

Resp Name	Organisation	Resp No.	Agent	Agent Resp No.	Rep No.	Question No. (if applicable)	Summary of rep	Test of soundness	Council response	Modification	Minor or Main
Charlotte Sargeant	N/A	410	N/A	N/A	1	6. Is the CQ AAP positively prepared?	No				
Charlotte Sargeant	N/A	410	N/A	N/A	2	7. Is the CQ AAP justified?	No				
Charlotte Sargeant	N/A	410	N/A	N/A	3	8. Is the CQ AAP effective?	No				
Charlotte Sargeant	N/A	410	N/A	N/A	4	9. Is the CQ AAP consistent with national policy?	No				
Charlotte Sargeant	N/A	410	N/A	N/A	5	10. Thinking about the tests of soundness, do you consider the CQ AAP to be sound?	Unsound				
Charlotte Sargeant	N/A	410	N/A	N/A	6	General comment	This is not a questionnaire for residents. It is too technical for the locals. No questions about the plans themselves for residents. It seems there is no way for residents to participate.		The document is a development plan document and thus follows a particular prescribed format. The document has been widely advertised and has been subject to various stages of consultation.	No	
Charlotte Sargeant	N/A	410	N/A	N/A	7	General comment	The type face on AAP is too small and faint for most people and this is probably deliberate so that people cannot make sound comments.		An 'accessible' version of the document is available on the Council's website (for people who use assistive technology). The electronic version on the Council's website allows the reader to increase the size of the text.	No	
Charlotte Sargeant	N/A	410	N/A	N/A	8	General comment	Make a smaller document and send to residents to read and comment on. Go house to house to talk to residents of Hornby Road and Barlow Road.		The document has been widely advertised and has been subject to various stages of consultation. House to house visits are not standard practice.	No	
Charlotte Sargeant	N/A	410	N/A	N/A	9	General comment	Do not want Hornby Road to be a processional route or the road opening at the other end as it is a cul de sac.		Hornby Road was never intended to be part of the Processional Route but rather to enable further pedestrian connectivity as part of a wider linkage. The Improved Permeability and Greenspace Plan, which forms part of Policy CQ1 (as a key parameter plan), does show a connecting route from Hornby Road through to the Tesco store, which is not currently available. It is accepted that this should be removed. However, the route is also shown on some other illustrative diagrams (for example, in the Neighbourhood guidance in Appendix 1). Given the status of these plans, and in acknowledging the underlying objectives of the CQAAP in seeking to improve permeability, it is not proposed to make further alterations beyond the parameter plan.	Yes	Main modification as part of wider Policy CQ1 changes
Charlotte Sargeant	N/A	410	N/A	N/A	10	General comment	The document does not say what is proposed for Hornby Road and Barlow Road.		The document is not intended to confirm the position in respect of individual streets. With the exception of the parameter plans forming part of Policy CQ1, the remaining plans and illustrations are indicative only and Policy CQ1 is clear on this. The parameter plan which shows Hornby Road being altered to a pedestrian through route will be amended.	Yes	Main modification as part of wider Policy CQ1 changes
Charlotte Sargeant	N/A	410	N/A	N/A	9	17. Do you consider the CQ AAP to have met/not met the requirement of the Duty to Cooperate in accordance with Section 110 of the Localism Act 2011 and Section 33A of the Planning and Compulsory Purchase Act 2004?	Not met		Noted	No	
Charlotte Sargeant	N/A	410	N/A	N/A	11	19. Independent Examination – Duty to Cooperate. In regards to the Duty to Cooperate, do you consider it necessary to participate in the Examination in Public?	No		Noted	No	
Charlotte Sargeant	N/A	410	N/A	N/A	12	21. With reference to the updates to the Integrated Assessment process, do you consider the assessment undertaken to be adequate?	No		Noted	No	
Charlotte Sargeant	N/A	410	N/A	N/A	13	General comment	Everything has changed since Covid and office space is no longer needed.		The amount of office space anticipated within the Regulation 19 version of the CQAAP has reduced relative to earlier versions. The evidence base (Commercial Demand Analysis) was updated in November 2020 to take account of the impacts of the COVID-19 pandemic.	No	
Charlotte Sargeant	N/A	413	N/A	N/A	14	General comment	What does the green arrow going up Hornby Road mean? Does it mean to open the road at one end for pedestrians?		A key premise of the CQAAP is to improve pedestrian permeability and connectivity. However, with the exception of the parameter plans forming part of Policy CQ1, the remaining plans and illustrations are indicative only and Policy CQ1 is clear on this. The parameter plan which shows Hornby Road being altered to a pedestrian through route will be amended.	Yes	Main modification as part of wider Policy CQ1 changes
Charlotte Sargeant	N/A	414	N/A	N/A	15	General comment	Tidying up the area and demolishing certain buildings would improve the area.		Noted		
Charlotte Sargeant	N/A	415	N/A	N/A	16	General comment	It is a disgrace that Barlow Road has not been resurfaced for about 20 years. Proposed improvements are for the experience of match days and not for the residents.		The premise of the CQAAP is to deliver wholesale change to the benefit of all residents and visitors to the area. The document refers to street improvements on Barlow Road and Hornby Road.	No	
Charlotte Sargeant	N/A	417	N/A	N/A	17	General comment	Big sporting events cause a headache for residents. The roads don't get closed and everyone arrives in an Uber. Marathons mean not being able to get out for hours and there is no offer of alternative parking on those days.		A key purpose of the CQAAP is to deliver physical and functional change to the way the area operates, including through improved connectivity and movement. For example, the intention is to discourage Talbot Road as a vehicular route. This could have some positive impact on such concerns.	No	
Charlotte Sargeant	N/A	417	N/A	N/A	18	General comment	Support is given to making the place nicer and creating new green spaces.		Noted	No	
Charlotte Sargeant	N/A	417	N/A	N/A	19	General comment	No to tall buildings.		In accordance with the evidence base and when having regard to the locational characteristics of the Civic Quarter, it has been concluded that high density development in certain areas is appropriate (which could include tall buildings). Some locations have been identified as being able to accommodate higher rise development than others. This would be confirmed through the development management process.	No	
Charlotte Sargeant	N/A	417	N/A	N/A	20	General comment	The green arrow/line reflecting aspirations to facilitate better pedestrian movement and connectivity will increase crime and litter from visitors and make it harder for resident to access their road.		A key purpose of the CQAAP is to deliver physical and functional change to the way the area operates, including through improved connectivity and movement. Matters such as crime and litter will need to be appropriately managed, and the planning process would seek to minimise such impacts as much as possible.	No	
Denice Bowler	N/A	578	N/A	N/A	1	6. Is the CQ AAP positively prepared?	Yes		Noted	No	
Denice Bowler	N/A	578	N/A	N/A	2	7. Is the CQ AAP justified?	Yes		Noted	No	
Denice Bowler	N/A	578	N/A	N/A	3	8. Is the CQ AAP effective?	No		Noted	No	
Denice Bowler	N/A	578	N/A	N/A	4	9. Is the CQ AAP consistent with national policy?	No		Noted	No	
Denice Bowler	N/A	578	N/A	N/A	5	10. Thinking about the tests of soundness, do you consider the CQ AAP to be sound?	Unsound		Noted	No	
Denice Bowler	N/A	578	N/A	N/A	6	11. Based on the answer to the tests of soundness, please state clearly which page, policy, paragraph, plan or other content you are referring to in forming this view.	CQ AAP Content 1: NPPF 91 and 92 - there is little open space being created and it does not meet the needs of the existing population. More green space is required. Area will be over developed. CQ AAP CQ AAP		There is very limited public open space within the Civic Quarter at present, although there are several large open spaces beyond its boundary and in close proximity for residents' use. The vision for the Civic Quarter is based on high density development in an urban setting. However, some new green spaces are envisaged, including (potentially) a park in the location of the former Botanical Gardens, recreational space adjacent to a new school, a public square close to LCCC, and new open space at the eastern gateway and a separate neighbourhood play area. There are also a series of new green links intended throughout the Civic Quarter. Moreover, Policy CQ11 is intended to secure financial contributions from developers towards (amongst other requirements) enhancements/improvements to existing open space in the wider locality.	No	
Denice Bowler	N/A	578	N/A	N/A	7	11. Based on the answer to the tests of soundness, please state clearly which page, policy, paragraph, plan or other content you are referring to in forming this view.	Content 2: There is not any playgrounds or recreational space provided. The pandemic has shown the needs for more accessible open spaces.		There is very limited public open space within the Civic Quarter at present, although there are several large open spaces beyond its boundary and in close proximity for residents' use. The vision for the Civic Quarter is based on high density development in an urban setting. However, some new green spaces are envisaged, including (potentially) a park in the location of the former Botanical Gardens, recreational space adjacent to a new school, a public square close to LCCC, and new open space at the eastern gateway and a separate neighbourhood play area. There are also a series of new green links intended throughout the Civic Quarter. Moreover, Policy CQ11 is intended to secure financial contributions from developers towards (amongst other requirements) enhancements/improvements to existing open space in the wider locality.	No	
Denice Bowler	N/A	578	N/A	N/A	8	11. Based on the answer to the tests of soundness, please state clearly which page, policy, paragraph, plan or other content you are referring to in forming this view.	Content 3: All policy has been written pre pandemic and therefore is outdated. It does not consider the shift in working from home that is reducing the need for office space, the increasing need for wider footways/cycleways or the need to encourage walking and cycling for transport and recreation.		The amount of office space anticipated within the Regulation 19 version of the CQAAP has reduced relative to earlier versions. The evidence base (Commercial Demand Analysis) was updated in November 2020 to take account of the impacts of the COVID-19 pandemic. A cornerstone of the CQAAP is to provide improved pedestrian and cycle links, and several areas of new public open space are envisaged. Financial contributions would be required from developers to support the enhancement/improvement of existing open space.	No	
Denice Bowler	N/A	578	N/A	N/A	9	12. Please state why you consider the CQ AAP to be sound/unsound, including references to relevant legislation and policies. Please reference legislation and policies for each comment.	Explanation regarding Content 1: NPPF needs to be updated to reflect cultural change, reduced need to work in offices and greater demand for local open space and play areas. Not more need for leisure centres because they can be closed when waves of infection occur.		The amount of office space anticipated within the Regulation 19 version of the CQAAP has reduced relative to earlier versions. The evidence base (Commercial Demand Analysis) was updated in November 2020 to take account of the impacts of the COVID-19 pandemic. Several areas of new public open space are envisaged and financial contributions would be required from developers to support the enhancement/improvement of existing open space. The provision of a new/refurbished leisure centre for Stretford is a long-standing Council priority to meet residents' needs, and there is no evidence for a change in this position (other than a likely switch to refurbishment rather than new-build). Changes to the NPPF are beyond the scope of the CQAAP.	No	
Denice Bowler	N/A	578	N/A	N/A	10	13. Are you proposing modification(s) to make the CQ AAP sound or to strengthen its soundness?	Yes				
Denice Bowler	N/A	578	N/A	N/A	11	14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and evidence necessary to support/justify your suggested change. Please be as precise as possible.	Modification to Content 1: All private office blocks to provide public realm space which adds to the local character, open planned and accessible integrated with wellbeing routes where applicable.		This comment is agreed with in principle and would be secured as much as possible via the development management process.	No	
Denice Bowler	N/A	579	N/A	N/A	12	14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and evidence necessary to support/justify your suggested change. Please be as precise as possible.	Modification to Content 2: Creation of public play areas within the quadrant area.		The Quadrant is outwith the CQAAP boundary. Several areas of new public open space are envisaged within the Civic Quarter itself.	No	
Denice Bowler	N/A	580	N/A	N/A	13	14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and evidence necessary to support/justify your suggested change. Please be as precise as possible.	Modification to Content 3: Improving accessibility along the Well-being route for pedestrians and cyclists by prioritising footways and cycleways.		Policy CQ8 envisages the provision of a dedicated cycle lane along Talbot Road and multiple pedestrian crossing points.	No	
Denice Bowler	N/A	581	N/A	N/A	14	14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and evidence necessary to support/justify your suggested change. Please be as precise as possible.	Modification to Content 4: Improve the wellbeing route by increasing pedestrian cyclists crossing points including at the junction leading to White City to prioritise crossing for pedestrian and cyclists (outside the nursery building).		Policy CQ8 envisages the provision of a dedicated cycle lane along Talbot Road and multiple pedestrian crossing points. The identification of the Well-being route within the policy includes the Talbot Road/White City Way junction.	No	
Denice Bowler	N/A	581	N/A	N/A	15	14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and evidence necessary to support/justify your suggested change. Please be as precise as possible.	Modification to Content 5: Reduce traffic flow.		A key objective of the CQAAP is to downgrade key vehicular routes within the Civic Quarter, particularly to Talbot Road, to better accommodate cyclists and pedestrians. This could be achieved through the narrowing of carriageways and reducing vehicle speeds. Brian Statham Way would also be pedestrianised. An intended consequence of this would be a reduction in traffic.	No	
Denice Bowler	N/A	578	N/A	N/A	16	15. If your representation is proposing a modification(s), do you consider it necessary to participate in the Examination in Public?	No		Noted	No	
Denice Bowler	N/A	578	N/A	N/A	17	16. Reason for Attending the Examination – Soundness. Please note that participation in the Examination will be at the discretion of the appointed Inspector. If you wish to participate in the Examination, please outline why you consider this to be necessary.	None		Noted	No	
Denice Bowler	N/A	578	N/A	N/A	18	17. Do you consider the CQ AAP to have met/not met the requirement of the Duty to Cooperate in accordance with Section 110 of the Localism Act 2011 and Section 33A of the Planning and Compulsory Purchase Act 2004?	Met		Noted	No	
Denice Bowler	N/A	578	N/A	N/A	19	19. Independent Examination – Duty to Cooperate. In regards to the Duty to Cooperate, do you consider it necessary to participate in the Examination in Public?	No		Noted	No	
Denice Bowler	N/A	578	N/A	N/A	20	21. With reference to the updates to the Integrated Assessment process, do you consider the assessment undertaken to be adequate?	Yes		Noted	No	
Martin Smith	N/A	579	N/A	N/A	1	6. Is the CQ AAP positively prepared?	Yes		Noted	No	
Martin Smith	N/A	579	N/A	N/A	2	7. Is the CQ AAP justified?	Yes		Noted	No	
Martin Smith	N/A	579	N/A	N/A	3	8. Is the CQ AAP effective?	Yes		Noted	No	
Martin Smith	N/A	579	N/A	N/A	4	9. Is the CQ AAP consistent with national policy?	Yes		Noted	No	

Martin Smith	N/A	579	N/A	N/A	5	10. Thinking about the tests of soundness, do you consider the CQ AAP to be sound?	Sound		Noted	No	
Martin Smith	N/A	579	N/A	N/A	6	13 Are you proposing modification(s) to make the CQ AAP sound or to strengthen its soundness?	No		Noted	No	
Martin Smith	N/A	579	N/A	N/A	7	15 If your representation is proposing a modification(s), do you consider it necessary to participate in the Examination in Public?	No		Noted	No	
Martin Smith	N/A	579	N/A	N/A	8	23 Do you have any further comments regarding the CQ AAP	Do not mess with the A56. Capacity on this road needs to be increased.		The evidence base (Transport Assessment) acknowledges that some mitigation may be necessary along the route of the A56 Chester Road given that traffic levels in this location could increase. This could be considered further at the development management stage.	No	
Martin Smith	N/A	579	N/A	N/A	9	24 Do you have any further comments regarding the CQ AAP	Do not remove White City retail park, it is so useful.		The CQAAP does not propose to entirely remove the retail park. However, the document provides the basis for the retail park's redevelopment (either in full or in part) should the landowner wish to pursue this option. It should be commented that this is an out-of-centre retail park which is afforded no policy protection. The CQAAP envisages new retail/commercial/service provision on a localised scale to meet residents'/visitors' needs throughout the Civic Quarter. Following the Regulation 19 consultation, it is proposed to make a change to the land uses parameter plan to show a combination of retail and residential uses across the retail park. It is also intended to amend the document (within the vision for the Central Neighbourhood) to refer more explicitly to the prospect of some retail park remaining.	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
Neil Dymond-Green	N/A	580	N/A	N/A	1	6. Is the CQ AAP positively prepared?	Yes		Noted	No	
Neil Dymond-Green	N/A	580	N/A	N/A	2	7. Is the CQ AAP justified?	No		Noted	No	
Neil Dymond-Green	N/A	580	N/A	N/A	3	10. Thinking about the tests of soundness, do you consider the CQ AAP to be sound?	Unsound		Noted	No	
Neil Dymond-Green	N/A	580	N/A	N/A	4	23. Do you have any further comments regarding the CQ AAP	There is a lot to celebrate about the plans for the Civic Quarter		Noted	No	
Neil Dymond-Green	N/A	580	N/A	N/A	5	23. Do you have any further comments regarding the CQ AAP	Do not understand why the retail park is being removed, as it is a positive contribution to the wider area and there are few alternatives anywhere nearby for many of the businesses there.		The CQAAP does not propose to entirely remove the retail park. However, the document provides the basis for the retail park's redevelopment (either in full or in part) should the landowner wish to pursue this option. It should be commented that this is an out-of-centre retail park which is afforded no policy protection. The CQAAP envisages new retail/commercial/service provision on a localised scale to meet residents'/visitors' needs throughout the Civic Quarter. Following the Regulation 19 consultation, it is proposed to make a change to the land uses parameter plan to show a combination of retail and residential uses across the retail park. It is also intended to amend the document (within the vision for the Central Neighbourhood) to refer more explicitly to the prospect of some retail park remaining.	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
Abbas Ali	N/A	20	N/A	N/A	1	General comment	The plans for Stretford look great.		Noted	No	
Abbas Ali	N/A	20	N/A	N/A	2	General comment	Bike theft is widespread and discourages people from cycling because there is no security. A form of secure bike storage would be really helpful. The mobility scheme the Council run is manned. People could leave their bikes at an empty store with a person. The place could also provide related stuff like bike sales, accessories, maintenance classes, repairs, accessibility to bikes for those on low income.		The provision of secured and sheltered cycle parking within new developments would be pursued at development management stage. Some matters raised within this representation go beyond the scope of the CQAAP	No	
Charles Bainbridge	N/A	379	N/A	N/A	1	General comment	Would like to see more bars, cafés, restaurants and independent shops. It would make a lot of money for the local community. The area needs to be a destination for a weekend drink and food, not just for sporting events.		The document seeks to significantly enhance the attraction of the Civic Quarter as a visitor and leisure destination, and for it to accommodate a range of retail, commercial, leisure and service uses to lead to enhanced vibrancy. Following the Regulation 19 consultation it is proposed to amend the document, including within Policy CQ1, to make it clear that development will be supported which maximises the identity of the Civic Quarter as a visitor destination	Yes	Main modification as part of wider Policy CQ1 changes
Charles Bainbridge	N/A	379	N/A	N/A	2	General comment	Would like more green spaces. Car parks could be turned into green areas with a push on people using public transport. The open spaces could have water features.		The detail regarding the use, function and appearance of new open space would be secured as part of the development management process. The document seeks to remove existing surface-level car parking through redevelopment and with the potential for some open space use in such locations	No	
Charles Bainbridge	N/A	379	N/A	N/A	3	General comment	Looking forward to having a new leisure centre. Sauna/steam room facilities would be great.		Noted. The detail regarding the leisure centre would be secured through the development management process. Some matters raised within this representation go beyond the scope of the CQAAP	No	
