



**Trafford Core Strategy:  
Summary of Responses to  
Further Consultation on the  
Preferred Option (June 2009)  
and  
Further Consultation on the  
Core Policies L2, L4, L5, W1  
and R5 (November 2009)  
and  
Further Consultation on the  
Vision, Strategic Objectives,  
and Delivery Strategy  
(March 2010)**

**September 2010**

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POLISH

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PUNJABI

Haddii aad dooneeyso in lagaa taageero garashada macluumaadkaani, fadlan qof uun ka codso inuu waco telefoonka 0161 912-2000 oo noo sheego sida ugu fiican oo aanu macluumaadkaani kuugu soo gudbin karno.

SOMALI

اگر آپ کو یہ معلومات سمجھنے میں مدد کی ضرورت ہے تو براہ مہربانی کسی سے کہیے کہ وہ ہمیں 0161 912-2000 پر ٹیلیفون کرے تاکہ ہمیں معلوم ہو سکے کہ آپ کو یہ معلومات فراہم کرنے کا بہترین طریقہ کیا ہے۔

URDU

## Index of those who have made representation at these stages

ID	Organisation
1013	Trafford Green Party
1018	Trafford Housing Trust
1019	United Utilities
1026	Shell Chemicals UK and Shell Property Co Ltd c/o Agent
1031	Spatial Planning Team, GONW
1034	The Woodland Trust
1035	The Theatres Trust
1036	L&M Limited c/o Agent
1037	Natural England
1038	GMGU (Urban Vision Partnership Ltd)
1040	Bellway Homes Manchester
1041	GMPTE
1042	Ramblers' Association (Manchester & High Peak)
1045	Peel Holdings c/o Agent
1047	Northwest Regional Development Agency
1049	National Offender Management Service c/o Agent
1050	Unnamed Clients c/o Agent
1051	The National Trust
1055	Brixton Plc c/o Agent
1057	LCCC & ASK c/o Agent
1064	Manchester Airport
1066	Greater Manchester Ecology Unit
1067	Altrincham & Sale Chamber of Commerce
1070	Bowdon Conservation Group
1072	APSL c/o Agent
1073	Highways Agency
1074	English Heritage
1076	Warburton Parish Council
1078	Redrow Homes
1080	Sport England
1081	Tesco Stores c/o Agent
1082	Barclays Bank c/o Agent
1085	JD Davidson c/o Agent
1089	United Utilities Property Solutions Ltd
1093	4NW (Formerly North West Regional Assembly)
1094	Bakemark UK c/o Agent
1096	Environment Agency
1097	National Grid
1100	Stevenor Investments c/o Agent
1103	The Coal Authority
1106	Sainsbury Supermarkets Ltd c/o Agent
1120	Trafford College
1125	Trafford Council, Children and Young Person Service (CYPS)
1129	Salford City Council, Strategic Planning
1130	Anstee, Sean
1132	County Archaeologist

1133	Williams, Alex
1134	Equality and Human Rights Commission
1135	Young, Michael
1136	Church Commissioners for England c/o Agent
1140	Wareing, Nicola
1141	Anonymous 2
1142	Trueblood, Joan
1145	Labour Group
1147	Trenchard, Stephen
1148	Fitzgerald, John
1150	Thompson, Peter J
1152	Nikal Ltd c/o Agent
1153	Carter, Audrey
1154	Friends of Longford Park
1155	Moreton, Diana
1158	Homestar Investments Limited c/o Agent
1159	Bowdon Downs Residents Association
1160	Green Spaces for Altrincham
1161	Daniel, Anthony and Partners c/o Agent
1164	BWEA
1166	Tesco Stores Ltd & Maloneview (Sale) Ltd c/o Agent
1167	Tesco Stores Ltd and LCCC c/o Agent
1169	Special Neighbourhood Forum - Altrincham
1170	Special Neighbourhood Forum - Urmston
1173	Greater Manchester Joint Transport Policy Team
1177	Equality & Diversity
1180	Trafford Council, Environment Strategy
1181	Trafford Council, Location Workshop 24 Sept 09
1186	Sharp, Bernard
1188	EnviroLink North West
1189	Orchard Barns c/o Agent
1190	Trafford Council, Conservation Officer
1192	Baugh, Jane
1195	Adshead, Steve
1196	Dolan, John
1197	Redrow Homes
1198	Crichton, B
1199	Sheridan, Marie
1200	Dolan, Ivy
1201	Salkeld, Lynne
1202	Dolan, Gerard
1203	Roberts, Janet
1204	Cuerden, L
1205	Taylor, Georgia
1206	Woodward, Michelle
1207	Citybranch
1208	Eastwood, Mary
1209	SEGRO
1211	Royal London Asset Management

**Further Consultation on the Preferred Option (June 2009) summary responses – Chapter 1 Introduction**

ID	Summary Of Representation
1072	<p>To be sound a core strategy must be effective, justified and consistent with national policy and founded on a robust and credible evidence base (see in particular paragraphs 4.52 and 4.36 of PPS12).</p> <p>The definition of a strategic site/location remains undeveloped and not robust. A generic designation is not appropriate.</p> <p>PPS12 and the Regulations require testing of “reasonable alternatives”. Insufficient examination of reasonable alternatives to spatial development within the Borough has taken place. The three spatial options considered in 2008 were rigid and showed very limited variation between them.</p> <p>The current SA does not consider any additional sites to those proposed in the consultation document, except for Davenport Green.</p> <p>Concern is raised over inconsistencies between several aspects of the evidence base and the robustness of the Core Strategy and accompanying SA in terms of testing reasonable alternatives for spatial development in Trafford. Specifically Davenport Green was not included in any of the three options put forward in July 2008, nor in the Preferred Option in June 2009.</p> <p>Davenport Green is the only site/location which has been subject to assessment which has not been designated as a strategic Site/Location in the Core Strategy. The other employment sites, allocated in the UDP, should have been subject to a similar assessment as Davenport Green. No evidence was provided in 2008 (and again in 2009) to demonstrate that the chosen locations and sites were the right ones and that together they would provide sufficient capacity for development over the plan period. There is no knowledge of Trafford making available a “long list” of sites/locations which were considered and assessed for their potential to meet the criteria for or definition of a strategic site/location.</p>
1072	The current consultation documentation does not make it clear that representations are invited on the SA in parallel with the Core Strategy: Further Consultation and the Core Strategy document quotes selectively from the SA. This is contrary to what is promoted within the PAS Plan Making Manual.
1073	Support for the 3rd bullet point that states that there is a need to ensure that adequate public transport provision exists/is provided by way of the proposed developments, however there is concern that this requirement is not fully reflected in the Strategic Sites and Locations section of the Plan.
1179	There is very little information on Altrincham in Part A.

**Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – Chapter 1 Introduction**

ID	Summary Of Representation
1177	Has an Equality Impact Assessment been undertaken for the Core Strategy?
1177	Has there been any involvement of disabled people in the development of the strategy as required under the Disability Equality Duty?

## Further Consultation on the Preferred Option (June 2009) responses – Chapter 2 Place Objectives

ID	Summary Of Representation
1013	A number of common themes are mentioned within the Spatial Profiles, but are not followed through in a coherent way. Opportunities associated with the Bridgewater Canal need to be reflected in each area that it runs through on its north-south axis. Similarly the A56 runs the length of the Borough and the problems associated with it should be mentioned in each area that it runs through. Also the issue of affordable housing for sale in regeneration areas such as Old Trafford and Partington is not dealt with effectively.
1036	Support objectives for Altrincham which seek to manage high levels of residential development pressure and to ensure that residents will be able to access jobs in areas such as Broadheath.
1042	The Trafford in Partnership section (2.17-2.21) should include reference to Trafford, Manchester and Salford working in partnership as a Joint Local Access Forum in relation to Rights of Way.
1045	Paragraph 2.21 should be expanded to include reference to the enhanced role and capability of inland waterways, including the Manchester Ship Canal, for freight distribution and the ensuing environmental benefits and positive implications in terms of climate change and reduced lorry miles should be considered to be of overriding benefit.
1045	Given that the Trafford Centre attracts over 30 million visitors per annum, the Trafford Park Spatial Profile should make reference to it, in addition to Manchester United and the Imperial War Museum.
1045	Support for the objective to maximise potential of visitor attractions such as the Imperial War Museum North and the Trafford Centre.
1045	The reference to the Barton Swing Bridge being a proposed World Heritage Site is inappropriate and misleading and should therefore be removed from the Trafford Park Spatial Profile.
1045	Both the Trafford Park and Carrington Key Issues and Objectives should make reference to the existence of berthage and adjoining land holdings which could provide opportunities for the sustainable and efficient movement of freight.
1045	The Urmston objective to manage the congestion associated with the Trafford Centre should be deleted. There is no evidence that the Trafford Centre is a cause of any significant or regular traffic congestion either in the immediate vicinity of the Trafford Centre or in Urmston.
1045	As recognised by Trafford's planners in relation to the WGIS planning application, Junction 10 of the M60 will be improved with the introduction of this new road proposal; generally through traffic flow changes and specifically for Urmston through the widening of the Barton Road entry.
1045	Aside from the fact the MSC were not previously aware of a proposed canal crossing in the vicinity of Carrington, any proposed bridge across the Ship Canal, would need to meet all the company's detailed requirements to ensure that there is no interference with the use of the MSC for freight and other shipping use.
1050	Support for Altrincham as a "main town centre" in Figure 2
1050	Clarification needed as to whether references to "Altrincham" in the document encompass Bowdon, Hale and Hale Barns as these areas are included with Altrincham in terms of the Spatial Profile.
1055	Support given to the Trafford Park Key Issues and Place Objectives.
1055	Support for sustainable residential development at Wharfside and Trafford Quays.

1055	Given that the development of brownfield land is seen as a priority, peripheral sites within the Trafford Park Core area should also be considered for appropriate residential development, providing that the integrity and function of Trafford Park as a significant employment destination is not jeopardised. The Spatial Profile should be amended accordingly.
1064	Support the reference to joint working arrangements on airport related LDF matters at paragraph 2.20.
1066	The Bridgewater Canal should be specifically mentioned as an “environmental asset” in the Trafford Park section, given its status as an SBI in this location.
1066	Support for the objective to maximise opportunities for green roofs and tree planting in Old Trafford.
1066	Support for Stretford objectives in relation to green roofs, tree planting and green space.
1070	Request that the Altrincham “Live” Objectives be amended to include a clause “to ensure new development reflects the characteristics of the areas, in particular the historic buildings in the town centre, the historic parks and conservation areas and the relatively low density suburban family housing neighbourhoods in the south of the area”.
1073	There is no reference to the lack of sustainable transport alternatives within the Trafford Park section. There needs to be some surety and assurances that sustainable transport measures are to be implemented to ensure the viability of this key sub-regional asset.
1089	Support for the need to determine the future land requirements of the Davyhulme Wastewater Treatment Works and to identify appropriate alternative uses for any surplus land.
1145	Support for the developments of Stretford Memorial, Trafford General and Altrincham Hospitals, but an area in need of improved healthcare provision within Urmston is Lostock.
1145	There is a need to develop improved and new youth provision in order to maintain and enhance cohesive communities. This is particularly the case in Old Trafford, Stretford, Lostock, Urmston, Flixton and Davyhulme, and Sale.
1180	It would be useful to highlight lack of appropriate (quality) public transport links and services to Trafford Park.
1180	Key issue bullet points 3 – Bus links to regional centre from Old Trafford to regional centre are relatively good. A new metrolink line is being built through Firwood. There is a need to develop better orbital links, particularly to Trafford Park. As well as public transport, other sustainable modes should be mentioned, specifically cycling e.g. To secure improvements to public transport and cycling infrastructure which are critical... Key Issue bullet point 4 – Improvements at Old Trafford Metrolink station are to be completed mid October '09.
1180	Key issue bullet point 3 – Severance to local communities should be added, e.g. to tackle the barrier that the A56 creates to pedestrian movement between some parts of the community.
1180	Key issue bullet point 7 – the parking issue is more about management than provision. Suggest another bullet point under Live - to secure improvement to Altrincham Interchange.
1180	Suggest another bullet point – to secure improved links by sustainable modes, e.g. Trans Pennine Trail, links between Carrington and Partington.

**Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – Chapter 2 Vision**

ID	Summary Of Representation
1093	The areas highlighted in the Vision where employment and housing growth will be focused, are generally in line with the RSS particularly in relation to Pomona and Wharfside being within the Regional Centre which is included in RDF1 and also in line with W3 and MCR2. LCCC is within the inner area in line with RDF1 as a 2nd priority and MCR2. Altrincham is also listed in RDF1 as a 3rd priority and Carrington accounted for in MCR3.
1093	Welcome the focus on the urban areas and Altrincham which is in line with RSS policy RDF1. Similarly welcome the emphasis on delivering a range of housing types and tenures which is in line with RSS Policy L4.
1051	<p>The Vision does not encompass the consideration of the Borough's landscapes or the overall approach to the prudent use of natural resources. Trafford has a number of distinctive landscape types. These are important for the natural environmental resources that they contain, but in addition they also represent an important layer of landform that has shaped and defined the Borough, its communities and its character. At present this element is missing from the Vision. It is suggested that the second paragraph is reworded e.g. "The historic, built and natural environment and landscapes (including strategic Green Infrastructure and the Green Belt), will be preserved, protected and enhanced."</p> <p>Secondly, the draft Vision does not mention how the Borough will ensure the prudent use of natural resources - this might best be addressed by adding a new paragraph relating to sustainable construction e.g. "All new development will encompass the principles of sustainable construction, and in particular will ensure that the recycling of materials is maximised and natural resources are used prudently".</p>
1026	Support the Vision for 2026 and the focus of economic and housing growth in the 5 Strategic Locations including Carrington and its identification as a sustainable area of Brownfield land that will be transformed into a new sustainable mixed use community.
1057	Welcome specific reference to LCCC Quarter being identified as a Strategic Location.
1047	No concerns with the revised draft Vision.
1209	<p>Generally support the Vision and welcome the significant reduction in the number of identified Strategic Locations with one major reservation. This will help to focus the key objectives of the Core Strategy and provide the opportunity to bring about significant change and help rejuvenate Trafford's economic standing.</p> <p>However there is concern that Trafford Park Core has not been retained as a Strategic Location given its importance to the region's economy. It is a key component for the delivery of economic prosperity at Trafford Park and the region as a whole. The strategic nature of Trafford Park Core was reflected within the recent 'Trafford Park - Vision and Implementation Report' (Oct 2008) which sets out its future potential to accommodate emerging technologies by creating informal zones to help embrace this transition and continue to support the traditional core of industries located at Trafford Park.</p>
1197	Whilst not objecting to the principle of regenerating the identified 5 strategic locations, it is considered that the identification of site specific locations for regeneration should be addressed elsewhere in the document and not within the general vision.



	<p>It is suggested that the second bullet point in the list of means whereby the Vision will be achieved is that 'all' of the most deprived areas will be regenerated. It is felt that as this document is concerned with delivery, this goal may be unduly ambitious. There is also uncertainty as to the reason for Carrington being identified separately from the regeneration locations in the second bullet point.</p> <p>Whilst a vision, almost by definition has an element of aspiration within it, in the context of an LDF it must be possible to demonstrate that the vision is also deliverable. In summary it is considered that the Vision and the means whereby it will be achieved need to be more general so as to allow greater flexibility.</p>
1036	<p>In the first bullet point about achieving the Vision it should be revised to refer to specific locations where significant housing will be delivered, including Woodfield Road. This would be consistent with the other bullets listed in the vision. It is considered Woodfield Road is highly sustainable and accessible and has significant potential for residential development.</p>
1211	<p>The Core Strategy is not considered to be in 'general conformity' with the Regional Spatial Strategy as required by PPS12.</p> <p>It is suggested that the Core Strategy does not consider the possibility that any sites in Trafford may be potentially suitable for regionally significant economic development.</p> <p>The Core Strategy is not considered to have addressed how Trafford might support the future development of the Airport, a facility that is a major source of employment for Trafford residents.</p> <p>It is suggested that the Core Strategy has not followed RSS advice to consider market attractiveness of its employment land.</p>
1211	<p>It is considered that the SCS creates a significantly different vision for the Borough from the Core Strategy. Comparison of the SCS and Core Strategy visions show that the SCS goes further than the Core Strategy in two key dimensions, it introduces the concept of Trafford as the enterprise capital and puts Trafford's economic role onto a regional plane.</p> <p>Given the outstanding locational advantages of the Borough it is suggested that the Vision of the Core Strategy be amended to read as follows: "Strategic sites and locations within the Borough will be identified and promoted as key places to work to support the Local, City Region and Regional economies."</p>
1211	<p>It is considered important to note that none of the vision, strategic objectives nor the place objectives in the Draft Core Strategy mention Manchester Airport in spite of the fact that the need for additional employment and the need to support international business both figure largely in the objectives of the Core Strategy.</p> <p>The Key Diagram in the Draft Core Strategy shows Manchester Airport as a "Significant Neighbouring Place" but there is no reference to the factors that make the Airport significant for Trafford.</p> <p>It is considered that the neglect of the Airport as a key economic driver next to major concentrations of deprivation conflicts directly with the RSS at Policy DP6.</p>
1041	<p>It is important that all future developments are located in areas of high accessibility by public transport and therefore SO6 is welcomed. It is important that if new development is to be located in areas with low accessibility, policies are put in place to ensure that adequate public transport is provided. Through earlier consultations an Accessibility Plan was provided, showing the areas of Trafford that currently meet the accessibility standards that GMPTE applies to new development. Once detailed plans are available of the Strategic Locations, these should be compared to this accessibility plan to identify areas of poor accessibility where improvements to public transport are required.</p>

1211	It is suggested that the Core Strategy Vision be amended as follows: "Strategic sites and locations within the Borough will be identified and promoted as key places to work to support the Local, City Region and Regional economies."
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### Preferred Option (June 2009) responses – Vision & Strategic Objectives

ID	Summary Of Representation
1013	There should be greater clarification that the vision of sustainable patterns of living applies across the Borough and is not just confined to the deprived areas in need of regeneration. Such an approach would complement the focus of the Trafford SCS.
1031	The Vision needs to be developed further to set out a more locally distinctive vision for the Borough. The material in the "Spatial Strategy" could be incorporated into the Vision to assist with this.
1045	Strategic Objective 1 should be expanded to reflect paragraph 6.5, stating that the CS seeks to promote sufficient new housing, not only to meet the Borough's own needs, but also to support growth and investment in the wider City Region.
1045	Strategic Objective 3 should be revised to acknowledge and give strong emphasis to the strategic role of Trafford Park as a sub-regional employment location. The objective does not match the positively expressed SCS vision which envisages Trafford being celebrated as the enterprise capital of the north west.
1047	Whilst supporting the existence of a separate Vision to that of the SCS, the new Vision does not reflect the ambition set out in 14.1 to grow and diversify the Borough's economy.
1051	The Vision has developed in a positive way and now provides a more appropriate direction for Trafford's future.
1051	Trafford's distinctive landscape types, such as those associated with its important river valleys and mosses are missing from the Vision. The final paragraph should be re-worded to make specific reference to landscape: "we will protect and enhance our historic, built and natural environment and landscapes (including strategic Green Infrastructure), to improve..."
1051	The Vision should address how the Borough will ensure the prudent use of natural resources by including a paragraph relating to sustainable construction: "all new development will encompass the principles of sustainable construction, and in particular will ensure that the recycling of materials is maximised and that natural resources are used prudently".
1051	SO2 should seek to pursue a more integrated approach to sustainable development, in particular it should embrace the benefits to disadvantaged communities of improvements to their environmental resources – not just the physical appearance but also the cultural and natural environment attributes. SO2 should make specific reference to the "physical, economic, environmental and social fabric of disadvantaged communities..."
1051	The Strategic Objectives do not make appropriate reference to the protection and enhancement of the historic environment. SO8 should be broadened to realise the wider potential of the Borough's heritage resources: "Make the most of, protect, enhance and value the Borough's heritage..."
1051	There should be a separate Strategic Objective dealing specifically with climate change. SO7 does not go far enough as it only considers the "reducing emissions" element of climate change, not how Trafford will adapt to those impacts of climate change.
1066	Support for SO5
1072	In order to achieve SO3, the ELS needs to consider that some forms of

	employment development will have specific needs which may only be met by certain sites. For example it is unlikely that many sites in Trafford, other than Davenport Green, would be able to accommodate high-end office occupiers making regionally significant scale investment.
1072	In order to achieve SO3, the ELS needs to consider that some forms of employment development will have specific needs which may only be met by certain sites. For example it is unlikely that many sites in Trafford, other than Davenport Green, would be able to accommodate high-end office occupiers making regionally significant scale investment.
1096	Although there is support for the work being undertaken jointly across AGMA districts in relation to flood risk, until such time that this work is completed it is not possible to endorse the Core Strategy Preferred Option as set out in June 2009.
1120	The Core Strategy Vision should allow for the growth of existing community services where these are outside existing town centres, Trafford Park and Carrington to ensure that the Core Strategy does not undermine the potential for additional investment at the Trafford College campuses.
1125	Although agree with SO1, 2, 4, 6, 7, and 8 and strongly agree with SO3 and 5, it is necessary to consider how the Trafford Core Strategy will sit alongside those of neighbouring authorities. It is also hard to predict the needs of future communities as it is not known who they will be made up of.
1140	Strongly agree with SO7, agree with SO5, 6, and 8, neither agree nor disagree with SO2, 3, and 4 and disagree with SO1. Families should be encouraged to share houses or use flats and avoid owning too large a home or more than one home.
1154	Strongly agree with SO2, 3, 4, 5, 6, and 8. Agree with SO1. In particular SO2, 3, 4 and 6 which give greater priority to Stretford. A larger Tesco store would be in conflict with SO4 and SO6 is excellent, although does it relate to the airport?
1167	The SCS Vision in the Core Strategy is supported and the acknowledgement in the consultation document of the Old Trafford Cricket Ground as a world class attraction is welcomed.
1031	The 2 sets of place and strategic objectives should be integrated into a single set of objectives. This will help to demonstrate how the policies provide the delivery strategy for achieving the objectives.
1047	No comments to make about the revised set of Strategic Objectives.
1074	Support for the Vision and the Strategic Objectives.
1082	Support for maintaining the vitality and viability of Altrincham will be an important part of this process but the delivery of that aim will largely depend upon major financial investment by private sector stakeholders. It is therefore requested that the planning policies do not discourage that investment.
1120	Acknowledgement of Table 1 – the Strategic Objectives.
1120	The objectives set out at Table 1 are acknowledged 'Strategic Options' and Policy L2 (Meeting Housing Needs). The intent of the Core Strategy is supported but there is a need to be mindful of the requirements of PPS12 to ensure that the Core Strategy is sound.

### Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – Chapter 3 Strategic Objectives and Place Objectives

ID	Summary Of Representation
1093	Objective SO3 states that development will be in the areas in line with RDF1 and the focus elsewhere will be on improving skills of the people to be able to work in

	the RDF areas.
1093	SO4 is broadly in line with the hierarchy/centre approach of PPS4.
1093	Would support SO1 which is in line with RSS Policy L4.
1093	There is a lack of any reference to making best use of the existing housing stock.
1093	Little mention of the place objectives of providing a high quality housing offer.
1093	Clarification is needed as to how ALO1 and AL05 link together, as they are very similar, however if they are different how do they support one another?
1093	In relation to rural communities is there a need to provide affordable housing in these areas to meet local needs in line with RSS policy L4?
1093	Delivery of the Core Strategy needs to take into account the likely budget cuts that will hinder the implementation of large transport schemes. The emphasis should be on a package of small scheme measures that address the primary issues of Climate Change, reducing the need to travel by private car and improved accessibility. Any proposed transport scheme should meet the five DaSTS goals of reducing carbon emissions, supporting economic growth, promoting equality of opportunity, contributing to better safety security and health, improving quality of life and a healthy natural environment.
1051	The change that has been made to this Strategic Objective addresses the concerns raised in June 2009 - this is welcomed accordingly and the revised SO2 is supported.
1051	The incorporation into the Climate Change element of this Strategic Objective of reference to adapting to climate change is helpful and supported.
1051	The amended Strategic Objective now included specific reference to "enhancement" reflecting previous representations, this is welcomed and the revised SO8 is supported.
1051	General support for the Place Objectives for the Rural Communities. It is unclear why RCO1 has been reformulated so that its intention to safeguard and protect the character and appearance of rural settlements and the Green Belt is only in respect of "inappropriate residential development". The Green Belt should be protected from all forms of inappropriate development. All proposals should be assessed to ensure that local character and appearance is safeguarded, protected and where possible enhanced. This can be achieved by deleting the word "residential" from RCO1 and replacing "safeguard and protect" with "safeguard, protect and enhance".
1026	Support the strategic objectives set out in plan. However whilst any development at Carrington will help revitalise the local shopping centre at Partington because of the scale of the development proposed and, to minimise car journeys, it is likely that the new community at Carrington will have its own centre and shopping facilities.
1026	Whilst the investigation of a link to Salford can be looked at it is unlikely that any development at Carrington will be able to deliver such a link because of land ownership and the significant cost of such a link. It is more likely that any link to Salford will be delivered as part of a regional strategic infrastructure investment initiative as this is not required for the release of land at Carrington.
1045	Support Strategic Objective 7 and the proposals to encourage and support 'opportunities to locate low carbon/decentralised energy facilities' to deliver the objectives in several districts of the borough. Trafford should play its part in contributing to the Northwest's energy and carbon reduction targets. The identified strategic and place objectives are commended because low carbon facilities should be an essential part of the borough's infrastructure.
1045	Requests a reference to residential development at Wharfside and Trafford Centre Rectangle meeting regional centre needs and supporting economic growth.
1045	Objection to the reference to "congestion associated with the Trafford Centre".

