Section				
Core Strategy: Further consultation on the Preferred Option	Yes	Page number	61			
Core Strategy summary broadsheet		Paragraph number	14.5			
Sustainability Appraisal	·	Policy number	W1			
Equality Impact Assessment		Vision reference				
Other document, (please specify)		Strategic Objective reference				
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		suggestions for alternative				
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Do you support, oppose or have general comments about this specific part of the document?					
Support	Yes	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.

If I have understood this document correctly. I would support the Council's now not needing to retain the historic UDP allocation for a high amenity employment site at Davenport Green.

I would add that I find it odd, some 20 years' after the release of this land from the Green Belt was first contemplated and recommended and "experts" then flown in from halfway round the World at considerable Council Tax payer expense, on behalf of the Council, in a Public Inquiry, to support the view that, "the region needs a truly exceptional site that will offset some of the disadvantages of the North West", that it is now accepted that this is no longer necessary.

I am relieved to learn from para 20.9 of the Core Strategy, that, "for the avoidance of doubt the land identified within the Adopted Trafford UDP, for a Major High Amenity employment site, at Davenport Green will Pg 77, Para 20.9, Support be retained within the Green Belt in accordance with Policy W1 of this Plan."

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.

Harrison, David

From:

Smith, Dennis

Sent:

29 July 2009 18:32

To:

Harrison, David

Cc:

Young, Michael

Subject: FW: DPD 1 - CORE STRATEGY

David.

Please register these comments as representations to the Core Strategy and ensure they are brought to the attention of the LDF team.

Dennis

From: Young, Michael Sent: 29 July 2009 16:53

To: Smith, Dennis

Subject: DPD 1 - CORE STRATEGY

Dear Dennis.

I have read the Core Strategy several times and have some comments on it. They are:

L1.3. I am concerned that too much conversion/sub division will alter the characters of some areas, there is already too much of this in Bowdon, or in other areas give rise to tenements rather than high quality housing which is our aim. I think there should be control over such use.

L1.6. Whilst I agree brown field sites should be used we do not want any more large gardens of old Koling properties turned into high density housing, this has already blighted parts of the Borough. This should be ρ_c strictly limited as an exception rather than a rule.

L4.5/L4.13. There is a need for adequate parking at the main Metro Stations in the South of the Borough to allow people, including those from outside the Borough, to park whilst commuting into the Regional Centre. At the moment from Brooklands South there are problems caused by commuters parking all day and denying the residents and shoppers parking spaces.

L5. There should be a requirement for a minimum amount of recycled material to be used in new construction, the range 25 - 30% is reasonable and should also reduce costs. A policy based on this will demonstrate we are serious about climate change and recycling.

L8.2/L8.3. Trafford has a shortage of Primary school places, in which whilst worst in the South will over the next few years spread all over the Borough. We should include provision of schools as part of the planning obligations. A quick count of SL 1, 2, 3 and 6 comes to about 4,500 additional units, which will result in many more children to be educated.

R1.3. We should try and include a policy more specifically to allow improvements to conservation areas. For example the Linotype Estate does need works to improve the external appearance and really make it look like a conservation area. This could be another area from funds from planning gains, such as SL12. Police (1)

SS3. Part of this land is currently owned by GMWDA as a closed landfill site which may need special consideration. 553, Pg 119, Object Const. 1

Yours.

Michael Young