Charles Bainbridge	N/A	379	N/A	N/A	4	General comment	Proposals for a new large hotel with a rooftop bar would be a great addition and attract tourists to stay in the areas. Getting lots of tourists would make the area thrive.		The document seeks to significantly enhance the attraction of the Civic Quarter as a visitor and leisure destination, and for it to accommodate a range of retail, commercial, leisure and service uses to lead to enhanced vibrancy. Policy CQ3 refers to hotels being appropriate uses within the Civic Quarter. Following the Regulation 19 consultation it is proposed to amend the document, including within Policy CQ1, to make it clear that development will be supported which maximises the identity of the Civic Quarter as a visitor destination.	Yes	Main modification as part of wider Policy CQ1 changes
Debbie Marshall	N/A	411	N/A	N/A	1	General comment	Concerned about the processional route from the cricket ground to the football ground. Question on how residents from Hornby Road and Barlow Road drive onto the streets.		The proposals for the Processional Route are not intended to prejudice the ability of residents on adjoining streets to access their property (including by private motor vehicle)	No	
Graham Cooper	N/A	396	N/A	N/A	1	General comment	Agree with all of the proposals.		Noted.	No	
Graham Cooper	N/A	396	N/A	N/A	2	General comment	There is a single reference to improving the experience of arriving at Old Trafford Metrolink stop but it is not in the relevant appendix. A large number of people arrive at Old Trafford Metrolink stop, they find it very basic and inhospitable and they do not know the direction to MUFC. The signage is not prominent. Improvements should include something very prominent like a triumphal arch with 'Welcome to Old Trafford' leading from the Metrolink stop to Brian Statham Way. Give the impression people are arriving somewhere important and welcoming.		The document acknowledges that the experience of arrival at the Old Trafford Metrolink stop is presently unremarkable and that there is an opportunity for this to be addressed. Policy CQ9 Processional Route refers to the intention to secure improved public realm at Old Trafford Metrolink stop, although the detail is not defined at this stage. It is accepted that the relevant Neighbourhood guidance should similarly contain this reference and the document is proposed to be changed accordingly.	Yes	Minor modification to supporting text/diagram
Joshua Montegrando	N/A	412	N/A	N/A	1	General comment	The area would greatly benefit from having the latest fibre optic broadband capabilities. At the moment, only subpar internet is available for residents and businesses here. Is this something that can be seriously considered and hopefully implemented? It would improve home working.		This request is beyond the scope and purpose of the CQAAP	No	
Nicola Carter	N/A	416	N/A	N/A	1	General comment	State of Charlton House, 687 Chester Road is a disgrace and has been repeatedly vandalised. The Council is responsible for the building. Confirm what will be done to clean up and secure the site.		It is intended that the CQAAP would facilitate investment in derelict/underused sites and buildings across the Civic Quarter, subject to the decisions of individual landowners. There is some prospect of this site being redeveloped. However, there is the potential for Compulsory Purchase Powers to be used, where justified.	No	
Nicola Carter	N/A	416	N/A	N/A	2	General comment	The number of new flats is not justified and the area already has problems for residents with access and poor quality roads. What will be done to ensure Montague Road is not blocked by parked cars given the excessive number of proposed flats and lack of parking proposed?		The CQAAP is a capacity-led document which envisages that up to 4,000 new homes could be accommodated in time. The Council's car parking standards would continue to be referred to in respect of individual planning applications and when having regard to site characteristics.	No	
Nicola Carter	N/A	416	N/A	N/A	3	General comment	Some very good plans but very poor on environmental issues. Lack of trees and green areas. In this regard, it has not been 'positively prepared' or consistent with national policy concerning the environment and air pollution.		The achievement of sustainable development is at the core of the CQAAP, consistent with the NPPF. Encouraging high density development in central, accessible and brownfield locations is a key premise of the CQAAP. In addition, the document contains a specific policy (CQ4) regarding sustainability and climate change. The policy sets out expectations in respect of sustainable construction, sustainable drainage, air quality, biodiversity and low emission vehicle technology, amongst other requirements. On the specific issue of green infrastructure, the document contains multiple commitments to securing the provision of new planting and landscaping. Some new open space is envisaged, along with securing financial contributions towards the improvement of existing open space in the wider area.	No	
Rupert Ward	N/A	418	N/A	N/A	1	General comment	Generally a very good plan. Traffic flow issues will be key to success.		Noted	No	
Rupert Ward	N/A	418	N/A	N/A	2	General comment	Supportive of policy to guide traffic around not through the area, but if this is to work there are key things to sort.		The traffic impacts of each development would be scrutinised as part of the development management process	No	
Rupert Ward	N/A	418	N/A	N/A	3	General comment	Lot of rush hour traffic flows on Trafford Wharf, White City Roundabout, White City Way, Talbot Road, Seymour Grove i.e. M602 to Chorlton. This can be diverted via Chester Road. Sort traffic lights and flow at White City Roundabout. Optimise prioritisation of Chester Road, Stretford Road, Seymour Grove. The traffic heading onto Bridgewater Way from Trafford Road and Wharfside Way blocks traffic travelling towards Chorlton via White City Way and travelling the other way the lights from Talbot Road onto White City Way do not optimise traffic flow. A multi-storey on the corner of the police station will cause more problems if traffic backs up onto the roundabout.		The highways implications of the proposals for the Civic Quarter as a whole have been reviewed at various stages by the local highway authority, Transport for Greater Manchester, and Highways England. No fundamental concerns have been raised by these parties, and the traffic impacts of each development would be scrutinised as part of the development management process. Indicative locations for new multi-storey car parks have been identified, and Policy CQ10 refers to focussing such provision at the periphery of the Civic Quarter (in order to draw traffic away from the heart of the Civic Quarter). Therefore, there is flexibility in their location and the suitability of particular sites would be confirmed at application stage.	No	
Rupert Ward	N/A	418	N/A	N/A	4	General comment	Traffic flow on Great Stone Road is terrible. Leisure Centre traffic from the Quadrant queues to go straight on because there is a queue of traffic that can't turn left onto Talbot Road because of traffic queues on Chester Road heading towards Stretford and the motorway. Look again at reorienting flow here.		The highways implications of the proposals for the Civic Quarter as a whole have been reviewed at various stages by the local highway authority, Transport for Greater Manchester, and Highways England. No fundamental concerns have been raised by these parties, and the traffic impacts of each development would be scrutinised as part of the development management process.	No	
Rupert Ward	N/A	418	N/A	N/A	5	General comment	Welcome refurbished Leisure Centre but multi-storey access will be hassle for families with young children. Provide more secure and sheltered bike parking. Think where NHS lorries should go. Make sure that leisure centre facilities are easy to access for those with families, the elderly, disabled etc. and carefully consider the role of parking and other ways of accessing these facilities to minimise barriers to use. Cycling from the Quadrant to the Leisure Centre is currently dangerous.		The detail surrounding proposals for a refurbished leisure centre and any potential new multi-storey car park in this location have yet to be confirmed, but would be carefully considered at the planning application stage. The CQAAP seeks to improve cycle infrastructure within the Civic Quarter and to deliver improved connections beyond.	No	
Rupert Ward	N/A	418	N/A	N/A	6	General comment	Think about how park and ride could help reduce traffic in the area. Trams should accommodate bicycles.		A park and ride facility has not been contemplated. The suggestion regarding trams is beyond the scope of the CQAAP.	No	
Rupert Ward	N/A	418	N/A	N/A	7	General comment	Pedestrianising from the Quays to LCC is an excellent idea.		Noted	No	
Rupert Ward	N/A	418	N/A	N/A	8	General comment	More outdoor sports facilities would be great.		Noted	No	
Rupert Ward	N/A	418	N/A	N/A	9	General comment	Trafford Bar needs a face lift. On match day there are no places to meet up. UA92, the college and residents can make this much better, so looking forward to seeing this developed.		Noted	No	
Will York	N/A	422	N/A	N/A	1	General comment	Support the plan in general and it meets the NPPF tests of soundness but there are opportunities for its soundness to be improved.		Noted	No	
Will York	N/A	422	N/A	N/A	2	General comment	Plan does not definitely say that segregated cycle ways will be kept/built. State categorically that Warwick Road and all the yellow routes on the map in section 2.4.1 must segregate cyclists from cars and pedestrians and prioritise cyclists at junctions to ensure development meets or exceeds national standards (LTN 1/20) and national policy ("Gear Change" Cycling and Walking Plan for England). Sections 4.3.1 and 4.3.10 of the Transport Assessment states that cycle infrastructure is 'excellent'. Existing cycling lanes along Talbot Road are poor or at best adequate. If local infrastructure is not widespread, does not exceed standards set out in LTN1/20, and does not embody the national policy set out in the Government's "Gear Change" Cycling and Walking Plan for England, then it cannot be considered 'excellent'.		The document, as part of Policy CQ8, refers to the provision of a dedicated cycle lane along Talbot Road (the Well-being route), and Policy CQ9 promotes improved conditions for pedestrian and cyclists along Warwick Road (the Processional Route)	No	
Will York	N/A	422	N/A	N/A	3	General comment	Section 8.4.2 of Transport Assessment sets pathetic targets for modal shift. The target of 10% does not align with the decarbonisation goals of Trafford Council, Greater Manchester, or the Government.		Noted. The CQAAP itself seeks to significantly improve cycle infrastructure	No	
Will York	N/A	422	N/A	N/A	4	General comment	Section 8.4.2 of Transport Assessment sets pathetic targets for modal shift. The target of 10% does not align with the decarbonisation goals of Trafford Council, Greater Manchester, or the Government.		Noted. The CQAAP has been prepared with the intention of encouraging modal shift through deprivatising car use, promoting public transport use as well as cycling and walking, and supporting a varied and sustainable mix of uses including residential and commercial uses to avoid the need to travel. The success of this objective will be measured over time.	No	
Will York	N/A	422	N/A	N/A	5	General comment	Section 4.5.1 of the Transport Assessment refers to 'shared off-road pedestrian/cycle provision' but this may not align with the Government's "Gear Change" Cycling and Walking Plan for England. Shared use pedestrian and cycle routes generally prove to be at best annoying, at worst dangerous, for both cyclists and pedestrians. When cyclists inevitably choose to use the road instead, this aggravates motorists.		The document, as part of Policy CQ8, makes some commitment to a dedicated cycle lane, but to plan for segregated provision (between cyclists and pedestrians) throughout the Civic Quarter may not be feasible	No	
Adam Johnson	Highways England	153	N/A	N/A	1	General comment	Highways England encourages engagement with it on plans as early as possible. Highways England are committed to working with plan-making bodies prior to and between formal consultation periods for the development of strong plans and proposals that take full account of highways issues.		Following the receipt of Highways England's representations at Regulation 19 stage, a separate approach was made to Highways England with a view to setting up a dedicated meeting to address issues raised. However, the response from Highways England was that it did not consider that a meeting was necessary and that Highways England was content for the CQAAP to progress as it stands. The response continued that the proposals for the Civic Quarter are within an urban area containing multiple sustainable transport links, and specifics regarding any potential traffic implications can be resolved through its involvement in the Places for Everyone assessment work (as well as at planning application stage, where required).	No	
Adam Johnson	Highways England	153	N/A	N/A	2	General comment	Concerns raised in previous consultation that the SRN had not been considered when determining potential traffic impacts of the site and whilst a significant proportion of trips generated would be via non-car modes, there was the potential for a significant number of new trips to access the SRN at M60 J7 or M602 J3. It was stated that further detail would be required to understand the potential number of vehicle trips which would enter or leave the SRN. This work was ongoing and it was recommended that Curtins share the results with Highways England. This was not supplied and Highways England are no nearer to understanding the impact on the M60 or M602.		See above	No	

Adam Johnson	Highways England	153	N/A	N/A	3	General comment	Alkins undertook a technical review of the latest Civic Quarter AAP consultation documents, which have been attached in full to this response. Based on their conclusions, Highways England's make the following comments and recommendations below.	See above	No	
Adam Johnson	Highways England	153	N/A	N/A	4	General comment	Although not directly adjacent to the SRN, the AAP area has direct connections to M60 Junction 7 (2.6km south-west via the A56 Chester Road), and to M602 Junction 3 (2km north via the A5063 Trafford Road).	See above	No	
Adam Johnson	Highways England	153	N/A	N/A	5	General comment	At M60 J7, there is moderate to high traffic demand during both the AM and PM peak hours, particularly on the exit slips from the SRN onto the A56 Chester Road in the AM peak.	See above	No	
Adam Johnson	Highways England	153	N/A	N/A	6	General comment	There are a number of development applications across Trafford, notably Carrington Village and Partington, which cumulatively are likely to have significant impacts on the SRN in this vicinity.	See above	No	
Adam Johnson	Highways England	153	N/A	N/A	7	General comment	At M602 J3, there is moderate to high traffic demand during the peak hours, with a tidal flow towards / away from Manchester City Centre during the respective peak period. It is noted that congestion on the A5063 Trafford Road during the PM peak from White City Roundabout to the M602 J3 is a regular occurrence.	See above	No	
Adam Johnson	Highways England	153	N/A	N/A	8	General comment	There are a number of development applications across the Salford Quays and MediaCityUK area that cumulatively are likely to have significant impacts on the SRN. Additionally, the A5063 is to undergo traffic calming along its length between the junction of A5063 / Broadway and A5063 / Exchange Quay, with the aim of reducing overall vehicle delay and increasing non-motorised infrastructure.	See above	No	
Adam Johnson	Highways England	153	N/A	N/A	9	General comment	Traffic Count Data – The traffic surveys were undertaken on a neutral day in May 2018. The peaks hours used are 08:00-09:00 and 17:00-18:00. However the raw data has not been supplied in the Transport Assessment (TA). Given the proximity of Old Trafford to Manchester City Centre, it could be the case that the peak hours are earlier than this. The peak hours should therefore be confirmed using the raw survey data.	See above	No	
Adam Johnson	Highways England	153	N/A	N/A	10	General comment	Traffic Growth – The traffic growth factors which have been derived from the Greater Manchester SATURN model appear to be robust in most cases. It is recommended that the 2030 morning peak factor for LGVs is increased, however this is unlikely to have a material impact on the model results. Confirmation is required in relation to the committed developments used in the forecast growth.	See above	No	
Adam Johnson	Highways England	153	N/A	N/A	11	General comment	Trip Rates and Generation – The adjustment factor for residential car trips results in just 16% of trips being by car in comparison to 51% from 2011 Census data. Despite the readily accessible sustainable modes in the vicinity, this seems quite low and further consideration may be required. The residential TRICS report showed the evening peak to be an hour later than the peak used in the assessment. For both residential and office, the TRICS report only contained developments which are much smaller in size than the proposed development. It is therefore a concern that the trip rates may not be representative. There has been no assessment of the redeveloped leisure facilities on trip generation, which should be clarified.	See above	No	
Adam Johnson	Highways England	153	N/A	N/A	12	General comment	Trip Distribution and Assignment – Although the comparison of the Do Minimum (DM) and Do Something (DS) shows a relatively low difference, the evening peak DS generates over 5 extra vehicles per minute which could have an impact if junctions are currently close to capacity. Traffic flow diagrams would be required to understand the number of vehicles heading to or from M60 J7 and M602 J3 as this is currently unclear. The total number of development trips in the morning peak hour is 987 and 936 in the evening peak hour. These numbers are relatively high and would likely have an impact on the SRN junctions. It is therefore crucial that the removal of existing trips is accurate to assess the true impact of the development on the surrounding network.	See above	No	
Adam Johnson	Highways England	153	N/A	N/A	13	General comment	Base Model – The Aimsun model does not extend to the SRN, therefore only local roads have been assessed. In the morning peak hour, the right turn from Bridgewater Way to Trafford Road has a GEH of over 10. This movement could have an impact on M602 J3 to the north. In the evening peak, another movement at the White City roundabout has a GEH over 10. As this junction links to Trafford Road and subsequently M602 J3, model validation is important in this location to determine possible impacts on the SRN. The TA identified that only 1 journey time route did not validate, however there is another route that potentially does not meet the criteria. Talbot Road northbound is 99 seconds too quick in the evening peak. If the model is too quick on this northbound route, there is potential to underestimate the impact on the M60 J7 to the south. It is suggested that the journey time validation is presented section by section as well as across the whole route.	See above	No	
Adam Johnson	Highways England	153	N/A	N/A	14	General comment	Forecast Model – The forecasting shows that the scheme causes some traffic to reassign from Talbot Road to the A56 Chester Road. Additionally, all journey time routes in both peaks significantly worsen with the scheme. As the assessment does not cover the SRN locations, the potential impact is unclear. To assess the impact on the SRN, the number of vehicles accessing the SRN as a result of the scheme should be made clear and, if necessary, a CD122 merge/diverge assessment should be completed. Depending on the increase seen at these junctions, detailed modelling may be required to assess the effects on capacity.	See above	No	
Adam Johnson	Highways England	153	N/A	N/A	15	General comment	It is acknowledged that a significant number of trips will be made using non-car methods, there is still insufficient evidence presented to enable Highways England to understand the full impact of the proposals on the SRN. Highways England would need to have an understanding of the impact further down the line at Planning Application stage. This may lead to additional pressure on individual developers when determining the forms of mitigation required for negating the traffic impact of their sites, however it is important to ensure that the safety of the SRN is not compromised, and the levels of additional traffic are minimised.	See above	No	
Melanie Lindsley	The Coal Authority	214	N/A	N/A	1	General comment	Records do not indicate that there are any recorded risks from coal mining legacy at surface or shallow depth within the Action Plan area. No specific comments to make in respect of the Trafford Civic Quarter Area Action Plan.	Noted		
N/A	Accrue (Forum) 1 LLP	275	WSP	389	1	General comment	Accrue Capital are the owners of the former B&Q on Great Stone Road and support the change in allocation from leisure to residential. The site is not suitable for a leisure centre or multi-storey car park. Accrue Capital welcome any dialogue with the Council regarding the redevelopment of the B&Q.	The B&Q site is shown, at Regulation 19 stage, for 'predominantly residential uses' on the land uses parameter plan and the relevant neighbourhood guidance refers to it as offering an opportunity for significant residential development. A different land use parameter plan is now proposed which incorporates a number of adjustments including the identification of the B&Q site for either 'residential or sport/leisure uses'. In addition, the neighbourhood guidance is proposed to change to refer to the B&Q site as offering potential for redevelopment subject to it not undermining the role, function and operation of LCC. This could include residential, sport/leisure uses or car parking, or any other use encouraged within the Civic Quarter.	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