	There is no evidence that the Trafford Centre is the cause of any significant or regular traffic congestion. Junction 10 of the M60 will be significantly improved with WGIS. Local journey times will generally improve with WGIS and more local demand can pass through the area without delay.
1045	City Airport, Salford Reds Stadium and Port Salford should be indicated as "Significant neighbouring places". WGIS should be identified as an 'Indicative Transport Infrastructure improvement'. Note plan makes reference to areas at risk of flooding.
1057	Place Objective OTO11 should be linked to the delivery of Strategic Objective SO2. LCCC Quarter is likely to make a significant contribution to regeneration objectives.
1100	CA03 and CA08 Place Objectives are essentially the same. Use the same place objective under more than one Strategic Objective.
1100	Objective should not be defined narrowly as only relating to the proposed residential community, but to the wider mixed-use development of the whole Strategic Location.
1100	The objective should not be simply to support waste management facilities, but to maximise opportunities to create energy from waste and to exploit linkages between this and end users of energy, which might include both new employment and residential uses. In addition, the site, which is a draft allocation in the Greater Manchester Waste Plan, is located next to the two power stations referred to in the table at paragraph 9.2. There is thus the opportunity to create a wider energy and waste park, utilising advanced technologies and enabling co-location with end users within the Strategic Location. Therefore it is requested that the Place Objectives are modified to add references to power generation, waste management and the co-location of potential heat suppliers and users.
1047	Welcome in particular the reference to Trafford contributing to the growth of the sub-region in SO1.
1047	Welcome the reference to sustainable construction and adapting to climate change in SO7.
1047	Welcome the change to SO8 which now explicitly recognises the historic environment's contribution to the attractiveness and distinctiveness of the Borough.
1209	The acknowledgement in TPO1 that Trafford Wharfside and Trafford Centre Rectangle have an important role to play in terms of meeting Trafford's housing needs is a positive objective. An overly prescriptive approach to alternative developments in these locations should be avoided. The removal of site boundaries from the Strategic Locations has gone some way towards achieving this.
1209	Strongly supports TPO2 to maximise the reuse or redevelopment of unused, underused or derelict land as this will help to protect and further enhance the status of Trafford Park as a premier location for business and industry.
1209	Welcomes the intention of TPO3 to ensure that Trafford Park as a whole is well served by public transport, the mechanism for delivering this will require some further consideration. Trafford Park is a strategic location within the Regional Centre and as such the demand for public transport links extends far beyond the park boundary. Public Transport provision needs to be planned and provided at the strategic level and should not be entirely dependent upon contributions from new development coming forward within the park boundary.
1209	Strongly supports TPO6 as ensuring access to a locally available skilled workforce will help to support the continued viability of businesses located on Trafford Park and in turn regenerate the local economy.

1209	Strongly support TPO8 as it will help Trafford Park to respond to the needs of emerging economic and business sectors whilst continuing to support the traditional core business and industrial area.
1197	It is not considered that merely arresting population decline will be sufficient. In order to move forward, a level of population growth is required that is sufficient to support enhanced facilities.
1197	It is suggested that if development in Partington is seen as a positive factor in reducing the physical isolation of Carrington, then Partington is, in many respects, a preferred location for development.
1197	It is not understood why these general objectives are set out in relation to Partington, but not in relation to all other places. It is felt that objectives should either be generally applicable or not applicable at all.
1019	All new development should be constructed in accordance with the latest environmental standards, not just large scale developments.
1036	It is considered an additional objective should be added to the Altrincham place objectives, which highlights the need to maximise the potential of Woodfield Road to meet residential needs and create mixed use development in this location. This should reflect its present UDP allocation and mention in the Strategic Locations Technical note as an important development priority.
1211	The ambition of SO3 is considered to be limited to contributing to the growth of the economy of the sub-region.
1211	The Core Strategy is not considered to explain what is meant by "growth of the economy of the sub-region".

#### Further Consultation on the Preferred Option (June 2009) responses – Spatial Strategy

ID	Summary Of Representation
1031	The spatial strategy could be incorporated into the vision. At present it is unclear what status it has in the Core Strategy as it is neither part of the vision, objectives or policies.
1031	The strategy splits the strategic locations into three priorities. However no mention is made of the strategic sites. Where do these fit in relation to the priorities?
1031	The first priority includes five strategic locations. It is assumed therefore that the Council wishes to see the early development of these areas. If this is the case why have they not been identified as strategic sites?
1036	The spatial strategy identifies the Woodfield Road site as falling within one of the third priority sites for development within the Borough after the Regional Centre/ Inner Area and key regeneration sites which are identified as the first and second priorities for development respectively. Support the identification of the land as a priority site for redevelopment. However steps should be taken to ensure that the Core Strategy does not preclude the potential for third priority sites to be brought forward for redevelopment in advance of first or second priority development sites, particularly in the instance of highly sustainable third priority sites such as the land at Woodfield Rd.
1045	Reference made to the representations and supporting information submitted in response to the previous draft document in respect of the Inner Area boundary. The key points of the earlier submission were: That adopted RSS defines the inner area in Trafford as comprising Trafford Park and North Trafford. The Trafford Centre Rectangle has always formed part of Trafford Park (the Council again confirms in its definition and description of Trafford Park as a place on p10 of the new draft CS) and accordingly any proposal to omit part of Trafford Park from the Inner Area should be supported by a clear and specific justification and evidence base. No such justification has been given by the Council.

1045	A single option with regard to the inner area boundary was presented in the 2008 draft and this has been carried forward into the new draft CS. Hence no other options have been properly considered or consulted upon. It is noted that the new draft document simply carries forward the previously proposed boundary for the Inner Area. Concern that no response has been given to the previous objection and concerns in the CS document or through any other means and the proposed boundary continues to lack any justification either within the draft document or any evidence base to support its selection.
1045	The M60 forms the natural, established and widely understood boundary of Trafford Park and is therefore the logical boundary to the Inner Area in this location.
1045	The M60 would provide the more logical boundary for the Inner Area and consider that the Trafford Quays delivery report which is being submitted to the Council in support of representations to this new draft CS provides further support for this view. More importantly in the absence of any evidence to justify the exclusion of the Trafford Centre Rectangle from the Inner Area, it is considered that the M60 boundary is the only one that would provide for consistency and compliance with the adopted RSS.
1045	Paragraph 4.12 states that "Strategic Sites" are specifically defined sites which will "deliver significant development that is central to the achievement of the Core Strategy" and that their allocation on the proposals map will give them a high status in decision making on applications. Following on from this the allocation of land at Trafford Quays for a high quality residential led mixed use development as a strategic site clearly means that the Council considers the delivery of housing development on that site to be a key component in meeting its housing development needs and this is confirmed in the SHLAA which forms part of the evidence base. In line with the second part of paragraph 4.12 the strategic site allocation should also provide the landowner with the comfort that the principle of the sites development for housing should not be in question if and when a planning application is brought forward by the company.
1047	Only comment on the draft Spatial Strategy relates to the first clause. This establishes the regional centre and the inner areas as the first priority for development (thus reflecting RSS). However it then says that within these areas development 'will be directed to' the five strategic locations SL1-5. It thus appears to give these locations a higher level of priority than the rest of the regional centre and the inner areas within Trafford. It may be appropriate to replace 'In particular development will be directed to....' with 'Within these areas, the Council particularly wishes to promote development and change at...'
1050	The second priority for growth is the remaining regeneration areas in Trafford and Altrincham Town Centre. The identification of Altrincham town centre as a second priority is strongly supported.
1050	It is considered that the boundary should extend beyond Altrincham town centre to Altrincham as a whole to ensure that the policy accords with RDF1 of the RSS. Policy RDF1 refers to the town of Altrincham and states that development should be focussed in and around the centres of the towns and cities. It also considers that development elsewhere within these towns and cities would be acceptable.
1050	Paragraph 2 of the Spatial Strategy policy should read "The second priority will be the areas in and around Altrincham Town Centre...."
1050	The wording of the third and fourth priorities is supported. In particular the fourth priority is considered to accord with Policy MCR3 of the RSS. The amendments that have been made to this approach are supported.
1050	In the case of South Manchester, except in that part of Trafford lying within or adjacent to Manchester regional centre, monitoring and managing of housing provision will be necessary to ensure that new housing development does not

	result in an adverse cumulative impact on local and neighbouring housing markets. Provision should focus on meeting local and affordable housing needs and any general market housing should support local regeneration strategies. Local housing needs are explained in the glossary as applying where people choose or need to live in a particular location and accommodation is available to them.
1051	Overall it appears that the preferred spatial strategy has taken appropriate account of the adopted RSS and relevant characteristics of the Borough.
1055	Paragraph 4.8 clearly sets out the potential for the Regional Centre and Inner Areas to cater for appropriate residential development, expansion of the knowledge economy and the provision of new communities. Again, this is a principle that the representor is supportive of. However there appears to be a conflict between the broad message being conveyed in this chapter, and the prescriptive nature of Chapter 6, which deals with land for new homes.
1070	Would like to see an additional sentence at the end of 4.4 to read 'Urban areas of character value in the south of the Borough would be protected from development'.
1070	To the sentence in 4.5 add the words 'or playing fields or open land used for formal and informal recreation purposes'.
1073	The spatial strategy as drafted does not involve the release of Green Belt land.
1073	Encouraged that economic and housing growth is to be focused within the urban area, as the urban areas within Trafford benefit from public transport provision and interchanges, as well as good access to key services via non car modes. Locating development in the Regional Centre conforms to RSS, and is encouraged, albeit with a degree of caution as parts of the Regional Centre is located close to the SRN, and as such, even though it is the preferred location for development according to RSS, there may still be significant impact at the SRN. Again this should be assessed in the LDF modelling work currently being undertaken.
1073	Locating development within Altrincham Town Centre is encouraged as it is well served by a range of public transport options, and home to key services, employment and leisure opportunities. However any large scale development aspirations in this location will have to be reviewed due to the likelihood of impacts on the A556 and M56 to the south of Altrincham.
1073	In addition no transport impact justification (as is the case for the majority of the strategy) is provided for Carrington's inclusion within the second priority of development.
1073	Previously commented on the suitability of Carrington and Partington as locations for development. If these sites can be delivered sustainably, with the appropriate transport and services infrastructure to reduce the need to travel by private car, then concerns may be addressed subject to the residual car based impact. Conversely if development at these locations results in large trip generating schemes, the representor may have to resist the development proposals at Carrington and Partington. However no individual or cumulative transport impact evidence to support these proposals has been presented as part of the Strategy.
1073	The third priority will see growth at Sale Town Centre (SL11), Stretford Town Centre (SL7), The Trafford Centre Rectangle (SL6), Woodfield Rd and Broadheath (SL12). Encouraged by such an approach on the whole as it aims to locate development in established town centre/urban areas.
1073	Whilst there is general support for the third priority for development, which aims to locate development in established town centres and urban areas, concern is raised over promoting residential development within Air Quality Management Areas, of which the Trafford Centre Rectangle is one.



1073	The transport impact of the Trafford Centre Rectangle location (along with all of the Strategic Sites and Locations) as it is currently envisaged in the strategy will be tested as part of the LDF modelling work.
1073	Outside of these areas new growth will be focussed on meeting local needs, particularly for affordable housing, with general 'market housing' (in sustainable locations, well served by public transport) supporting local needs and regeneration priorities. Encourage Trafford's aspirations to locate additional development in sustainable locations as this will reduce the need to travel by private car.
1089	Point 4 states "Outside of these areas new growth will be focussed on meeting local needs, particularly for affordable housing, with general "market housing" (in sustainable locations, well served by public transport) supporting local needs and regeneration priorities." Request further clarification on how this will be applied to applications for new housing development. It is unclear when applications for market housing will be acceptable in these locations. It is suggested that this point is sufficiently flexible to allow the delivery of general market housing in sustainable locations so that all urban areas of the borough can contribute to the delivery of the housing required. It will be important to have this flexibility if it is demonstrated that the annual average dwelling requirement (as required by the North West of England Plan Regional Spatial Strategy to 2021 and the growth point status of Trafford) is not being met.
1093	It is noted that the approach to be taken allows development in and around the inner areas of Trafford. In previous comments it was stated that a combination of Options 1 and 2 would be more appropriate and it is recognised that it is planned to take option 2 forward.
1093	It is noted that the justification for taking Option 2 forward is due to the sustainability appraisal recommendations and this also seems a more deliverable option. This could seem a less specific 'spatial option' as it does cover various areas of the Trafford Borough, however it is noted that the Spatial Strategy has identified key strategic sites (as identified in the RSS) and it is also noted that apart from the strategic sites, Altrincham and the Boroughs principal town will be second priority for development in line with RSS Policy RDF1 and W5.
1093	The Core Strategy also fits within the spatial priorities defined in RSS for the Manchester City Region, which states plans should support interventions to achieve significant improvement in the sub regions economic performance, secure improvements including enhancements of public transport links and accommodate housing in inner areas.
1096	The work being undertaken as part of the Level 2 SFRA is supported and it is expected that this will be completed by the final submission stage as this will inform the sustainability appraisal of the DPD and ultimately the application of the exception test (PPS25). Until this work is completed the representor is unable to endorse the preferred option at this stage as the flood risks associated with the preferred option/strategic sites are not fully understood. For information the representor will be adopting the same stance to other authorities who do not have a complete SFRA at the preferred option stage of their Core Strategy.
1097	<p>The Energy White paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:</p> <ul style="list-style-type: none"> <li>- An expansion of national infrastructure ( e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations)</li> <li>- New forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites)</li> </ul>

1097	<p>Request to be involved in the preparation, alteration and review of Development Plan documents (DPDs) which may affect assets including policies and plans relating to the following issues;</p> <ul style="list-style-type: none"> <li>- Any policies relating to overhead transmission lines, underground cables or gas pipeline installations</li> <li>- Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines.</li> <li>- Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations</li> <li>- Any policies relating to the diverting or undergrounding of overhead transmission lines</li> <li>- Other policies relating to infrastructure or utility provision</li> <li>- Policies relating to development in the countryside</li> <li>- Landscape policies</li> <li>- Waste and mineral plans</li> </ul>
1120	The Council should amend the wording of the Spatial Strategy to ensure that the potential for further investment in the campuses of Trafford College are not undermined and that the College can make the best use of its assets, especially where this will allow for continued investment in education/community facilities.
1130	The Core Strategy has been well thought through and considered. Of the opinion that it is right that the areas of the Borough highlighted as Priority 1 locations for change have been selected. Pleased to see that this is not just housing led regeneration, but does include the redevelopment of Lancashire County Cricket Club, Mediacity: uk, an increased focus on employment and improved public transport.
1130	The comment (SL5) 'Improvements to public transport access are essential' is also true of priority 2 sites, Partington (SL9) and Sale West (SL10). Any efforts to regenerate communities that will allow access to jobs throughout the Borough and encourage people to live there will undoubtedly fail without effective public transport provision.
1145	It is important that all Green Belt land and Park land in the Borough is protected.
1145	It is important to continue the development of Altrincham Town Centre. There is a need for affordable homes to enable people to stay in the area they grew up in. Need to protect the small shopping parades in the communities.
1180	Suggest addition of metrolink phase 3a and link to the airport.

#### Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – Chapter 4 Strategic Locations

ID	Summary Of Representation
1093	As this site is within the Regional Centre it is therefore in line with RSS Policy MCR1, as residential development is acceptable where it is part of a mixed use scheme comprising a good range of housing sizes, types, tenures and affordability. As the proposal is for a mixed use development and although there is an emphasis on the provision of apartments, there is also a requirement to deliver some family accommodation on this site which would be welcome in line with RSS policy L4. There is, however no requirement for the provision of affordable housing which is needed to be in line with RSS policy L5.
1026	Support the revised Strategic Locations Strategy reducing the Strategic Locations from 13 to 5 and the retention of Carrington as a Strategic Location. Agree that a Local Infrastructure Plan will be important for the delivery of the strategy and look forward to having the opportunity to comment upon it once it is available. Welcome

	the establishment of project delivery teams and, together with the preparation of Action Area Plans suggest this is the way forward to ensure timely delivery of development throughout the lifetime of the plan.
1057	Amend SL3 to reflect the requirement for the redevelopment of Old Trafford Cricket Ground to be cross-funded by the provision of a new superstore on Chester Road.
1057	Strategic Proposal should also be amended to refer to the provision of a large superstore on Chester Road.
1057	The second development requirement should be revised to prioritise the delivery of the pedestrian linkage alongside the Tesco proposal as opposed to a strategic processional route along Warwick Road and Brian Statham Way, for which a need and delivery strategy has not yet been identified.
1209	Support the reduction in the number of Strategic Locations from 13 to 5 and the removal of site boundaries. The removal of site boundaries advocates a more flexible and realistic approach towards alternative mixed use development encouraged in Trafford Wharfside and Trafford Centre Rectangle.
1197	<p>It is suggested that the reassessment demonstrates that there is insufficient knowledge and certainty in relation to any of the identified locations to justify them being identified as Strategic Sites and that only five locations can be identified as Strategic Locations in recognition of their emerging, but as yet inadequately established, potential.</p> <p>Whilst welcoming what is considered a more realistic assessment of the present knowledge and deliverability of these complex sites, the outcome is of concern when it is fed through into policies relating to the provision of the required levels of development.</p> <p>It is suggested that concerns regarding deliverability have not been addressed by a commitment to establishing project delivery teams, such an approach may, if appropriately managed, maximise the potential of a particular location, but it cannot deliver a fundamentally undeliverable project. The potential of any site will depend primarily on the nature of the project itself, market demand, the cost of infrastructure and land control; it is these factors that are likely to determine whether a particular site will come forward in whole or in part within the Plan period and not the existence of a project delivery team.</p>
1031	<p>For infrastructure proposals which are 'priority 2' – There must be a confidence that these can be delivered. Where there are doubts about the deliverability of these or the delivery of housing and employment development in the strategic locations, it needs to be clear on the contingency position.</p> <p>The clearer the Council can be on the implementation of the proposals in the core strategy the better. Note the PINS guidance on making clear the 'when, where, who by and how much' of how the intentions of the plan will be achieved; whilst the implementation sections do contain a great deal of detail, it can be inferred that some of it – notably the 'who by' – might be worked up more.</p>
1096	No objections to raise on sequential or exception grounds as the principles of PPS25 have been followed.
1036	<p>It is considered the conclusions of the technical note as to why Woodfield Road is not selected as a Strategic site due to the scale of development being "limited" are not appropriate. The SHLAA confirms the site could accommodate 478 units.</p> <p>On the statement about infrastructure issues needing to be resolved. There is no awareness of any constraints to development on the location. Further details of what these issues are that need to be resolved would be helpful.</p> <p>It is requested that if Woodfield road can not be considered as a Strategic Location reference could be made in the Core Strategy to its significant potential to accommodate large scale residential led development.</p>

1073	<p>The need for public transport improvements and mitigation measures at the local and strategic road networks to support development at the Strategic Locations has been recognised within the policies and the need for a further joint study is recognised in the overview of the strategic objectives.</p> <p>However, the overall development quantum has been shown in the Trafford LDF Modelling report to have a number of impacts at the Strategic Road Network (SRN), specifically increasing journey times in both directions between junctions 5 and 11 of the M60. Where there is likely to be an impact at the SRN, appropriate and sustainable mitigation measures should be identified and details of funding, timing and phasing of developments and infrastructure will be a key output of the further study work mentioned above, to ensure nil detriment to the SRN.</p> <p>In addition the modelling outputs have shown an increase in CO2 emissions of 16% between 2011 and 2026 within Trafford as a result of the emerging development aspirations through to 2026. Government policy encourages LDFs to come forward on a carbon neutral basis, and as such, the transport impacts of the proposed development quantum are in direct conflict with the policy.</p> <p>The further study will ensure a cumulative approach to mitigation and infrastructure measures and in addition, this work will examine the level of infrastructure required as a consequence of the emergence of the Strategic Locations, and as such will inform the Land Allocations DPD and local infrastructure plan as they progress.</p> <p>Given the commitments expressed within the policies to work with the Agency to explore appropriate public transport improvements to mitigate traffic impacts at the SRN (and local road network), the Agency considers the Core Strategy to be in compliance with the concordat, subject to the minor changes included, however further work will be required to ensure that development sites are brought forward on a sustainable basis.</p>
1211	The Core Strategy is considered to fail in identifying sites or locations that are capable of being competitive on this international scale.
1211	It is suggested that Davenport Green has been refused identification for a strategic employment development as it appears a prior decision has been made to return the land to the Green Belt. The Planning Inspectorate specifically warn against retrospective justification of planning proposals in development plan documents.
1211	<p>It is suggested that there may be little merit in the inclusion of Strategic Locations in a Core Strategy. Their identification in the Core Strategy is considered to be of no practical planning benefit in that they are not allocated for development in a subsequent Development Plan Document, whereas Strategic Sites are allocations and can be brought through an SPD or Masterplan. PPS12 was expressly amended to enable strategic sites to be brought forward more rapidly.</p> <p>The Core Strategy is considered to fail in identifying any sites that are central to the achievement of that objective as it now contains no land allocations that are central to the achievement of the Core Strategy. The reason for this omission is considered to be that the Council has not been able to provide sufficient evidence on the deliverability of the sites that may be suitable for strategic economic development.</p>
1211	It is suggested that the Council have failed to identify sufficient and / or appropriate land for development.
1211	The infrastructure requirements for the five identified locations are only expressed in terms of the priority attaching to their status, the priorities being explained in paragraph 4.19 of the Draft Core Strategy: apart from Priority 1 (committed and

	<p>needed now) the priorities (2-4) are all stated simply as needed or desirable which is considered to fall short of the requirements in paragraph 4.7.</p> <p>Whilst they are described as important for the delivery of the Core Strategy, it is considered that there is no evidence that the identified locations pass the second test set out by the Council for Strategic Locations: that they will be "supported by information of what is being provided, when it will be provided and how it will be delivered".</p>
1211	<p>This omission on the part of Trafford is considered to be in conflict with the advice in PPS12. It is suggested that major opportunities for the delivery of benefits for the communities in Trafford are omitted from consideration in the Core Strategy.</p> <p>The Airport is considered to be a very significant gap in the Trafford Draft Core Strategy. It is proposed that Davenport Green should be designated as a Strategic Site.</p>
1211	<p>An amendment to the Core Strategy is suggested in the form of a Policy identifying Davenport Green as a Strategic Site for employment.</p>
1211	<p>An amendment to the Core Strategy is suggested in the form of a Policy identifying Davenport Green as a Strategic Site for employment.</p> <p>An exemplar mixed use development of business space with supporting services and infrastructure is anticipated, the proposals being designed to integrate with the wider strategy for airport-related development (the arc of development) and with local and cross border regeneration programmes.</p> <p>Specifically, development of this site will deliver:</p> <p>A. B1 and b: a minimum of 600 000 sq ft with potential, subject to detailed transport studies and viability assessment, to expand to 1m sq ft.</p> <p>B. Supporting uses: A1-A5, D1 to maximum of 500,000 sq ft for the 600,000 sq ft scheme and a maximum of 75,000 sq ft within a 1 m. sq ft scheme i.e. meeting, recreational, retail and restaurant facilities, to meet the needs of staff and business visitors.</p> <p>C. Community facilities, if appropriate to meet the needs of adjacent communities:</p> <p>D. A new rural park devoted to community food protection, nature conservation and informal recreation.</p> <p>E. New and improved pedestrian and cycle links.</p> <p>F. New and extended bus services in the short term, including links to nearby regeneration areas in Trafford and Manchester; possible long term development of new public transport links between Roundthorn Industrial Estate, Wythenshawe Hospital, Davenport Green and the Airport, which is a new major interchange for buses, coaches, trains and taxis as well as national and international flight connections.</p> <p>G. Access to the site will be to the east via the existing Thorley Lane bridge over the M56; capacity will be expanded at Junction 6 and on other local roads.</p> <p>It is suggested that the proposals will be taken forward through planning applications and master plans for succeeding phases of development.</p> <p>In order for development on this site to be acceptable the following is suggested:</p> <p>A. Environmental Impact Assessment.</p> <p>B. Improved pedestrian and cycle routes</p> <p>C. Exemplary sustainability standards - Outstanding BREEAM as an aim</p> <p>D. Sensitive treatment of landscape and buildings.</p> <p>E. Improvements to local highway network and public transport infrastructure and development of travel plan.</p>

	<p>F. Development of programmes to assist disadvantaged people to access the jobs created.</p> <p>G. Laying out of the rural park, creation of the trust and transfer of the completed park to the trust together with appropriate endowment funds for its future maintenance and management.</p> <p>H. The provision of appropriate retail, catering, meeting and community facilities to support those people using the development.</p> <p>I. Contributions towards the provision of additional utility capabilities.</p> <p>An assessment of biodiversity must be carried out prior to development and appropriate sites for nature conservation must be provided to compensate for any loss.</p>
1211	It is suggested that designating Davenport Green as a strategic site will restore the soundness of the Core Strategy.
1211	Davenport Green is considered to represent the Councils best chance to address the challenges of sustainable economic development, to address regeneration needs in and outside the Borough and to gain a new rural park.
1211	It is considered that despite the major progress made in regenerating the sub-region, especially the regional core, there remains much to be done for the city region to become competitive on an international scale.
1211	In Greater Manchester the Business Leadership Council, supported by MIDAS, are so concerned about the loss of business investment from the city region that they are commissioning a study to identify major employment sites; the overriding emphasis of the study is on the competitiveness of the sites.
1211	It is suggested that an important dimension of the renewed focus on the competitiveness of the sub-region is a continuing emphasis on the need to offer sites in the south of the conurbation where the demand from many mobile business investors arises.
1211	The Submitted Draft RSS (2007) identified three classes of regionally significant sites and broad locations in which sites should be identified through Local Development Frameworks. Specifically in the case of South Manchester, RSS sought identification of one or two Knowledge Nuclei Sites (KNS) for Manchester City Region, which is shown as a reserve site (to be kept for large scale HQ functions that might otherwise be lost to the region).
1211	The text of the Draft RSS referred to the NWDA's list of 25 strategic regional sites, which included Davenport Green.
1211	The Regional Economic Strategy 2006 listed 25 Strategic Regional Sites including Davenport Green. Trafford's UDP 1996 and revised in 2006, showed Davenport Green as a High Amenity Site for Employment.
1211	It is considered that the recognition of the advantages of the south of the conurbation as a location for business investment is expressed very clearly in the arc of development concept that originated in the Airport Master Plan and which has now been incorporated into the West Wythenshawe Local Plan / Wythenshawe Strategic Regeneration Framework.
1211	Whilst it is not considered appropriate for either the Airport or the City Council to make proposals for land lying outside their areas, they have both taken an appropriately strategic view of their area and shown Davenport Green as a major employment site within the arc of development in their plans; this quite properly reflected Trafford's commitment in the UDP to see the site developed as a High Amenity site for Employment.
1211	It is considered that Trafford has focused on the Regional Core but risks missing out on the opportunities presented by the Airport and the south of the conurbation. Davenport Green represents the Councils best chance to address the challenges

	of sustainable economic development, and to address regeneration needs in and outside the Borough and to gain a new rural park.
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#### Further Consultation on the Preferred Option (June 2009) responses – SL1 Pomona

ID	Summary Of Representation
1031	Advised previously that Strategic Locations should be shown diagrammatically on the Key Diagram.
1031	Site needs allocating on a DPD. Further planning guidance could also be set via SPD. It should not be handled via informal planning guidance. It will need to be demonstrated that the proposals for hotel and leisure uses accord with sequential approach set out in PPS6, Paragraph 2.44.
1045	Object to proposals being brought forward having the requirement of being in accordance with the Irwell City Park informal guidance.
1045	The proposal for a new bridge crossing should be deleted from the development requirements set out in SL1 due to possible adverse effects on any Pomona development proposals.
1066	The proposal for an ecological corridor should be included as a development requirement rather than in justification.
1073	Support location for development.
1073	Encouraged by mixed use development in this location as it is sustainable in terms of public transport. Additional pedestrian and cycle routes also encouraged.
1093	Recognise priority given to site for development and regeneration.
1096	Support the development requirements of reviewing the outputs of Level 2 SFRA and methods of sustainable energy generation.
1181	Concerns were raised over Pomona having enough resources to look after all the new residential properties.
1181	There are not many family friendly homes in Pomona and more flats would be considered a mistake. It is up to the Council to show that the need for these residential units has been understood.

#### Further Consultation on the Preferred Option (June 2009) responses – SL2 Trafford Wharfside

ID	Summary Of Representation
1031	Will the results of the SFRA be available before the publication version of the core strategy?
1031	Site needs allocating on a DPD. Further planning guidance could also be set via SPD. It should not be handled via informal planning guidance.
1031	Office proposals will need to accord with national planning policy in terms of the need for development (PPS6 Paragraph 2.39) and the sequential approach.
1045	Object to Strategic Proposal setting out limit on quantum of development of commercial office development on the following ground: - No work has been done to assess realistic capacity of Wharfside or what the most appropriate mix of commercial viable mixes might be. - No evidence to support the inclusion of limit up to 10,000sqm - Setting of limit without evidence is contrary to RSS and to objectives of core strategy looking to maximise growth to support and contribute to economic growth.
1055	Welcome inclusion as first priority site for development and their inclusion within the defined regional centre and Inner Areas.
1055	Strategic proposal does not go far enough to help achieve the mix use redevelopment potential that has been earmarked for Trafford Wharfside as

	referenced throughout the document.
1055	To limit residential development in the Mediacity development to two specific sites limits the potential to achieve a comprehensive mixed use development throughout Trafford Wharfside. The opportunity to assess sites on a site by site basis should be catered for and the development of initiatives such as the Trafford Park Masterplan will provide an appropriate vehicle for this to happen. This should be the aim for the Strategic Proposal for this area.
1073	Supports location for development.
1073	Encourages joint working with Salford City Council to ensure the Media City development does not impact on the operation and safety of the M602, as well as ensuring public transport and sustainable links work with regards to cross boundary movement.
1093	Recognise priority given to site for development and regeneration.
1096	Carrington, Partington and Mediacity are areas with sewer capacity and drainage issues. Careful consideration is required of the planned significant development.
1096	Supports the development requirements of reviewing the SFRA Level 2 and methods of sustainable energy generation.
1130	The Core Strategy has been well thought through and considered. Of the opinion that the right areas of the Borough highlighted as Priority 1 locations for change, have been selected. Pleased to see that this is not just housing led regeneration, but does include the redevelopment of Lancashire County Cricket Club, Mediacity:uk, an increased focus on employment and improved public transport.
1133	It is considered that Lancashire Cricket Club, Trafford Park Core and Wharfside areas are key to promote Trafford's status as the major sporting and economically active borough in the sub region.
1145	It is important to protect Trafford's existing Town Centres and therefore the Plan should state clearly that the land around the Trafford Centre where it's proposed to develop housing, will not be designated a "Town Centre". Also there should be a higher percentage of affordable properties built in this area.
1180	It would be useful to mention walking and cycling links to Salford Quays, e.g. proposed extension of Manchester Cycleway.
1181	The Wharfside site has the potential to alter depending on the possible move of Granada to this site. Wharfside is directly opposite Media City and there is big scope for development on this site. Cycle routes from Fallowfield will run through this site and Matt Busby Way will become a pedestrianised area. Concern raised over the effect this will have on the traffic in this area.
1181	This site is taking in other areas which is always challenging as projects that were meant for Wharfside will start bleeding into other areas.
1181	Land ownership should not have any impact but it could be a much bigger issue for larger sites.

#### Further Consultation on the Preferred Option (June 2009) responses – SL3 Old Trafford

ID	Summary Of Representation
1018	Support the inclusion of Old Trafford as a strategic location but believe the key issues and place objectives section does not include all the relevant issues. Other areas that should be listed include: <ul style="list-style-type: none"> <li>- The enhancement of green space to make it a safe place to enjoy;</li> <li>- Improve road layout into Old Trafford and the specific neighbourhoods within Old Trafford to encourage permeability; and</li> <li>- Improve access to city centre, digital city, Stretford to access jobs, employment</li> </ul>



	and training.
1031	It is said that details of the amount, location and type of development will be in accordance with an agreed masterplan for Old Trafford. Again, a site will need to be identified and allocated via a subsequent DPD. Further planning guidance could then be set via SPD. It should not be handled via informal planning guidance.
1066	Since the spatial profile has the objective to maximise opportunities for green roofs and tree planting in this area, we would suggest that these be included within the Development Requirements.
1145	Because Old Trafford is a heavily populated area it is important to protect its green open spaces and there is a need for more open spaces for recreational use, i.e. football, cricket, netball, tennis etc.
1145	It is suggested local shopping parades in Old Trafford be protected as they are the life blood of the community.
1145	Within the Old Trafford Neighbourhood Area, there is a need for more open spaces for recreational use i.e. football, cricket, netball, tennis etc.
1168	<p>It is considered in general that the draft objectives and policies now being consulted on in the Preferred Option for the Core Strategy document are a compromise that will provide the basis for spatial planning guidance for the future development proposals throughout the Borough. The present buildings and the full site occupied by the enterprise are a key location in the Old Trafford neighbourhood and have strategic potential for its future development and regeneration.</p> <p>Specific Objection relates to:</p> <ol style="list-style-type: none"> <li>1. The Development Requirements (SL3 Old Trafford) being subsumed into a generic requirement that states that development proposals must be in accordance with an agreed Masterplan for Old Trafford, or otherwise, development proposals might be refused on the grounds of prematurity if they would compromise the deliverability of a Masterplan.</li> <li>2. The reliance placed on the provisions of the Masterplan for Old Trafford is unsound, as that document it is understood is not yet adopted by the Council for spatial planning purposes, guidance and delivery of strategic development proposals in the narrowly defined area of the much larger Old Trafford neighbourhood. It is presumed that the adoption of this masterplan might only be a formality. This process is contrary to the guidance provided in the PPS12 paragraphs 1.4 and 5.2 (4) for the preparation of the development plan documents, and specifically the Core Strategy documents.</li> </ol>

#### Further Consultation on the Preferred Option (June 2009) responses – SL4 Lancashire County Cricket Club Area

ID	Summary Of Representation
1031	It is said that development proposals must be supported by a full range of PPS6 (or its replacement) assessments to ensure that any proposed development would not have a negative impact on surrounding areas. Given that the proposal is to identify a strategic area to accommodate a mix of uses including substantial retail development, this assessment should be carried out prior to the publication version of the plan so that its impact on surrounding town centres is clear. Again, a site will need to be identified and allocated via a subsequent DPD.
1047	With regard to Lancashire County Cricket Ground Area (SL4) the Agency has already funded improvements to the cricket ground and is involved in ongoing discussions regarding the regeneration of the surrounding area.

1057	Response about LCCC & Tesco received for workshop on Locations & Sites.
1073	It is noted within the development requirements that public transport infrastructure improvements may be required to cope with the increased capacity at LCCC. Currently the site is well served by public transport, however an increase in capacity at the site may induce network impacts further a field, and as such encourage and support any public transport infrastructure improvements which will mitigate these impacts as identified by the LIP.
1074	Whilst SL2 requires the protection and enhancement of the setting of the listed Town Hall a development requirement should include securing an appropriate use for the building in order to safeguard its long term future. This should be part and parcel of the strategic proposal for the area and merits specific mention in the CS.
1120	The Core Strategy should make specific reference to the important role that Trafford College plays in the Borough, and allow it to continue to develop in the community. The College has recently been graded 'outstanding' by OFSTED and offers great potential to assist the Council in delivering its policies and aspirations including those within the Sustainable Community Strategy. In particular, the College provides access to high quality training and education needs that raise the skills level of local residents to meet the demands of the local and wider regional economy.
1120	The Core Strategy should not undermine the potential contribution that the College can make towards widening housing choice in the Borough, and improving the quality of and access to open space.
1130	The Core Strategy has been well thought through and considered. The right areas of the Borough highlighted as Priority 1 locations for change, have been selected. Pleased to see that this is not just housing led regeneration, but does include the redevelopment of Lancashire County Cricket Club, Mediacity:uk, an increased focus on employment and improved public transport.
1133	It is considered that Lancashire Cricket Club, Trafford Park Core and Wharfside areas are key to promote Trafford's status as the major sporting and economically active borough in the sub region.
1145	Need to protect both Town Halls.
1145	The Tesco on Chester Road at the rear of Stretford Leisure Centre should not be allowed to increase its present planning permission size of 48,000sq ft store (this is in line with previous planning permission and that of the planning inspector, decided at a public enquiry). Anything above this size would have a detrimental impact on Stretford Town Centre and other Centres in the Borough.
1145	There is a need to protect the small shopping parades in communities.
1145	There needs to be much more consideration for residents living near to Sporting Stadia on match days and event days (a commitment needs to be made by the Council to limit the adverse effects of anti-social behaviour, noise, litter, traffic and parking problems etc).
1148	Happy to see Old Trafford Cricket Ground improved and the redevelopment of the surrounding area, but not at the cost of accepting one of the largest Tescos in the UK being built on this site. They have planning permission for a medium sized supermarket that should be sufficient for the area.
1154	Agree with the redevelopment of LCCC, but not on the basis of an extended Tesco store.
1167	Support the place objectives for Old Trafford, in particular the need to maximise the potential of LCCC as a visitor attraction and recognise its potential to lead major regeneration in the area.
1167	Draft Policy SL4 sets out the strategic proposal for this area. Supportive of this proposal subject to a number of revisions being made to the Strategic Proposal and Development Requirements parts of the draft policy:

	<p>1. The proposal needs to be amended to reflect the requirement for the improvements to the Cricket Ground to be cross funded by the provision of a superstore.</p> <p>2. Old Trafford Cricket Ground is the only venue in North West England where international standard cricket matches can be played. These matches provide significant income to LCCC and the wider regional / local economy as well as considerable profile to Trafford, Manchester and the North West region. However, the LCCC has fallen below the standards required to host test matches and requires an upgrading of its facilities in order to stage international cricket in the future.</p> <p>3. Urgent action and considerable investment is needed to upgrade and modernise facilities to ensure Old Trafford regains its test match status and its profile as one of the world's great cricket venues. This will have a highly beneficial effect on the area and enable it to build upon its reputation as a world class attraction as sought by the Vision for Trafford.</p> <p>4. Cross funding is required to finance most of the necessary works. A superstore will cross fund the works needed to upgrade the ground to meet Test match standards. This will result in sporting, community and cultural benefits being achieved.</p> <p>5. There is also an acknowledged need for a large superstore in the Old Trafford area and this can be provided at the Stretford Playing Fields site where food retail development has previously been permitted. A superstore will deliver retail employment and economic regeneration benefits for the area in keeping with national policy objectives.</p> <p>6. The combined stadium and superstore development will contribute to the comprehensive regeneration of the area by improving the attractiveness of the location to new investors and helping to stimulate new commercial, residential and educational development in the remaining area.</p> <p>7. The proposed change would involve deleting the reference to retail floorspace being delivered and replacing it in a reformatted policy with the following text: Provision of a large superstore on the Stretford Playing Fields site to meet the recognised need in the Old Trafford area and to cross fund the Stadium redevelopment works being undertaken.</p> <p>8. A need and a strategy for the creation of a high quality public realm along Warwick Road and Brian Statham Way has not been demonstrated. This part of the Strategic Proposal should therefore be deleted.</p>
1167	<p>Support the first, fourth and sixth requirements.</p> <p>In response to the second requirement which indicates that an increased capacity at the Cricket Ground has the potential to exacerbate congestion on the highway network and overcrowding on the Metrolink at peak times, the capacity of the Cricket Ground will not change significantly following redevelopment. As a result there will not be a marked increase in the number of spectators attending test matches. In any event, due to the timing of cricket matches, most spectators do not travel to or from the ground in peak periods. Consequently, the redevelopment of the ground will not exacerbate any congestion on the highway network and overcrowding Metrolink that may occur at peak times. The first sentence should therefore be deleted.</p>
1167	<p>The words "where appropriate" should be added at the start of the second sentence to reflect the fact that the requirement for any contributions must take account of the circumstances of each case. This sentence also requires adjustment to reflect the proposed deletion of the first sentence.</p>
1167	<p>The third requirement should be deleted as PPS12 advises that it is unnecessary to reiterate national policy in a Development Plan document. In any event, the sporting, community, economic and retail benefits that the scheme will bring are</p>

	consistent with national policy.
1167	The fifth requirement should be amended to include the words "fronting the A56" after the words "development proposals" to reflect the provisions of the SPD.
1167	<p>The amended Policy SL4, taking into account suggested revisions would read as follows:</p> <p>The comprehensive regeneration of the area will be delivered by:  Provision of a redeveloped and much improved LCCC sports stadium and ancillary sport and leisure facilities;  Provision of a large superstore on the Stretford Playing Field site to meet the recognised need in the Old Trafford area and to cross fund the stadium redevelopment works;  Business floorspace and new residential accommodation (up to 900 units);  Improvements to educational facilities; and  Public transport infrastructure improvements as necessary.</p> <p>Development Requirements.  Development Proposals must demonstrate a positive contribution to the delivery of the comprehensive regeneration of the area as set out in the Strategic Proposal.  The settling of the Grade II listed Trafford Town Hall should be protected and, if possible, enhanced.  Development Proposals fronting the A56 to accord with the development guidelines set out within the A56 Corridor SPD.  Where appropriate, development proposals should include Combined Heat and Power systems or alternative methods of sustainable energy generation / conservation.</p> <p>Justification for the Proposal.  The proposal is in accord with the RSS policy framework for the Manchester City Region area as set out in policies MCR1, MCR2, W3 and W6.  Redevelopment to upgrade and modernise facilities at the Old Trafford Cricket Ground will enhance Trafford's reputation as a location for national and international sporting events and directly and indirectly deliver additional employment opportunities and sporting and community benefits for local people.  There is an acknowledged need for a large superstore in Old Trafford and its provision will cross fund the upgrading and modernising of the Cricket Grounds facilities.  Proposals will focus significant business and housing regeneration schemes in the Gorse Hill, LCCC and Trafford Town Hall area and incorporate improvements to the education facilities in the area, high quality public realm and active street frontage improvements.  The proposals will promote the regeneration and development of an area that is highly accessible by a choice of modes of transport with access to the Metrolink and bus services linking the location to the wider area.</p> <p>Delivery Mechanism &amp; Funding  The location is in a mix of private and public sector ownerships.  Funding and delivery of the proposal principally will be the responsibility of the private sector and development partners.</p> <p>Development Phasing  Housing element to commence post 2011 / 12 with 35% built by 2015 / 16, 65% by 2020 / 21 and 100% by 2025 / 26.</p>

1169	In relation to LCCC there is currently a consultation being carried out in relation to the proposals which include a large Tesco supermarket. This will have a huge impact on other areas in Trafford including those outside Trafford such as Chorlton, why does there need to be a supermarket in that area.
1170	<p>In regards to the proposed Tesco store at LCCC, why was a previous application for a 50,000sq m floorspace refused and yet an application for a store more than twice its size (140,000sq m) been accepted.</p> <p>Additional concerns over whether planning permission and the details of the planning permission will be enforced in regards to floorspace for example.</p> <p>New jobs will be provided; Tesco has a track record of exceeding original planning permission and then applying for retrospective permission.</p> <p>Concerns over sustainability of store in terms of detrimental effects on other local businesses. Concerns echoed over the future of Stretford Mall which is in a state of decay and that efforts should be focused on improving the quality and vitality of the shops here.</p>

#### Further consultation on the Preferred Option (June 2009) responses – SL5 Trafford Park Core

ID	Summary Of Representation
1031	It is proposed that the emerging Trafford Park Masterplan will provide additional guidance for development and change. This would appear to be informal planning guidance. Further guidance should be set out in an LDD. What is the scope for new development in this area? If the scope is limited it is not clear what the purpose is in identifying it as a strategic location for new development.
1045	Clarification is required within the text of the Strategic Proposal of what is intended by the words "supporting commercial office accommodation" to avoid any confusion between the anticipated roles of Trafford Wharfside, the Trafford Centre Rectangle and the Core of Trafford Park. If the Core is to be protected and developed for modern industrial storage and distribution uses then this wording should be expanded to confirm that there is a presumption against general office development within Trafford Park Core which is not ancillary or directly related to a manufacturing or other industrial/storage/distribution use.
1055	Welcome inclusion as first priority site for development and their inclusion within the defined regional centre and Inner Areas.
1055	Trafford Park should retain its status of national significance and continue to be regarded as the key location for industry and business activity in the Manchester City Region. Therefore support is given for the stance taken in the strategic proposal for Trafford Park Core. Particular support is given to the proposal to 'improve the public transport infrastructure to provide integrated frequent public transit system linking the location with surrounding residential and commercial areas.
1055	There is some uncertainty as to the form of improvements and exactly how they are to be delivered. Delivery of this key transport infrastructure is essential if Trafford Park and the immediately surrounding area is to realistically achieve the sustainable mixed use development referred to throughout the Core Strategy document.
1073	Supports location for development.
1073	Welcome and encourage the aspiration to deliver associated public transport infrastructure improvements alongside the delivery of additional floorspace, to ensure that workers can access Trafford Park on a sustainable basis rather than

	using the private car.
1073	Any significant development proposed that is not covered in the LDF Modelling work should be undertaken using a masterplan approach to ensure that public transport improvements are in place before new developments/floorspace is occupied at this location.
1096	Development requirements should include the need to review the findings of the Level 2 SFRA. This strategic location borders both the Manchester Ship Canal and the Bridgewater Canal.
1133	It is considered that Lancashire Cricket Club, Trafford Park Core and Wharfside areas are key to promote Trafford's status as the major sporting and economically active borough in the sub region.

### Further Consultation on the Preferred Option (June 2009) responses – SL6 Trafford Centre Rectangle

ID	Summary Of Representation
1031	This is said to include a mix of uses including commercial offices, hotel and leisure development. It is not clear whether this will accord with national planning policy.
1031	It is proposed that the emerging Trafford Park Masterplan will provide additional guidance for development and change. This would appear to be informal planning guidance. Further guidance should be set out in an LDD.
1031	It will be necessary to identify and allocate sites in a subsequent DPD. It is noted that it is proposed to allocate part of this strategic location as a strategic site in the core strategy. Besides the proposed development on the strategic site at Trafford Quays and the development referred to that has planning permission, what is the scope for further development within this strategic location? If the scope is limited, it is not clear what the purpose is in identifying it as a strategic location for new development.
1045	Support in principle for the strategic proposal but object to the inclusion of the words "where appropriate" in respect of commercial office, hotel and leisure accommodation. This could be open to many different interpretations and is likely to give rise to major difficulties in promoting development proposals. These words should be deleted and replaced by a reference to the need for any proposed development in these use categories be subject to the tests set out in PPS6 or its successor. This would also provide for consistency between SL6 and SS2.
1045	The SA assertion that public transport to the TCR is presently limited contradicts conclusions in the Trafford Park and Salford Quays Accessibility Study and TCR's bus station is categorised as a Category B Major Transport Interchange by GMPTE. It is considered that the conclusions in relation to accessibility are flawed and require revision.
1045	The Trafford Quays Delivery Report has been prepared on behalf of the landowner for the site. It sets out in detail the level of proposed development and associated development. It should be read alongside documents submitted in August 2008.
1055	Support for the inclusion of the Trafford Centre Rectangle as a Strategic Location. Land holdings immediately adjacent to the Strategic Location could make a significant contribution towards the sustainable mixed use development included in the Strategic Proposal. Further clarification may be required with regard to the 'significant improvements to public transport infrastructure' in particular the timing and method of delivery.
1073	Over 1,000 dwellings are to be located within the Trafford Centre Rectangle, and although this is a 'third priority' location in terms of locating development, this

	location aims to deliver almost 10% of the housing provision across the Core Strategy (Table L1). A development quantum of 1,000 dwellings in a location close to the SRN causes some concern, and therefore requires sound transport evidence to support the development aspirations at this location.
1073	Concern is raised over promoting residential development within Air Quality Management Areas, of which the Trafford Centre Rectangle is one.
1073	The Trafford Centre Rectangle site is identified as having a mixed-use (non-residential) development quantum. Development in this location will impact upon the SRN, and as such, any development needs to be supported by extensive public transport improvements to ensure the impact on the SRN is minimised. Therefore any proposal will need to be supported by sound transport evidence for the site, as well as being clearly demonstrated within the Local Infrastructure Plan that the site can come forward on a sustainable basis.
1074	SL6 includes a Grade I church within its boundaries and the need to safeguard and enhance its settings should be included in the development requirements.
1145	It is important to protect Trafford's existing Town Centres and therefore the Plan should state clearly that the land around the Trafford Centre where it's proposed to develop housing, will not be designated a "Town Centre". Also there should be a higher percentage of affordable properties built in this area.