N/A	Accrue (Forum) 1 LLP	275	WSP	389	2	General comment	Welcome the aim for 4,000 homes on brownfield land. Greater clarity and consistency needed as to where these homes will be viably and realistically delivered.	The CQAP is a capacity-led document which envisages that up to 4,000 new homes could be accommodated in time. Following the Regulation 19 consultation, it is proposed to amend Policy CQ2 to refer to 2,500 of the 4,000 homes being delivered in the plan period and the remainder after 2037.	Yes	Minor modification to Policy CQ2
N/A	Accrue (Forum) 1 LLP	275	WSP	389	3	General comment	The majority of the land identified for the 4,000 homes is in existing alternative uses, so bringing the B&Q site forward for 333 homes in the short term will help kickstart regeneration and improve the character of Great Stone Road.	The availability of the B&Q site is noted. The CQAP seeks to deliver an improved physical environment for Great Stone Road	No	
N/A	Accrue (Forum) 1 LLP	275	WSP	389	4	6. Is the CQ AAP positively prepared?	The phasing of development has not been presented and so it has not been demonstrated that the AAP can deliver the quantum of homes urgently needed to address the housing shortfall within the borough	The CQ AAP is a capacity-led document which envisages that up to 4,000 new homes could be accommodated in time. Following the Regulation 19 consultation, it is proposed to amend Policy CQ2 to refer to 2,500 of the 4,000 homes being delivered in the plan period and the remainder after 2037.	No	Minor modification to Policy CQ2
N/A	Accrue (Forum) 1 LLP	275	WSP	389	5	7. Is the CQ AAP justified?	The building height limitations are not grounded in evidence as alternative building heights and massing has not been assessed in the preparation of the AAP and the plan is unsound due to no assessment of alternatives to ensure justification based on evidence underpins the plan's policies.	The building heights parameter plan which forms part of Policy CQ1 identifies the locations where the tallest buildings may be appropriate when having regard to the findings of the Townscape and Visual Impact Assessment (evidence base). Policy CQ1 is clear that development proposals should accord with the parameter plans. Some adjustment to this parameter plan is proposed following the Regulation 19 consultation, including in respect of maximum building heights in certain locations (but not in the area of the former B&Q site). The development management process will provide an opportunity for the impact of tall buildings across the Civic Quarter to be assessed.	Yes	Main modification as part of wider Policy CQ1 changes
N/A	Accrue (Forum) 1 LLP	275	WSP	389	6	8. Is the CQ AAP effective?	The infrastructure sum proposed is not compliant with the Regulation 122 tests and will have a huge impact on the viability and deliverability of the AAP, as well as the housing supply and delivery across the borough, with consequential economic and social impacts.	On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focussed consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. It is noted that Accrue were represented at this event; no alternative inputs were provided and with a subsequent written representation observing that the viability assessment (evidence base) undertaken to support the CQAAP had taken account of the viability assessment submitted with the planning application for the redevelopment of the former B&Q site.	No	
N/A	Accrue (Forum) 1 LLP	275	WSP	389	7	General comment	Do not dispute that Stretford and Old Trafford need regeneration. Support much of the AAP but object to certain elements and shortfalls that will render the plan unsound.	Noted	No	
N/A	Accrue (Forum) 1 LLP	275	WSP	389	4	6. Is the CQ AAP positively prepared?	Support ambition to deliver 4,000 homes, though this should be confirmed as a minimum. Policy CQ2 (Housing) should specify the time period in which these homes will come forward. There are significant inconsistencies between the AAP and emerging Local Plan with regards to how the AAP will meet the area's objectively assessed needs. Draft Local Plan Policy HO1.6 states the CQ will provide around 2,700 dwellings rather than the 4,000 in the AAP. The AAP should be clear in how the area's objectively assessed needs will be met, AAP should set out a trajectory of allocated sites to demonstrate how at least 4,000 homes will be delivered. Crucial that Local Plan and AAP are consistent with each other. Object to the absence of any phasing or any allocation of homes. B&Q site can provide 333 new homes by 2024, based on the grant of planning permission in 2021. AAP and evidence base documents do not indicate the number of units apportioned for each site and so it is unclear how development will be phased and delivered. Nor has a residential appraisal of the B&Q redevelopment been undertaken. AAP should identify the following challenges: Failure to demonstrate five-year housing supply across the borough; Failure against the Housing Delivery Test (HDT) across the Borough and Measures in the HDT to deliver homes in strategic locations including the Lancashire Cricket Club Quarter. HDT Action Plan includes working with landowners on the AAP but this has been minimal. AAP risks failing to help problems of a land supply of less than three years and persistent failure to deliver the required number of new homes.	The CQ AAP is a capacity-led document which envisages that up to 4,000 new homes could be accommodated in time. It is specifically not consistent with the emerging Local Plan and its references to housing delivery within the Civic Quarter 'Area of Focus' since the Local Plan figure is based upon Borough-wide housing requirements over the period of the Local Plan. The two emerging development plan documents are complementary. Following the Regulation 19 consultation, it is proposed to amend Policy CQ2 to refer to 2,500 of the 4,000 homes being delivered in the plan period and the remainder after 2037.	Yes	Minor modification to Policy CQ2

N/A	Accrue (Forum) 1 LLP	275	WSP	389	5	7. Is the CQ AAP justified?	Building Heights Object to the building height parameters. They are not justified and could impact on the deliverability of the AAP. Disagree with the TVA (5.15) that a six storey limit to the B&Q redevelopment is due to sensitivities to neighbouring homes. TVA only tests the Council's assumptions and does not consider a range of buildings heights, therefore no evidence to justify proposed building height parameters. B&Q site can accommodate buildings taller than six storeys without impact on residential amenity, heritage assets or local character but this has not been tested. Acceptability of taller buildings heights at the B&Q site has been demonstrated for planning application for 333 homes. Documents associated with the application are provided in Appendices A-C. The Places Matter Design Panel did not agree with limit to six storey building height. Townscape and Visual Assessment (TVA) only assesses the approach set out in the AAP and does not assess any other options including alternative development heights or massing. This means the AAP should not prescribe maximum building heights. Disagree with much of paragraph 4.23 of the TVA. Old Trafford cricket ground is not unique. Event days at the cricket ground are less common than non-event days. The public spaces are the highways and the remainder of the areas is either LCCC land, B&Q site or other private land. Heritage Statement - Agree with the list of heritage assets and welcome clarification that the non-designated asset within the cricket club is the pavilion rather than the whole ground. Agree views of the pavilion are limited to within the ground and also that from Talbot Road the historic building is no longer recognisable. Gateway Opportunities - Question why no 'gateway opportunities' have	The building heights parameter plan which forms part of Policy CQ1 identifies the locations where the tallest buildings may be appropriate when having regard to the findings of the Townscape and Visual Impact Assessment (evidence base). Policy CQ1 is clear that development proposals should accord with the parameter plans. Some adjustment to this parameter plan is proposed following the Regulation 19 consultation, including in respect of maximum building heights in certain locations (but not in the area of the former B&Q site). The development management process will provide an opportunity for the impact of tall buildings across the Civic Quarter to be assessed. It is maintained that LCCC is an important attraction within the Civic Quarter which has the potential to lead major regeneration. A number of gateway opportunities have been identified across the Civic Quarter, and with some adjustment to these locations proposed following the Regulation 19 consultation (now identified as gateway locations). However, this location (the B&Q site) is not considered to provide such scope. Even in the case of the identified gateway locations, it should be noted that this does not amount to acceptance of a tall building. The design requirements for new developments conveyed within the COAAPs design code are based on sound design principles which are being simultaneously pursued in the emerging Trafford Design Guide and should continue to be aspired to. There is no intention to adjust these design requirements. Courtyard developments are not encouraged; the favoured approach is perimeter blocks. Any remaining references to courtyards will be removed. The affordable housing contribution follows detail viability testing. Further attempts have been made to engage on	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
N/A	Accrue (Forum) 1 LLP	275	WSP	389	6	8. Is the CQ AAP effective?	The following will inhibit the deliverability of the AAP: Absence of phasing and delivery of new homes; Building height parameters; and Infrastructure sum - Object to a fixed rate financial contribution (per sqm) imposed on all development, which cover 'area wide' infrastructure costs secured via S106 planning obligations. The Infrastructure Sum (the principle) - should meet the legal tests in regulation 122 of the Community Infrastructure Regulations 2010 and Paragraph 56 of the NPPF. A fixed rate across the area requires development to fund improvements which are not necessary to make the development acceptable in planning terms and do not directly relate to the development. This levy would not satisfy the three tests. Private market homes, leisure uses and hotels in this area are already subject to CIL charging. Infrastructure sum (impact on viability) - The AAP's levy would treble the contributions of the proposed B&Q redevelopment and jeopardise its viability and therefore brings into question the effectiveness of this policy. The approved application for a mixed use scheme on UA92 would be seriously affected by the levy. The S106 contributions allied with the CIL will seriously undermine the viability and deliverability of the AAP with impacts upon the borough's housing supply, housing delivery and the economic and social characteristics of its community. The AAP would be unsound as it not be effective. A stormwater management strategy is proposed across the AAP. The recent B&Q planning application can drain itself adequately without further intervention. This demonstrates that taking a blanket approach to infrastructure funding is not consistent with the tests for planning obligations.	On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focused consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. It is noted that Accrue were represented at this event; no alternative inputs were provided and with a subsequent written representation observing that the viability assessment (evidence base) undertaken to support the CQAAP had taken account of the viability assessment submitted with the planning application for the redevelopment of the former B&Q site. The infrastructure requirements needed to support development in the Civic Quarter have been carefully considered as part of the evidence base, and Policy CQ11 reflects this.	No	
N/A	Accrue (Forum) 1 LLP	275	WSP	389	7	9. Is the CQ AAP consistent with national policy?	The plan is not deliverable, which is inconsistent with Paragraph 35 of the NPPF and it is not based on sound evidence and an assessment of reasonable alternatives. Nor is the levy consistent with the CIL Regulations and NPPF and is therefore unsound. Supportive of encouraging small scale retail users which meet local needs (Policy CQ3 Mixed Use Communities) and consider this approach for mixed use communities is consistent with NPPF policies.	Noted	No	
N/A	Accrue (Forum) 1 LLP	275	WSP	389	8	10. Thinking about the tests of soundness, do you consider the CQ AAP to be sound?	No	Noted	No	
N/A	Accrue (Forum) 1 LLP	275	WSP	389	9	11. Based on the answer to the tests of soundness, please state clearly which page, policy, paragraph, plan or other content you are referring to in forming this view.	Policy CQ2; Parameters Plan (Page 63); Policy CQ11 Infrastructure and Obligations: Infrastructure Sum Policy CQ11 Infrastructure Obligations: Affordable Housing contribution; AAP Design Code; 4.23 of the TVA	Noted	No	
N/A	Accrue (Forum) 1 LLP	275	WSP	389	10	12. Please state why you consider the CQ AAP to be sound/unsound, including references to relevant legislation and policies. Please reference legislation and policies for each comment.	Please refer to table 3.2	Noted, see previous comments	No	
N/A	Accrue (Forum) 1 LLP	275	WSP	389	11	13. Are you proposing modification(s) to make the CQ AAP sound or to strengthen its soundness?	Please refer to table 3.2	Noted, see previous comments	No	
N/A	Accrue (Forum) 1 LLP	275	WSP	389	12	14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and evidence	Please refer to table 3.2	Noted, see previous comments	No	
N/A	Accrue (Forum) 1 LLP	275	WSP	389	13	15. If your representation is proposing a modification(s), do you consider it necessary to participate in the Examination in Public?	Yes, we wish to participate in the Examination in Public	Noted	No	
N/A	Accrue (Forum) 1 LLP	275	WSP	389	14	16. Reason for Attending the Examination – Soundness. Please note that participation in the Examination will be at the discretion of the appointed Inspector. If you wish to participate in the Examination, please outline why you consider this to be necessary	Accrue has a wealth of evidence and understanding of the local context that brings the deliverability of the AAP into doubt. Accrue is one of the main landowners within the AAP, owning the land that has been consistently promoted for residential development for more than four years. There remains disagreement between the Council and Accrue about the scale of development the site can withstand. It is also essential to attend the Examination to interrogate the Council's assumptions on phasing, the number of homes on each allocation and the deliverability thereof, as well as the proposed levy.	Noted	No	
N/A	Accrue (Forum) 1 LLP	275	WSP	389	15	23. Further comments	The consultants who have prepared the Area Action Plan have mixed up some images. The photos on pages 21 and 163 are not of the consultation associated with the Civic Quarter SPD / masterplan / Area Action Plan. The photos were taken at the pre-application consultation event for the development in the grounds of UA92.	Noted. This will be changed	Yes	Minor modification to supporting text/diagram
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	1	General comment	Planning permission has been sought for demolition of the existing office building and erection of a hotel 701 Chester Road. Permission was refused and went to appeal. The Inspector considered the main issues of the proposal. The appeal decision and the Local Planning Authority's own analysis conclude that there are no other issues requiring resolution, including the principle of a hotel.	Noted	No	
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	2	General comment	The site is located in Core Strategy Strategic Location 3 Lancashire Cricket Club Quarter, the AAP and the proposal would implement its ambition for a major mixed use development. Core Strategy Policy R6 lists the Strategic Location as an area where culture and tourism will be supported. The proposal is located on a key route and creates a landmark between public transport facilities and visitor attractions. Policy R2 seeks to encourage increase in hotel provision. Present policy supports this land use in this part of the borough. Providing site specific issues can be met and no objections raised to the principle of a hotel, this proposal is acceptable. A hotel in this location will reduce transport demand. Although the site is outside of a town centre, it is within the hinterland of the Trafford and Salford visitor attractions where a hotel would be expected and meet demand.	The site of 701 Chester Road is shown, at Regulation 19 stage, for 'predominantly residential uses' on the land uses parameter plan. A different land use parameter plan is now proposed which incorporates a number of adjustments including the identification of this site and its environs for 'mixed uses'. This could include a hotel. In addition, the wider changes to Policy CQ1, including its text, are intended to emphasise the opportunity afforded by the CQAAP to establish the Civic Quarter as a visitor destination. However, a revised Policy CQ3 is proposed which would clarify that proposals for main town centre uses would still be subject to compliance with tests relating to such uses in out of centre locations.	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to Policy CQ3.
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	3	General comment	The AAP proposes: 701 Chester Road is a gateway and landmark development at a strategic location; Pages 47 & 49 identifies the site and adjacent Chester Road sites as 'Negative impact buildings on under-utilised sites' and the opportunity is noted as 'There is both a need and opportunity to better define places and urban grain in the area, including opportunities for gateway buildings to arterial routes, improved transport hubs and new neighbourhoods', this is consistent with our hotel proposal; Policy CQ3 encourages 'Hotels/aparhotel accommodation to meet market demand'; The AAP and Transport Assessment notes an over-provision of parking, the area is dominated by car parking and it detracts from the area.	The site, at Regulation 19 stage, is shown as a location for a proposed landmark building (in the Neighbourhood guidance). However, the site was not then identified as a 'gateway opportunity' on the building heights parameter plan. A different approach is now proposed in which 'gateway opportunities' are removed from the building heights parameter plan and 'gateway locations' are added to the improved permeability and greenspace parameter plan. 'Proposed landmark buildings will also be removed from the Neighbourhood guidance. The area of this site is proposed to be shown as a 'gateway location' in accessibility terms. The site continues to be shown as containing 'negative impact buildings on under-utilised sites'.	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	4	General comment	The site has a gateway function as being a marker between the two sports facilities. It is at a key junction where Warwick Road is used by many sports fans. The site has the opportunity to reflect this cornerstone quality and become a gateway building towards the city centre. A taller building allows greater space to be allocated to the public realm making it better able to deal with large crowds. A taller building would be a landmark celebrating this key junction and potential public space. Support the proposal for a landmark building. The Inspector at the Appeal found 16/17 storeys too oppressive but the Local Authority have promoted a nearby building of 12 storeys on P63. The parameter plans note our part of the locality is "Predominantly residential" but has a goal of up to 12 storeys. The preceding pages note "The following parameter plans form part of this policy. The other landscape, masterplans and massing diagrams contained in this document are illustrative only and have not been tested against the policies of the AAP or other development plan policies. They should not be treated as a template to guide planning applications". Given this is an opportunity site this ambiguity is not helpful. Suggest the AAP could provide greater clarity.	The site, at Regulation 19 stage, is shown as a location for a proposed landmark building. However, the site was not then identified as a 'gateway opportunity' on the building heights parameter plan. A different approach is now proposed in which 'gateway opportunities' are removed from the building heights parameter plan and 'gateway locations' are added to the improved permeability and greenspace parameter plan. 'Proposed landmark buildings will also be removed from the Neighbourhood guidance. The area of this site is proposed to be shown as a 'gateway location' in accessibility terms. The identification of a gateway location does not automatically justify a tall building. The site is shown on the building heights parameter plan as a location where up to 12 storeys is felt to be appropriate, and this is maintained. Policy CQ1 is clear that development proposals should accord with the parameter plans. Other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this.	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	5	General comment	Support the recognition that a hotel is an appropriate use for the locality subject to market conditions. The proposal will implement the vision, particularly 'providing a unique and attractive destination for the wider community, residents, businesses and visitors alike'.	The site of 701 Chester Road is shown, at Regulation 19 stage, for 'predominantly residential uses' on the land uses parameter plan. A different land use parameter plan is now proposed which incorporates a number of adjustments including the identification of this site and its environs for 'mixed uses'. This could include a hotel. In addition, the wider changes to Policy CQ1, including its text, are intended to emphasise the opportunity afforded by the CQAAP to establish the Civic Quarter as a visitor destination. However, a revised Policy CQ3 is proposed which would clarify that proposals for main town centre uses would still be subject to compliance with tests relating to such uses in out of centre locations.	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to Policy CQ3.