#### Further Consultation on the Preferred Option (June 2009) responses – SL7 Stretford Crossroads

ID	Summary Of Representation
1013	Following major developments in Sale, Altrincham and Urmston Town Centres, Stretford is the only one of the major centres still to be considered. Concerned that proposals appear to be targeted at some relatively distant point in time. The potential to create something fine for Stretford is not fully covered and cannot be delayed for this long. Certain issues need to be stressed: The A56 is a major barrier between the shopping centre and other strategic parts of the centre, including the canal, the Metro and the Essoldo. Thought must be given to strategic redevelopment to unify the centre, including sinking the crossroads and giving the ground level to pedestrians. More emphasis needs to be placed on the corridor linking the shopping centre with Longfield Park. The Bridgewater canal needs to be linked to the centre and made a major feature to include recreation, leisure and canal-based commercial activity. Cycle storage/hire/repair facilities need to be added to the Metro station and bus stops to create a truly sustainable transport interchange. A wider, more strategic vision is needed to re-join the two halves of the centre and regenerate it as a community based entity.
1031	It will be necessary to identify and allocate sites in a subsequent DPD. Is it necessary though to identify this as a strategic location?
1066	Since the Spatial Profile has the objective to explore opportunities for green roofs and tree planting in the Stretford area, it is suggested that these be included within the Development Requirements.
1073	Development in this location is encouraged, due to its town centre location and public transport accessibility characteristics.
1074	SL7 makes reference to the listed Essoldo cinema under the justification for the proposal and refers to funding for its re-use. It would be better if the development requirements section set out more clearly the mechanisms to achieve this.
1142	Aware that Stretford Mall is privately owned but consider there should be discussions about the number of dwindling shops.
1145	There is a desperate need for the Council to develop a 'Comprehensive Stretford Town Centre Plan' which develops first class shopping, leisure and recreation and

	job opportunities for the people of Stretford. The Council will further help support regeneration of the Town Centre, recognising its 10% stake in the Mall and how this can be best used towards such regeneration projects, and would seek to involve all local stakeholders.
1147	<p>A number of people have previously raised concerns over the existing underpass system linking the four areas of Stretford Crossroads. Quoting paragraph 6.6 of the A56 Corridor SPD, commitment to improve crossing facilities which includes Stretford Crossroads. The response stated that pedestrian controlled crossings are not within the scope of the Core Strategy but are the responsibility of the Transport department. It is suggested that all of the relevant departments of the Council liaise with the Transport Department and engage in joint planning so that the preferred crossroads can be installed at the same time as the redevelopment takes place. This would allow easier crossing, and allow development around the Essoldo Cinema and Newton Street. The underpass may remain until such funding allows them to be filled in / closed as long as pedestrians have the option of controlled crossing.</p> <p>Increased residential accommodation further justifies pedestrian crossings and Stretford town centre regeneration to provide more local employment and easier access to the Metro Link for cross city travel.</p> <p>Council policies are in favour of a more cyclist and pedestrian friendly A56 and installing facilities to encourage the use of public transport. Surely installing pedestrian crossings will encourage more use of the Metro Link thus removing cars from the road as part of the Councils remit.</p> <p>It is also proposed that Kingsway from below the car park entrance to the traffic lights on Chester Road is pedestrianised, with traffic diverted along Barton Road. This would instantly rejoin two halves of Stretford crossroads bringing the library and clinic back to the town centre.</p>
1147	With the regeneration of Stretford town centre, what are the proposed plans? The current documentation is vague. What are the exact details of the new improved floor space to enhance the offer of the town centre? What are the exact intentions regarding improvement and development in and around Stretford Mall to improve retail facility and offer available to the local community? This could range from a fresh coat of paint to demolition, please clarify.
1147	What are the plans to increase accessibility to the Metrolink?
1147	What are specific proposals for the Essoldo?
1148	Over 25 retail units and nearly all the market at the mall is now vacant. The Council should encourage investment in Stretford Town Centre not killing any future opportunities by building a massive Tesco nearby. Sale, Altrincham and Urmston have had significant investment, nothing has improved in Stretford for a long time, and a new town centre is needed.
1153	This is a thoroughly thought out paper on the borough as a whole, but as a resident in Stretford, living near the centre it is considered that this part of the town requires careful consideration. The shopping mall at the moment is not very enticing as many units are unlet, most likely due to the economic situation. It is appreciated that this is privately owned.
1153	The Essoldo Cinema has been in private ownership for some years and work in progress is very slow. Recently a few bricks were replaced at roof level. Appreciate that it is difficult to persuade the owner to 'get a move on' but something needs to be done as this listed building is not being used to its full potential.
1153	Reference is made to Stretford Crossroads Strategic Option in relation to housing.



	Certainly this area needs improving to make it more attractive and safer. Cyclists using the pavements in Stretford rather than the cycle paths are a menace, as bikes don't have bells these days you can't hear them.
1153	Definitely need a good restaurant. Sale, Urmston and Altrincham have plenty, so why can't Sale?
1154	Stretford is the only town centre without recent substantial investment and should be given priority. It has become merely a main road, the underpass should be allocated to cars not to people.
1154	This is vague. Stretford is the area which needs the most help and more varied shopping.
1154	Stretford must be the priority for development.

#### Further consultation on the Preferred Option (June 2009) responses – SL8 Carrington

ID	Summary Of Representation
1026	Carrington to be developed as mixed use, which will meet many of the Council's strategic objectives. It is of a scale sufficient to generate investment required to improve accessibility and infrastructure in the area, to open up Partington for Regeneration and offer range of housing and employment opportunities therefore reducing the need to travel. Carrington also provides opportunities for on-site energy generation, improvements to public transport, a green space strategy with development over the next 25 years.
1026	Carrington provides an alternative location for housing.
1026	The development at Carrington will adopt measures to reduce carbon emissions. As well as sustainable construction, there is potential for a Biomass low carbon energy facility to be developed on site. The SFRA work will inform of any risk from flooding, the site has not been flooded in over 60 years.
1026	Support the identification of Carrington as a Strategic Location, but have proposals for the type of use and infrastructure.
1026	Do not support the proposed development of Carrington and we are currently producing a masterplan for the area and would like for the early outputs of this work to be incorporated within the Core Strategy.
1026	The development of a bridge crossing over the Manchester Ship Canal is not required as part of the masterplan development for mixed use. There are other local highway opportunities to deliver the scale and mix of proposed development.
1026	Agree with the justification for SL8 and see these appropriate to justify the mixed use community development.
1026	Carrington will meet the majority of the Council's Strategic Objectives.
1026	Propose a mixed use sustainable phased development of housing, employment, open space and other ancillary uses. New elements of and improvements to the highway and public transport infrastructure to improve the accessibility of the location. The masterplan provides an opportunity to re-develop a large area of currently under-utilised brownfield land to accommodate mixed use development that will support the regeneration of Carrington as an economic driver in the sub-region. The location is in a single private sector ownership.
1026	A masterplan vision has been prepared for the Carrington site. The aim of that Vision is to produce a sustainable mixed use development on this large brownfield site at Carrington over the next 25 years that is achievable and deliverable.
1026	The land within the client's ownership meets all of these criteria (available, suitable, and achievable) with the added bonus of the opportunity to create a new sustainable community around the existing housing and employment around

	Carrington.
1026	Our proposals for Carrington represent an ideal marriage of opportunity and need, a large area of brownfield land becoming available in parallel with the preparation of the Core Strategy and an increase in housing numbers required by the Growth Point Agenda with the delivery of a sustainable mixed use development.
1026	In order to achieve all of the 'Place Objectives' for Carrington, particularly the major improvements to infrastructure, then these can only be delivered by a mixed use sustainable development of the brownfield land that will also help to bring about the regeneration of Partington. The mixed use development of Carrington is key to delivery of the regeneration of the substantial area of brownfield land within Shell's control but also the infrastructure required to open up the wider area.
1026	It is considered that the Council are missing a major opportunity in the Preferred Option to create a truly sustainable, vibrant, prosperous, well designed and deliverable mixed use community on the brownfield land at Carrington in accord with both national and regional policy.
1026	SO1 - The site at Carrington will provide sufficient family housing throughout and beyond the plan period to meet the Borough's needs and will create a sustainable community linking housing with employment and the supporting social infrastructure.
1026	SO2 - The development of a mixed use community at Carrington will have positive regeneration benefits not only for Carrington but also for Partington creating a range and choice of jobs and housing with improved accessibility and public transport.
1026	SO3 - Carrington can as a mixed use development deliver a range and choice of employment opportunities in this sustainable location. It is the intention to retain all of the existing jobs on site in addition to creating a range of new employment opportunities.
1026	SO5 - The Shell ownership at Carrington includes a significant amount of green space which through a masterplan for the area to be protected and enhanced increasing local accessibility but also creating linkages to the wider area.
1026	SO6 - The promotion of a "significant" level of mixed development on the brownfield land at Carrington will reduce the need to travel and improve accessibility.
1026	SO7 - The development at Carrington, because of its scale and the timescale for the overall delivery, will include new technologies such as biomass and innovative waste management to combat climate change and to minimise the impact on Trafford's resources.
1026	Carrington should be considered a Strategic Site rather than a Location.
1026	In Paragraph 23.5 the Council makes reference to the production of planning guidance for each site, have already commenced work on a masterplan for Carrington in consultation with the Council and have produced a vision which has already been the subject of consultation with local stakeholders as well as Members and Chief Officers of the Council.
1031	There are significant concerns regarding highway improvements as development is planned to commence by 2010/11. It will be necessary to indicate in some detail the infrastructure required and who will provide it. Also for the impact of the development to be considered and explained how it will be mitigated.
1031	Will the Level 2 SFRA be available to examine flood risk issues prior to publication version? It will be necessary to indicate how flood risk issues will be dealt with given the proposed to commencement of development early in the plan period.
1031	It will be necessary to identify and allocate sites in a subsequent DPD.

1045	The text should make mention of the role of the Manchester Ship Canal in handling of freight for users in this area.
1047	Carrington is not designated as a strategic regional site by the NWDA.
1051	Support the general principles however there is some concern about the allocation of undeveloped land to the south of the former railway line and any new development on it. It should be given greater consideration as it is located approximately 100 metres from the historic agricultural estate of Dunham Massey. Thereby development proposals consider their impact on the landscape of the surrounding area.
1066	Suggest relocation of wording from the last bullet point in the justification for the proposal text to be included under the development requirements.
1073	Concerns raised over public transport accessibility to Carrington and Partington. More detailed work will therefore need to be done to support these locations. This work should establish the likely origin-destination travel patterns from the LDF modelling arising from development at these locations, the level of public transport infrastructure required to support these movements and the timescales over which infrastructure will be required to be provided in order to support the development quantum proposed. This will need to be supported by operational analysis to ensure that the scale of any impact at the SRN is quantified and the appropriate sustainable transport is provided. This is a wider point also relevant to the cumulative transport impact of the strategy as a whole that the LDF modelling should help address.
1073	The development aspirations for Carrington raise concern due to its poor public transport accessibility and potential impact on the Strategic Road Network. Links to enhance accessibility to the M60 are not supported. If this is to encourage car borne journeys. No alternative options are detailed. An iterative process should be undertaken to identify more suitable travel options. Concerns are raised about the additional Manchester Ship Canal crossing and should be subject to LDF modelling work and all details for infrastructure in the LIP.
1073	The locations of Partington and Carrington do generate car borne trips due to poor public transport trips. Welcome the development in Partington to improve public transport provision.
1074	SL8 includes a Grade 2* listed Church, this should be referred to in the development requirements.
1093	In terms of transport it is recognised that Core Policy L4 commits to accessible locations for development, however question the inclusion of Partington and Carrington. Both of these locations are only served by a single road in/out, they are 'rural' in nature and are severed from the network by the Manchester Ship Canal. The sustainable nature or lack of, at these locations has been raised before.
1093	SL8 specifically mentions the need for a new crossing over the Manchester Ship Canal in order to link to the motorway network, with little information to say how such a major structure would be funded.
1096	Carrington, Partington and Mediacity are areas with sewer capacity and drainage issues. Careful consideration is required of the planned significant development.
1096	Parts of SL8 lies within flood zones 2 and 3. Following outputs from SFRA Level 2, it is expected that a sequential approach is applied at site level so that buildings are located away from areas of risk. Principles of Green Infrastructure should be applied in these flood risk areas to provide multifunctional benefits and requirements of policies L5. R2 and R3. The vulnerability of developments should be considered if located in flood risk areas.
1100	Object to the reduced size of the Strategic Location if the outputs of the SFRA

	Level 2 stated so. Consideration of flood risk should be integrated within the policy wording for each development proposal.
1100	Support SL8 and its regeneration benefits, including utilising large area of under-utilised brownfield land, large scale industrial development which will support Carrington's role as an economic driver, increased employment opportunities. There is a need to enhance accessibility and developments might help to fund this. The SA details the need to remediate contaminated land.
1100	There is an overwhelming case for regeneration of Carrington, which will complement the remodelling of the residential area of Partington. These benefits will not be achieved by a significant reduction on the amount of economic development proposed in SL8.
1100	Understand the development of land in Carrington will be subject to flood risk assessment.
1100	There is an inconsistency between policy L6 and SL7, whereby in L6 Carrington is identified as a location for waste management, but there is no mention of this in SL8.
1100	Consideration of conflicting land use types should be undertaken in Carrington, particularly with regard to power generation and waste management sites.
1100	It is suggested to amend SL8 to incorporate reference to the potential for additional economic development to exploit the potential of the new power station and a waste to energy facility. Thereby using surplus heat in local industry, or by district heating schemes or anaerobic digestion plants. Another option is intensive agriculture, which is less vulnerable to flood risk.
1100	Large areas of Carrington are used for airport related uses.
1100	There is no justification to drop airport related uses from Carrington.
1100	There is a need to revisit Policy W1 and Carrington Strategic Location to address the potential of airport-related development.
1100	The SL8 policy should be revisited to exploit its potential.
1145	Carrington community centre and youth facilities need improving. As well as public transport provision.
1156	Carrington should be developed as a mixed use site.
1156	Urge the reconsideration of SL8 to a mixed use site.

#### Further Consultation on the Preferred Option (June 2009) responses – SL9 Partington

ID	Summary Of Representation
1013	Partington desperately needs resourcing to create a more vibrant community. Perhaps more emphasis on training programmes to help local residents into new local employment could be given. Partington is an isolated community and it needs local jobs, shops and facilities to avoid locals having to travel long distances, which in itself would be unsustainable and undesirable. With the surrounding agricultural area, perhaps Partington could pilot schemes based upon local food production, allotments, markets etc for consideration regarding possible cascading around the Borough?
1051	The identified area is close to the wider Dunham Massey Estate - On this occasion within less than 50 metres. Accordingly the impacts upon the wider landscape and its historical importance require more detailed consideration. In particular it is requested that the Development Requirements are supplemented to ensure that development proposals consider their impact upon the landscape character of the surrounding area, including the historic Dunham Massey Estate and are designed accordingly.
1067	Development Requirements - Critically important - apart from country lanes there

	is only the A6144 giving access to the location from either east or west which is at peak times to say the least liable to congestion.
1067	Justification for the proposal - Redevelopment of the shopping centre will not create 'but support' a more sustainable community.
1073	Concerns raised over public transport accessibility to Carrington and Partington. More detailed work will therefore need to be done to support these locations. This work should establish the likely origin-destination travel patterns from the LDF modelling arising from development at these locations, the level of public transport infrastructure required to support these movements and the timescales over which infrastructure will be required to be provided in order to support the development quantum proposed. This will need to be supported by operational analysis to ensure that the scale of any impact at the SRN is quantified and the appropriate sustainable transport is provided. This is a wider point also relevant to the cumulative transport impact of the strategy as a whole that the LDF modelling should help address.
1073	The locations of Partington and Carrington do generate car borne trips due to poor public transport. Welcome the development in Partington to improve public transport provision.
1073	Until a sound transport evidence base is developed via the LDF modelling and the LIP to support the development aspirations at this location, the Agency holds similar concerns for the Partington site as those held for Carrington.
1078	The land to the south of Partington, currently Protected Open Land, should be included within the boundary of the Strategic Location to recognise its future potential for housing development which would support the regeneration of the area.
1093	In terms of transport it is recognised that Core Policy L4 commits to accessible locations for development, however question the inclusion of Partington and Carrington. Both of these locations are only served by a single road in/out, they are 'rural' in nature and are severed from the network by the Manchester Ship Canal. The sustainable nature or lack of, at these locations has been raised before.
1096	Carrington, Partington and Mediacity are areas with sewer capacity and drainage issues. Careful consideration is required of the planned significant development.
1130	The comment (SL5) 'Improvements to public transport access are essential' is also true of priority 2 sites Partington (SL9). Any efforts to regenerate these communities that will allow access to jobs throughout the Borough and encourage people to live there will undoubtedly fail, without effective public transport provision.
1141	Regarding Partington decent shops and other facilities are required.
1145	Town Centre shops need redeveloping as a matter of urgency. There is a real need to develop a better mix of social and private housing. A comprehensive strategy is needed to address the isolation of Partington (road and public transport). More job opportunities need to be created for the people of Partington.
1154	Partington is desperately in need of a choice of retail outlets.
1187	Partington is identified as accepting considerable residential build. Would like to see all brown/green potentials in closer proximity to the city fully utilised before any semi rural build. Partington's curse for decades has been lots of houses and nothing else. Fine words allied with nebulous promises of improvements have yielded little.

### Further Consultation on the Preferred Option (June 2009) responses – SL10 Sale West

ID	Summary Of Representation
1031	It is said that the proposal will be delivered by RSL and private sector partners and that it is likely to be dependent on funding from the Homes and Communities Agency. Given that development is proposed to commence in 2010/11 it will be necessary to indicate what level of funding is required and who will be providing it.
1031	It will be necessary to identify and allocate sites in a subsequent DPD. Is it necessary though to identify this as a strategic location?
1067	Opportunity to encourage cycling to be applauded but also open to abuse. Create linkages to other employment opportunities - what, where, how? Potential for development within the specified boundary is very limited unless designated green spaces are built on.
1073	Due to edge of Town Centre location of this site and the relatively small amount of development there is less concern.
1130	Improvements to public transport are essential.

### Further Consultation on the Preferred Option (June 2009) responses – SL11 Sale Town Centre

ID	Summary Of Representation
1031	Given that development is proposed to commence in 2010/11 it will be necessary to indicate what level of funding is required and who will be providing it.
1031	It will be necessary to identify and allocate sites in a subsequent DPD. Is it necessary though to identify this as a strategic location?
1067	Selected up-dates have been incorporated onto a map which is roughly 20 years out of date. The P.O. relocated out of that building in about 1990. The road on your map named Roman Road has not been called that for the last 40 years. School Road is to the East of the A56. Ashton Road is to the West of the A56. Is the redesignation part of the Strategy? Hope Road is not recognised.
1073	Due to the edge of town centre nature of the site, combined with the relatively small amount of development at this site, the development aspirations at Strategic Location SL11 are encouraged.
1145	Should be a definite statement to work towards supporting and enhancing Sale Town Centre.
1166	Support the Council's identification of Sale town centre as a Strategic Location (SL11) within the draft Core Strategy. However, it is felt that the policy should provide for 'strengthening and enhancement' of the centre, rather than the 'consolidation and improvement' which is proposed. This approach would provide increased economic and social benefits for the centre and assist in achieving the stated Development Requirement of positively enhancing the vitality and viability of the centre.
1166	In regard to the Strategic Proposal criteria, support an improvement to the mix and quality of the existing retail offer; however it is believed that the new retail floorspace proposed should be focussed around 'The Square' and serve to improve the quality of both convenience and comparison provision within the centre, which can be achieved through increasing the scale of the unit shops and enlarging the Tesco foodstore. As such, a maximum level of retail floorspace should not be contemplated, as it may unnecessarily restrict the appropriate level of development required.
1166	The Strategic Proposal for new commercial office accommodation, additional leisure and community facility development and additional residential

	accommodation is also supported, although a maximum level of commercial floorspace or number of residential units should not be specified within the policy, as it may unnecessarily restrict the appropriate level of development required.
1166	In terms of the Development Requirements, strongly support the first criterion that development should enhance the vitality and viability of the town centre.
1166	It is suggested that the second criterion should be amended to state that 'development proposals in Sale town centre which front onto the A56 should accord with the development guidelines set out within the A56 corridor SPD' in order to ensure that this requirement does not apply to development which has no frontage on the A56.
1166	With reference to the Justification for the proposal, the enhancement of Sale town centre fully accords with Policy W5 of the Regional Spatial Strategy (RSS) which seeks investment of an appropriate scale within defined centres to maintain and enhance vitality and viability, and also does not conflict with Policies MCR1 and MCR3 in the RSS.
1166	Agree that Sale town centre is located in a most accessible location due to its excellent links to public transport including bus and tram services.
1166	The third bullet point should be amended in order to maximise the benefits for the vitality and viability of the centre, such that it states 'the proposed development will allow for enhancement of the town centre to strengthen the commercial and civic focus - providing convenient services to local people and contributing to economic growth.
1166	<p>It is suggested that the final bullet point for the justification of the proposal, which refers to the conclusions of the Trafford Retail Study (TRS) should be deleted, because the recommendations of the TRS did not take account of the potential for the enhancement and strengthening of Sale town centre.</p> <p>Therefore this point should be written more positively to read 'The emphasis should be on quantitative and qualitative expansion of the town centre for both convenience and comparison goods through the redevelopment of the square and the surrounding units, along with the extension of the Tesco foodstore'. This will allow for the creation of larger footplate units which are better able to attract National multiple retailers, and also modernise the Tesco store which is some 30 years old, such that the range and choice of goods available can be expanded in order to improve the level of provision available to local shoppers. This approach will serve to positively enhance the vitality and viability of Sale town centre.</p>
1166	Agree with the Delivery Mechanism and Funding section.
1166	In regard to Development Phasing, suggest that this is deleted as it is not possible to predict with any accuracy when elements of the development will be provided.
1166	<p>It is considered that the Sale Town Centre Strategic Location should read as follows.</p> <p>Strategic Proposal - Redevelopment to promote the strengthening and enhancement of the town centre to provide:</p> <ul style="list-style-type: none"> <li>-Improvements to the mix and quality of the existing retail offer.</li> <li>-New retail floorspace focussed around the Square to increase the range and size of the unit shops, and extension of the Tesco foodstore to improve the quality and choice of the retail offer.</li> <li>-New commercial office accommodation.</li> <li>-Additional leisure and community facility development.</li> <li>-Additional residential accommodation.</li> </ul> <p>Development Requirements:</p> <ul style="list-style-type: none"> <li>-Development should positively enhance the vitality and viability of the existing</li> </ul>

	<p>town centre.</p> <p>-Development proposals in Sale town centre which front onto the A56 should accord with the development guidelines set out within the A56 Corridor SPD.</p> <p>-A review of impact of the proposed development on flood risk related to the adjoining Bridgewater Canal to be undertaken when the findings of the Level 2 / Hybrid SFRA for Manchester, Salford and Trafford are published.</p> <p>Justification for the Proposal.</p> <p>-The proposal is in accordance with the RSS policy framework for the Manchester Region area as set out in policies MCR1, MCR3 and W5.</p> <p>-Sale town centre is located in a most accessible location with excellent links to public transport services such as Metrolink and bus services,</p> <p>-The proposed development will allow for enhancement of the town centre to strengthen the commercial and civic focus - providing convenient services to local people and contributing to economic growth.</p> <p>-The emphasis should be on quantitative and qualitative expansion of the town centre for both convenience and comparison goods through the redevelopment of the Square and surrounding units, along with an extension to the Tesco foodstore.</p> <p>Delivery Mechanism &amp; Funding:</p> <p>-The area is a mix of private and public sector ownership.</p> <p>-The proposals will be delivered principally by private sector land owners and development partners.</p>
1180	Under point 2 of Justification for the Proposal, links to cycling and walking need to be made clear. Cycling also needs to be more prominent across other strategic locations and sites.

#### Further Consultation on the Preferred Option (June 2009) responses – SL12 Woodfield Road

ID	Summary Of Representation
1031	Will the Level 2 SFRA be available in order to examine flood risk issues prior to the publication version of the core strategy? It will be necessary to indicate how flood risk issues will be dealt with given that it is proposed to commence development early in the plan period.
1031	It will be necessary to identify and allocate sites in a subsequent DPD.
1036	Support the identification of the wider Woodfield Road site (including the land within its ownership) as a Strategic Location. However the strategic proposal should be revised to reflect the potential that exists for the site to accommodate more than 400 residential units. In addition, it should acknowledge that any residential-led mixed use development of the site may comprise a range of other uses in addition to new housing and offices such as, for example ancillary retail.
1051	It will appear that consideration will need to be given to the impact of the development on the nearby Linotype Estate.
1066	Welcome the statement that the proposals will include enhancements of the ecological corridor running along the Bridgewater Canal but would suggest that this should be included under Development Requirements rather than just as a justification for the proposal.
1067	Highway improvements are critical but difficult to deliver. Residential developments to date have already resulted in problems. Protection and enhancement are important - the luxi warehouse is decaying rapidly.
1067	Too much emphasis is given to offices. Modest workshop facilities must also be incorporated. Units of 50-80 sqm are too scarce.



1073	The development aspirations at Woodfield Road aim to redevelop redundant industrial premises in this "most accessible location" for residential led mixed use development, including up to 400 residential units and 2000 square metres of office floor space. The Woodfield Road site is accessible via sustainable modes, and due to its location and relatively small development quantum the proposed development can be encouraged.
1074	Welcome the reference to the setting of the listed buildings. However the policy should go further than this and address the future of the buildings themselves and how they will be safeguarded.
1180	Under bullet point 3 in Development requirements, it would be useful to add improvements for encouraging cycling along the Bridgewater Canal.