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	6	General comment	NPPF supports reduction in parking to reduce congestion and increase development densities. In April 2019 Trafford's review of Local Development Plan policies concluded that parking standards in local policy are out of date and have little weight. Note the proposal to downgrade Warwick Road and to enhance it as a processional route. The findings of the parking study undertaken by Curtins suggest an overprovision of car parking. Support the proposal to relax parking standards with a greater focus on more sustainable modes of transport. The site has a GMAL score of 7, which is classified as a very high level of accessibility. GMAL scores of 7 and 8 are typically found in city centres in areas with the best levels of accessibility in Greater Manchester	Noted	No	
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	7	General comment	The Chester Road junction is identified for an "Improved supercrossing at gateway" (Page 117). This has the possible potential to impact on the design of the building. It would assist if a schematic plan could be included.	There are no details available as yet and the reference in the CQAAP is an aspiration. However, the correct terminology has been confirmed as a CYCLOPS junction (and all references will be updated)	Yes	Minor modification to supporting text/diagram
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	8	General comment	On Page 35 the plan identifies Hornby Road (and other nearby roads) as a 'Non-designated heritage asset'. We recognise that these buildings represent a past era but they are also undistinguished and there is a possible conflict with other policies promoting development with a landmark building up to 12 storeys.	The status of these buildings as non-designated heritage assets is maintained and new development within their setting would be expected to be respectful.	No	
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	9	General comment	Policy CQ11: Infrastructure and Obligations is a new provision but appears not well related to specific infrastructure projects and in this respect may conflict with CIL. The provision should be specifically related to costed projects	On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focused consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Acre Manchester Ltd were not represented at the event although were invited	No	
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	10	General comment	The draft AAP is sound at this stage and is generally supported but greater clarification as detailed in this submission would assist the development process.	Noted	No	
Peter Kilvert	Breathe Clean Air	279	N/A	N/A	1	General comment	Vital health issue. Ensure all premises in this area (whether domestic or commercial) do not use any wood-burning appliances.	The suggestion is beyond the scope of the CQAAP.	No	
N/A	Derwent Estates	283	Mark Aylward	284	1	General comment	Derwent Group has numerous land interests in the AAP area, comprising of 39 Talbot Road, 17-19 Talbot Road (tyre depot), 601 Chester Road (Bingo 3000), White City Retail Park. Detail in the AAP on yield of specific plots is indicative and does not preclude landowners providing their own design response.	Noted. With the exception of the parameter plans contained within Policy CQ1, all other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this.	No	

N/A	Derwent Estates	283	Mark Aylward	284	2	General comment	It is understood weight was ascribed to the status of the document as a DPD to underpin a potential requirement to take forward land assembly of specific third party plots to drive forward schemes that are both acceptable in planning terms and meet the tests set out to justify the use of s226 powers. This may now be of less relevance to the Council in the context of the B&Q site but the Council could also utilise the s226 process to simplify title which will catalyse delivery and maximise yield on some parcels which are constrained (in part) by easements and covenants. This would represent a positive use of s226 powers to accelerate plan-led development that is acceptable in planning terms and would positively contribute to the objectives of the AAP.		The CQAAP refers to the possibility Compulsory Purchase Powers being used, where justified.	No	
N/A	Derwent Estates	283	Mark Aylward	284	3	General comment	Strongly support adjustment to extend AAP area along Talbot Road to Trafford Bar Metrolink. The inclusion of this area within the AAP boundary reduces the risk of this remaining as a poor quality zone and also secures an opportunity to deliver new development which can act positively as a gateway to the Trafford Civic Quarter.		Noted	No	
N/A	Derwent Estates	283	Mark Aylward	284	4	General comment	The AAP area is considerable both in physical scale and its potential contribution to economic performance and housing delivery. It should be relevant in regard to the emerging Local Plan and the GMSF, as well as this AAP and any other emerging evidence base material for the Local Plan or development management processes.		The Civic Quarter and its significant development potential is referred to in the emerging Local Plan (as one of a small number of 'Areas of Focus' where new development will be directed)	No	
N/A	Derwent Estates	283	Mark Aylward	284	5	General comment	Due to the significance and strategic nature of the Civic Quarter scheme, the AAP should be directly referenced within the GMSF. This would provide a further layer of policy support for these objectives and ensure that Trafford's ambitions will be endorsed at a sub-regional level.		The Civic Quarter is not individually referenced in the GMSF (now called Places for Everyone)	No	
N/A	Derwent Estates	283	Mark Aylward	284	6	General comment	The Civic Quarter ambitions will be fundamental to delivering Local Plan objectives including a strong contribution to housing land supply. There is some inconsistency between the anticipated yields for certain plots within the AAP area when comparing the trajectory schedules for the Local Plan and some of the yield assumptions which underpin this AAP. Inconsistencies should be addressed and rectified prior to any future Examination into either/both of the AAP or the Local Plan itself.		The CQAAP is a capacity-led document which envisages that up to 4,000 new homes could be accommodated in time. It is specifically not consistent with the emerging Local Plan and its references to housing delivery within the Civic Quarter Area of Focus since the Local Plan figure is based upon Borough-wide housing requirements over the period of the Local Plan. The two emerging development plan documents are complementary. Following the Regulation 19 consultation, it is proposed to amend Policy CQ2 to refer to 2,500 of the 4,000 homes being delivered in the plan period and the remainder after 2037.	Yes	Minor modification to Policy CQ2
N/A	Derwent Estates	283	Mark Aylward	284	7	General comment	In general terms, support ambition for cohesive development in urbanised areas such as the AAP. Pragmatic decisions in these less sensitive locations provides opportunity to minimise Green Belt release. That approach is consistent with NPF requirements, especially in regard to highly accessible locations with proximity to shops and services, employment and high-frequency public transport. Crucial to ensure delivery of development and infrastructure is achievable and viable. Opportunities to secure early development that would contribute towards housing requirements in years 1-5 of the plan period should be afforded considerable positive weight.		Noted	No	
N/A	Derwent Estates	283	Mark Aylward	284	8	General comment	Section 4 of the Viability Assessment identifies a framework for expected sales values for the apartment product of circa £360-£370 for 1 and 2 bedroomed products. This appears to be a hybrid position between figures achieved in Castlefield and what has been achieved in the AAP area and/or projected through viability submissions made on behalf of developers. Paragraph 4.14 of the Viability Assessment does appear to accept that the figures achieved in Castlefield are not directly applicable as Castlefield is an established market location whilst the Civic Quarter is a new proposition. This appears to be highly optimistic and it likely that expectations of those types of return load risk on the developer and should only be applied where the profit margin (which is reflective of the risk) is increased.		On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focussed consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Derwent Estates was represented at this event and provided a subsequent viability-led representation. This representation and the Council's response to it is summarised in a separate document which deals with the July 2021 event.	See separate viability response	
N/A	Derwent Estates	283	Mark Aylward	284	9	General comment	Construction costs for apartment development feel too low especially when regard is had for the fact that the aspirations for build quality and environmental performance are substantial. Note very substantial variation in construction costs (on a unit area basis) for apartment blocks by height (say between 4 and 6 storeys) and the costs for the smaller blocks feels particularly low. This needs to be clarified more effectively by Continuum as the AAP progresses towards Examination and Derwent Group reserve the right to instruct specialist advice for the Examination.		On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focussed consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Derwent Estates was represented at this event and provided a subsequent viability-led representation. This representation and the Council's response to it is summarised in a separate document which deals with the July 2021 event.	See separate viability response	
N/A	Derwent Estates	283	Mark Aylward	284	10	General comment	In regard to other cost inputs, landowners would submit planning applications are to commit significant resource on professional fees. The 7% professional fees budget is too low (10% is a more standard allowance other than for a very large project where economies of scale may be applicable) and the finance costs arising need to be applied over a longer period that reflects the time between Local Plan promotion to the sale of the last property.		On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focussed consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Derwent Estates was represented at this event and provided a subsequent viability-led representation. This representation and the Council's response to it is summarised in a separate document which deals with the July 2021 event.	See separate viability response	
N/A	Derwent Estates	283	Mark Aylward	284	11	General comment	A simplified singular approach to the assessment of costs and values subject to end use fails to provide necessary granularity to reach plausible outcomes. Existing use values across the AAP site are vastly different. It cannot be reasonable to assume that the "EUV plus" assessment for a successful and well-let retail park will be the same as other parcels within the AAP area.		On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focussed consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Derwent Estates was represented at this event and provided a subsequent viability-led representation. This representation and the Council's response to it is summarised in a separate document which deals with the July 2021 event.	See separate viability response	
N/A	Derwent Estates	283	Mark Aylward	284	12	General comment	The policy should ideally be rewritten to ensure that it allows for viability testing and would not prevent otherwise acceptable and positive development from being approved and implemented.		The CQAAP is underpinned by a detailed viability assessment (evidence base) which has informed Policy CQ11. Every effort has been made to engage with landowners, developers and other key stakeholders on this viability assessment as prepared at plan-making stage. Discussions surrounding the viability of development proposals at planning application stage are not generally envisaged.	No	
N/A	Derwent Estates	283	Mark Aylward	284	13	General comment	Very difficult to reconcile how the Council's advisers would now argue that apartment development in this location can now sustain all of the following when they have found several apartment developments to be acceptable in recent times providing a much reduced affordable housing offer and also less in terms of the other contributions: 25% affordable housing aligned to preferred tenure mix; CIL levy; Adoption of environmental objectives; and Roof tax of £145 per sq m		On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focussed consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Derwent Estates was represented at this event and provided a subsequent viability-led representation. This representation and the Council's response to it is summarised in a separate document which deals with the July 2021 event.	See separate viability response	
N/A	Derwent Estates	283	Mark Aylward	284	14	General comment	Whilst the roof tax figure does set aside the requirement for s106 measures, this alongside the increased affordable housing offer is a step- change and it is difficult to reconcile a lack of consistency. Great risk that obligations will render otherwise acceptable development non-viable and this would be completely at odds with the clear advice of the NPPF. The AAP as a whole includes a number of environmental aspirations which need to be incorporated as part of a "policy on" calculation but also that other components (such as public realm or MSCP) which will likely generate negative returns would need to be addressed as "shared costs" or otherwise addressed through an equalisation approach. Do not accept that the proposed financial contributions are well-based in evidence and these will need to be properly justified.		On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focussed consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Derwent Estates was represented at this event and provided a subsequent viability-led representation. This representation and the Council's response to it is summarised in a separate document which deals with the July 2021 event.	See separate viability response	
N/A	Derwent Estates	283	Mark Aylward	284	15	General comment	The modelled profit margins of 17.5% for market dwellings and 6% for affordable dwellings is on the low side. This extent of new apartment development represents a considerable supply-side adjustment and there is an inherent risk in terms of market saturation and slowed sales rates and suppressed sales values. All of these components would ordinarily be addressed by a more substantive profit margin for the market accommodation. Any resultant "shortfall" from the developer's expectation of a reasonable return will be exacerbated if the social products fail to achieve the anticipated returns. There is a considerable challenge for the Registered Providers if they have to accept somewhere circa 1600 social apartments. Whilst the viability work assumes a 40% effective discount there is no obligation upon the RP to match that valuation and there is of course a risk that they would suppress their offers to give themselves a reasonable margin. The application of a highly mechanistic universal "EUV plus" and assumption that market developers and RPs will accept those low profit margins places doubt upon the Viability Assessment conclusions, specifically the realism that can be given to the aspiration to deliver 25% affordable housing and a roof tax as well as other components.		On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focussed consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Derwent Estates was represented at this event and provided a subsequent viability-led representation. This representation and the Council's response to it is summarised in a separate Excel spreadsheet which deals with the July 2021 event.	See separate viability response	
N/A	Derwent Estates	283	Mark Aylward	284	16	General comment	A fundamental component of the Council's approach is that the extent of surface parking across the AAP area is excessive and provides an opportunity to free up development plots. This thesis has been underpinned in part by a car park usage survey. The survey date is a Tuesday afternoon and this does not represent a peak usage period for a retail park. Given that this is designed to accommodate peak requirements, caution against review of midweek results as being a 'worst case' analysis of requirement.		The highways implications of the proposals for the Civic Quarter as a whole have been reviewed at various stages by the local highway authority, Transport for Greater Manchester, and Highways England. No fundamental concerns have been raised by these parties, and the traffic impacts of each development (including regarding the loss of and/or provision of car parking) would be scrutinised as part of the development management process.	No	
N/A	Derwent Estates	283	Mark Aylward	284	17	General comment	Previously expresses concern with the AAP Heritage Assessment in relation to undesignated assets with specific regard to the former Old Trafford Bowling Club. For a withdrawn application for apartment development at 39 Talbot Rd, the applicant's adviser considered the significance of that parcel and concludes that the heritage significance of that parcel is much less considerable than would be envisaged through reference to the AAP Heritage Assessment.		The status of this building as a non-designated heritage asset is maintained and new development within its setting would be expected to be respectful. An application has been made by a third party which promotes the listing of this building. The decision is outstanding. The building heights parameter plan shows that building heights should be a maximum of six storeys in this location, and this is maintained.	No	
N/A	Derwent Estates	283	Mark Aylward	284	18	General comment	Given the AAP suggests reduced building heights by reference to heritage harm, a more pragmatic analysis would suggest that it can accommodate (some) greater height prior to resulting in material adverse impact upon that significance. Would welcome the omission of the following from the AAP Heritage Assessment: 'The Old Trafford Bowling Club is a vital connection to the leisure and sporting history of the area, as well as a site of considerable architectural and aesthetic interest. Its contribution to the heritage significance and historic character of the area is correspondingly high. The bowling green is a fundamental part of the site and makes a similarly high positive contribution. This site forms group value with the collection of other heritage assets noted on this eastern stretch of Talbot Rd within the plan area'.		The status of this building as a non-designated heritage asset is maintained and new development within its setting would be expected to be respectful. An application has been made by a third party which promotes the listing of this building. The decision is outstanding. The building heights parameter plan shows that building heights should be a maximum of six storeys in this location, and this is maintained.	No	
N/A	Derwent Estates	283	Mark Aylward	284	19	General comment	Strongly reject the proposed Talbot Road North Conservation Area. It would not be genuinely necessary and it would fail to reflect that considerable elements of built form within that area are neither "historic" nor would genuinely be argued to provide positive contribution to local streetscene. AAP is recommending considerable redevelopment within this area it does not appear to be suggesting that a Conservation Area should be progressed in this area.		The CQAAP does not refer to this potential conservation area	No	
N/A	Derwent Estates	283	Mark Aylward	284	20	General comment	The listed entrance portal at White City Retail Park has been impacted through commercial development. Agree that there is an opportunity to deliver new development at White City which can provide an appropriate setting to the asset subject to well-considered new development.		Noted	No	
N/A	Derwent Estates	283	Mark Aylward	284	21	General comment	The Neighbourhoods plan includes boundaries to the proposed Northern Neighbourhood which includes a small part of the the Bingo 3000 plot so would therefore bisect the plot which we presume is an unintended error. It would be much preferable if the Bingo 3000 plot was entirely located within either parcel, but not to straddle both. This plan should be amended to ensure that its boundaries have regard for property interests to avoid confusion through both the Examination and later in regard to development management processes.		The site of the existing Bingo 3000 building is intentionally split between the Northern and Eastern Neighbourhoods, and with the line of division representing the location of part of the route of the Exhibition Walk (as shown on the improved permeability and greenspace parameter plan referred to in Policy CQ1). It is not intended to alter neighbourhood boundaries to reflect landownerships.	No	
N/A	Derwent Estates	283	Mark Aylward	284	22	General comment	The 2020 Land Uses Parameters Plan included a fontage of retail development adjacent to Chester Road but was opaque how the layout might work. Welcome that Policy CQ1 recognises that this is one possible way forward. There are reservations as to whether it is achievable or desirable. There will inevitably be design solutions through which White City can support residential redevelopment and town centre uses. As drawn, cannot support this as it would result in layouts (re servicing requirements) that would be unacceptable to end occupiers and impede the gateways given to Talbot Rd or Chester Rd in due course.		The CQAAP provides the basis for the redevelopment of White City Retail Park (either in full or in part) should the landowner wish to pursue this option. With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this. Following the Regulation 19 consultation, it is proposed to make a change to the land uses parameter plan to show a combination of retail and residential uses across the retail park. It is also intended to amend the document (within the vision for the Central Neighbourhood) to refer more explicitly to the prospect of some retail park remaining.	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram

N/A	Derwent Estates	283	Mark Aylward	284	23	General comment	Clear Building Height Parameters. This is a somewhat historic plan that does not appear to align with more recent developed drawings and schedules in terms of building heights and notional yields which can be achieved. There appears to be considerable inconsistency in terms of what might be recommended or potentially modelled heights and yields for these development parcels. It will clearly be much preferable if these approaches were internally consistent. If there is a premise why the Masterplan should suggest different heights for the same parcel of land in the prism of a specific analysis, this should be expressly addressed and the overall recommendation should be clear. In its current form and without proper context, suggest that this parameters plan is either deleted or is highlighted as being simply a representation of one possible way forward.		Since Regulation 19 stage some amendments are proposed to the building heights parameter plan, including to better align height boundaries with development plots. There have also been some adjustments to proposed building heights in some locations. Policy CQ1 is clear that development proposals should accord with the parameter plans. Other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this.	Yes	Main modification as part of wider Policy CQ1 changes.