### **Further Consultation on the Preferred Option (June 2009) responses – SL13 Altrincham Town Centre**

<b>ID</b>	<b>Summary Of Representation</b>
1031	The proposal includes a variety of elements including improved public transport interchange, enhancement to the public realm and improvements to pedestrian routes. It is unclear what funding will be required, when it will be needed and who will deliver it.
1031	It will be necessary to identify and allocate sites in a subsequent DPD.
1051	Insufficient consideration has been given to the relevant historic environment resources within the identified area - these are more extensive than as listed in the third bullet point under Development Requirements. The fourth bullet point under "Justification" provides a more accurate reference to these resources and how they should influence development proposals. It is suggested that it is moved to the Development Requirements section.
1067	Development of the "Historic Market Quarter" must be ignited by major investment in the Market itself. King's Court (off Railway Street) should be added to the list.
1067	The most recent proposal is that the residential component for Altair be substantially reduced from the original figure of 150.
1073	Encouraged by the concentration of development in Altrincham Town Centre as it benefits from established public transport links to local and regional centres via a number of differing modes, and also plays host to a number of key services, retail and leisure and employment opportunities.
1073	Locating significant amount of development in this location may see demand for the Junction 6 and 7 of the M56, and as such, development pressures may impact upon the operation of these junctions. Any large-scale development aspirations in this location will need to be brought forward sustainably to minimise any impact on the SRN. Any large scale development sites should be supported by the appropriate infrastructure and sound evidence bases to ensure any impact on the SRN is minimised.
1074	Policy SL13 is supported. Given the significance of the town centre's conservation areas it is suggested that this area is prioritised for the preparation of Conservation Area Management Plans.
1082	Policy SL13 requires development to "positively enhance the vitality and viability of town centres" but this is not compatible with seeking to limit other than A1 uses in prime shopping frontages.
1133	The continued development of Altrincham town centre is vital as the largest town centre in the Borough and a key destination for those who live outside the Borough in addition to visitors across Trafford.
1140	Concerned regarding the larger River Island. It is considered an unethical

	company.
1145	Need to protect both Town Halls.
1145	It is important to continue the development of Altrincham Town Centre.
1152	First priority of Spatial Strategy to direct development to the North East of Trafford within the Regional Centre and Inner Areas. Second priority Altrincham Town Centre. Priority 3 relates to the remaining Strategic Locations and the fourth explains that outside of these growth areas, new growth will be focussed on meeting local needs with market housing in sustainable locations well served by public transport.
1152	Directing growth to this area will assist in contributing to the regeneration of Altrincham Town Centre by encouraging business and shoppers to locate there.
1152	Presently the Altair site which is located within SL13 makes no contribution to the character or well-being of the Town Centre. The site is located within a prominent gateway position next to Altrincham's Transport interchange and is in need of investment and development. The Altair scheme will include the demolition of all existing buildings and replace them with a comprehensive regeneration scheme for a mix of high quality uses. In addition to the facilities proposed, the scheme will also provide a high quality public realm with street furniture and art work to attract members of the local community.
1152	The content of Policy W1 is supported. It is important to guide economic regeneration and development in such locations as Altrincham town centre in order to assist growth of the City Region. Altair is specifically recognised as one of the most important regeneration sites in Altrincham town centre and represents an opportunity to enhance the town centre's viability and contribute towards Altrincham's role as a sub-regional centre. The mixed use regeneration of the site will encourage shoppers and business to Altrincham.
1159	There is no mention in the document about the declining state of Altrincham Market, which is at the core of the town's existence. The market is dying and no longer a visitor or tourist attraction. Money needs to be spent on the infrastructure and a programme put in place to attract more traders and to hold events to encourage people back to the market and town centre.
1160	Despite there being 4 policies covering the topic of green spaces, not one of them mentions the intention to protect any of the smaller green open spaces under 2000sq metres, which are not currently protected under the UDP. It is understood that neither the Green Space Strategy, nor the Integrated Green Plan will mention them or protect them in any way. Yet these smaller green spaces are very vulnerable to development, despite them being essential for the environment and visual amenity, as well as providing places for people to sit, especially in town centres. Currently and in the future, any planning application to build upon them will not be rejected, as no policy protects them, this is a serious oversight in the document.
1169	What will happen to Altrincham Market?
1169	Improvements to the market in Altrincham are needed as other areas are better (e.g. Bury).
1169	There is concern regarding the fate of the market. It is suggested that a "Friends of the Market" group should be set up. The Council should not to be too prescriptive about the Altrincham market until more is known about the hospital site. Whatever happens to the hospital site will impinge upon the market.
1169	There is a need to maintain facilities as there is no point implementing them if they are not maintained.
1169	The document focuses on large development sites but does not consider smaller sites. The Stamford Bowling Club and a site next to the High Bank Adult Centre have become vacant. The site has been advertised for parking which is not a

	good use of the site. Question what is going to happen to the sites and if the Local Authority are considering proposals of a smaller scale.
1169	Against the Altair development. The focus has to be on redevelopment rather than new development. Businesses come and go all of the time as people do not visit the town centre. People don't come to Altrincham as there is the perception that there is no parking, but the problem is that it is not readily accessible or seen. Need to make it easier for people to visit Altrincham.
1169	30 years ago Altrincham was thriving; people are now shopping elsewhere e.g. Warrington. We should rectify the problems created in the past rather than looking to the future.
1169	Parking should be free in the Stamford Quarter and should be free on Saturdays. There are a number of sites which are empty which could be used as car parks.
1169	Should be looking at making Altrincham more attractive.

#### Further consultation on the Preferred Option (June 2009) responses – SS1 Victoria Warehouse

ID	Summary Of Representation
1031	The proposals here for this out of centre location include offices and hotel uses. It will be necessary to show how these proposals comply with national planning policy. Has the need for new office floorspace over the plan period been assessed (PPS6 paragraph 2.39)? Has a sequential approach been applied in terms of selecting sites for allocation (PPS6 paragraph 2.44)?
1031	The Level 2 SFRA need to be available in order to examine flood risk issues prior to the publication version of the core strategy. It will be necessary to indicate how flood risk issues will be dealt with given that it is proposed to commence development early in the plan period.
1031	Further guidance for the development of the site can be set out in SPD. It would not be appropriate for this to be handled through informal planning guidance as has been indicated.
1041	The site should include reasonable access to bus services and Metrolink. The bus service capacity would be challenged once the development is fully occupied therefore developer contributions for service improvements would be reasonable to include in the Development Requirements of SS1. Pedestrian permeability and access across the Bridgewater Canal are already a Development Requirement.
1045	Where references are made in the "Development Requirements" sections in respect of Strategic Sites these state the development should make a contribution to affordable housing provision "of at least" (x or y%). Objection to the principle of this being set as a minimum requirement as this is not considered that this is supported by the Economic Viability Study which expresses the various figures in its findings as "targets" and a starting point for negotiations with developers/landowners. Given the acknowledgement in the EVS that it represents a "snapshot" in time and that sites will need to be subject to reappraisal in the market conditions in which they are brought forward in planning applications and with regard to other costs that may apply, the setting of minimum level of affordable provision for individual sites is not appropriate at this stage.
1047	Four of the five strategic sites (SS1, SS2, SS4 & SS5) lie within the proposed strategic locations. Where this is the case, it would be helpful to clarify whether the indicative housing numbers and floorspace figures given for the strategic locations include the contributions from the strategic site.
1055	There appears to be an error with regard to the site boundary for the Victoria Warehouse Site. The representor is in ownership of the site referred to as 'Land West of Victoria Warehouse', which was considered as part of the Trafford

	Employment Land Study (Ref: 70125). The site was subsequently considered as part of the SHLAA and page 6 of that document demonstrates that the site was included as part of the Victoria Warehouse Site (Ref: 1450) as does map 2 on page 110. In addition to the sites inclusion in the SHLAA, an outline planning application for a mixed use development that included the representor's site in addition to Victoria Warehouse. It is requested that the SS1 boundary be amended to include the representor's land as per the SHLAA. Its inclusion allows for more options to be considered as it provides additional land on what is essentially a tight constrained site.
1066	The requirement to provide measures to enhance the Bridgewater Canal for ecological purposes is welcomed.
1073	Development will benefit from accessibility via public transport, as well as being located on the edge of the Regional Centre.
1073	Proposed development uses are complementary to the nearby uses and as such, the site should benefit from linked trips. Further response is not felt to be needed subject to the results of the transport evidence base and LIP, required to demonstrate that the site can be delivered on a sustainable basis.
1074	Consideration should be given to a tall buildings policy within the LDF.
1096	Contamination may be an issue when detailed proposals are considered due to former landfill site. There is an opportunity as part of any development to pull the existing warehouse back from the canal frontage. This would support policy R2 of the Core Strategy.
1155	Strongly against demolishing Victoria Warehouse. Already a surfeit of flats in these areas.
1170	Would not like to see Victoria Warehouse demolished
1180	First bullet point – this point could be included for SL12 and SL7 too.

#### Further Consultation on the Preferred Option (June 2009) responses – SS2 Trafford Quays

ID	Summary Of Representation
1019	Account should be taken that the site is next to the Wastewater Treatment Works - Davyhulme. There is potential for nuisance impact from vibration, noise, traffic, dust etc and the site should be designed in such a way to confine the impact of nuisance in accordance with this paragraph.
1031	It will be necessary to show how this proposal accords with national planning policy. Has the need for new office floorspace over the plan period been assessed (PPS6 paragraph 2.39)? Has a sequential approach been applied in terms of selecting sites for allocation? (PPS6 paragraph 2.44). This will need to be demonstrated to support the allocation of the site rather than relying on this to be done following allocation.
1031	It is said that improvements to public transport infrastructure may be phased over the plan period in accordance with an agreed strategy for the delivery of improvements for public transport accessibility and usage and that this will require substantial improvements to be put in place prior to the first occupation of any development at Trafford Quays. More detail is necessary to explain what improvements are necessary, when they will be delivered and who will be delivering them. Also it needs to be clearer as to what substantial improvements need to be in place prior to the occupation of any development. More detail is also required about the impact of the development on the highway network and what improvements are necessary. It is said that development will be phased to reflect the timing of such highway infrastructure provision. Details of this phasing should be set out.

1031	Will flood risk information be available prior to the publication stage of the Core Strategy? It will be necessary to indicate how flood risk issues will be dealt with given that it is proposed to commence development early in the plan period.
1031	The proposed phasing of the housing on this site is set out in table L1 and housing will be provided over the plan period. Is it appropriate for housing to be developed in the early stages of the plan period given that housing here is to be developed on a green field site?
1041	<p>Under half the site is well served by the bus service. This is particularly unfortunate considering the large amount of traffic the site will generate and the extra strains it will put on the local highway already congested by traffic to and from the Trafford Centre and surrounding developments.</p> <p>Ensure that Development Proposals to "Significantly improve public transport infrastructure including an integrated, frequent public transit system linking the location with surrounding residential and commercial areas" are ensured through commitments from Trafford MBC to secure adequate amounts of developer contributions.</p> <p>No bus service truly serves the entire site well in terms of distance from stops however the walking distances do reach part way into the site.</p> <p>There are frequent bus services that connect the accessible parts of the site to areas in Manchester, Trafford, Salford and Stockport.</p>
1045	Where references are made in the "Development Requirements" sections in respect of Strategic Sites these state the development should make a contribution to affordable housing provision "of at least" (x or y%). Objection to the principle of this being set as a minimum requirement as this is not considered that this is supported by the Economic Viability Study which expresses the various figures in its findings as "targets" and a starting point for negotiations with developers/landowners. Given the acknowledgement in the EVS that it represents a "snapshot" in time and that sites will need to be subject to reappraisal in the market conditions in which they are brought forward in planning applications and with regard to other costs that may apply, the setting of minimum level of affordable provision for individual sites is not appropriate at this stage.
1045	The text in the Strategic Proposal should be revised to make it clear that not all of the Trafford Quays site does contain "greenfield" land.
1045	The SA concludes Trafford Quays has major negative impact on conserving land resources but does not give explanation or justification for this except that it is green field. The sub objectives of E6 suggest little conflict. Conclusions reached would only be appropriate if there was adequate brownfield land to meet housing land elsewhere in Trafford but as it is a strategic site it is assumed everything to conserve land resources is being done.
1045	The Summary SA of TQ says there maybe an adverse impact on objective E2. However ecological assessments have demonstrated limited value but the scope for enhancement through development is significant
1045	The SA conclusions on the TQ site state the site has poor accessibility by public transport. This is contrary to the conclusions of the Trafford Park Accessibility Study which says the immediate area of the site is "well served by buses". TQ is highly sustainable location for development and enhancements to public transport can be made without significant investment in new infrastructure. The SA Accessibility conclusions are flawed and need to be revised.
1045	The Trafford Quays Delivery Report has been prepared on behalf of the landowner for the site. It sets out in detail the level of proposed development and associated development. It should be read alongside documents submitted in

	August 2008.
1047	Four of the five strategic sites (SS1, SS2, SS4 & SS5) lie within the proposed strategic locations. Where this is the case, it would be helpful to clarify whether the indicative housing numbers and floorspace figures given for the strategic locations include the contributions from the strategic site.
1073	As with development at the adjacent Trafford Centre Rectangle site, development in this location will impact upon the SRN, and as such, any development needs to be supported by extensive public transport improvements to ensure the impact on the SRN is minimised. These public transport improvements should be identified and programmed within the supporting Local Infrastructure Plan to justify the deliverability of the site, ensuring it comes forward on a sustainable basis.
1073	Significant measures to improve public transport accessibility are welcomed and have been identified as important to delivering the site for development; however these need to be explicitly identified with mechanisms put in place to ensure they are delivered before the site is operational through the LDF Modelling and LIP. Until the evidence and infrastructure information is presented, a view can not be formed regarding the aspirations at this location.
1074	SS2 reference to the listed buildings in the development requirements section is welcomed. It is suggested that a similar and consistent approach is taken to heritage assets in or adjacent to the sites and locations throughout this section of the document.
1093	There could be an issue in terms of the Trafford Quays site as there is a proposal for 1,050 dwellings.
1096	We have records which show that this site was built on a former landfill. Therefore contamination may be an issue when detailed development proposals are considered. There is an opportunity as part of any redevelopment to pull the existing warehouse back from the canal frontage. This would support policy R2 of the Core Strategy.
1096	The review of flood risk is supported following the completion of the Level 2 SFRA and where applicable the application of the sequential test. This site contains several ponds and land drains. An objection would be raised to any culverting as part of the redevelopment and appropriate ecological assessments should be undertaken as required under policy R2.
1145	It is important to protect Trafford's existing Town Centres and therefore the Plan should state clearly that the land around the Trafford Centre where it's proposed to develop housing, will not be designated a "Town Centre". Also there should be a higher percentage of affordable properties built in this area.
1145	There should be a higher figure stated on the number of new dwellings built which should be affordable in this area.

#### Further Consultation on the Preferred Option (June 2009) responses – SS3 Stretford Meadows

ID	Summary Of Representation
1031	Is it intended that this site be retained in the Green Belt?
1066	Welcome this proposal.
1067	Strongly support the creation/enhancement of woodland/meadow provision.  In 1989 the restricted access junction from what is now the M60 to Stretford Road was closed with the impending opening of the junction to accommodate the Carrington Spur. This had a negative economic impact on the Western Part of

	Stretford and the South East part of Urmston. Might consideration be given to the construction of a link from the (north east) roundabout at junction of Carrington Spur/M60 to meet up with Stretford Road (about Newcroft Road). A single carriageway linked flanked by trees as the existing Carrington Spur.
1073	Provided development at this location is purely leisure based, with no ancillary trip-generating uses, there is no objection to the development proposals at this site. However, this site should come forward with cycling and walking infrastructure to ensure the site is permeable by non-motorised modes to reduce the need to travel by private car to the site.
1096	Support the inclusion of the Stretford Meadows site within the Core Strategy. In particular they support the development requirements to improve drainage and provide enhancement of watercourses.
1097	National Grid's ZNN 275kV overhead electricity transmission line runs from Danes substation to South Manchester substation crossing through the south eastern corner of the site. The following points should be taken into account:  National Grid does not own the land over which the overhead lines cross, and obtains the rights from individual landowners to place their equipment on their land. Potential operators of the sites should be aware that it is National Grid policy to retain their existing overhead lines in-situ because of the strategic nature of their network.  Statutory electrical safety clearances must be maintained at all times.
1125	Would like to see more natural, safe but challenging play spaces on these plans including picnic/family dedicated areas.
1133	Delighted with the proposals for Stretford Meadows which will turn a former landfill site into a recreational "green area".
1135	Part of this land is currently owned by GMWDA as a closed landfill and may require special consideration.
1149	Concern about the proposal for the site as have not agreed or had consultation on these proposals and feel would affect the development potential of the site.
1154	The area should be a much bigger area with Stretford Town Centre as a focus. It should stretch from Stretford Meadows via the crossroads to the canal side and as far as Longford Park.

#### Further Consultation on the Preferred Option (June 2009) responses – SS4 Partington Canalside

ID	Summary Of Representation
1031	Will flood risk information be available prior to the publication stage of the Core Strategy? It will be necessary to indicate how flood risk issues will be dealt with given that it is proposed to commence development early in the plan period.
1031	It needs to be explained how the development of the site is linked to the redevelopment of the shopping centre.
1041	Poor access to public transport services as it is outside of acceptable walking distance by a large margin. Development requirements for this Strategic Site include 'additional contributions towards additional bus service provision' which is promising as long as it is done for every development and dependent upon how much is asked for.
1045	SA conclusions in regards to development in Partington pay no regard to mitigation and enhancement proposed relating to the planning application for residential development. This should be revised.
1047	Four of the five strategic sites (SS1, SS2, SS4 & SS5) lie within the proposed strategic locations. Where this is the case, it would be helpful to clarify whether

	the indicative housing numbers and floorspace figures given for the strategic locations include the contributions from the strategic site.
1066	It is suggested that the need to protect the wildlife corridor along the ship canal be included under Development Requirements.
1067	Support the redevelopment of the main local shopping centre. Support the justification for the improvement of the public transport provision.
1073	Although Partington is not close to the Strategic Road Network its poor public transport accessibility means that the use of the private car is a highly viable option to accessing this location. As such it is likely that development in this location will impact on the M60 and M6. Welcome the development requirement for the Partington area is to improve public transport accessibility and usage in the area. Notwithstanding this until a sound transport evidence base is developed via the LDF modelling and LIP to support the development aspirations at this location.
1076	It is noted that phase 1 of the redevelopment of the shopping centre in Partington has to be completed by the time the first 250 houses of Partington Canalside are completed. This is important. Phase 2 of the development should be tied into the planning agreements more closely so that the developers don't walk away at the end leaving the retail centre redevelopment incomplete.
1141	Regarding Partington decent shops and other facilities are needed.
1145	Town Centre shops need redeveloping as a matter of urgency. There is a real need to develop a better mix of social and private housing. A comprehensive strategy is needed to address the isolation of Partington (road and public transport). More job opportunities need to be created for the people of Partington.

#### Further Consultation on the Preferred Option (June 2009) responses – SS5 Altair Altrincham

ID	Summary Of Representation
1031	Given that the site has an outline planning permission for the uses described in the proposal is it necessary for it to be identified as a strategic site.
1041	Highly accessible by a multi modal choice of public transport.
1045	Where references are made in the "Development Requirements" sections in respect of Strategic Sites these state the development should make a contribution to affordable housing provision "of at least" (x or y%). Objection to the principle of this being set as a minimum requirement as this is not considered that this is supported by the Economic Viability Study which expresses the various figures in its findings as "targets" and a starting point for negotiations with developers/landowners. Given the acknowledgement in the EVS that it represents a "snapshot" in time and that sites will need to be subject to reappraisal in the market conditions in which they are brought forward in planning applications and with regard to other costs that may apply, the setting of minimum level of affordable provision for individual sites is not appropriate at this stage.
1047	Four of the five strategic sites (SS1, SS2, SS4 & SS5) lie within the proposed strategic locations. Where this is the case, it would be helpful to clarify whether the indicative housing numbers and floorspace figures given for the strategic locations include the contributions from the strategic site.
1067	Support SS5.
1073	The comments made regarding SL13 also apply to this site. Any large-scale development aspirations in this location will need to be brought forward sustainably to minimise any impact on the SRN. Large scale development sites should be supported by the appropriate infrastructure and sound evidence bases to ensure any impact on the SRN is minimised.
1093	Question the reason for including the "smaller" development sites within the



	document and the fact that they are classified as strategic sites e.g. SS5 Altair. These sites are very localised and small in size and do not specifically fit within the spatial/strategic strategy. These sites should be accounted for within an additional document.
1096	Specific reference has been made for the Altair site to be built of high quality standards under BREEAM, Code for sustainable Homes. Would expect this development requirement is identified for all of the strategic sites, particularly as Trafford is part of the AGMA growth point.
1133	Agree that the Altair scheme is a key redevelopment scheme. Key to this redevelopment will be the provision of a permanent ice rink which is in line with aspirations to keep an ice rink facility in Altrincham. The provision of increased car parking is also integral to boosting the local economy in Altrincham.
1145	It is important to continue the development of Altrincham Town Centre.
1152	Directing growth to this area will assist in contributing to the regeneration of Altrincham Town Centre by encouraging business and shoppers to locate there.
1152	Presently the Altair site which is located within SL13 makes no contribution to the character or well-being of the town centre. The site is located within a prominent gateway position next to Altrincham's Transport interchange and is in need of investment and development. The Altair scheme will include the demolition of all existing buildings and replace them with a comprehensive regeneration scheme for a mix of high quality uses. In addition to the facilities proposed, the scheme will also provide a high quality public realm with street furniture and art work to attract members of the local community.
1152	The content of Policy W1 is supported. It is important to guide economic regeneration and development in such locations as Altrincham town centre in order to assist growth of the City Region. Altair is specifically recognised as one of the most important regeneration sites in Altrincham town centre and represents an opportunity to enhance the town centre's viability and contribute towards Altrincham's role as a sub-regional centre. The mixed use regeneration of the site will encourage shoppers and business to Altrincham.
1152	Support the development parameters of the uses listed in line with the outline planning permission (H/OUT/68603) a variety of other uses are also suitable for the town centre site, such as a hospital or other public buildings for example. It is important therefore to maintain flexibility within SS5 and not to limit the site solely to the approved uses.
1159	Object to the proposed Altair scheme apart from the ice rink and hotel. The retail and restaurant aspect will draw business away from the main town centre streets. The latter is dwindling with shops closing and businesses struggling. Any new development should be concentrated in the existing town centre, including Railway Street and the old Altrincham General Hospital site and only when there is a need to expand further, should an extension be considered, certainly not beforehand. The town will be split in two and both sides will dwindle.
1159	The architect for the Altair scheme is noted for his highly modern and "statement" glass buildings, which are totally inappropriate for the historic market town character of Altrincham, being primarily built of brick, stone and terracotta. The listed Stamford House building, the station and the Bonson Warehouse are all in close proximity to the Altair site and any form of glass and steel building will not be in keeping nor enhance the character of the town, going against all the proposed new policies. Unless the style in the revised Planning Application is compatible with the historic fabric of the town it should be rejected.
1169	What will happen if there is a lot of opposition to the proposal?
1169	Against the Altair development. The focus has to be on redevelopment rather than new development. Businesses come and go all of the time as people do not visit the town centre. People don't come to Altrincham as there is the perception that

	there is no parking, but the problem is that it is not readily accessible or seen. Need to make it easier for people to visit Altrincham.
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### Preferred Option (June 2009) responses – All Strategic Sites and Locations

ID	Summary of Representation
1026	The Council have identified 11 Strategic Locations and 4 Strategic Sites. Of these, seven (46%) are in the ownership or control of a single landowner who it is anticipated will deliver 4,550 (62%) units out of 7,300 proposed in the SL and 1,600 (75%) of the 2,150 on the SS. At the top of the housing market, but particularly over the next 3-5 years, it is difficult to envisage a single landowner wishing to bring forward seven separate sites, probably with a similar mix of units, all of which will be in competition with each other. The Council's anticipated commencement sites on each site must be seriously questioned as is their ability with the current allocations to meet their 5, 10 and 15 year targets.
1026	In general terms it should be noted that seven of the Strategic Locations are to be reviewed for the impact of flooding and this also applies to all four of the strategic housing sites. Two of the Strategic Sites are on Greenfield land, Partington and Trafford Quays whilst the Trafford Rectangle is a partial greenfield site. The RSS policies seek to encourage the re-use of disused land and buildings, in line with national policy, and see this as being critical to improving the Regions image.
1026	The Council have assumed optimistic development phasing for each location or site, in all but two cases the Council have indicated that development will commence in 2010/11 and in the two exceptions commencement is delayed 2011/12. In the current economic climate it is unlikely that the housing market will recover until 2013 and, as stated previously, this will be a cautious recovery where developers will not be producing the historic volume of units from a site until perhaps 2015. Furthermore the heavy reliance on apartments is unrealistic as the market in the Manchester sub region has already has an oversupply of apartments and this market has collapsed.
1026	There are questions over the deliverability, achievability and suitability of some of the Strategic Sites and Locations in the preferred option, particularly in regard to the ownership, location and anticipated commencement dates.
1031	Paragraph 23.4 says that for each strategic location consideration will be given to producing planning guidance which may take the form of an AAP, Land Allocations DPD, SPD or informal masterplan. It needs to be made clear that following the identification of a strategic location in the Core Strategy, which would be indicated on the key diagram, it would be necessary to allocate the site in a subsequent DPD.
1031	Paragraph 23.5 says that for each strategic site consideration will be given to the production of planning guidance which may take the form of SPD, a development brief or informal planning guidance. Firstly, such guidance should take the form of SPD. PPS12, paragraph 6.4, says that Councils should not produce guidance other than SPD where the guidance is intended to be used in decision making or the coordination of development as this could be construed as wishing to circumvent the provisions for consultation and sustainability appraisals. Secondly PPS12 paragraph 4.11 says that infrastructure planning for the Core Strategy should include the specific infrastructure requirements of any strategic site allocated in it.
1031	It is unclear from paragraph 23.6 whether the flood risk issues in relation to strategic locations and sites will be addressed prior to the publication stage of the Core Strategy. As indicated previously, it is necessary for the Core Strategy to reflect the Councils strategic approach to flood risk and the Council need to explain how it has informed the preparation of the Core Strategy. PPS25 Practice