N/A	Derwent Estates	283	Mark Aylward	284	24	General comment	Derwent is supportive of the principle of this wider redevelopment but any substantive remodelling of the retail park area can only come forward following detailed design and viability analysis. As drawn, the permeability analysis for the wider scheme does appear to assume key routes through the retail park and it has to be anticipated that the White City redevelopment might well be undertaken on a phased basis so it may be necessary and advisable to have the capacity for an interim approach. White City (following investment) is a successful retail park which has to have regard for the safe servicing requirements of its tenants. This must be integral to the consideration of how phased redevelopment is implemented in practice.		The CQAAP provides the basis for the redevelopment of White City Retail Park (either in full or in part) should the landowner wish to pursue this option. With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this. Following the Regulation 19 consultation, it is proposed to make a change to the land uses parameter plan to show a combination of retail and residential uses across the retail park. It is also intended to amend the document (within the vision for the Central Neighbourhood) to refer more explicitly to the prospect of some retail park remaining. The detail of any redevelopment would be confirmed at development management stage, subject to the principles of the document being adhered to.	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
N/A	Derwent Estates	283	Mark Aylward	284	25	General comment	Policy CQ1 advises the parameter plans are illustrative. Given that they are illustrative and there are deliverability challenges, parameter plans should be omitted. If they were given weight in decision making, the policy could prejudice the implementation of developments that would otherwise be acceptable prior to any determination that the redevelopment anticipated by the AAP is genuinely deliverable. This is important given that the policy puts the onus on the applicant to demonstrate their proposals would not materially impact upon the AAP objectives. In the context of White City Retail Park, Derwent supports the ambition but any redevelopment decision requires considerable market testing and that there is potential that may such redevelopment would be phased. Rectify that AAP does not consider phasing or interim uses. Amend policy to expressly recognise need for pragmatism in terms of phasing and therefore support 'meanwhile uses'.		The CQAAP provides the basis for the redevelopment of White City Retail Park (either in full or in part) should the landowner wish to pursue this option. With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this. Following the Regulation 19 consultation, it is proposed to make a change to the land uses parameter plan to show a combination of retail and residential uses across the retail park. It is also intended to amend the document (within the vision for the Central Neighbourhood) to refer more explicitly to the prospect of some retail park remaining. The detail of any redevelopment would be confirmed at development management stage, subject to the principles of the document being adhered to.	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
N/A	Derwent Estates	283	Mark Aylward	284	26	General comment	Policy CQ2. AAP aspirations for 25% affordable housing on site. CIL levy plus a roof tax which would capture all of the typical obligations with the exception of affordable housing and CIL. Viability analysis should undertake a 'policy on' assessment of the viability implications of these requirements as well as developments costs and existing use value. Concerns that the approach is too simplistic and will considerably under-estimate existing use value and over-estimate what new development can sustain in terms of affordable housing and roof tax levies. If obligations are over-estimated, considerable risk that quantum of new homes envisaged will not be delivered in early part of the plan period without having to challenge the viability assumptions at D11 stage which would be unhelpful to all stakeholders.		On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focussed consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Derwent Estates was represented at this event and provided a subsequent viability-led representation. This representation and the Council's response to it is summarised in a separate document which deals with the July 2021 event.	See separate viability response	
N/A	Derwent Estates	283	Mark Aylward	284	27	General comment	Policy CQ3. The site includes a major retail park serving a range of local needs and not reasonably described as 'small scale'. Revise policy to refer to localised needs or F2 Use Class. If White City Retail Park was redeveloped and any retail would fall within Use Class F2, that would not allow a store akin to Tesco Express which would fail to meet shopping needs and push residents to drive further afield. It would likely create pressure for further out-of-centre retail development to replace existing facilities that provide fresh food. Replacement stores might be located further away from housing, economic activity and public transport. Not feasible that a local needs store can cater for 4000 homes, so they will be compelled to use private car. This element of CQ3 needs to be fundamentally reconsidered, also because it will cause conflict with the ambitions and intent of Policy CQ4.		White City Retail Park is an out-of-centre location and, presently, any proposals for new/expanded main town centre uses within it are subject to the standard government tests (other than in situations where some form of fall back could be relied upon when utilising existing floorspace). The Civic Quarter is envisaged as a location for a variety of uses to support a new and significantly expanded community. Major new retail development is not anticipated, although it is acknowledged that planning proposals may come forward in time. A revised Policy CQ3 is proposed which would clarify that proposals for main town centre uses would still be subject to compliance with tests relating to such uses in out of centre locations.	Yes	Minor modification to Policy CQ3
N/A	Derwent Estates	283	Mark Aylward	284	28	General comment	Support general principles of Policy CQ4 but expect that through the Examination that the "policy on" implications of this and all policies have been properly tested. If CQ3 is not amended, the prospect of compliance falls away. The Examination should rigorously test that the "policy on" implications have been assessed and consider how to proceed if there is any resultant doubt re the deliverability of viable development across the Plan period.		On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focussed consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Derwent Estates was represented at this event and provided a subsequent viability-led representation. This representation and the Council's response to it is summarised in a separate document which deals with the July 2021 event.	See separate viability response	
N/A	Derwent Estates	283	Mark Aylward	284	29	General comment	Broadly supportive of aspirations stated by Policy CQ5. Conclusions in Heritage Assessment on significance of existing buildings and structures to the east of AAP area are poorly judged. Heritage Assessment suggests a Conservation Area that is not expressed in CQ5, the AAP should confirm that it does not seek to take forward any such approach. If those proposals were not amended, Derwent would strongly object.		The CQAAP does not refer to this potential conservation area	No	
N/A	Derwent Estates	283	Mark Aylward	284	30	General comment	Policy CQ10 refers to ambition for concentration of parking upon White City Retail Park, infer that this would be a multi-storey car park. Whilst achievable in principle, it would need to be subject of detailed design and viability analysis considered in detail. If the viability was below a reasonable level, the Council should consider how redevelopment of White City might need to be reviewed in the light of any planning benefits of a multi-storey car park as compared to other planning objectives in AAP or as part of a broader equalisation approach. This requires further consideration and needs to be inputted into to viability framework.		The CQ AAP provides the basis for the redevelopment of White City Retail Park (either in full or in part) should the landowner wish to pursue this option. The consolidation of car parking remains an aspiration of the CQAAP. Indicative locations for new multi-storey car parks have been identified, and Policy CQ10 refers to focussing such provision at the periphery of the Civic Quarter (in order to draw traffic away from the heart of the Civic Quarter). Therefore, there is flexibility in their location and the suitability of particular sites would be confirmed at application stage.	No	
N/A	Derwent Estates	283	Mark Aylward	284	31	General comment	Policy CQ11. Welcome general approach to simplify the calculation for infrastructure and developer contributions but it over-simplifies the approach because of vastly different use values across AAP area. Not reasonable to assume that the EUV plus assessment for a successful retail park will be the same as other parcels. Rewrite policy to allow for viability testing and do not prevent otherwise acceptable development from being implemented. Environmental aspirations in AAP need to be incorporated as part of a 'policy on' calculation and other components such as public realm or multi storey car park which would likely generate negative returns would need to be addressed as 'shared costs' or otherwise addressed through an equalisation approach. Proposed financial contributions are not well-based in evidence and these will need to be properly justified.		On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focussed consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Derwent Estates was represented at this event and provided a subsequent viability-led representation. This representation and the Council's response to it is summarised in a separate document which deals with the July 2021 event.	See separate viability response	
N/A	Derwent Estates	283	Mark Aylward	284	32	General comment	Central Neighbourhood. Supportive in principle of proposed redevelopment of White City Retail Park. Welcome bringing forward substantive mixed-use development in eastern part of retail park. This includes a range of blocks of varying height including the tallest element on the north-eastern boundary to act as a landmark and gateway to the CD area. The intensification of the Talbot Road corridor would provide an opportunity for linked trips to the Retail Park but that these will be mitigated by the current layout which makes north/south pedestrian movements difficult. Any full redevelopment decision requires considerable market testing and that there is potential that may such redevelopment would need to be phased. The AAP should be amended to expressly recognise that phased delivery is likely and that there would be a need for a pragmatic approach to support 'meanwhile uses'.		The CQ AAP provides the basis for the redevelopment of White City Retail Park (either in full or in part) should the landowner wish to pursue this option. With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this. Following the Regulation 19 consultation, it is proposed to make a change to the land uses parameter plan to show a combination of retail and residential uses across the retail park. It is also intended to amend the document (within the vision for the Central Neighbourhood) to refer more explicitly to the prospect of some retail park remaining. The detail of any redevelopment would be confirmed at development management stage, subject to the principles of the document being adhered to. In addition, it is proposed to change the building heights parameter plan to remove the reference to all 'gateway opportunities' (including the one in this location) and to include a new location where only building heights of up to 6 storeys would be permitted within the setting of the historic White City entrance portal. The different height categories would also now more closely correspond with development sites. 'Proposed landmark buildings' are also proposed to be removed from the Neighbourhood guidance (including the one in this location).	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
N/A	Derwent Estates	283	Mark Aylward	284	33	General comment	Derwent is keen to engage with the Council and encourages iterative dialogue so that we can contribute to the Masterplan's key objectives and to optimise the opportunity for their realisation. This should include for the opportunity for a substantive landmark residential-led development within the eastern quadrant of the retail park, which could enhance pedestrian linkage to and through the site from the Talbot Road corridor.		Following the Regulation 19 consultation, it is proposed to change the building heights parameter plan to remove the reference to all 'gateway opportunities' (including the one in this location) and to include a new location where only building heights of up to 6 storeys would be permitted within the setting of the historic White City entrance portal. The different height categories would also now more closely correspond with development sites. 'Proposed landmark buildings' are also proposed to be removed from the Neighbourhood guidance (including the one in this location).	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
N/A	Derwent Estates	283	Mark Aylward	284	34	General comment	Concerns with the proposed layout and maximum heights in north-eastern part of the site. It is one design solution and would be unduly prescriptive if applied in blanket fashion. The economics of this type of accommodation vary very widely, so it will be important to accommodate some design development or risk impact upon the ability of the development to deliver social infrastructure including affordable housing.		The CQAAP provides the basis for the redevelopment of White City Retail Park (either in full or in part) should the landowner wish to pursue this option. With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this. Following the Regulation 19 consultation, it is proposed to make a change to the land uses parameter plan to show a combination of retail and residential uses across the retail park. It is also intended to amend the document (within the vision for the Central Neighbourhood) to refer more explicitly to the prospect of some retail park remaining. The detail of any redevelopment would be confirmed at development management stage, subject to the principles of the document being adhered to. In addition, it is proposed to change the building heights parameter plan to include a new location where only building heights of up to 6 storeys would be permitted within the setting of the historic White City entrance portal. The different height categories would also now more closely correspond with development sites. 'Proposed landmark buildings' are also proposed to be removed from the Neighbourhood guidance (including the one in this location).	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
N/A	Derwent Estates	283	Mark Aylward	284	35	General comment	Concerns with multi storey car park solutions from a viability perspective. In addition, the development would be on a phased basis. This is unlikely to be described as 'small scale' so there will be a need to understand that the layout will need to accommodate that and those servicing requirements.		The CQAAP provides the basis for the redevelopment of White City Retail Park (either in full or in part) should the landowner wish to pursue this option. With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this. Following the Regulation 19 consultation, it is proposed to make a change to the land uses parameter plan to show a combination of retail and residential uses across the retail park. It is also intended to amend the document (within the vision for the Central Neighbourhood) to refer more explicitly to the prospect of some retail park remaining. The detail of any redevelopment would be confirmed at development management stage, subject to the principles of the document being adhered to.	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
N/A	Derwent Estates	283	Mark Aylward	284	36	General comment	The Bingo 3000 site provides an opportunity for a landmark building (or buildings) delivering considerable yield and significant redevelopment in a key location prominent to two primary axes. This is readily available for development in the early part of the Plan period.		At Regulation 19 stage, land slightly to the east of the site is shown as a location for a proposed landmark building (within the Neighbourhood guidance). The same location was identified as a 'gateway opportunity' on the building heights parameter plan. A different approach is now proposed in which 'gateway opportunities' are removed from the building heights parameter plan and 'gateway locations' are added to the improved permeability and greenspace parameter plan. This location is proposed to be shown as a 'gateway location' in accessibility terms. This does not automatically translate into a tall building. The detail would be confirmed at planning application stage. The building heights parameter plan confirms building heights of up to 6 storeys in this location. All references to 'proposed landmark buildings' within the Neighbourhood guidance are intended to be removed.	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
N/A	Derwent Estates	283	Mark Aylward	284	37	General comment	Eastern Neighbourhood. Derwent is supportive in principle of the inclusion of this area within the AAP, recognising that it can provide real contribution to AAP objectives and support positive development on this key gateway.		Noted	No	
N/A	Derwent Estates	283	Mark Aylward	284	38	General comment	Non-designated buildings have been given excessive significance and the Heritage Assessment suggests a Conservation Area which is not justified. Welcome the AAP does not take forward this suggestion but it does suggest a lower height for the plot adjacent to the Bowling Club which we suggest could straightforwardly accommodate 6-8 storeys which would also align with the indicative yield which is mooted through the Regulation 18 Local Plan.		The status of this building as a non-designated heritage asset is maintained and new development within its setting would be expected to be respectful. An application has been made by a third party which promotes the listing of this building. The decision is outstanding. The building heights parameter plan shows that building heights should be a maximum of six storeys in this location, and this is maintained.	No	
N/A	Derwent Estates	283	Mark Aylward	284	39	General comment	Support approach that site to the east of Trafford Public Hall used as a tyre depot can support residential apartments of up to 10 storeys. This can come forward quickly and contribute to housing land supply in years 1-5 of the Plan period, subject to viability testing and ensuring that the CQ11 framework is realistic and will not impede development coming forward.		The building heights parameter plan which forms part of Policy CQ1 identifies the locations where the tallest buildings may be appropriate when having regard to the findings of the Townscape and Visual Impact Assessment (evidence base). This plan in fact identifies this as a location where a developments should be limited to six storeys in height, and this position is maintained. Policy CQ1 is clear that development proposals should accord with the parameter plans. Other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this.	No	

N/A	Derwent Estates	283	Mark Aylward	284	40	General comment	Hope that the proposed maximum heights for block developments (such as 39 Talbot Road and White City Retail Park) will be utilized as broad guidance rather than a set of absolute standards. The block layout and form does not necessarily align with market signals, and this could impact upon deliverability and the opportunity to secure social infrastructure such as much needed affordable housing.		The building heights parameter plan which forms part of Policy CQ1 identifies the locations where the tallest buildings may be appropriate when having regard to the findings of the Townscape and Visual Impact Assessment (evidence base). Policy CQ1 is clear that development proposals should accord with the parameter plans. Other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this. The detail surrounding any new development would be confirmed at development management stage subject to the principles of the CQAAP being adhered to.	No	
Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	1	General comment	Heritage Assessment is welcomed. The AAP offers a significant opportunity to facilitate the development of Old Trafford with this incredible legacy. Fully support the inclusion of heritage as one of the key themes and welcome the identification of a number of non-designated heritage assets inside the boundary.		Noted.	No	
Elisabeth Lewis	Heritage Development Officer, Trafford Council	402	N/A	N/A	2	General comment	The document recognises the sporting and cultural heritage of Old Trafford and the contribution it could make to the regeneration and place shaping. The history of Manchester Botanical Gardens and subsequent amusement park is not carried through sufficiently in the proposed layout of individual neighbourhoods nor the potential for archaeology or heritage interpretation. The blue prints of White City should be included in the assessment and this layout could have influenced the northern area of the central neighbourhood. Reflect unique history of the area reflected/interpreted in the layout of buildings, height parameters, landscaping, public space, materials and artwork/interpretation. This should also be reflected in Policy CQ5.		A Statement of Common Ground is due to be prepared with the Heritage Development Officer. With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this. The detail surrounding any new development would be confirmed at development management stage subject to the principles of the CQAAP being adhered to.	No	
Elisabeth Lewis	Heritage Development Officer, Trafford Council	403	N/A	N/A	3	General comment	The significance of LCCC is noted in the document and in particular the reference to the ground. This should be included as part of the NDHA with the exception of the stands.		A Statement of Common Ground is due to be prepared with the Heritage Development Officer. Following the Regulation 19 consultation, it is proposed to amend the document to illustrate that the pavilion and pitch of LCCC is a non-designated heritage asset (but not the stands).	Yes	Minor modification to supporting diagram
Elisabeth Lewis	Heritage Development Officer, Trafford Council	404	N/A	N/A	4	General comment	The assessment also includes the significance of the Police Station, this should also be identified as a NDHA.		A Statement of Common Ground is due to be prepared with the Heritage Development Officer. The Heritage Assessment does not in fact suggest that the police station should be identified as a non-designated heritage asset, and the Heritage Development Officer is, on reflection, in agreement with this.	No	
Elisabeth Lewis	Heritage Development Officer, Trafford Council	405	N/A	N/A	5	General comment	The setting of Trafford Town Hall, GII & Entrance portal and lodges to White City GII [White City Gates] needs to be expanded.		A Statement of Common Ground is due to be prepared with the Heritage Development Officer.	No	
Elisabeth Lewis	Heritage Development Officer, Trafford Council	406	N/A	N/A	6	General comment	An analysis of views of all the designated and non-designated heritage assets should be included in the HA. In particular further analysis of Trafford Town Hall. There are key views of the clock tower along Brian Statham Way from the south east; across the car park at LCCC and from the north west along Warwick Road. There are also views outside the AAP along Chester Road and the junction of Talbot Road and Chester Road. Key views should be identified to ensure they are sufficiently protected.		A Statement of Common Ground is due to be prepared with the Heritage Development Officer.	No	
Elisabeth Lewis	Heritage Development Officer, Trafford Council	407	N/A	N/A	7	General comment	There is no recognition of the former Warwick Road Station, now Metrolink, and the contribution this has made. The former railways station lies on the boundary of the AAP and redundant platforms are within the boundary. The existing platforms afford views of TTH.		A Statement of Common Ground is due to be prepared with the Heritage Development Officer.	No	
Elisabeth Lewis	Heritage Development Officer, Trafford Council	408	N/A	N/A	8	General comment	General concerns about proposed height parameters. Whilst there is scope to increase heights in the area, up to 20 storeys is exceptionally tall. It is not clear how this will preserve the area's unique characteristics when the majority of heritage assets identified are two storeys, nor integrate the fragmented townscape. Buildings of this height on Talbot Road will impact on TTH. A more sensitive scale such as 3 storeys would be welcomed in certain areas. In particular along Talbot Road & Warwick Road and also adjacent to White City Gates. There is also a significant jump from 20 storeys to 6 along Talbot Road and this should be more gradual. Not clear what a gateway opportunity is and how this will impact on heritage assets such as Trafford Bar, Trafford Hall Hotel and White City Gates. The heights proposed adjacent to White City Gates are also a concern.		A Statement of Common Ground is due to be prepared with the Heritage Development Officer. Following the Regulation 19 consultation, some adjustment to the building heights parameter plan is proposed. A gradation of build heights along Talbot Road is proposed and a new location showing building heights of up to 6 storeys only is proposed around the White City entrance portal. In addition, 'gateway opportunities' are proposed to be removed from the building heights parameter plan and 'gateway locations' are added to the improved permeability and greenspace parameter plan. These are intended to illustrate gateway locations in accessibility terms and do not automatically translate into a location for a tall building. Locations which could accommodate a development of up to 20 storeys continue to be limited. The detail would be confirmed at planning application stage.	Yes	Main modification as part of wider Policy CQ1 changes
Elisabeth Lewis	Heritage Development Officer, Trafford Council	409	N/A	N/A	9	General comment	Entrance portal and lodges to White City Gates are in poor condition. The structure requires remedial work and some restoration of lost architectural features. This and need for enhancement should be recognised by the AAP.		Following the Regulation 19 consultation, it is intended to amend the document to refer to the repair and restoration of the entrance portal and lodge (within the vision for the Central Neighbourhood)	Yes	Minor modification to supporting text/diagram
Elisabeth Lewis	Heritage Development Officer, Trafford Council	410	N/A	N/A	10	General comment	A series of blocks up to 12 storeys behind White City Gates with public realm to the west is a missed opportunity. The public realm should form the setting to the Grade II listed structure referencing the former pleasure grounds and linking through to Talbot Road. The proposed height of up to 20 storeys will have an impact on White City Gates and a more sensitive scale should be sought surrounding the Grade II listed structure and public realm.		A Statement of Common Ground is due to be prepared with the Heritage Development Officer. With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this. The detail surrounding any new development would be confirmed at development management stage subject to the principles of the CQAAP being adhered to. The neighbourhood plans are illustrative only and show a new public park in the vicinity of the entrance gates, which is supported in principle. Its location would be confirmed at planning application stage. Following the Regulation 19 consultation, some adjustment to the building heights parameter plan is proposed; a new location showing building heights of up to 6 storeys only is proposed around the White City entrance portal.	Yes	Main modification as part of wider Policy CQ1 changes
Elisabeth Lewis	Heritage Development Officer, Trafford Council	411	N/A	N/A	11	General comment	Proposed block in front of UA92 and the up to 20 storey block on Talbot Road will have most impact on openness and the contribution this area makes to the setting of Trafford Town Hall. The proposed up to 20 storeys appears excessive. The existing Oakland House is 15 storeys and there is scope to reflect this. Potentially buildings of this height could impact on Old Trafford Bowling Club. Existing design principles along Talbot Road needs greater recognition these include the set back and depth of buildings, spaciousness between blocks, grass verges, street trees, soft landscaping such as hedging.		A Statement of Common Ground is due to be prepared with the Heritage Development Officer. With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only. The detail surrounding any new development would be confirmed at development management stage subject to the principles of the CQAAP being adhered to. The building heights parameter plan limits developments in close proximity to Trafford Town Hall to a maximum of six storeys, and this is proposed to be retained. Following the Regulation 19 consultation, some adjustment to the building heights parameter plan is proposed including a gradation of build heights along Talbot Road on approach to the Old Trafford Bowling Club. Some adjustment to the relevant neighbourhood guidance is also proposed in order to reinforce the existing character of Talbot Road (including the need to retain and establish trees and verges, and to maintain the set back and sense of spaciousness).	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
Elisabeth Lewis	Heritage Development Officer, Trafford Council	412	N/A	N/A	12	General comment	The Old Trafford Bowling Club is a fascinating remnant of sporting heritage. The adjacent proposed height parameters should be reduced to adequately respond to non-designated heritage assets such as Trafford Bar, Trafford Hall Hotel and the OT Bowling Club. The bowling green is orientated to receive the afternoon sun; existing design principles along Talbot Road could impact on this important aspect of the design.		A Statement of Common Ground is due to be prepared with the Heritage Development Officer. The building heights parameter plan shows a reduced height of development (up to 6 storeys) towards Trafford Hall Hotel and Trafford Bar. Following the Regulation 19 consultation, some adjustment to the building heights parameter plan is proposed; a gradation of build heights along Talbot Road on approach to the Old Trafford Bowling Club is now proposed.	Yes	Main modification as part of wider changes to Policy CQ1
Elisabeth Lewis	Heritage Development Officer, Trafford Council	413	N/A	N/A	13	General comment	TVA doesn't take account of kinetic views. Views identified do not take account of all heritage assets identified in AAP nor includes heritage assets potentially affected outside the boundary such as Longford Park CA; Empress Conservation Area or Gorse Hill Park including associated group of listed structures. A greater analysis of TTH or White City Gates is required.		A Statement of Common Ground is due to be prepared with the Heritage Development Officer. With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this. The detail surrounding any new development would be confirmed at development management stage subject to the principles of the CQAAP being adhered to.	No	
Elisabeth Lewis	Heritage Development Officer, Trafford Council	414	N/A	N/A	14	General comment	Design Code. The AAP should encourage interesting silhouettes and varied rooflines to tall buildings; a good quality palette of materials; well articulated buildings with detailed principal elevations and active frontages at street level. A specific design codes for tall buildings would be welcomed and for each neighbourhood.		A Statement of Common Ground is due to be prepared with the Heritage Development Officer. It is considered that the design code as contained within Appendix 2 already meets this objective	No	
Elisabeth Lewis	Heritage Development Officer, Trafford Council	415	N/A	N/A	15	General comment	The current set back & depth to buildings along Talbot Road should be recognised and also include the importance of spaciousness between blocks, grass verges, street trees and hedging which all add to the quality of the street and should be retained and incorporated into the design code for elsewhere in the AAP. The setback in particular has helped reduce the prominence of existing tall buildings along Talbot Road. This is not sufficiently included in the design code or public realm principles.		A Statement of Common Ground is due to be prepared with the Heritage Development Officer. Following the Regulation 19 consultation, it is intended to amend the document to place greater emphasis on the need to retain and establish trees and verges to Talbot Road, and to maintain the set back and sense of spaciousness within the design and layout of new development. This would involve revisions to the Neighbourhood guidance.	Yes	Minor modification to supporting text/diagram
Elisabeth Lewis	Heritage Development Officer, Trafford Council	416	N/A	N/A	16	General comment	The processional route to MUFC should be included in the AAP boundary to link the two sporting grounds.		MUFC is outside of the boundary of the Civic Quarter. However, the document builds on, as much as it can, the potential for physical and functional links to be reinforced between MUFC and LCCC through the establishment of the Processional route.	No	
Andy Davies	Environment Agency	228	N/A	N/A	1	10. Thinking about the tests of soundness, do you consider the CQ AAP to be sound?	For matters within the remit of the Environment Agency, the AAP is in accordance with the criteria of 'soundness' detailed within paragraph 35 of the NPPF. The AAP has been informed by a comprehensive IA including a SA and SEA.		Noted	No	
Andy Davies	Environment Agency	228	N/A	N/A	2	General comment	The strategic policies are in line with paragraph 28 of the NPPF. Although making general allocations, the AAP is not required to be informed by an updated Strategic Flood Risk Assessment (SFRA) at this stage. The AAP area is situated within Flood Zone 1 and therefore at lower risk of flooding		Noted	No	
Andy Davies	Environment Agency	228	N/A	N/A	3	General comment	In forming the wider Trafford Development Plan an updated SFRA (further to the 2011 SFRA presented as part of the CQ APP IA evidence basis) will be required for the emerging Local Plan within which the Civic Quarter area will be encompassed.		Noted	No	
Andy Davies	Environment Agency	228	N/A	N/A	4	General comment	Development proposals within the AAP area should be assessed in line with the requirements of paragraph 163 of the NPPF and where required a site specific Flood Risk Assessment presented as part of the evidence basis.		Noted	No	
Garry Thornton	Greater Manchester Minerals and Waste Planning Unit	237	N/A	N/A	1	General comment	No further comment to add to previous comments of March 2020 (Reg 18). Again recommend that specific reference should be made within the text of Policy CQ4 to the requirement for any development proposals to adhere to the Greater Manchester Joint Waste Development Plan 2012 (GMJWDP) by ensuring the movement of waste up the waste hierarchy.		Following the Regulation 19 consultation, it is intended to amend Policy CQ4 to refer to the importance of new developments adopting the waste hierarchy during demolition and construction processes.	Yes	Minor modification to Policy CQ4
Emily Hyrcan	Historic England	292	N/A	N/A	1	General comment	No comments to make on the document at this stage.		Noted	No	
Nicola Elsworth	Homes England	293	N/A	N/A	1	General comment	Homes England does not wish to make any representations on the Civic Quarter Area Action Plan Consultation.		Noted	No	
Jacob Jumani	Jumani Holdings	413	N/A	N/A	1	General comment	Jumani Holdings (JH) has interest in land within AAP boundary covering two sites at the former MKM House on Warwick Road and Charlton House which is located fronting Warwick Road, Chester Road, and Montague Road. JH has proceeded to implement planning permission at Former MKM House Site. There are design challenges with its delivery and a new scheme has been submitted to make the scheme a quality placemaking opportunity. JH is in the process of acquiring Charlton House site from current owners and discussions are ongoing with Trafford Council regarding redevelopment principles.		Noted. The revised planning application referred to at the MKM House site has since been refused.	No	
Jacob Jumani	Jumani Holdings	413	N/A	N/A	2	General comment	Designation of MKM Housing site as an 'Area to be Developed' is supported. Although question identifying The Trafford pub as a non-designated heritage asset and the value that should be attributed to its retention given it is infrequently open and does not offer much to this important gateway into the AAP area.		The status of this building as a non-designated heritage asset is maintained and new development within its setting would be expected to be respectful	No	
Jacob Jumani	Jumani Holdings	413	N/A	N/A	3	General comment	Generally support the vision to create a mixed-use neighbourhood. The proposed illustrative masterplan (IMP) does identify one form of potential new development on the site in question, although it is acknowledged that these are not yet based on sound detailed design principles.		With the exception of the parameter plans, all other plans within the document are illustrative only. The detail would be confirmed at development management stage subject to the principles of the CQAAP being adhered to.	No	
Jacob Jumani	Jumani Holdings	413	N/A	N/A	4	General comment	Policy CQ1 (Section 4.1.1). Note that the three urban strategy diagrams set out key strategies for the future development of the two sites, including: Predominantly C uses (residential); Improved permeability with a new tertiary connecting route shown through the Charlton House site; A massing language that seeks to strengthen Chester Road with a potential courtyard shown on the Charlton House site; and Clear height parameters of up to 12 storeys covering both sites. Support these broad objectives, redevelopment of both sites can help deliver these. But have comments on the above height.		Following the Regulation 19 consultation, some adjustment to the land use parameter plan is proposed. The changes include affixed land use designations more closely with development sites. The affected sites in this case continue to be shown for 'predominantly residential uses' and also as locations for up to 12 storey developments. Courtyard developments are not, in fact, encouraged and any remaining reference to courtyards will be removed. The favoured approach is perimeter blocks. With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only.	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram
Jacob Jumani	Jumani Holdings	413	N/A	N/A	5	General comment	Central Neighbourhood (Pages 49 & 50) Support aspiration for denser urban grain and use of vacant sites but have issues with the illustrative masterplan image. It depicts a form of development on the former MKM House site that bears no resemblance to the consented scheme. The illustrative material should reflect the implemented scheme or the newly submitted scheme throughout the document that was submitted in September 2020.		With the exception of the parameter plans, all other plans within the document are illustrative only. The detail would be confirmed at development management stage subject to the principles of the CQAAP being adhered to.	No	

Jacob Jumani	Jumani Holdings	413	N/A	N/A	6	General comment	The illustrative masterplan image shows the redevelopment of Charlton House as significantly below the 12 storey parameter height, which is not deliverable. This material should be consistent and portray the correct message. A taller scheme should be included in the illustrative masterplan, at least up to the 12 storey datum if not taller to represent a Landmark Building.		The building heights parameter plan which forms part of Policy CQ1 identifies the locations where the tallest buildings may be appropriate when having regard to the findings of the Townscape and Visual Impact Assessment (evidence base). This plan identifies this as a location where a developments should be limited to 12 storeys in height. Whilst some adjustments to this parameter plan are proposed following the Regulation 19 consultation, the changes do not affect this location. The site, at Regulation 19 stage, was not shown as a 'gateway opportunity' on the building heights parameter plan and nor as a location for a landmark building within the neighbourhood guidance. A different approach is now proposed in which 'gateway opportunities' are removed from the building heights parameters plan and 'gateway locations' are added to the improved permeability and greenspace parameters plan. A 'gateway location' is identified at the junction of Warwick Road and Chester Road. However, this does not automatically translate into a tall building. The site continues to be shown as containing 'negative impact buildings on under-utilised sites.'	Yes	Main modification as part of wider Policy CQ1 changes.
Jacob Jumani	Jumani Holdings	413	N/A	N/A	7	General comment	Do not agree with the illustrative masterplan that proposes development at MKM House that is significantly lower than the now implemented planning permission for a 12 storey building albeit is also lower than the submitted planning application for a 13 storey building.		The building heights parameter plan which forms part of Policy CQ1 identifies the locations where the tallest buildings may be appropriate when having regard to the findings of the Townscape and Visual Impact Assessment (evidence base). This plan identifies this as a location where a developments should be limited to 12 storeys in height. Whilst some adjustments to this parameter plan are proposed following the Regulation 19 consultation, the changes do not affect this location. With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAAP are illustrative only.	No	
Jacob Jumani	Jumani Holdings	413	N/A	N/A	8	General comment	It is a significant missed opportunity not to identify the Charlton House site a "Proposed Landmark Building" given its location at arguably the most important Major Gateway in the AAP area. This will be a prominent development on Chester Road and the new Processional Route and has the potential to be a high quality building marking the Civic Quarter from Chester Road.		The site, at Regulation 19 stage, was not shown as a 'gateway opportunity' on the building heights parameter plan and nor as a location for a landmark building within the neighbourhood guidance. A different approach is now proposed in which 'gateway opportunities' are removed from the building heights parameter plan and 'gateway locations' are added to the improved permeability and greenspace parameter plan. A 'gateway location' is identified at the junction of Warwick Road and Chester Road. However, this does not automatically translate into a tall building.	No	
Jacob Jumani	Jumani Holdings	413	N/A	N/A	9	General comment	Acknowledge the new green route proposed that could be provided as part of the Charlton House redevelopment.		Noted	No	
Jacob Jumani	Jumani Holdings	413	N/A	N/A	10	General comment	Regarding height parameters for Former MKM House, it is acknowledged that the site sits within an area indicated for buildings up to 12 storeys, which reflects the implemented consent and is supported. As part of the newly submitted scheme being discussed with officers it does need to take into account to include an additional storey over and above the 12 storeys to help make the scheme deliverable. Given the scale of the existing Warwickgate House it is felt that, subject to an acceptable design solution, an additional storey could be supported and, therefore, it is requested that the language of the AAP is clear that there may be potential to explore heights above the stated guidelines in certain circumstances.		The building heights parameter plan which forms part of Policy CQ1 identifies the locations where the tallest buildings may be appropriate when having regard to the findings of the Townscape and Visual Impact Assessment (evidence base). This plan identifies this as a location where developments should be limited to 12 storeys in height. Whilst some adjustments to this parameter plan are proposed following the Regulation 19 consultation, the changes do not affect this location. Policy CQ1 is clear that development proposals should accord with the parameter plans. The revised planning application has since been refused.	No	
Jacob Jumani	Jumani Holdings	413	N/A	N/A	11	General comment	Regarding height parameters for Charlton House, this site sits at the strategically important junction of Warwick Road and Chester Road, being a key and visible gateway into the Civic Quarter for people going to and from the sports grounds or travelling into Manchester. The existing building is already tall but is currently derelict and an eyesore.		The building heights parameter plan which forms part of Policy CQ1 identifies the locations where the tallest buildings may be appropriate when having regard to the findings of the Townscape and Visual Impact Assessment (evidence base). This plan identifies this as a location where developments should be limited to 12 storeys in height. Whilst some adjustments to this parameter plan are proposed following the Regulation 19 consultation, the changes do not affect this location. The site, at Regulation 19 stage, was not shown as a 'gateway opportunity' on the building heights parameter plan and nor as a location for a landmark building within the neighbourhood guidance. A different approach is now proposed in which 'gateway opportunities' are removed from the building heights parameter plan and 'gateway locations' are added to the improved permeability and greenspace parameter plan. A 'gateway location' is identified at the junction of Warwick Road and Chester Road. However, this does not automatically translate into a tall building.	Yes	Main modification as part of wider Policy CQ1 changes.