	Guide indicates that the LPA should demonstrate through evidence that it has considered a range of options in conjunction with the flood zone information from the SFRA and applied the sequential test and where necessary the exception test in the site allocation process. This can be undertaken directly as part of the SA.
1031	It is also unclear whether the highway implications of the strategic locations and sites will be considered prior to publication. Aware that transport modelling is currently being undertaken. It will be necessary for the results of this work to inform the core strategy. The impact of major proposed developments on the highway network will need to be understood and the measures to deal with and mitigate this impact should be set out. This is particularly important in relation to the impact of schemes on the motorway network and it is likely that you will need to engage with the Highways Agency prior to the publication of the plan to agree how this impact can be mitigated. It may also be necessary to consider how the phasing of development can ensure a good fit with planned transport infrastructure.
1036	It is understood that the "Strategic Locations" will set the framework for future land allocations, including those that are brought forward within the Council's "Land Use Allocations DPD" or via Area Action Plans at a later date. This approach is supported.
1040	Remain concerned that the Core Strategy relies too heavily on those Strategic Sites which, whilst important regeneration priorities, will not provide the amount of new homes envisaged. Many of these sites are included for higher density residential use (some as part of mixed use schemes), which are unlikely to come forward in the short term. The commercial market is equally depressed so these schemes will be slower to materialise. It is therefore requested that the Council's policies allow for residential development (at lower densities) elsewhere outside of these areas and that they are not refused for not being within these areas or for prejudicing the delivery of these developments. Otherwise support the policy approach to selected areas and support their regeneration. If these sites do not deliver then policy is needed to support (or not obstruct) other sites that can deliver the RSS targets for new homes.
1045	Support the allocation of Pomona, Wharfside, Partington and the Trafford Centre Rectangle as Strategic Locations and of Trafford Quays as a Strategic Site.
1045	By reference to PPS12 and to paragraphs 4.11 and 4.12 of the draft CS, it is understood that one of the key distinctions between a Strategic Location and a Strategic Site is that the strategic sites are already much more clearly defined at this stage, in respect of a site boundary, the range and mix of land uses proposed and the general scale of development likely to be brought forward on them. Hence it is both possible and appropriate to define them on the proposals map and in line with paragraph 4.12 this is a specific land use allocation which gives them high status in decision making on planning applications. Given this status the allocation of a Strategic Site in the CS should be capable of providing a landowner with a level of certainty and confidence to invest time and to incur architects and other fees in developing detailed proposals and submitting a planning application. This level of confidence is undermined by the Council's proposal at paragraph 23.5 of the draft CS that consideration will be given to further planning guidance or an SPD for the Strategic Sites. Whilst this may be necessary for Strategic Locations where proposals are less clearly defined, it is not necessary for the Strategic Sites. Any suggestion of such a requirement will serve simply to remove the certainty that a land use allocation should provide. Paragraph 23.5 should therefore be deleted.
1045	Strategic Proposals Sections: The reference to numbers of residential units in each of the Allocations and Sites should be amended to clarify that this figure reflects the assumed contribution within the plan period and does not define or seek in anyway to limit the capacity of the site or location for residential

	development.
1045	Strategic Proposal Sections: Object to the use of the words "up to" in relation to the quoted housing numbers. This appears to imply a limit on the scale of development each site or location although the figures do not generally reflect known development capacity. More importantly the setting of such limits is unwarranted since the RSS housing land requirement are not to be treated as a maximum figure.
1045	Development Requirements Sections: The specific reference to CHP in each of the development requirement sections may be seen to imply that this is a preferred option whereas there may be a number of equally suitable or even more preferable options in respect of these development opportunities as is recognised in policy L5.8 of the draft CS. Hence it is considered that the specific reference to CHP is over prescriptive and should be replaced by a more generally worded requirement for renewable energy provision.
1047	It is noted that the Employment Land Study details there is sufficient supply of sites without the need to retain Davenport Green, additionally it should be noted that the site has been removed from the NWDA's list of strategic regional sites.
1051	The reference to environmental management and mitigation in the seventh bullet point is too limiting and should be broadened to encompass opportunities for enhancement, e.g. through heritage led regeneration or the promotion of tourism opportunities.
1051	The reference to environmental management and mitigation in the fifth bullet point is too limiting and should be broadened to encompass opportunities for enhancement, e.g. through heritage led regeneration or the promotion of tourism opportunities.
1067	Designating priority locations for change as priority 1/2/3 suggests that those locations in priority 1 are of a greater priority than those in priority 2 and 3 and those in priority 2 are of a greater priority than those in priority 3. It is understood that this is not necessarily the intention but that the groupings are for other reasons. Suggest that the designations should have been pink, orange, and yellow. An explanation as to how the groupings were determined would have helped the reader.
1072	Concerned that "questions" relating to deliverability, and compliance with national and regional policy, are not explored or detailed in the Core Strategy or the accompanying Sustainability Appraisal (SA). Questions are quite different from evidence and carry correspondingly less weight. The Employment Land Study (ELS) provides a cursory assessment of Davenport Green against planning policy in its Appendix. It is also unclear which "emerging spatial strategy" paragraph 23.11 is referring to, RSS for the North West was published in September 2008. Finally in stating that Davenport Green is "not required" it can only be assumed that paragraph 23.11 is drawing on the ELS, which recommended that Davenport Green be released from Trafford's stock of employment land (as stated in paragraph 14.5 of the Core Strategy: Further Consultation).
1072	Development at any site will have both positive and negative impacts. The SA assesses social, environmental and economic impacts, to give an overall assessment of the sustainability of development. Unfamiliar with the term "positive sustainability impact". Rather the sustainability of a site for development should be judged once positive and negative impacts are taken into account. Paragraph 23.10 directly quotes from the SA in listing negative impacts; evidence for these potential impacts is to be found in the Appendix to the SA. It is suggested that the public should be given a summary of positive impacts as well as negative impacts, in order to be able to respond usefully to this paragraph.
1072	Regarding paragraph 23.11 it is noted that issues of deliverability were considered in Trafford's own assessment of employment sites, as part of the

	employment land study (paragraph 6.1 of the ELS). If it is assumed that deliverability relates to the "planning policy" and "market attractiveness" aspects of this assessment, detailed in Appendix D of the ELS, then Davenport Green does not score significantly better or worse than a number of other sites, including strategic sites and other sites located within strategic locations. The average score, out of 70, for "planning policy" and "market attractiveness" combined was 51. Davenport Green scored 47 and 17 of the 48 other sites scored lower.
1072	<p>Paragraph 23.11 is not explicit in stating the basis upon which it is "clear" that the "proposal is not required in order to meet employment or housing needs". As the ELS establishes there is a need for 100-170ha of employment land from 2007 to 2026. None of the sites, individually, are strictly "required" to meet this need. Rather the Councils responsibility as part of the LDF should be to identify which sites offer the best potential for sustainable economic development, and create a policy framework in which sufficient sites can be expected to come forward for employment development over the plan period. The contrast between the Councils proposed policy and the Councils existing policy framework for Davenport Green Policy E14 of the UDP is striking. The supporting text in the UDP to justify policy E14 clearly articulated that Davenport Green was an allocation designed to meet a need which exists at the regional and sub regional scale. Hence the allocation of Davenport Green was designed to ensure that Davenport Green complemented employment sites within the existing urban areas as explained in the UDP.</p> <p>(Note Paragraph 6.1 of the ELS claims that "For this employment land study, Trafford Council have carried out a detailed assessment of the current and potential employment land sites within Trafford. This was completed in terms of location, availability and deliverability". However location is not an explicit category in the assessment (detailed in Appendix D to the ELS). Location is considered within the "sustainability" set of criteria. Availability is considered within the "market attractiveness" set of criteria; Davenport Green scores 3/5. Deliverability is not explicitly mentioned).</p>
1073	Encouraged by the 'headline requirement' for the need for development to be accessed by 'adequate public transport', although this requirement is not fully reflected within some of the land allocations within the Strategic Sites and Strategic Locations (SS/SL).
1073	Encouraged by the first priority for locating development - Pomona Island (SL1); Trafford Wharfside (SL2); Old Trafford (SL3); Lancashire County Cricket Club (SL4); and Trafford Park Core (SL5). Notwithstanding that, appropriate sustainable transport infrastructure (or better links to existing infrastructure) may have to be delivered, alongside development in these locations to ensure any wider traffic impacts are not at the Strategic Road Network (SRN).
1073	Policy W1.9 should include - sites that are accessible by a range of alternative modes other than the private car.
1073	It should be noted that all of the comments regarding strategic sites and strategic locations are made without sight of the LDF Modelling Outputs and as such the comments are subject to results and subsequent discussions to produce the LIP.
1073	In regard to the Strategic Sites and Strategic Locations, where development is to be phased, the support infrastructure to support this development must also be phased to ensure that sustainable development comes forward. This should be reflected in the transport evidence base and local infrastructure plan.
1074	Part D on strategic sites and locations now includes reference to some of the heritage assets included in previous representations. As a general comment it is suggested that the development requirements should include a more pro-active approach to securing the conservation and enhancement of these assets.

1089	Support the identification of SHLAA site 1591 Davyhulme Wastewater Treatment Works as a potential site for residential uses. For confirmation this support is offered in respect of that area which is identified as a disused sewage works. The main part of the site remains a strategic operational asset of United Utilities. The site is identified as having a capacity of 501 dwellings in the SHLAA. Given this size it is suggested that this site should be included in Table 4: Strategic Sites and Locations Summary Table.
1125	Not sure how additional housing will help regeneration when there are issues with employment and transport. In each of the planned sites for development there is no mention of schools and/or childcare provision. There is a gap in childcare provision in areas of deprivation evidenced in the Trafford Childcare Sufficiency Assessment Plan 2008.
1125	The Local Authority has statutory responsibility to take a strategic lead and facilitate the childcare market. This is proving very difficult due to the lack of, or extreme costs of venues across the borough. This makes it difficult to attract and develop local accessible childcare for families and employers thus creating a problem for regeneration plans.
1125	These locations for change bring an opportunity for developing spaces/sites for childcare in or around schools and larger commercial business areas. Childcare does need to be sustainable before it can be successful and therefore needs to be part of the strategic planning process.
1181	There are some sites that are not considered to be strategic enough to be included within the Core Strategy.
1040	<p>We remain concerned that the Core Strategy relies too heavily upon those Strategic Sites, which whilst important regeneration priorities, will not provide the amount of new homes envisaged. Many of these sites are included for higher density residential use (some as part of mixed use schemes), which are unlikely to come forward in the short term. The commercial market is equally depressed so these schemes will be slower to materialise. We therefore ask that the Councils policies allow for residential development (at lower densities) elsewhere outside of these areas and that they are not refused for not being in these areas or for prejudicing the delivery of these developments.</p> <p>Otherwise support the policy approach to selected areas and support their regeneration, but simply wish to be realistic in this tough market. If these sites do not deliver, we simply need policy to support (or not obstruct) other sites that can deliver the RSS target for new homes.</p>
1093	Encourage the consideration of alternative methods for delivery of the core strategy should not all the strategic sites go ahead.
1093	The disaggregation of the RSS sub-regional requirement is currently being considered by the Greater Manchester Authorities through a study which will provide evidence to inform the amount of employment land that needs to be provided in Trafford. As there is a list of strategic sites within the document, appropriateness of these sites should be considered by the Council through the Employment Land Review.
1130	Support the principal of the sites identified for redevelopment notably Victoria Warehouse, Trafford Quays, Stretford Meadows, Partington canal-side and Altair.

**Note the above Strategic Sites and Locations were changed and amended into the following list for the March 2010 consultation. There are now no longer any Strategic Sites.**

**Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – SL1 Pomona Island**

ID	Summary Of Representation
1019	<p>The Mediacity development is moving at a fast pace, and on current form will approach its, supply limits (first trigger) sometime in 2013/14. This trigger will necessitate additional reinforcements to be put in place before additional expansion can progress.</p> <p>In the light of the above proposals it may be that insufficient network flexibility will remain and extensive supply reinforcements may need to be implemented in advance of 2014. Detailed planning for this will be required prior to any future approval for additional supplies.</p>
1019	<p>There is insufficient detail to give a meaningful response to water infrastructure requirements but in general there do not seem to be an issue with supporting the domestic population with the necessary supplies.</p>
1040	<p>As this site is no longer suitable due to flood risk it increases the importance upon other sites to deliver Trafford's housing needs.</p>
1041	<p>Whilst this location is well accessed by Metrolink, there will be a need to improve pedestrian links to the site and it is therefore to be welcomed that SL1 identifies the need to provide 'suitable pedestrian and cycle links to and from existing Metrolink Stops at Cornbrook and Pomona'. However pedestrian and links should also be provided to key bus routes to give access to a wider range destinations.</p> <p>Both Pomona Island and the Wharfside areas will benefit from the increase in Metrolink services following the introduction of the Metrolink Mediacity:uk extension in 2010.</p>
1045	<p>It is not believed the SFRA has definitively demonstrated that development on Pomona would increase flood risk elsewhere. It would be more appropriate for SL1 to require a detailed FRA alongside an application involving hotel/bar uses should they be shown, following completion of a revised SFRA, to fall within zone 3a.</p>
1045	<p>It is believed the exclusion of residential development from the allocation will compromise the ongoing regeneration of the site.</p>
1045	<p>An SFRA conducted in line with EA policy and PPS guidance would show a material reduction in the proportion of the site in Flood Zone 3. Without this assessment the mapping process cannot be concluded and as a consequence it is premature for the Council to make definitive decisions regarding the appropriate range and mix of uses on Pomona.</p>
1045	<p>It is believed the reasoning in the Sequential test document is weak and not in accordance with PPS 25 which does not set thresholds relating to the proportion of sites that must be within flood zones 1 And 2 for the Sequential test to be satisfied. The SFRA assesses 51% of the site to be in zone 3.</p>
1045	<p>Basis for Council's proposal to delete residential component from Pomona Island is unclear as in the interaction between the documents generally.</p>
1045	<p>SL1 no longer makes an allowance for this location to contribute to the Council's housing land target. It is considered the policy fails to recognise that there is an extant planning permission for 546 residential units on this site.</p> <p>The Council's PPS25 Flood Risk Sequential test document indicates 49% is located in either Flood Zone 1 or 2. PPS25 makes it clear that whilst residential uses fall within the 'more vulnerable' category and as such are capable of being sited on those parts of Pomona which lie within Floor Zone 3. This would be subject to a Flood Risk Assessment without triggering a requirement for the requirements of the exceptions test to be met. In view of this it is requested that</p>

	<p>SL1 be revised such that in the very least, reference is made to the extant consent and allowance of at least 546 and potentially up to 800 residential units be reinstated.</p> <p>There may have been a flawed assumption that permission at Pomona expired in June 2010 and not 2012. Relevant exceptions test may have been based on this and is consequently equally flawed and cannot be relied upon to support decisions at Pomona and Carrington. It is believed that the exceptions test needs to be repeated prior to housing allowances being finalised. Unless this is undertaken again using correct inputs the soundness of the Core Strategy will be compromised.</p> <p>The March 2010 Sustainability Appraisal report and exception test document accepts that Pomona has potential to deliver a range of sustainability benefits including accessibility to services and facilities, reducing poverty and social exclusion and conserving land resources. It is Confirmed there would be positive effects stemming from accessibility by public transport and proximity to areas of deprivation.</p> <p>The correct approach is to look closely at the site from a flood risk perspective and ensure that its ability to accommodated residential development is maximised and to direct residential development to areas least at risk of flooding.</p> <p>Employment component - There are no provisions in the Core Strategy or RSS to justify the inclusion of the words "up to" at start of first bullet point. Trafford should be seeking to maximise economic investment in sustainable urban locations such a Pomona. It is therefore requested that the words "up to" are deleted.</p>
1047	<p>Northwest Regional Development Agency designated the Salford Quays/Irwell Corridor as a strategic regional site with the following draft purposes:</p> <ul style="list-style-type: none"> <li>-to provide the opportunity to expand and integrate the area with the regional centre of Manchester through a mixed use framework;</li> <li>-to take advantage of outstanding rail and Metrolink access, build outwards from the strengths of Manchester City Centre and Salford Quays, strengthen public transport connections between Salford Quays, the regional rail network and Manchester City Centre and bring back into use derelict and underused land.</li> </ul> <p>The draft purposes and detailed site boundary are currently the subject of discussions with the relevant local authorities and Central Salford URC. It is anticipated that the strategic regional site will take in land on the Trafford side of the Manchester Ship Canal, including Pomona Island and part of Trafford Wharfside. It may be helpful to refer to the designation of the strategic regional site within the supporting text.</p> <p>Paragraph 5.2 suggests this vacant site will be redeveloped into a high quality mixed-use community. Since housing is not one of the proposed uses for the site, it may be more appropriate to say it will be redeveloped 'for a mix of high quality employment and ancillary use.</p>
1073	<p>It is identified within the policy that improvements to the local highway network and public transport infrastructure will be required in order for development in this location to be acceptable. The representor is satisfied that this level of transport intervention is acceptable for the proposed strategic site. There are therefore no further comments to make regarding this policy.</p>
1093	<p>Green infrastructure could be explored in development requirements for each of the strategic sites, meaning that the natural environment through a green infrastructure approach can be improved within the development site.</p>



1093	The mixed use employment and leisure facilities proposed here are within the context of the Regional Centre and in line with RDF1, W3 and MCR2.
1211	<p>Pomona is identified as having potential for 10 hectares of employment development. It is suggested that the below points create considerable uncertainty over the future development of Pomona in this role.</p> <p>The planning permission for 546 residential units does not expire until May 2012.</p> <p>The Strategic Flood Risk Assessment has shown the site to be unsuitable for vulnerable uses such as residential, health, education and some leisure activities.</p> <p>Concern over the viability of the site is aroused in the Phasing and Milestones section on Pomona in the Trafford Core Strategy, Background Note on the 5 Proposed Strategic Locations, March 2010, where reference is made to seeking funds from the HCA.</p> <p>Constraints that need to be addressed include: rendering the site safe from a flood risk, assessment of potential contamination and remediation if necessary, provision of pedestrian and links to the two nearby Metrolink stations, improvements to the highway network and to public transport, provision of community facilities and additional infrastructure capacity and other works set out in the Background Note, paragraph 2.19.</p> <p>The commercial role of the site is considered to be very unclear.</p> <p>Justification for the designation of this location describes it as promoting local economies, not the sub-regional or regional economy.</p> <p>In conclusion this Strategic Location is considered to have major uncertainties about its delivery at any time in the plan period. Is considered unlikely to be attractive for business investment and will not contribute to the growth of the sub regional or regional economies.</p>

**Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – SL2 Trafford Wharfside**

ID	Summary Of Representation
1019	There is insufficient detail to give a meaningful response to water infrastructure requirements but in general there does not seem to be an issue with supporting the domestic population with the necessary supplies.
1019	<p>The Media City development is moving at a fast pace, and on current form will approach its, supply limits (first trigger) sometime in 2013/14. This trigger will necessitate additional reinforcements to be put in place before additional expansion can progress.</p> <p>In the light of the above proposals it may be that insufficient network flexibility will remain and extensive supply reinforcements may need to be implemented in advance of 2014. Detailed planning for this will be required prior to any future approval for additional supplies.</p>
1019	In view of the significant development in this area there is a potential need to invest in the wastewater infrastructure.
1040	Due to the market collapse in apartments and lack of finance for such development it is felt 900 units high density units on this site is overly ambitious. It is recommended for SHLAA estimates this is downgraded in terms of delivery to 450 dwellings in the plan period.

1040	The infrastructure improvements required and likely Council expenditure constraints need to be taken into account in phasing and delivery as they are likely to slow down completions for these sites.
1041	This location requires improved pedestrian links. The requirement to provide pedestrian bridge crossings at Clippers Quay and Mediacity are to be welcomed. Both Pomona Island and the Wharfside areas will benefit from the increase in Metrolink services following the introduction of the Metrolink Mediacity;uk extension in 2010.
1045	It is considered these policies subject to the conclusions of a corrected SFRA should require a detailed FRA to be completed and submitted alongside any application which proposes development of "more vulnerable uses" within Flood Zone 3, instead of the requirement that these uses be located outside of zone 3.
1045	There are no provisions within the draft Core Strategy or other relevant documents such as the RSS which would justify the inclusion of the words "up to" at the start of the first bullet point. Employment land requirements are not expressed as maximums and Trafford should be seeking to maximise economic investment in sustainable urban locations such as Trafford Wharfside. It is requested that the words "up to" be deleted from the text.
1047	<p>Northwest Regional Development Agency designated the Salford Quays/Irwell Corridor as a strategic regional site with the following draft purposes to provide the opportunity to expand and integrate the area with the regional centre of Manchester through a mixed use framework and the development will: take advantage of outstanding rail and Metrolink access, build outwards from the strengths of Manchester City Centre and Salford Quays, strengthen public transport connections between Salford Quays, the regional rail network and Manchester City Centre and bring back into use derelict and underused land.</p> <p>The draft purposes and detailed site boundary are currently the subject of discussions with the relevant local authorities and Central Salford URC. Anticipated that the strategic regional site will take in land on the Trafford side of the Manchester Ship Canal, including Pomona Island and part of Trafford Wharfside. It may be helpful to refer to the designation of the strategic regional site within the supporting text.</p> <p>Whilst there are no major concerns with the policy as drafted, it would be helpful to give further detail regarding the requirement to provide a 'strategic processional route' linking Mediacity:uk through to LCCC. As drafted it is not clear whether this will be a pedestrian or vehicular route.</p>
1073	<p>It is identified within the policy that a new high frequency public transport system for the area will be required in order for development in this location to be acceptable. There is acceptance with the level of involvement in the implementation plans at the moment with further works being identified for the SPD1. When looking towards the future works element of the Allocation Plans the Agency would like to see further ITB measures, such as travel planning to be clearly identified.</p> <p>In addition, the aspiration for the 'provision of a new high frequency public transport system for the area' within the policy are welcomed, and the need to ensure a high frequency public transport system for the area should be operational in order to influence the modal choices of people working, living or visiting the development at Trafford Wharfside.</p>
1093	This fits within RSS policy W2 and W3 in terms of regionally significant office development within the Regional Centre and policies W6/W7 in terms of the hotels and visitor/business tourism aspects.

1093	As this site is within the Regional Centre it is therefore in line with RSS Policy MCR1, as residential development is acceptable where it is part of a mixed use scheme comprising a good range of housing sizes, types, tenures and affordability. As the proposal is for a mixed use development and there is an emphasis on the provision of apartments, there is also a requirement to deliver some family accommodation on this site. This would be welcome in line with RSS policy L4. There is, however no requirement for the provision of affordable housing which is needed to be in line with RSS policy L5.
1093	Green infrastructure could be explored in development requirements for each of the strategic sites, meaning that the natural environment through a green infrastructure approach can be improved within the development site.
1197	<p>There is no objection to the principle of redevelopment in this area; it is considered to be one with significant potential for regeneration / redevelopment.</p> <p>Taking account of the need for proposals to be taken forward through the Land Allocations Plan DPD, presumably with requirements for masterplanning and the submission and approval of applications, including what will clearly be complex S.106 obligations, the delivery of dwellings from 2011 onwards is considered impractical. It is suggested that 2014/15 is a more realistic start date.</p> <p>The site is in multiple ownerships and will not assist in bringing development forward.</p> <p>It is suggested that the assumption that a significant number of dwellings will be apartments raises problems in the current market conditions. The apartment market may improve but it is not thought that this can be relied upon, certainly to the extent that it would support a development of this nature which is so heavily skewed towards apartments. Furthermore, in current market conditions, a development with a large number of apartments within it may not obtain finance.</p> <p>It is suggested that the infrastructure requirements, for which the costs are generally unspecified, will run into many millions of pounds, this places a major financial burden on proposals and introduces cash flow issues.</p>
1209	<p>Supports the principle of retaining Trafford Wharfside as a Strategic Location as the area has an important role to play not only to Trafford but the region as a whole. Following the removal of Victoria Warehouse as a Strategic Site SEGRO welcome its inclusion as a key element of the Trafford Wharfside Strategic Location. The Victoria Warehouse site in part or as a whole represents a unique opportunity to provide a landmark high density development in a gateway location for the Regional Centre.</p> <p>The Development requirement 'in order for development in this Location to be acceptable the following will be required to contribute to:' a series of infrastructure requirements and design criteria are then listed, the purpose of which is not entirely clear, is it a list of pre-requisites or a wish list? This should be clarified. Some of the infrastructure requirements clearly have a greater impact and role the Wharfside locations itself and should be considered at a strategic borough wide level. It would be unreasonable to rely solely upon developments within the Wharfside location to provide this infrastructure or be reliant upon its completion before development is able to commence.</p>
1211	<p>It is considered doubtful that the B1 development will deliver sub regional growth.</p> <p>The B1 mixed use development is described as being in the Mediacity:uk area, the implication being that the development will be stimulated by Mediacity:uk. For the foreseeable future it is considered more likely that that Mediacity:uk will be a very effective competitor for the targeted digital and media industries at the expense of</p>

	<p>Trafford Wharfside.</p> <p>The regional and international significance to which the Policy refers relates to MUFC which lies within the area, not to the quality of the B1 development.</p> <p>There are major development requirements to be met: The provision of a new high frequency public transport system, provision of a strategic processional route from Mediacity:uk to Irwell City Park, two new pedestrian crossings of the Ship Canal, a new primary and secondary school. The location is in multiple ownerships, there is no reference to how issues of land assembly for either infrastructure or development are to be resolved.</p>
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**Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – SL3 Lancashire County Cricket Club Quarter**

ID	Summary Of Representation
1019	The remaining SL sites have some network connectivity issues but should not require major bulk transfer systems to support proposals.
1019	There is insufficient detail to give a meaningful response to water infrastructure requirements, but in general there does not seem to be an issue with supporting the domestic population with the necessary supplies.
1031	Policies SL3 and W2 refer to a new superstore on Chester Road. The Policy needs to be clear about the justification for this and explain how it accords with PPS4.
1040	The infrastructure improvements required and likely Council expenditure constraints need to be taken into account in phasing and delivery as they are likely to slow down completions for these sites.
1040	900 dwellings appear to be optimistic for this site. It is recommended lower density family homes. It is envisaged 450 units is more likely over the plan period.
1041	This location is well accessed by Metrolink, and whilst capacity problems would otherwise have become an issue, additional trams are now being introduced on the adjacent line. However the proposed intensification of use at this location may cause problems with capacity in the future as passenger demand grows.
1057	The second development requirement should be revised to prioritise the delivery of the pedestrian linkage alongside the Tesco proposal as opposed to a strategic processional route along Warwick Road and Brian Statham Way, for which a need and delivery strategy has not yet been identified.
1057	Strategic Proposal should also be amended to refer to the provision of a large superstore on Chester Road.
1057	Amend SL3 to reflect the requirement for the redevelopment of Old Trafford Cricket Ground to be cross-funded by the provision of a new superstore on Chester Road.
1073	It is not felt that the development proposals in this location will impact on the SRN.
1093	Green infrastructure could be explored in development requirements for each of the strategic sites, meaning that the natural environment through a green infrastructure approach can be improved within the development site.
1093	As LCCC is within the inner area it is therefore in line with RSS Policy MCR2
1093	The improvements to the cricket ground are in line with RSS policies W6 and W7.
1197	<p>There is no objection to the principle of this regeneration proposal.</p> <p>It is suggested that as the site is in multiple ownerships, both public and private, if the development is to be brought forward as a comprehensive strategy then the land should be brought into single ownership and the cooperation of individual owners in this respect cannot be relied upon.</p>

	<p>Although the infrastructure requirements seem less than in relation to some of the other Strategic Locations they are, nevertheless, still very significant and the ability of the scheme to deliver the full package of proposals cannot be assured unless, or until, the masterplanning and feasibility exercises have been completed.</p> <p>The Background Note on the Strategic Location confirms that construction on the residential sites will not commence until 2018, it is considered unrealistic to assume delivery of houses from 2011 / 12 onwards. It is suggested that 2018 / 19 is the earliest possible, and it is suggested that construction will run well over the end of the Plan period.</p>
1211	It is considered that focus is primarily on the redevelopment of the stadium for LCCC, the development of 900 residential units, the redevelopment of the Town Hall and improvements to educational, community and commercial facilities. It is not considered to contain any significant employment development proposals.

**Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – SL4 Trafford Centre Rectangle**

ID	Summary Of Representation
1019	There is insufficient detail to give a meaningful response to water infrastructure requirements but in general there does not seem to be an issue with supporting the domestic population with the necessary supplies.
1019	The remaining SL sites have some network connectivity issues but should not require major bulk transfer systems to support proposals.
1019	Note there is a requirement for all new homes to have renewable heating by 2016. In view of this requirement, it is worth noting the proximity of the Wastewater Treatment Works at Davyhulme to the Trafford Centre Rectangle Development Area. There may be opportunities in the future to export renewable heat from Davyhulme to such a development. At this stage a significant amount of investigation would be required to determine the viability of this.
1031	Comments have been made previously about the scope for further development in the Trafford Centre Rectangle, over and above that on the Trafford Quays part of the area and the sites which already have planning permission. If the scope is limited it would seem that the focus should be on Trafford Quays rather than the wider area.
1040	Support for emphasis on family accommodation. The phasing of 250 units in the 4 year period from 2011 is ambitious in this market. The yield should be reduced to 600 units over the plan period
1040	The infrastructure improvements required and likely Council expenditure constraints need to be taken into account in phasing and delivery as they are likely to slow down completions for these sites.
1041	<p>Some sections of this location have good access to Trafford Centre Bus Station, but other parts currently have poor access by public transport. Improved public transport is essential given the congestion problems on the M60.</p> <p>Greater Manchester Integrated Transport Authority indicated its policy preference for a future Metrolink extension to serve Trafford Park leading to the Trafford Centre and Trafford Quays. However, the route of the Trafford Park Metrolink extension is currently unfunded and has yet to be confirmed via the process of public consultation and a Transport and Works Act order application.</p> <p>The future Metrolink Trafford Park extension has the potential to improve public transport access to SL1, SL2 and SL4.</p>
1045	It is considered these policies should be subject to the conclusions of a corrected SFRA and should require a detailed FRA to be completed and submitted alongside any application which proposes development of "more vulnerable uses" within

	Flood Zone 3 instead of requiring these uses be located outside of zone 3.
1045	<p>The policy should be worded to make it clear that as the Trafford Centre Rectangle has been selected as a strategic location supported by the completion of a need and sequential assessment by the Council. There will be no requirement for individual development proposals to satisfy the requirements of PPS4.</p> <p>The text of the second bullet point under this heading should be amended to make clear that the figures for employment land provision relate only to the release of new employment land. The approved development of the former Kratos site should not be included within the 10 hectare provision.</p> <p>No justification to include "up to" at the start of the second bullet point. Employment land requirements are not expressed as maximums and Trafford should be seeking to maximise economic investment in sustainable urban locations such as the TCR. Words "up to" should therefore be deleted.</p> <p>Requests the deletion of requirement for "a contribution towards a scheme to mitigate the impact of traffic generated by the development on the M60". The current wording of the third bullet point regarding WGIS should be taken as the full contribution to off site highway works.</p> <p>Policy implies that a secondary school will be required on the Trafford Quays site. Policy should be amended to clarify that what is sought is a financial contribution towards off site provision rather than physical provision on site.</p> <p>No justification for precluding housing residential development in areas of 'potentially' poor air quality around Trafford Boulevard and Barton Bridge. This policy constraint should be deleted. Report by Air Quality Consultants on behalf of Peel in August 2009 concluded that road traffic emissions would not provide any constraints to development and that a satisfactory environment in terms of air quality can be created for residents. Also sites location relative to the Davyhulme waste water treatment works should not be a factor which influences the site's development.</p> <p>The Trafford Water Taxi development should at most be identified as a Priority 3 requirement. Provisions of policy should be expanded to make clear that should the Water Taxi facility be implemented then this will be taken into account by the Council when considering subsequent development proposals with reference to relevant SPD documents.</p> <p>The list of projects makes reference to the Managed Motorway - M60 J8-12 and the provision of an "Additional Lane Eastbound M60 between Junction 10 and 15. The Council has since confirmed that the reference should be "westbound". Both these schemes are categorised as Priority 2. It is requested that they are amended to Priority 3.</p> <p>Request that the policy justification emphasises further the important role Trafford Quays will play in meeting identified housing needs in particular for high quality 'aspirational homes in the north of the Borough'.</p> <p>Requested that paragraph 8.3 be amended to read "The identified housing need includes a requirement for higher quality, larger 'aspirational' housing particularly in the north of the Borough to support employment and economic growth in the borough and Regional Centre more widely, and to create a more sustainable pattern of development. With the exception of Trafford Quays, few sites in the</p>

	<p>Borough are of sufficient size to provide the mix of properties which Trafford requires nor do they enjoy the vocational advantages of Trafford Quays in terms of its proximity to the Trafford Park Core Area and Regional Centre both of which are key employment locations.</p> <p>The Council's Strategic Housing Land Availability Assessment confirms that there are no other opportunities in the north of the Borough to create an aspirational residential environment capable of competing with the suburbs in the south of the borough."</p> <p>It is requested that additional text be included within the policy justification which makes it clear that planning applications for development at Trafford Quays which address the requirements of Policy SL4 may be considered acceptable in advance of the adoption of the Area Allocations Development Plan Document.</p>
1045	<p>Generally supportive of SL4. Trafford Quays has the potential to accommodate a significant quantum of residential accommodation and making a major contribution towards meeting housing land requirements in plan period and beyond. Its size will enable a mix of housing types, commercial B1 and community facilities set within an attractive and green setting.</p> <p>Interrelated stages of site master planning and preparation of detailed development proposals will provide the appropriate forums for sustainable developments.</p> <p>With reference to strategic objective SO6, it is noted that with its proximity to Trafford bus station, it is highly accessible by public transport and with the critical mass of residential development there exists the opportunity to improve the levels of transport connectivity.</p>
1073	<p>It is identified in the policy that significant improvements to public transport infrastructure will be required including 'an integrated, frequent public transit system'. In addition, a contribution towards transport mitigation to off set the impact of traffic generated by the development on the M60 will be required, along with the provision of the Western Gateway Infrastructure Scheme (WGIS). As these have been included within the 'Development Requirements' section of Policy SL4, the Agency are pleased that the transport impacts of the proposed development quantum have been identified at this stage, and steps are being taken to identify the appropriate infrastructure.</p> <p>As noted within the justification for the policy, the outcomes of the Greater Manchester Transport Modelling Assessment indicate that issues remain regarding the impact of this development on the SRN. In particular as a result of the modelling up to 2026, journey times between junctions 5 and 11 of the M60 were found to increase as a result of the development aspirations emerging within the Trafford LDF. As such Policy SL4 should explicitly state the following:  "Transport mitigation measures should be identified to offset the impact, of traffic generated by the development on the M60, in agreement with the Agency and GMPTE, with funding streams identified and obtained, and be operational in advance of the first occupation of the development quantum identified within Policy SL4;"</p> <p>It is recommended that within the implementation plans the wording is amended from Improvements to "local Highway network and public transport provision" to "local and strategic networks" to emphasise where HA involvement is necessary.</p>
1093	<p>It is noted that the plan states that the Trafford Centre is unlikely to change during the plan period, which echoes paragraph 6.26 within the RSS.</p> <p>In terms of the office development proposed in the context of RDF1 and MCR2 this</p>

	<p>could support employment, however only in the context of W3, which states that office development should as far as possible be located within the regional centres or town centres of RDF1.</p> <p>In terms of hotel and conference facilities, RSS policy W6 directs these facilities to the Regional Centre. PPS4 also expects them to be considered within a sequential process. In terms of Museum facilities PPS4 describes museums as town centre uses, which should be considered sequentially.</p>
1093	<p>The background document and technical note on strategic sites and locations identify that the area is not within the Regional Centre or the inner area, and therefore falls under RSS Policy MCR3. The policy states that residential should support local regeneration strategies and meet local needs (particularly for affordable housing) in sustainable locations well served by public transport. It is noted that the proposal is to deliver 1,050 residential units on the greenfield Trafford Quays site, which is predominantly family accommodation. There is also a requirement to provide 30% affordable housing. The SHLAA (dated June 2009) identifies that 16% of the total potential supply is within the Trafford Park (Wharfside and Trafford Quays) area, which is the third largest part of supply after Old Trafford and Altrincham. Acknowledging that, care needs to be taken around the provision of such a large proportion of housing in the Trafford Quays area, and how it will support regeneration priorities and contribute to meeting local needs.</p>
1093	<p>Green infrastructure could be explored in development requirements for each of the strategic sites, meaning that the natural environment through a green infrastructure approach can be improved within the development site.</p>
1197	<p>The table of works required in relation to the development makes clear the need for works to the M60, including the provision of an additional eastbound lane. As this would be dependant upon DFT funding and delivery, they would, therefore, need to be party to any S106 Agreement. It is suggested that in the current economic climate this factor, irrespective of the other infrastructure requirements, could place a fundamental block on the delivery of the project.</p>
1209	<p>SEGRO supports the continued inclusion of the Trafford Centre Rectangle as a Strategic Location as a number of sites may exist at the periphery of this area that could contribute towards the identified need for family housing.</p>
1211	<p>It is considered that the ability to deliver Policy SL4 includes: the need to provide an integrated frequent public transit system and the need for significant but uncostered contributions to motorway and highway capacity, to additional education, open space and sports facilities and to additional utilities capacity.</p> <p>The public transport requirement is considered to be significant however there are no costs or phasing. Private developers are assumed to be responsible. It is considered that infrastructure that is needed to enable the development to take place, but for which no implementation plan exists cannot be claimed as a benefit of the policy.</p> <p>Trafford Park's ability to deliver sites for employment development of sufficient quality is considered a concern. Given that the Council see Trafford Park as the major focus for strategic employment development (Draft Core Strategy, March 2010) the evidence base is considered to give no confidence that Trafford Park (or therefore the Borough) will be able to provide office accommodation of sufficient quality to be competitive and attractive for investors and occupiers.</p>



**Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – SL5 Carrington**

ID	Summary Of Representation
1019	There is insufficient detail to give a meaningful response to water infrastructure requirements but in general there does not seem to be an issue with supporting the domestic population with the necessary supplies.
1019	The remaining SL sites have some network connectivity issues but should not require major bulk transfer systems to support proposals.
1019	This area would require significant investment in wastewater assets in order to support the development outlined in this plan as there is limited infrastructure in this area.
1026	<p>Support the identification of Carrington as a key strategic location. Would suggest that because of the scale and nature of the proposals it may be worth considering an Action Area Plan as an alternative to inclusion in the land allocations DPD.</p> <p>With regard to development requirements; suggest some are reworded as they currently appear to introduce possible random scenarios if either 3rd parties decides not to co-operate and or the delivery of one particular requirement is seen as fundamental to the strategy. In particular access to the Ship canal for transportation purposes. If access is made freely available and can be delivered during the plan period this could be achieved, however if it is not then this development requirement may need to be reworded. The "contribution towards the provision of additional utility capacity" is too open ended and this requirement should also be reworded or linked into the Local Infrastructure Plan.</p> <p>Implementation- suggest that these details are deleted particularly the costs and funding sources as these may change over time, may be required at a different stage in the development and may be delivered by a different body. Would question the source and accuracy of these costs at this time which can at best be only estimates and have no regard to other sources of funding that may be available. Particular attention is drawn to the Carrington By Pass which is not required to service the release of the land at Carrington and, the provision of a new ship canal crossing which is within the gift of others and will probably be linked to a wider regional transport strategy.</p> <p>At Carrington it may be appropriate to negotiate the levels of affordable housing to be included rather than a blanket percentage which could result in an unbalance community that, if too high may not achieve the regeneration objectives for the site.</p>
1026	Support policy W2 but would suggest that it should also make provision for the development of a new local centre to support the emerging new community at Carrington.
1026	Carrington is a major brownfield development opportunity that is central to the Core Strategy. The majority of the land is within a single ownership and can be delivered during the plan period. Shell will continue to work with the Council to deliver a viable sustainable mixed use community at Carrington.
1040	<p>Support for the inclusion of this site and the regeneration and environmental benefits it will bring. It is considered it could yield more units (in order of 2,000) which could generate a scale of development to support the associated works. Potential enhancements to the (off-site) highway network to the south should be investigated further.</p> <p>Site reclamation costs should be factored in and an open book approach is preferred rather than a prescriptive approach.</p>

1041	This location is currently poorly served by public transport, and it takes an hour by bus to Manchester. The provision of fast, high quality public transport links to the main local trip attractors would be essential in the development of this location. The development of infrastructure and provision of services would need financial support from future developers.
1045	<p>The appropriateness of 'transferring' the whole of the 1560 residential units from Pomona to Carrington is challenged. The assumption that residential development can be delivered at Carrington from 2011/2 onwards appears unachievable. The site's historic use as a major chemicals complex with a complexity of ownerships and no doubt a need to address ground contamination remediation is likely makes the ability of the site to deliver the quantum of development within the plan period totally unrealistic.</p> <p>No adjustment in employment land allowance notwithstanding the introduction of a substantial housing allowance.</p> <p>Allocation of housing should be reduced by at least 546 units with phasing amended accordingly. A further reduction of at least 250 units would reflect a realistic development programme.</p>
1073	<p>The requirement for significant improvements to public transport infrastructure by improving access to Partington is welcomed, the Regional Centre and Altrincham with links to the Metrolink system. In order to ensure that this is effective however, the development requirements should acknowledge that the anticipated increase in Metrolink patronage over the plan period will have to be accompanied by increased capacity/frequency or viable public transport alternatives in order to ensure that these trips do not become private car trips. As such Policy SL5 should explicitly state the following:</p> <p>'A mitigation measures should be identified to offset the impact, of traffic generated by the development on the M60, in agreement with the Agency and GMPT, with funding streams identified and obtained, and be operational in advance of the first occupation of the development quantum identified within Policy SL5' and it should look at 'an integrated and frequent public transport system, serving the proposed developments at Carrington and Partington'.</p>
1076	Paragraph 9.5 states "the scale of the development proposed at this location is designed to be of such a level that it will assist in maintaining the viability of valuable community facilities in the neighbouring Priority Regeneration Area of Partington, such as a rejuvenated shopping centre and health and education facilities". It is understood that the Partington Canal Side Development was to develop and sustain such facilities. If the proposed development of Carrington is to be a sustainable development, what is the link between the development of Carrington and Partington?
1076	<p>Concerned that the proposed development of Carrington is an intrusion into the Green Belt and into the Protected Open Land as proposed by the Shell Carrington Delivery Statement (Nov 2009). There are proposals for development east of Isherwood Road into Green Belt, south of Shell into Protected Open Land; SE of this Protected Open Land into more Green Belt and even more development SW of this Open Protected Land into even more Green Belt.</p> <p>Trafford Council is clear in its commitment, in Policy R4 to the Green Belt and indicates in 4.7 that it will "protect the following areas of open land from development - land south of Shell, Carrington".</p> <p>The biggest concern is the proposal to develop Green Belt Land south of the Gasworks. This is totally inappropriate; it is out side the Brownfield area of Shell; it is an isolated area of land; it is Green Belt land and some of the proposals (a link road and screening) are on National Trust Land.</p>

	When considering the development of Carrington it is expected the above mentioned areas will be deleted.
1076	Broadly support the proposed development of Carrington provided that there is no encroachment from this development into the Green Belt and that improved Transport links to the M60 are developed.
1093	Green infrastructure could be explored in development requirements for each of the strategic sites, meaning that the natural environment through a green infrastructure approach can be improved within the development site.
1093	RSS policy MCR3 states that plans in this part of the City Region should sustain and promote economic prosperity consistent with the environmental character of the area and further that employment development will be focused in the towns set out in RDF1 and brownfield sites which accord with spatial principles to support the overall economic growth of the City Region. Would encourage this for 75ha proposed at this site. The approach needs to be consistent with W3, which again states that office should be in the centres identified in RDF1. More specific detail on employment uses (i.e. B1, B2 and B8 breakdown) would be welcomed.
1093	Concerned regarding Carrington and particularly Partington in terms of sustainability due to the limited highway access. Both of these sites border the Manchester Ship canal and a disused railway line which has been mooted in the past as a link into Carrington. The DaSTS Study 3; Access to the Port of Liverpool is now looking at increasing the use of the canal for distribution rather than road, this may increase the opportunity for industrial/distribution uses for Trafford Park and perhaps proposals for Carrington if highway access issues can be resolved.
1093	<p>This falls within RSS Policy MCR3 and therefore residential development should support local regeneration strategies and meet local needs (particularly for affordable housing) in sustainable locations well served by public transport. The strategic location is within the vicinity of, but somewhat detached from Partington (an area of identified regeneration need). It is not clear how the provision of new housing development will support and/or compliment the regeneration of Partington, would welcome more clarity. It is however recognised that there is a requirement to provide affordable housing in line with Policy L2, and 4NW would welcome the emphasis on the provision of family housing.</p> <p>The background document on strategic locations highlights that Carrington falls within the least accessible area with poor transport links. This is clearly a significant issue which will need to be addressed in making this an appropriate location for significant residential development.</p>
1096	One of the development requirements for this location is that development must demonstrate high standards of sustainable design. However it is not clear from current policy or the background documents, what this definition of high standards means for this strategic location.
1096	Support the inclusion of the development requirement of protection and enhancement of the Mossland as a carbon sink to mitigate the impact of climate change.
1096	<p>For information, the Environment Agency is currently heading a project called Mersey Life which aims to build on the benefits that improvements in water quality have brought about.</p> <p>This is an aspirational project that will address new challenges we now face. It aims to realise the socio-economic and ecological potential of our rivers by restoring degraded habitats, developing sustainable fisheries and improving access &amp; recreation. The Environment Agency has begun by looking at the River Bollin, the River Goyt &amp; the non-tidal section of the River Mersey.</p> <p>To help guide the Environment Agency's actions, they have produced a Portfolio of potential projects which will be delivered through a phased programme of river</p>

	<p>restoration, working in partnership with businesses, local authorities, public bodies and communities.</p> <p>This is particularly relevant to Carrington as it adjoins the River Mersey. There may be opportunities to link the objectives of the Mersey Life Project with detailed development proposals in the future.</p>
1097	<p>Carrington substation is an essential part of the transmission network and has an important role to play in maintaining the supply of electricity to the local distribution network operator and therefore ultimately to homes and businesses throughout Greater Manchester and the wider area. The site is therefore "Operational Land" and, for the reasons outlined above, there may need to be further essential utility development at the site in the future.</p> <p>A number of National Grid's high voltage overhead electricity transmission lines routed via Carrington substation pass through this area. Potential developers of the sites should be aware that it is National Grid policy to retain existing overhead lines in-situ. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid also has high pressure underground gas transmission pipelines located within the vicinity of the Carrington Strategic Location.</p> <p>Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE.</p>
1100	Strategic Proposal should make specific reference to both power generation and energy from waste, to reflect both the existing advanced power station proposals and the potential of an adjacent 15 ha site, which has a draft allocation for waste treatment in the Greater Manchester Waste Plan.
1100	Justification would need to be modified should the Council accept the case to cover power generation, energy from waste and the co-location of potential heat suppliers and users.
1100	The viability of the proposal is a matter for testing by the landowner and the Council, but it would be wrong for other more readily deliverable opportunities to be held up pending progress with the implementation of this. It is noted that the consultation document makes various references to a future Land Allocations DPD, but it is not clear whether this is the same DPD for Carrington as is referred to in paragraph 9.2. In any event, the timescales are such that the Core Strategy should acknowledge that the Strategic Location does not exclusively consist of the Shell opportunity and reflect the fact that applications may need to be determined on other sites before these documents have progressed.
1100	Whilst there is a single landowner who controls the majority of the Strategic Location, this does not mean that there are not other significant land ownerships which should be acknowledged. This is of relevance to Implementation as it is probable that planning proposals will come forward which do not require the infrastructure works that the more comprehensive mixed-use development would.
1100	The wording of the development requirements implies that no development whatsoever will be acceptable in this Location without all of the items listed being required. This would clearly be disproportionate in relation to any specific development proposal, whilst some of the items will not be relevant. The wording should be clarified to say "In order for the overall scale of development proposed in this Location to be acceptable..."
1100	The phasing of employment land development appears to be somewhat arbitrary, as it is assumed to be equal for each of the 5 year periods used. In reality, this will

	depend on the economic climate, funding and the availability of essential infrastructure. It is considered inappropriate for the plan to be over-prescriptive and it should make it clear that such targets are only indicative and will not constrain viable development proposals of which the impacts have been demonstrated to be acceptable.
1197	<p>It is suggested that whilst there may be a principle landowner, other landowners may not share the same vision for this site.</p> <p>It is considered from the list of infrastructure requirements that there are massive costs associated with this development proposal, many of which relate to making it a sustainable location, which may render the project unviable.</p> <p>When addressing the redevelopment of a former petrochemical site, particularly for residential development it is suggested that contamination should be seen as an issue that has been clearly addressed at the outset, it is not considered clear whether there has been any detailed work on this matter. It is suggested that a contamination issue could add to the cost of the development and potentially render the project unviable. It is noted that this issue needs to be clearly resolved before the project progresses.</p> <p>The relationship of existing and proposed uses to one another within a development of this nature is considered a key element that should be identified within the Development Requirements part of the policy. It is suggested that the residential development of this area would be very difficult due to the area being dominated by heavy industry.</p>
1211	Having reviewed the Council's evidence, it is considered that the Locations identified in Trafford Park and at Carrington represent a 'business as usual' approach with little 'significant change' and a 'failure to identify appropriate land'.
1211	<p>Whilst the justification suggests that the location will provide a range of employment opportunities, there is no indication of what the mix of industrial, distribution, sui generis and office / R&amp;D will be. It is therefore not considered possible to assess the claim that the range of employment opportunities will meet the economic regeneration and development needs of the Borough.</p> <p>In conclusion it is considered that Carrington is unlikely to deliver the quality of business premises to attract mobile investment to the City Region and that there are major unresolved uncertainties relating to the delivery of the proposals within the life of the Core Strategy.</p>

## Further Consultation on the Preferred Option (June 2009) responses – Chapter 5 Core Policies

ID	Summary Of Representation
1073	<p>The policy section as it currently stands appears to ignore the work done (or to be done) in the LDF modelling exercise and appears to cover wider development within Trafford that does not form part of the SS/SL. As set out in the accompanying "Issues to be addressed in the Local Infrastructure Plan (IAR)." The LDF modelling evidence base will be used to identify mitigating transport infrastructure and delivery timescales that underpin the strategy. For this reason the Agency recommend that the Core Policies should be linked to the LIP (when complete) for the strategic sites and locations identified in the strategy. This will give more certainty to the sites and locations identified in the strategy as major transport infrastructure will have been identified at this early stage and not the application stage.</p>