Jacob Jumani	Jumani Holdings	413	N/A	N/A	12	General comment	Do not necessarily challenge maximum of 12 storeys to the north of Warwick Road in the Central Neighbourhood. However, the AAP recognises that elsewhere sites in few locations can have additional height as 'Gateway Opportunities'. It is significant missed opportunity not to recognise Charlton House as such. The other identified 'Gateway Opportunities' have the relationship to the new Processional Route. Its location adjacent to The Trafford pub should not prevent it being made a non-designated heritage asset, given other such designations are also next to heritage assets. Strongly consider designating the building as a 'Gateway Opportunity', it would set a context for exploring the most appropriate height and design further with officers to ensure this important site can fulfil its true potential. JH are extremely keen to work collaboratively with the Council in bringing forward a high quality development on the site.		The building heights parameter plan which forms part of Policy CQ1 identifies the locations where the tallest buildings may be appropriate when having regard to the findings of the Townscape and Visual Impact Assessment (evidence base). This plan identifies this as a location where developments should be limited to 12 storeys in height. Whilst some adjustments to this parameter plan are proposed following the Regulation 19 consultation, the changes do not affect this location. The site, at Regulation 19 stage, was not shown as a 'gateway opportunity' on the building heights parameter plan and nor as a location for a landmark building within the neighbourhood guidance. A different approach is now proposed in which 'gateway opportunities' are removed from the building heights parameter plan and 'gateway locations' are added to the improved permeability and greenspace parameter plan. A 'gateway location' is identified at the junction of Warwick Road and Chester Road. However, this does not automatically translate into a tall building. The detail would be confirmed at planning application stage.	Yes	Main modification as part of wider Policy CQ1 changes
Jacob Jumani	Jumani Holdings	413	N/A	N/A	13	General comment	Given the detailed discussions on the current new planning application, there are concerns around the methodology and assumptions underpinning the viability and affordable housing targets which can somewhat make future developments of a challenge to achieve in the future.		On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focused consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Jumani Holdings was not represented at the event although were invited. The revised planning application has since been refused.	No	
Jacob Jumani	Jumani Holdings	413	N/A	N/A	14	General comment	Support the broad ambitions for the area and the JH sites can make a significant contribution to their delivery and meeting strategic growth objectives. Hoped the improvements set out can be incorporated. JH would welcome further dialogue with Trafford Council and key stakeholders prior to the SRF AAP being finalised to ensure that its comments can be addressed.		On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focused consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Jumani Holdings was not represented at the event although were invited.	No	
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	1	General comment	Lancashire County Cricket Club (LCCC) has engaged with the Council on its aspirations for the cricket ground during the formulation of the Civic Quarter Masterplan and the AAP. As part of these discussions, it was LCCC's understanding that the vision for the area covered by the Southern Neighbourhood was the creation of a leisure quarter with the promotion of the cricket ground together with enhanced/additional leisure facilities. This vision included strengthening the role of the cricket ground, replacing the outdated LCCC training facilities as part of combined new leisure facility, additional multistorey car park on the former B&Q site with other leisure uses to compensate for loss of parking, enhancing the visitor experience to the cricket ground with professional route on Brian Statham Way together with enhancement of areas round the cricket ground. LCCC has always made clear that the creation of a permanent public square on an area of LCCC's car parking would not be acceptable. LCCC's understanding was that significant progress had been made with the Council in setting that vision and was fully expecting it to be incorporated/reflected in the current version of the AAP. LCCC is particularly disappointed that this is not the case. The vision is a clear departure from the vision promoted by the Council in partnership with the LCCC. That calls into question the deliverability of the AAP and Southern Neighbourhood. The AAP for that reason cannot be regarded as effective in accordance with the tests of soundness.		A Statement of Common Ground is due to be prepared with LCCC. In advance of the Regulation 19 consultation, a change in Council priorities in response to financial pressures resulted in investment proposals for leisure centres being changed from new build/new locations to refurbishment in situ. This impacted on plans for Stretford leisure centre; previously intended to be relocated to the B&Q site and with an adjacent multi-storey car park. Such a siting would have resulted in the concentration of main sporting facilities/attractions in the Southern Neighbourhood. The adjustment resulted in the B&Q site being indicated as 'predominantly residential' in the land use parameter plan. Following the Regulation 19 consultation, and in reflecting on LCCC's comments, some adjustments to the document are proposed in response, as follows: 1. Policy CQ1 is proposed to be redrafted and with reference given at the outset to development being supported which maximises the identity of the Civic Quarter as a visitor destination and to lead major regeneration in the area (and with specific reference given in the policy to the role and potential of LCCC); 2. Policy CQ1 will also be redrafted to refer to the need to prevent development on sites adjacent to LCCC which may undermine its role and operation; 3. The land use parameter plan supporting Policy CQ1 is proposed to change to show the B&Q site for both 'residential and sport/leisure uses' (and not just residential uses); 4. The land use parameter plan is also proposed to change to show the existing leisure centre for the same both 'residential and sport/leisure uses' (and not just sport/leisure uses); 5. The opportunity that LCCC's presence affords in reinforcing a sport/leisure/tourist function within the Civic Quarter will be referred to within the 'Summary of Opportunities' at para 2.8; 6. Building on the	Yes	Main modification as part of wider Policy CQ1 changes, minor modification to Policy CQ2 and to supporting text/diagram
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	2	General comment	The AAP throws out the outcome of a partnership approach to the Southern Neighbourhood which fairly represented not only an analysis of community needs but their alignment with spatial planning to guide public and private investment decisions.		Noted	No	
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	3	General comment	Ambition to create new leisure community facility linked with other assets including LCCC has been lost because short term investment priorities have been impacted by the present health crisis. The AAP covers the area through to 2037 and beyond, the availability of resources should determine the pace at which the vision for the area is delivered not the essence of the vision itself when it is the right vision for the area. There are a range of public funding programmes available which can assist in the delivery of the leisure facility, such as the levelling up fund.		A Statement of Common Ground is due to be prepared with LCCC. In advance of the Regulation 19 consultation, a change in Council priorities in response to financial pressures resulted in investment proposals for leisure centres being changed from new build/new locations to refurbishment in situ. This impacted on plans for Stretford leisure centre; previously intended to be relocated to the B&Q site and with an adjacent multi-storey car park. Such a siting would have resulted in the concentration of main sporting facilities/attractions in the Southern Neighbourhood. The adjustment resulted in the B&Q site being indicated as 'predominantly residential' in the land use parameter plan. Following the Regulation 19 consultation, and in reflecting on LCCC's comments, some adjustments to the document are proposed in response, including: the land use parameter plan supporting Policy CQ1 is proposed to change to show the B&Q site for both 'residential and sport/leisure uses' (and not just residential uses); and the land use parameter plan is also proposed to change to show the existing leisure centre for the same both 'residential and sport/leisure uses' (and not just sport/leisure uses). The Council can no longer commit to the building of a new leisure centre on the adjacent site, although nonetheless the redrafted wording of the document (and the land uses parameter plan) would not prohibit it as an option in the future. However, new community/club training facilities could still be pursued by LCCC if it desired in a location near to their ground.	No	Main modification as part of Policy CQ1 changes
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	4	General comment	The vision is a clear departure from the vision promoted by the Council in partnership with the LCCC. That calls into question the deliverability of the AAP and Southern Neighbourhood. The AAP cannot be regarded as effective in accordance with the tests of soundness		A Statement of Common Ground is due to be prepared with LCCC. Following the Regulation 19 consultation, and in reflecting on LCCC's comments, some adjustments to the document are proposed in response, including: Policy CQ1 is proposed to be redrafted and with reference given at the outset to development being supported which maximises the identity of the Civic Quarter as a visitor destination and to lead major regeneration in the area (and with specific reference given in the policy to the role and potential of LCCC); Policy CQ1 will also be redrafted to refer to the need to prevent development on sites adjacent to LCCC which may undermine its role and operation; the opportunity that LCCC's presence affords in reinforcing a sport/leisure/tourist function within the Civic Quarter will be referred to within the 'Summary of Opportunities' at para 2.8; and building on the success of LCCC will be referred to as a new Strategic Objectives at para 3.2. The main purpose of these changes is to further the function, status and scope of LCCC, in recognition of its ability to play an anchor role in the regeneration of the Civic Quarter.	Yes	Main modification as part of wider Policy CQ1 changes, other minor modifications
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	5	12. Please state why you consider the CQ AAP to be sound/unsound, including references to relevant legislation and policies. Please reference legislation and policies for each comment.	Policies from the NPPF, the Core Strategy, Refreshed Stretford Masterplan and emerging Local Plan have been highlighted. For the AAP to pass the test of soundness it should contain proposals/policies which are consistent with the above planning policy framework. This means including proposals/policies which will enhance LCCC's status. The current draft of the AAP fails to achieve this and LCCC therefore objects to the AAP. None of the strategic objectives in section 3.2 include 'the growth and enhancement of LCCC and the strengthening of its role as an international sporting venue'. It is clear from the planning policy context that such an objective is central to the AAP. The failure of the AAP to do so means that the AAP cannot be regarded as having been positively prepared, justified or consistent with national/regional and local planning policy. The strategic vision focuses solely on connectivity and accessibility. The strategic vision should include reference to the role of LCCC as a renowned international sporting venue. In failing to do so, the AAP has not been positively prepared, justified and is inconsistent with national/regional/local policy. The Improved Permeability and Greenspace Plan includes two large areas of open space on the LCCC site. The existing car parking is necessary to LCCC's operation and the loss of such land to open space would have significant detrimental effect on LCCC's future as an international sporting venue. The AAP is therefore unsound in this respect being neither positively prepared, justified or consistent with relevant planning policy. Vision for the Southern Neighbourhood should be amended to refer to enhancement of LCCC as an international sporting venue. Describing the opportunities for the cricket ground as 'consolidation' is at odds with		A Statement of Common Ground is due to be prepared with LCCC. Following the Regulation 19 consultation, and in reflecting on LCCC's comments, some adjustments to the document are proposed in response, including: Policy CQ1 is proposed to be redrafted and with reference given at the outset to development being supported which maximises the identity of the Civic Quarter as a visitor destination and to lead major regeneration in the area (and with specific reference given in the policy to the role and potential of LCCC); Policy CQ1 will also be redrafted to refer to the need to prevent development on sites adjacent to LCCC which may undermine its role and operation; the opportunity that LCCC's presence affords in reinforcing a sport/leisure/tourist function within the Civic Quarter will be referred to within the 'Summary of Opportunities' at para 2.8; and building on the success of LCCC will be referred to as a new Strategic Objectives at para 3.2. The main purpose of these changes is to further the function, status and scope of LCCC, in recognition of its ability to play an anchor role in the regeneration of the Civic Quarter. Notwithstanding their illustrative nature, the plans showing the two new buildings within LCCC's curtilage will be amended, and furthermore, it is proposed to adjust the text in the Neighbourhood guidance to refer to the potential for some consolidation of surface level car parking at LCCC is alternative parking is provided and which would not impact upon the operation of LCCC.	Yes	Main modification as part of wider Policy CQ1 changes. Minor modification to supporting text/diagram

N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	6	General comment	LCCC objects to the parameter plans incorporated as part of the Policy CQ1 on page 4. Identification of the former B&Q site as residential in the Land Uses Plan is inconsistent with the vision and previous partnership approach for the AAP to promote the growth and enhancement of LCCC as an international sporting venue. Identification of the B&Q site for residential would utilise land which should be promoted for development consistent with growth of the LCCC. The site was identified for multi storey car park/mixed use as part of freeing up car parking to deliver new leisure facilities. This need to replace outdated training facilities remains. The current planning application/appeal for residential development shows that residential on the site is unsuitable and prejudicial to the future operation of the cricket club. The site should be re-designated for car parking/leisure/ancillary uses to the cricket ground. It would be consistent with enhancing LCCCs status as international sporting venue and also strengthen links with Longford Park. The 'Area Today' section for the Southern Neighbourhood should remove reference to significant opportunity for residential development and emended to identify opportunities for the former B&Q site are to deliver development that is strengthening of the role of the cricket ground as an international sporting venue comprising carparking/leisure related uses.		A Statement of Common Ground is due to be prepared with LCCC. In advance of the Regulation 19 consultation, a change in Council priorities in response to financial pressures resulted in investment proposals for leisure centres being changed from new build/new locations to refurbishment in situ. This impacted on plans for Stretford leisure centre; previously intended to be relocated to the B&Q site and with an adjacent multi-storey car park. Such a siting would have resulted in the concentration of main sporting facilities/attractions in the Southern Neighbourhood. The adjustment resulted in the B&Q site being indicated as 'predominantly residential' in the land use parameter plan. Following the Regulation 19 consultation, and in reflecting on LCCC's comments, some adjustments to the document are proposed in response, including: the land use parameter plan supporting Policy CQ1 is proposed to change to show the B&Q site for both 'residential and sport/leisure uses' (and not just residential uses); and the land use parameter plan is also proposed to change to show the existing leisure centre for the same both 'residential and sport/leisure uses' (and not just sport/leisure uses). The Council can no longer commit to the building of a new leisure centre on the adjacent site, although nonetheless the redrafted wording of the document (and the land uses parameter plan) would not prohibit it as an option in the future. However, new community/club training facilities could still be pursued by LCCC in a location near to their ground.	Yes	Main modification as part of wider Policy CQ1 changes. Other minor modifications
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	7	General comment	If the Council wishes to promote a public square, it should achieve that by utilising the area in front of the Town Hall including the under used driveway directly in front of the Town Hall, - incorporating the development plot within the Central Neighbourhood which adjoins the junction of Talbot Road and Brian Statham Way which is currently proposed for development; - utilising the existing area of highway within Talbot Road; reconfiguring the junction of Talbot Road and Warwick Road and potentially pedestrianising Warwick Road.		A Statement of Common Ground is due to be prepared with LCCC. Following the Regulation 19 consultation a change is proposed in respect of the delivery of the public space - 'lan zone' - with some flexibility incorporated to indicate its provision at the Talbot Road/Warwick Road/Brian Statham Way junction, potentially involving a combination of Council, UA92, LCCC and highway land but with any detailed proposals brought forward in association with LCCC. LCCC's need for a secure perimeter to the ground is acknowledged.	Yes	Minor modification to supporting text/diagram
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	8	General comment	The AAP for the Southern Neighbourhood lists as an opportunity 'removing barriers and fencing'. The LCCC being permanently open to the public would prejudice use of its landholding/carparking for its own purposes and would be prejudicial to security of the cricket ground. The reference in the AAP to removing barriers and fencing therefore needs to be amended and qualified. LCCC is happy to explore greater use of its landholding to enhance visitor experience on match days but cannot support proposals which potentially prejudice its future operations.		A Statement of Common Ground is due to be prepared with LCCC. These concerns of LCCC are understood and it is suggested that the vision for the Southern Neighbourhood is amended to refer to a diminished visual impact from barriers and fencing (where possible) whilst not undermining public safety. In addition, following subsequent confirmation by LCCC, it is clear that proposals for a new pedestrian route around the outside of the stands cannot be supported in view of safety/security risks. It is proposed, therefore, that all references to this will be deleted. As an alternative the Council is currently exploring with TIGM whether a pedestrian route could be provided on the northern side of the tramline (involving TIGM land) linking Old Trafford Metrolink stop with Great Stone Road.	Yes	Minor modification to supporting text/diagram
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415		General comment	The vision for the Southern Neighbourhood includes as an opportunity 'activating the processional route.' Notwithstanding the Central Neighbourhood also fronts the entire length of Brian Statham Way, there is no corresponding opportunity identified for that neighbourhood to activate the processional route.		It is intended to amend the document to make an equivalent reference within the neighbourhood guidance for the Central Neighbourhood regarding the need to activate the Processional Route (i.e. the eastern side of Brian Statham Way).	Yes	Minor modification to supporting text/diagram
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	9	General comment	The landscape design principles for the Southern Neighbourhood includes podium carparking fronting Great Stone Road which would 'allow for carparking to be consolidated and release space for people friendly "community streets" and a central green area for residents' insofar as it relates to land within LCCC's ownership. LCCC objects to this proposal and given its prejudicial impact on the operation of the cricket ground and for this reason the proposal is unsound.		A Statement of Common Ground is due to be prepared with LCCC. It is proposed to adjust the text in the Neighbourhood guidance to refer to the potential for some consolidation of surface level car parking at LCCC is alternative parking is provided and which would not impact upon the operation of LCCC.	Yes	Minor modification to supporting text/diagram
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	10	22. Depending on your answer to question 21, please give details of why you considered that the updated Integrated Assessment process is/is not adequate.	For the same reasons LCCC objects to the AAP and considers it unsound, it follows that the integrated assessment is also inadequate in particular in relation to the assessments undertaken and conclusions reached on IA Objectives 3, 4 and 6.		The conclusions of the integrated assessment process surrounding objectives 3, 4 and 6 are maintained	No	
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	11	16. Reason for Attending the Examination – Soundness. Please note that participation in the Examination will be at the discretion of the appointed Inspector. If you wish to participate in the Examination, please outline why you consider this to be necessary.	It is of critical importance to LCCC as a key stakeholder that the AAP provides a sound and acceptable strategy for the future development of this area. In light of this fact and LCCC's objections to the AAP, it is important that LCCC is afforded an opportunity to appear at the examination of the AAP		Noted	No	
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415		General comment	The plan accompanying the vision for the Southern Neighbourhood shows two large buildings located within LCCC's landholdings. No uses are specified but it is assumed that they are proposed for office use. Such a proposal would utilise existing LCCC car parking and erode the openness around the ground.		Notwithstanding that the plans referred to are illustrative only (contained within the Neighbourhood guidance), it is proposed to amend the document to omit these two buildings from all illustrative plans.	Yes	Minor modification to supporting diagram
Dawn Kinrade	Natural England	219	N/A	N/A	1	General comment	Natural England does not consider that the AAP poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment. The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.		Noted	No	
Pete Whittinham	Savills	419	N/A	N/A	1	General comment	The site shown on enclosed plan is large plot in a prominent location on Talbot Road. Site is currently a vacant office building and car parking, the building extends to almost 100,000 sq ft within a site of 2.2 ha. Site is 2km from Manchester City Centre, within easy walking distance of cricket and football stadiums. White City Retail Park and Tesco Extra provide shops and services within walking distance. Old Trafford Metrolink stop is nearby. Frequent bus services. Site is sustainably located and suitable for redevelopment. The office building within the site is not considered suitable for conversion. The UA92 site was recently granted planning permission on 25 September 2020 for residential and mixed use. This is indicative of the emerging context of the site. The majority of the site could be redeveloped for a medium to high density residential scheme. This would provide much needed new housing. Site is not allocated for any specific purpose. The site falls within the Old Trafford Priority Regeneration Area (Policy L3). The policy states that housing led redevelopment will be promoted. The site is a sustainably located brownfield site which offers a significant regeneration opportunity. Given the sensitivity around Green Belt release through the GMSF the Council should be seeking to concentrate high density development on sustainable urban brownfield sites wherever possible. Trafford Council acknowledge that their current housing land supply figure is 2.4 years. Trafford's housing supply is therefore less than 50% of the Government's target of five years. In Trafford, the HDT has shown an under delivery of housing over the last three years. The effect of this is the presumption in favour of sustainable development. The overall context in Trafford lends favourably to supporting the development of land in sustainable		The British Gas site (the building) is shown, at Regulation 19 stage, for 'predominantly workspace uses' whilst its car park is shown for 'predominantly residential uses' on the land uses parameter plan. The relevant neighbourhood guidance refers to the site as offering a significant opportunity for continuing employment development and potentially new commercial development, residential development or a mix of these uses. A different land use parameter plan is now proposed which incorporates a number of adjustments, including aligning different uses more closely with site boundaries. The site in its entirety is shown for both residential and workspace uses. No changes are proposed to the neighbourhood guidance since flexibility is retained in terms of the options for conversion or redevelopment, and also with reference to end uses.	Yes	Main modification as part of wider Policy CQ1 changes
					2	General comment	Supportive of general objective to provide new housing. The 4,000 should not be seen as a cap but as a broad target which could be exceeded. The site straddles the Central and Eastern Neighbourhoods. The AAP shows new buildings on the existing car park in the Eastern Neighbourhood. Agree with the site being identified as an opportunity. But recommend that the building is also identified for redevelopment to provide flexibility within the AAP for future redevelopment proposals.		The British Gas site (the building) is shown, at Regulation 19 stage, for 'predominantly workspace uses' whilst its car park is shown for 'predominantly residential uses' on the land uses parameter plan. The relevant neighbourhood guidance refers to the site as offering a significant opportunity for continuing employment development and potentially new commercial development, residential development or a mix of these uses. A different land use parameter plan is now proposed which incorporates a number of adjustments, including aligning different uses more closely with site boundaries. The site in its entirety is shown for both residential and workspace uses. No changes are proposed to the neighbourhood guidance since flexibility is retained in terms of the options for conversion or redevelopment, and also with reference to end uses. The CQAAP is a capacity-led document which envisages that up to 4,000 new homes could be accommodated in time.	Yes	Main modification as part of wider Policy CQ1 changes
					3	General comment	Section 2.6 of the AAP identifies existing tall buildings within the AAP boundary. Other tall buildings in the AAP areas include Alexander House off Talbot Road and the newly built Insignia scheme at 86 Talbot Road off Warwick Road. There are also a number of large buildings and structures in terms of scale and massing in the area, such as Old Trafford Football Stadium and Old Trafford Cricket Ground. The City Centre's commercial and residential boundaries are expanding outwards into Trafford. The change has seen a number of new high density tall residential buildings being granted planning permission and built in recent years. This change is reflected in the AAP which identifies sites as being suitable for high density development and tall buildings of up-to 20 storeys in certain locations. This provides a useful guide on the development context in the immediate vicinity of the site and demonstrates that there is a precedent for tall buildings in the area. Again, 20 storeys should not be seen as cap but indicative of the general height that could be achieved. By allowing some flexibility there would be opportunity to assess the impact of tall buildings on the skyline. Support the general objective of tall buildings. Buildings of 20 storeys would also be appropriate at the site and this should be reflected in the AAP. Policies within the AAP should not place unnecessary restrictions on building heights. Any parameters within the AAP should be used to guide development proposals and not be enforced stringently. Flexibility should be incorporated into the AAP to allow the appropriateness of scale and massing to be assessed on a site by site basis.		The building heights parameter plan which forms part of Policy CQ1 identifies the locations where the tallest buildings may be appropriate when having regard to the findings of the Townscape and Visual Impact Assessment (evidence base). Following the Regulation 19 consultation, some adjustments to the building heights parameter plan are now proposed, including aligning height categories more closely with development sites. Other changes affect the location of the British Gas site, including a more gradual height gradation to the east of the British Gas building, and the consequence is that the British Gas site in its entirety spans the three height ranges (of up to 20 storeys, up to 12 storeys, and up to 6 storeys). Policy CQ1 is clear that development proposals should accord with the parameter plans. All other plans within the document are illustrative only. The detail would be confirmed at development management stage subject to the principles of the CQAAP being adhered to.	Yes	Main modification as part of wider Policy CQ1 changes
Neil Tatton	Resolve106	417	N/A	N/A	1	12. Please state why you consider the CQ AAP to be sound/unsound, including references to relevant legislation and policies. Please reference legislation and policies for each comment.	The AAP does not meet the tests of soundness having regard to the adequacy of the viability evidence that underpins Policy CQ11 'Infrastructure and Obligations', including a requirement for 25% affordable housing provision. The Viability Assessment (VA) has not been produced in accordance with National Planning Guidance (NPG) and is unable to demonstrate that the requirements of policy CQ11 are deliverable without prejudicing the realisation of an appropriate Benchmark Land Value. Trafford openly acknowledge that the VA departs from the recommended approach in NPG that requires the establishment of Benchmark Land Value (BLV) based on the principle of Existing Use Value (EUV) plus a 'premium' to incentivise an owner to release land for development. Trafford confirms at paragraph 4.494 that if NPG compliant methodology toward the establishment of BLV is applied Policy CQ11 is not viable. The 'alternative method' included in paragraph 4.95 comprises an assessment of the Residual Value as a proportion of the Net Development Value (NDV) to which TC conclude that a viable BLV equates to between 4.5% to 6.5% of NDV. Whilst the VA incorporates a 'benchmarking' of land values derived from analysis of different projects in Trafford this does not represent an assessment of BLV in accordance with NPG. Suggested that this be made explicit in order that it may be identified whether or not this is the case. There is no alternate methodology supported by NPG, therefore its provisions must be adhered to in the process of Plan Making. The VA is neither effective or consistent with national policy and by definition policy CQ11 is therefore unsound. The circumstances in relation to the identified deficiencies in the VA are comparable with those considered at the examination of the Old Oak and Park Royal Development		On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focussed consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Resolve 106 was not represented at the event although were invited (and with apologies given)	No	
					2	14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and evidence necessary to support/justify your suggested change. Please be as precise as possible.	A new VA should be undertaken before the CQ AAP is submitted for examination, utilising the required methodology in NPG to establish an appropriate BLV for plan making purposes. Essential that a revised VA tests the delivery of the CQ AAP incorporating the required S106 contributions on a stand-alone basis. Testing the proportion of affordable housing that may be viably supported should be demonstrably in excess of 10%. This is because Core Strategy Policy L2 provides greater flexibility in allowing negotiation of affordable housing than post 2019 NPPF. Paragraph L.2.1.3 of the TCS remains a suitable basis for consideration of viability matters in connection with planning applications until such time as it is replaced in full with a NPPF compliant Local Plan		On 12th July 2021, and following the Regulation 19 consultation, an additional viability-focussed consultation event was held. The purpose of this exercise was to extract details from the development industry on key viability assumptions, regarding values and costs for example. Resolve 106 were not represented at the event although were invited (and with apologies given)	No	
					3	15. If your representation is proposing a modification(s), do you consider it necessary to participate in the Examination in Public?	Would be prepared to participate in the Examination in Public if this would be of assistance.		Noted	No	
Fiona Pudge	Sport England	28	N/A	N/A	1	General comment	Creation of high quality public realm – this objective is welcomed and supported, especially the creation of a Wellbeing Route and public spaces that link LCC and Manchester United.		Noted	No	

Fiona Pudge	Sport England	28	N/A	N/A	2		Supporting Economic Growth – the inclusion of leisure within this objective is welcomed. However, given the presence of the two international sports stadiums, one within the AAP boundary and one just outside, the economic opportunities they can bring should be encouraged.	Noted	No	
Fiona Pudge	Sport England	28	N/A	N/A	3		Improved Permeability and Connectivity – this objective is welcomed and supported.	Noted	No	
Fiona Pudge	Sport England	28	N/A	N/A	4		Strategic Vision – the aspiration to enhance the main arterial route as a walking and cycling corridor linking to other areas, and the potential for a new Recreation Corridor, is welcomed and supported.	Noted	No	
Fiona Pudge	Sport England	28	N/A	N/A	5		Policy CQ1 (Civic Quarter Regeneration) - Support but suggest it can be strengthened by adding a requirement to include the principles of Active Design. Suggested wording: 'Generally accord with the principles of Active Design to promote health and well being and to encourage physical activity'. Active Design is a key principle of the GM Moving Strategy. The priorities set out in the GM Moving Plan should also be used to help inform this AAP. The inclusion of this wording would also help implement the Active Environment 'Big Issue' of Sport England's Strategy 'Uniting the Movement' (2021).	Following the Regulation 19 consultation, it is intended to amend the document to make reference to Active Design, including within Policy CQ7 and within the text accompanying Policy CQ8	Yes	Minor modification to Policy CQ7, Policy CQ8 and to supporting text/diagram
Fiona Pudge	Sport England	28	N/A	N/A	6		Policy CQ1 (Parameters) - Wish to see a reduction in the height of buildings immediately adjacent to the LCC cricket ground. There is a fine turf training facility next to the ground within the car park and overshadowing from tall buildings can prejudice the use of the training facility. The height of buildings causing a prejudicial impact on the training facility as a result of a planning application on the former B&Q site has been cited as a reason for refusal (ref: 100400/OUT/20). The building heights cited in this application are between 4 and 8 storeys. It is strongly advised the AAP Team consult with the England and Wales Cricket Board (ECB) Facilities Team and the LCC to discuss what an appropriate height in this location would be. Sport England would object to this element of the AAP if the building heights parameters within the vicinity of the cricket ground are not reduced in accordance with advice from the ECB.	The building heights parameter plan which forms part of Policy CQ1 identifies the locations where the tallest buildings may be appropriate when having regard to the findings of the Townscape and Visual Impact Assessment (evidence base). This plan identifies this as a location where developments should be limited to 6 storeys in height. Whilst some adjustments to this parameter plan are proposed following the Regulation 19 consultation, the changes do not affect this location. Policy CQ1 is clear that development proposals should accord with the parameter plans, but that does not infer all developments in this location should amount to six storeys. The detail would be confirmed at development management stage subject to the principles of the CQAAP being adhered to. Sport England would have an opportunity to comment on individual planning applications.	No	
Fiona Pudge	Sport England	28	N/A	N/A	7		Policy CQ3 (Mixed Communities) – the inclusion of refurbishing Stretford Leisure Centre is welcomed and supported.	Noted	No	
Fiona Pudge	Sport England	28	N/A	N/A	8		CQ6 (High Quality Urban Design) - Support this policy but suggest it can be strengthened by adding a requirement to include the principles of Active Design. Suggested wording: 'Generally accord with the principles of Active Design to promote health and well being and to encourage physical activity'. Active Design is a key principle of the GM Moving Strategy. The priorities set out in the GM Moving Plan should also be used to help inform this AAP. The inclusion of this wording would also help implement the Active Environment 'Big Issue' of Sport England's Strategy 'Uniting the Movement' (2021). The third bullet point relating to taller buildings, would be inappropriate in the vicinity of the cricket ground. If the Parameters Plan associated with policy CQ1 is amended to show a lower building height around the LCC ground, then Sport England would wish to see a direct reference to that plan contained within this policy.	Following the Regulation 19 consultation, it is intended to amend the document to make reference to Active Design, including within Policy CQ7 and within the text accompanying Policy CQ8. The building heights parameter plan which forms part of Policy CQ1 identifies the locations where the tallest buildings may be appropriate when having regard to the findings of the Townscape and Visual Impact Assessment (evidence base). This plan identifies this as a location where developments should be limited to 6 storeys in height. Whilst some adjustments to this parameter plan are proposed following the Regulation 19 consultation, the changes do not affect this location. Policy CQ1 is clear that development proposals should accord with the parameter plans, but that does not infer all developments in this location should amount to six storeys. The detail would be confirmed at development management stage subject to the principles of the CQAAP being adhered to. Sport England would have an opportunity to comment on individual planning applications.	Yes	Minor modification to Policy CQ7, Policy CQ8 and to supporting text/diagram
Fiona Pudge	Sport England	28	N/A	N/A	9		Policy CQ7 (Public Realm Principles) – Sport England supports this policy but suggests it can be strengthened by adding a requirement to include the principles of Active Design. Suggested wording is below: 'Generally accord with the principles of Active Design to promote health and well being and to encourage physical activity'. Active Design is a key principle of the GM Moving Strategy. The priorities set out in the GM Moving Plan should also be used to help inform this AAP. The inclusion of this wording would also help implement the Active Environment 'Big Issue' of Sport England's Strategy 'Uniting the Movement' (2021).	Following the Regulation 19 consultation, it is intended to amend the document to make reference to Active Design, including within Policy CQ7 and within the text accompanying Policy CQ8	Yes	Minor modification to Policy CQ7, Policy CQ8 and to supporting text/diagram
Fiona Pudge	Sport England	28	N/A	N/A	10		Policy CQ8 (Wellbeing Route – Talbot Road) – this is welcomed and supported.	Noted	No	
Fiona Pudge	Sport England	28	N/A	N/A	11		Policy CQ9 (Processional Route) – this is welcomed and supported.	Noted	No	
Fiona Pudge	Sport England	28	N/A	N/A	12		Policy CQ11 (Infrastructure and Obligations) – the inclusion of sports facilities as an essential infrastructure item is welcomed and supported.	Noted	No	
John Cookson	Transport for Greater Manchester	421	N/A	N/A	1	General comment	The draft of the AAP appears broadly similar to the previous draft and therefore Transport for Greater Manchester's (TfGM) response to the previous draft (attached) still largely applies. Though it is noted that some comments no longer apply as they have been addressed	Noted	No	
John Cookson	Transport for Greater Manchester	421	N/A	N/A	2	General comment	The AAP is broadly coherent with TfGM's 2040 Strategy (which is now referenced explicitly in this draft).	Noted	No	
John Cookson	Transport for Greater Manchester	421	N/A	N/A	3	General comment	TfGM strongly supports the approach to urban design and to density and walkability of neighbourhoods	Noted	No	
John Cookson	Transport for Greater Manchester	421	N/A	N/A	4	General comment	TfGM supports the approach to walking and cycling, which is coherent with TfGM's Streets for All approach and with the Bee Network – it may be worth referencing these two documents explicitly in the AAP	Following the Regulation 19 consultation, it is intended to amend the document to make reference to the Streets for All initiative, including within the text accompanying Policy CQ7 and Policy CQ8. The Bee Network was previously referenced but it is proposed to amend the document to make this clearer.	Yes	Minor modification to Policy CQ7, Policy CQ8 and to supporting text/diagram
John Cookson	Transport for Greater Manchester	421	N/A	N/A	5	General comment	TfGM supports the approach to walking and cycling, which is coherent with TfGM's Streets for All approach and with the Bee Network – it may be worth referencing these two documents explicitly in the AAP.	Following the Regulation 19 consultation, it is intended to amend the document to make reference to the Streets for All initiative, including within the text accompanying Policy CQ7 and Policy CQ8. The Bee Network was previously referenced but it is proposed to make this clearer	Yes	Minor modification to Policy CQ7, Policy CQ8 and to supporting text/diagram
John Cookson	Transport for Greater Manchester	421	N/A	N/A	6	General comment	There is scope to say more about bus in the AAP.	Following the Regulation 19 consultation, it is intended to amend the document to make reference to buses as well as to trams (as part of a wider objective of promoting public transport use) within the text accompanying Policy CQ10.	Yes	Minor modification to Policy CQ10
Gemma Gaskell	United Utilities	260	N/A	N/A	1	General comment	Consultation responses to earlier consultations on the Civic Quarter Masterplan in 2018 and 2020 should be read in conjunction with this response. There is some significant and complex infrastructure within the area and that will need to be afforded due regard in the construction process. The Council should be aware that complications could arise as networks pass straight through these areas.	With the exception of the parameter plans and the land allocations plan, all other plans within the document are illustrative only. The detailed positioning and layout of buildings would be confirmed at development management stage subject to the principles of the CQAAP being adhered to. United Utilities would have the opportunity to comment on individual planning applications	No	
Gemma Gaskell	United Utilities	260	N/A	N/A	2	General comment	United Utilities seek to work closely with the Council during the masterplanning process. Highlight United Utilities' free pre-application service for applicants to discuss drainage strategies and water supply requirements. Contacts supplied for enquiries.	Noted	No	
Gemma Gaskell	United Utilities	260	N/A	N/A	3	General comment	AAP should set out need to follow the hierarchy of drainage options for surface water. Public sewer is the least preferable option in NPPG. Principles should set out how redevelopment of sites achieve a significant volume reduction of surface water discharge with no surface water discharging to the existing public sewerage network. This can be achieved if early thought is given to drainage strategies. A reduction in surface water is in accordance with the non-statutory technical standards for sustainable drainage produced by DEFRA. Reducing discharge to public sewer network will reduce the risk of sewer flooding and reduce the pressure on combined sewer overflows and therefore resulting in environmental benefits for the wider environment. It is important to explain that the existing drainage system in the area appears to be largely dominated by combined sewers. These sewers include several combined sewer overflows that are permitted by the Environment Agency. If the surface water entering the sewer network in the area is significantly reduced by discharging to more sustainable forms, it decreases the discharges from such overflow points and improve the river environment.	Following the Regulation 19 consultation, it is intended to amend the document to make specific reference to the need to apply the hierarchy of drainage options for dealing with surface water within new developments (within Policy CQ4) and to generally emphasise the importance of incorporating sustainable drainage options within new developments and new areas of public realm. Other parts of the document where references to sustainable drainage features will be either introduced or further reinforced include Policy CQ7 and within the Neighbourhood guidance.	Yes	Minor modification to Policy CQ4, Policy CQ7 and to supporting text/diagram
Gemma Gaskell	United Utilities	260	N/A	N/A	4	General comment	There are opportunities to further increase flood resilience and manage surface water run-off sustainably. Genuine above ground SuDS can be effectively utilised in the following instances: To drain surface water run-off from car parking, whilst making a significant improvement to the visual appearance of the car park, and providing biodiversity enhancements. United Utilities would like to see the above highlighted in Policy CQ10 'Movement and Car Parking Strategy'. Installing new and retrofitting existing public spaces with SuDS - features such as green roofs, street trees, sculpture trails, high quality public realm, landscaping proposal and walking/cycling routes all offer an alternative to directly channelling surface water through sewers or to nearby watercourses. This should be reflected in Policy CQ6 'High Quality Urban Design' and Policy CQ7 'Public Realm Principles' in the AAP. With the amount of public realm improvements proposed, surface water management should be at the forefront of the design process, and would encourage consideration is given to delivering such schemes with the aim of achieving the most sustainable outcome.	Following the Regulation 19 consultation, it is intended to amend the document to make specific reference to the need to apply the hierarchy of drainage options for dealing with surface water within new developments (within Policy CQ4) and to generally emphasise the importance of incorporating sustainable drainage options within new developments and new areas of public realm. Other parts of the document where references to sustainable drainage features will be either introduced or further reinforced include Policy CQ7 and within the Neighbourhood guidance.	Yes	Minor modification to Policy CQ4, Policy CQ7 and to supporting text/diagram
Gemma Gaskell	United Utilities	260	N/A	N/A	5	General comment	Pleased that Policy CQ4 Sustainability and Climate Change states that 'All development proposals within the AAP area should achieve the highest levels of energy and water efficiency that is practical and viable, and should maximise opportunities to incorporate sustainable design features where feasible'. Encourage design techniques like rainwater recycling, green roofs, water butts and permeable surfaces that reduce pressure on public water supply and public sewage system along with mitigating the impact of potential flood risk both within and beyond a site boundary. Opportunity for AAP to add requirement for all new development to encourage water efficiency measures/techniques as part of the design process, whilst ensuring potential is minimised for urban diffuse pollution to affect the surrounding watercourses and water bodies. Encourage all new residential development to achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day. Cost of installing water-efficient fittings to target a per capita consumption of 110l/d has been estimated as a one-off cost of £9 for a four bedroom house. Research undertaken for the Welsh Government indicated potential annual savings on water and energy bills for householders of £24 per year as a result of such water efficiency measures. Evidence document attached from Water Resources West to support the adoption of the Building Regulations Optional Requirement for local authorities in North West England and the Midlands.	Following the Regulation 19 consultation, it is intended to amend the document to make specific reference to the need to apply the hierarchy of drainage options for dealing with surface water within new developments (within Policy CQ4) and to generally emphasise the importance of incorporating sustainable drainage options within new developments and new areas of public realm. Other parts of the document where references to sustainable drainage features will be either introduced or further reinforced include Policy CQ7 and within the Neighbourhood guidance. The document includes precedent imagery of potential sustainable drainage features (such as rain gardens). Policy CQ4 will retain the reference to new development achieving the highest level of energy and water efficiency that is practical and viable (and with an extra sentence added to ensure that pollution risks are minimised), but it is not considered necessary to specifically introduce matters covered via Building Regulations.	Yes	Minor modification to Policy CQ4, Policy CQ7 and to supporting text/diagram
Gemma Gaskell	United Utilities	260	N/A	N/A	6	General comment	Future developers should consider that sites may have existing infrastructure crossing through them. It will be important that any applicant produces a detailed constraints plan to inform any development layout on these sites. Development will most likely not be possible over or in close proximity to these assets, and diversion or modification to site layout may be required. It is advised that United Utilities is contacted at the earliest opportunity to discuss this.	With the exception of the parameter plans, all other plans within the document are illustrative only. The detailed positioning and layout of buildings would be confirmed at development management stage subject to the principles of the CQAAP being adhered to. United Utilities would have the opportunity to comment on individual planning applications	No	
Peter Baugh	Trafford Arts Association	420	N/A	N/A	1	General comment	Providing input to contribute to the creation of much needed community facilities for future generations. There are serious shortcomings in the current facilities within Trafford. Trafford Arts Association is an umbrella organisation for the arts, musical and creative activities within Trafford.	The document seeks to significantly enhance the attraction of the Civic Quarter as a visitor and leisure destination, and for it to accommodate a range of retail, commercial, leisure and service uses to lead to enhanced vibrancy. Following this Regulation 19 consultation it is proposed to amend Policy CQ3 to make explicit reference to new uses being encouraged which would further enhance the civic and tourism function of the Civic Quarter (including museums, exhibition halls and art galleries)	Yes	Minor modification to Policy CQ3
					2	General comment	Wholeheartedly agree with statement in Core Strategy Policy R6 Culture and Tourism, section 26.1.	Noted	No	
					3	General comment	The plan makes great play of the 19th century developments in the area. But, despite the occasional inclusion of the word 'culture', it fails to include anything recognised as a cultural facility such as a concert hall, for future generations.	The document seeks to significantly enhance the attraction of the Civic Quarter as a visitor and leisure destination, and for it to accommodate a range of retail, commercial, leisure and service uses to lead to enhanced vibrancy. Following this Regulation 19 consultation it is proposed to amend Policy CQ3 to make explicit reference to new uses being encouraged which would further enhance the civic and tourism function of the Civic Quarter (including museums, exhibition halls and art galleries)	Yes	Minor modification to Policy CQ3

					4	General comment	The inclusion in the AAP of a multi-purpose performing arts space comprising a concert hall, exhibition space and rooms for use by musicians, artists, and craft workers would be an asset offering concerts, musical theatre, plays, photographic and art and craft exhibitions. This building, if situated in a pedestrianised area along with shops and cafes, would play a large part of any special community day or local or Trafford festival.		The document seeks to significantly enhance the attraction of the Civic Quarter as a visitor and leisure destination, and for it to accommodate a range of retail, commercial, leisure and service uses to lead to enhanced vibrancy. Following this Regulation 19 consultation it is proposed to amend Policy CQ3 to make explicit reference to new uses being encouraged which would further enhance the civic and tourism function of the Civic Quarter (including museums, exhibition halls and art galleries)	Yes	Minor modification to Policy CQ3
					5	General comment	Great wish for Trafford to help enrich community buildings. Consideration should also be given to bringing down the cost of hire of Trafford's public buildings including schools, to support not-for-profit community groups.		This request is beyond the scope and purpose of the CQ AAP	No	