**Further Consultation on the Preferred Option (June 2009) responses – L1**

ID	Summary Of Representation
1026	The Council are proposing to release sufficient land to accommodate 11,800 new dwellings however this figure would appear to exclude the four strategic sites that should, in theory, deliver an additional 2,150 units totalling 13,950 dwellings. The forecasted numbers in Table 4 in the SHLAA 2009 review, which includes both the Strategic Sites and Strategic Locations the total number of units, is only 7,357.
1026	It is worth noting that Table 4 in the SHLAA does not include SL6 Trafford Centre Rectangle which is listed in Table L1 in the Core Strategy as producing 1,050 units, however even with this addition the total figure in Table 4 only increases to 8,407 some 3,000 units less than that proposed in Policy L1. Furthermore there does appear to be some double counting with regard to SS4 Partington Canalside and SL9 Partington. Table L1 lists a total number of units of 850 from SL9 (which includes 550 from the Strategic Site SS4). Table 4 in the SHLAA appears to indicate that a total of 1,004 units will result from the development of the Strategic Location and the Strategic Site.
1026	Policy L1 indicates that of the 11,800 dwellings 42% (4956) will be provided within the Regional Centre and Inner areas, therefore 58% (6844) will have to be provided elsewhere. Of the sites identified in the SHLAA outside of the Regional Centre and the Inner Areas the total number of dwellings identified in Table 4 is 1,936 an apparent shortfall of 4,908 dwellings? Table 1 appears to indicate that some 3,900 dwellings will be forthcoming from other South City Region Sites, although these are not identified and would appear to produce a remarkably consistent 1,000 units for each period of the plan. Even if this were to be the case there still appears to be a shortfall of 1,000 dwellings between the Table L1 and Table L4 in the SHLAA. The figures in the SHLAA, that represent a 2009 Review, do not tally with the figures in the Policy and must raise questions over delivery, suitability and achievability.
1026	<p>Policy L2 requires developers to make a contribution to the creation of mixed and sustainable communities; to be adaptable to the needs of residents over time and; to increase to provision of family homes in the north of the Borough, particularly larger properties of 3 or more bedrooms.</p> <p>A mixed use development at Carrington will create a sustainable community that can be adaptable to the needs of residents over time and, whilst not located in the north has the capacity to provide a range of family homes. It is difficult to interpret from the published information the mix of dwelling types proposed on each site and it is difficult to calculate comparative densities however, from the information available it would appear that in the North and Inner Areas the dwelling mix will be as follows:</p> <p>SL1 Pomona - 1,500 apartments  SL2 Trafford Wharf - 900 apartments  SL4 LCCC - 900 apartments  SL6 Trafford Centre Rectangle - 500 houses, 500 apartments  SL7 Stratford Crossroads 125 houses, 125 apartments  SS1 Victoria Warehouse - 400 apartments  SS2 Trafford Quays - 525 houses and 525 apartments</p> <p>Assuming the above breakdown is correct then of 6,000 units proposed only 1,150 (19%) will be family housing. This hardly meets the requirements of Policy L2 which seeks to encourage a range of family houses. The remaining 4,850 apartments will be in direct competition not only with each other but also with the</p>

	<p>large number of apartments proposed immediately to the north in and around the Quays in Salford. There is an existing oversupply of apartments in the Manchester City Region which is evidenced by the markets lack of appetite for apartments, the demise of many city centre developers and the fact that none of the major housing development companies intend to construct any apartments in the foreseeable future. In addition the large number of apartment consents in neighbouring areas around Salford Quays that have yet to be implemented and the banks reluctance to fund such schemes brings into question the feasibility of these allocations and the delivery of this large number of apartments at the northern area of Trafford.</p> <p>Contrary to the claim in paragraph 7.3 of the Preferred Option the policy as drafted with the locations and sites identified cannot and will not in our opinion deliver a balanced housing offer.</p>
1026	<p>A report was published on 30th July 2009 at the NHPAU (National Housing and Planning Advice Unit) calling on Government to revise its housing supply by between three and five percent. It argues that at least 237,800 new homes are needed every year between now and 2031 and that these figures should be used to inform regional plans. No allowance is currently made within the Core Strategy Preferred Option for this forecast increase in demand.</p>
1031	<p>At publication stage the Core Strategy should include trajectories in respect of previously developed land and the rate of housing delivery in accordance with paragraphs 43 and 55 of PPS3.</p>
1036	<p>Draft Policy L1 identifies the sites where new housing is to be directed in the Borough and indicates that the Woodfield Road Strategic Location could accommodate up to 400 units during the lifespan of the Core Strategy. It is estimated that 100 units could be delivered on the site by 2011 and a further 300 units by 2016. The land at Woodfield Road is well located in relation to public transport and is surrounded by existing residential areas, which make it an appropriate location for new housing as part of a wider mixed use development, support the principle of delivering new housing here.</p> <p>It is considered that the site has the potential to accommodate more than 400 units. This potential is recognised in Trafford's "SHLAA 2009 Review" which indicates that Woodfield Road could accommodate 478 new residential units, including 243 on a single site within the Woodfield Road location. On this basis it is suggested that Draft Policy L1 should be revised so that it more accurately reflects the capacity for new housing on the site.</p>
1040	<p>In terms of existing commitments it may need to be assumed that many higher density schemes (apartments especially) will not be developed, given the poor state of this market. In excess of 50% of existing commitments may need to be discounted (depending on the proportion of apartments) to reflect this. Furthermore due to contractions in the capacity of the house building industry, other commitments should also be discounted, as developers now have significantly lower expectations based upon much lower sales over the past 12-18 months or so. Failure to make these adjustments will inflate commitments beyond what will actually be delivered.</p>
1040	<p>The Councils 5 year supply will need to be amended accordingly to reflect current market conditions. This will have implications for the Councils SHLAA as sites might need to be brought forward earlier than previously envisaged. There will be a greater pressure to identify within the SHLAA sufficient (new?) sites for the Core Strategy period.</p>
1040	<p>It is requested that Council owned land and surplus property be positively utilised to deliver new homes and recommend a coordinated approach (Estates and</p>

	Planning) be adopted.
1040	In relation to PDL resistance is still being experienced from landowners to sell PDL at an appropriate value. Their expectation is that values will rise and that this is halting the release of PDL for development. Any policy/strategy must take this into account. An over reliance on PDL could jeopardise the delivery of RSS targets (as well as Growth Point uplift for the City Region).
1040	<p>There is concern that the Core Strategy relies too heavily upon those Strategic Sites, which whilst important regeneration priorities, will not provide the amount of new homes envisaged. Many of these sites are included for higher density residential use (some as part of mixed use schemes), which are unlikely to come forward in the short term. The commercial market is equally depressed so these schemes will be slower to materialise. We therefore ask that the Councils policies allow for residential development (at lower densities) elsewhere outside of these areas and that they are not refused for not being in these areas or for prejudicing the delivery of these developments.</p> <p>Otherwise support the policy approach to selected areas and support their regeneration, but simply wish to be realistic in this tough market. If these sites do not deliver, simply need policy to support (or not obstruct) other sites that can deliver the RSS target for new homes.</p>
1045	<p>Policy L1 appears to be inconsistent with other parts of the Core Strategy and in particular with the allocation in part D of the document of land as 'Strategic Sites and Locations'.</p> <p>Paragraph 4.12 of the draft document states that the 'Strategic Sites' are specifically defined sites which "will deliver significant development that is central to the achievement of the Core Strategy" and their allocation on the proposals map will give them a "high status in decision making on planning applications." Following on from this the allocation of land at Trafford Quays for a high quality residential led mixed use development as a Strategic Site clearly means that the Council considers the delivery of housing development on that site to be a key component in meeting its housing development needs and this is confirmed in the SHLAA which forms part of the evidence base. However part L1.6 of Policy L1 sets out a clear order of priority for land release for development which makes no mention of the Strategic Sites that have been allocated, even though they are stated to be central to the delivery of new housing. In addition part L1.8 states that greenfield land (which most of the Trafford Quays site is) will only be released in exceptional circumstances, where the housing land needs cannot be met on brownfield sites.</p>
1045	Part L1.6 of Policy L1 sets out a clear order of priority for land release for development which makes no mention of the Strategic Sites that have been allocated, even though they are stated to be central to the delivery of new housing.
1045	Part L1.8 states that greenfield land (which most of the Trafford Quays site is) will only be released in exceptional circumstances where the housing needs cannot be met on brownfield sites. There is not even any reference to in the Policy to PPS3 guidance that greenfield sites in sustainable locations are to be preferred to unsustainable brownfield sites as locations for new housing.
1045	The current wording of Policy L1 is contradictory to the allocation of Trafford Quays and other land as strategic sites and strategic locations. Object to the draft policy and seek that it be amended to include Strategic Sites and Strategic Locations within the first order of priority under L1.6 and L1.8 and would also need to be amended to the effect that the allocated sites are not subject to these policies.



1045	Question the inclusion of the suggestion that growth in Trafford must be seen to "strengthen" the more vulnerable market areas both within and adjacent to Trafford. It is difficult to envisage how any development which is not physically within or contiguous with such areas could be shown to have a strengthening effect. Accordingly this requirement could be used to resist or call into question development proposals that are acceptable in all other respects. This should therefore be deleted from the text.
1045	<p>In respect of the detailed figures in Table 1 support the total quantum of contribution assumed from the Wharfside and Pomona sites but it requests that the Pomona contribution be rephased as follows:</p> <p>2008/9 - 2010/11 - 0  2011/12 - 2015/16 - 550  2016/17 - 2020/21 - 550  2021/22 - 2025/26 - 400</p> <p>The capacity of the Trafford Quays site is such that it could make a larger contribution to housing development in the plan period and the Council may therefore consider increasing this in the final version of the Core Strategy.</p>
1047	No concern regarding the scale of new housing provision proposed. However, as the figure of 11,800 is net of clearance replacement (reflecting RSS) it would be helpful for the supporting text to explain that additional provision to take account of clearance activity will be taken into account through the annual monitoring report.
1047	With regard to the prioritisation of brownfield sites in L1.6, clause (b) cross refers to Policy L3 on regeneration, but not the wider spatial strategy. As a result Old Trafford (SL3), Partington (SL9) and Sale West (SL10) are identified as priorities, whereas the spatial strategy's focus on Carrington (SL8) and town centres such as Altrincham (SL13), Sale (SL11) and Stretford (SL7) is lost.
1047	Clause L1.8 sets out the exceptional circumstances under which greenfield housing development will be considered. It makes no reference to the proposed greenfield allocations at Trafford Quays and Partington Canalside (SS2 and SS4) and is therefore unclear how these sites might be phased relative to other brownfield housing sites.
1047	The contribution of housing and employment land requirements detailed in the Strategic Sites needs to be assessed and quantified. The submission draft should state the balance between numbers of residential units and hectares of employment land in each the Strategic Sites.
1050	The general principles of section L1.2 and L1.3 in Policy L1 are supported. It is not clear why the plan period extends from 2008 to 2026. Clarification should be provided on this.
1050	It is not clear why the annual requirement from 2008 to 2011 is less than the RSS annual requirement when this period is within the Housing Growth Point timeframe. It is considered that this should be adjusted to allow more dwellings to be brought forward in the early stages of the plan period.
1050	<p>The wording of the policy could be more simply explained as follows:  "Between 2008 and 2026 the Council will seek to deliver high quality housing in lines with RSS Policy L4 and the spatial distribution framework set by RSS Policies MCR1, MCR2 and MCR3 by:</p> <p>a) Releasing sufficient land to accommodate a minimum of 11,800 new dwellings net of clearance between 2008 and 2026. This includes an uplift of 20% on the RSS Policy L4 minimum (578) from 2008 to 2018 to accommodate the Housing Growth Point status.</p>

	<p>B) Phasing the release of land to accommodate:</p> <p>1,600 new dwellings between 2008/9 and 2010/11 (533 per annum)  4,000 new dwellings between 2011/12 and 2015/16 (800 per annum)  3,300 new dwellings between 2016/17 and 2020/21 (660 per annum)  2,900 new dwellings between 2021/22 and 2025/26 (580 per annum)</p>
1050	<p>L1.5 states that "Table L1 demonstrates that a significant element (42%) will be concentrated within the Regional Centre and Inner Areas of the Borough in line with RSS." It is considered that L1.5 should be deleted from the policy and included in the explanatory text. RSS does not make reference to any particular percentage of development that should be achieved in the Regional Centre and Inner Areas. The 42% is based solely on Table L1. Although many of the sites listed in Table L1 relate to allocations there is an element of the estimated housing supply that is based on windfall. There is therefore no guarantee that 42% would be achieved.</p>
1050	<p>L1.6 sets out the priority for the use of the land. The redevelopment of previously developed land in preference of greenfield land is supported. However the wording of the proposed policy does not reflect the wording in the Policy DP4 of the RSS. Guidance in PPS3 and the RSS encourage the re-use of previously developed land but there is no guidance to suggest that derelict, vacant or under-used land should be used as a priority over other previously developed land.</p>
1050	<p>It is considered that L1.4 should be broken into 2 sections and worded as follows:</p> <p>Distribution  Priority should be given to developments in locations consistent with the Spatial Strategy set out in Chapter 4.</p> <p>Use of existing resources  To ensure that the indicative 80% target proportion of new housing provision to use previously developed land and buildings set out in RSS is achieved, development should accord with the following sequential approach:</p> <ol style="list-style-type: none"> <li>First using existing buildings (including conversion) and previously developed land.</li> <li>Second using other suitable infill opportunities within settlements, where compatible with other development plan policies</li> <li>Third the development of other land where this is well located in relation to housing jobs, other services and infrastructure and which complies with other policies in the development plan.</li> </ol>
1055	<p>When considering the national planning policy basis for the supply of land for housing, it is considered that the housing figures set out in table L1 to be too site specific. For example, the 900 units identified within the Trafford Wharfside Strategic Location directly relate to two specific sites identified in the Trafford SHLAA (June 2009) - 1450 Victoria Warehouse (400 units) and site 1609 Wharfside, Trafford Park (500 units). So despite the Spatial Profile stating that Trafford Wharfside as a whole is to be the focus for sustainable residential development, just 2 sites in single ownership have been identified in this location to deliver housing until 2026. In effect by including the specific targets for each Strategic Location in table L1, the Core Strategy has introduced a series of Strategic Sites, which requires a substantial set of criteria to be fulfilled.</p> <p>It is questionable whether table L1 in its current form is the most appropriate for the Core Strategy and suggest that the parameters for broad locations should be introduced rather than a direct correlation between individual sites contained within the June 2009 SHLAA which is to be updated on a regular basis in any case. The emerging Trafford Park Masterplan would appear to be the most appropriate forum for the analysis of Trafford Park and its environs in respect of</p>

	the potential for alternative uses such as residential to be introduced on individual sites.
1070	<p>There is concern that Trafford appears to be committed to an uplift of 20% to its minimum housing target set out in RSS Policy L4. Table L1 shows a Policy L1 allocation total of 11,800 units compared to a total of 9300 units in the comparable table in the Preferred Options (July 2008) document albeit the latter figure seems to be for 2 years less. A significant cause of the higher figure is the 20% voluntary uplift in the housing target. Furthermore table L1 shows that all of this increase of 2500 units from the July 2008 document is to be built on 'Other South City Region Sites' which is to provide 33% of the total units. The Spatial Strategy sets out the Councils priorities in line with the RSS for the North West and table 1 accommodates all these priority sites (or Strategic Locations as they are described) but it still leaves 33% of the total to be built in the South City Region. It is considered that this results in the following:</p> <ol style="list-style-type: none"> <li>1. The Council is not following properly the spatial planning framework set out in RSS for the North West.</li> <li>2. There will be immense pressure to release sites or units in places which are not priority areas as described in the Spatial Strategy so that the character and appearance of places such as Bowdon will be threatened. We trust that the various guidelines will be adequate to protect the Conservation Areas but it is these and areas around them which together make up the character of places such as Bowdon and which are an asset to Trafford which could be destroyed.</li> </ol> <p>If the Council cannot find, as it would appear from the document, sufficient units within the Strategic Locations to accommodate the voluntary uplift of 20% then we consider that the voluntary uplift should be abandoned.</p>
1073	Over 1,000 dwellings are to be located within the Trafford Centre Rectangle, and although this is a 'third priority' location in terms of locating development, this location aims to deliver almost 10% of the housing provision across the Core Strategy (table L1). A development quantum of 1,000 dwellings in a location close to the SRN causes some concern, and therefore requires sound transport evidence to support the development aspirations at this location.
1073	In addition 3,900 dwellings out of the 11,800 total are to be delivered in 'Other South City Region Sites', although locations are not specified within the document, these sites do not appear to be located within Strategic Sites or Strategic Locations, and therefore they will have to be delivered in other areas across the Borough. Work will continue to be carried out with Trafford to ensure that any sites which emerge to accommodate these dwellings are sustainable and do not impact on the operation and safety of the SRN predominantly through the planning and pre-application and application process. Large scale housing developments close to the SRN which may impact upon the SRN should be discouraged, unless it is demonstrated within the supporting evidence base, that the impact on the SRN can be minimised through the use of sustainable modes. In addition there should be stronger links between Core Policy L1 and the delivery of housing outside of the Strategic Sites and Strategic Locations as this may trigger (depending upon scale and location) a review of the Local Infrastructure Plan, to ensure these new sites can be delivered sustainably. The mechanism for such a review needs identifying in the LIP reflected in the Core Policies.
1073	It is pertinent to comment that the Core Strategy review identified a shortfall in housing proposed at the Strategic Sites and Locations when compared to the numbers proposed in the RSS. This shortfall of 3,900 is significant in scale; need to ensure that the SHLAA addresses this shortfall, with any proposed large housing sites supported by sustainable transport measures.

1076	Support the assurance that 80% of new housing provision will come from brownfield land as set out in RSS.
1076	It is considered that the exceptional circumstances described in L1.8 should only be considered as a last resort and not as an option.
1078	The table is based on a flawed SHLAA (see comments on SHLAA) and grossly exaggerates the deliverable and developable housing land supply. Specifically it makes inflated assumptions about the capacity of sites and the delivery of completions, especially the Strategic Sites and Strategic Locations. Many of those sites are subject to significant constraints and the claimed capacities must assume high density development for which there is no market and no finance available, at least in the short to medium term. High numbers of apartments would also be at odds with the SHMA which identifies a need for more traditional family housing.
1078	The wording of sub paragraph L1.2 should be strengthened to give a clear and explicit commitment to meeting the minimum housing requirements set out in the RSS, plus a 20% uplift for growth over the period 2008 to 2018 as a result of the Growth Point initiative.
1078	The proposed phasing in sub- paragraph L1.2 is not explained or justified. In the absence of any special justification, the housing requirement for the first three years should be 2080 (3x694) not 1600.
1078	The plan should set out a mechanism for addressing any shortfall in housing land supply, including a trigger level (e.g. less than 6 years supply) and the approach to be taken to bringing other sites forward earlier. This will provide necessary transparency and certainty.
1089	The sequential approach to the release of land for housing in L1.6 requires flexibility so that a balance can be struck between the delivery of the housing requirements and the sequential priorities of the borough. The policy should include provision for flexibility when the minimum housing numbers are not being delivered. The application of this policy and the need for flexibility to deliver the housing numbers should be informed by regular liaison with the house building industry. The need for liaison with the house building industry should be reflected in paragraph 6.13.
1093	Would like to state the importance of using previously developed/brownfield land and the re-use of existing buildings is encouraged by RSS policy DP4. It is noted that the Core Strategy has highlighted this and that the majority of the local/smaller sites which are identified are previously developed which is in line with DP4.
1093	The use of previously developed land is also needed within the inner areas where the majority of development should be focussed.
1093	In terms of Policy L1 note the use of the word minimum. L1.2 states that the Strategy is seeking to accommodate a minimum of 11,800 new dwellings, whilst it is recognised that the area has been identified as a Growth Point, and therefore there is some 'pressure' to develop above the RSS figures, would like to emphasise that the RSS does not express the provision figures as minimum. The supporting text clearly states that the figures are not absolute targets and may be exceeded. However similarly the same paragraph says that some areas will achieve lower levels in earlier years (paragraph 7.19). This approach is comfortable with RSS, however RSS in itself does not specify that the figures are minimum. It states that Local Authorities should seek to achieve the housing provision set out in Table 7.1 (Policy L4) and that the annual average figures may be exceeded where justified (paragraph 7.19). In relation to the RSS therefore there is no requirement to express the provision as a minimum, and if the figures are to be minimum it will be important to demonstrate that they will be deliverable on that basis.

1093	Table L1, which supports the policy also raises some concern. Clearly the RSS directs residential development to the Regional Centre (as part of mixed use employment schemes) and the inner areas. The policy in relation to the southern part of the city region (which includes those parts of Trafford outside of the Regional Centre and Inner Areas is for residential development that supports local regeneration strategies and to meet identified local needs. The table shows a much higher proportion of residential development in the South City region area as opposed to the regional centre and the inner areas.
1120	Acknowledge the objectives set out at Table 1 'Strategic Options' and Policy L1 (Land for new homes), Policy L2 (Meeting Housing Needs) and Policy R5 (Open Space and Recreation).
1129	The mix of uses to be brought forward within Strategic Locations, particularly those within the North of the Borough, should be determined having regard to potential impacts on regeneration priorities within Trafford, adjoining areas and the wider City-Region.
1135	Concern that too much conversion/sub division will alter the character of some areas, there is already too much of this in Bowdon. Or in other areas give rise to tenements rather than high quality housing. There should be control over such use.
1135	Whilst it is agreed that brownfield sites should be used do not want any more large gardens of old properties turned into high density housing, this has already blighted parts of the Borough. This should be strictly limited as an exception rather than a rule.
1144	Support L1.
1145	It is important to protect Trafford's existing Town Centres and therefore the Plan should state clearly that the land around the Trafford Centre where it's proposed to develop housing, will not be designated a "Town Centre". Also there should be a higher percentage of affordable properties built in this area.
1152	The policy sets out the scale and distribution of new housing development. In terms of scale the policy identifies that up to 2016 the Council will seek to deliver high quality housing in line with RSS Policy L4 i.e. 11,800 new dwellings including a 20% uplift (until 2018) on the RSS Policy L4 minimum to accommodate the housing growth point status. This part of the policy is supported as the Altair scheme is considered both developable and deliverable in accordance with PPS3. This site constitutes previously developed land in a highly sustainable location and as a result can make a valuable contribution towards Trafford's housing requirements.
1152	Policy L1 seeks to direct significant new housing development to certain locations/sites and this is set out in Table L1. The table demonstrates that a significant proportion will be directed to the Strategic Location, which for Altrincham Town Centre comprises 250 units to be provided within the plan period. Support is also given to this approach and it is worth noting that the Councils draft SHLAA forecasts 150 residential units to be provided at Altair.

**Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – L1 Land for New Homes**

ID	Summary Of Representation
1026	Support policy L1.
1031	The phasing referred to in the second bullet point of paragraph L1.2 does not match that shown in the bottom line of table L1.
1036	Paragraph 4.15 makes reference to Woodfield Road as one of the "other South City Region Site". However it is not mentioned in Policy L1 and Table L1. These should be revised to be consistent with 4.15.

1040	Support to the policy identifying new housing sites. However in terms of PDL and change of use to residential, suppressed land values may not persuade land owners to sell so impacting upon delivery of new homes. Monitoring and review of L1.5 will be needed and L1.5 should avoid dictating the precise rate and location of development over the plan period.
1040	900 dwellings appear to be optimistic for this site. It is recommended lower density family homes as this is a better market. Therefore it is envisaged 450 units is more likely over the plan period.
1045	<p>Policy L1.6 should be amended to confirm that residential development within the Trafford Park core area will not be supported due to its key importance as an employment area both for the borough and the City Region.</p> <p>Requests amendments to table L1 re: Pomona, Carrington, Regional Centre totals and South City Region Area totals (see table).</p> <p>The inclusion of the suggestion that growth in Trafford must be seen to "strengthen" the more vulnerable market areas both within and adjacent to Trafford is questioned. Difficult to envisage how any development which is not within or contiguous with such areas could be shown to have a strengthening effect. Requests this requirement is deleted.</p>
1047	<p>1. The supporting text should be amended to explain that additional provision to take account of clearance would be considered as part of the monitoring process.</p> <p>2. The sequential approach outlined at L1.6 does not reflect the role of Trafford's 4 main town centres in accommodating future housing growth.</p> <p>3. The approach to greenfield housing development now makes specific reference to the proposed greenfield allocations at the Trafford Centre Rectangle and Partington.</p> <p>Paragraph 11.10 deals with the last of these points. However, the first two issues do not appear to have been addressed.</p>
1070	<p>Previous representations have expressed concern at the voluntary uplift of 20% in the housing target for two reasons:-</p> <p>1. It is not considered the Council is following properly the spatial planning framework set out in RSS for the North West</p> <p>2. It brings immense pressure to find residential units in the Other South City Region Sites.</p> <p>Reason 2 has been made even worse by the loss of 1500 residential units planned for Pomona Island. In view of this recent development it is considered the voluntary uplift should be abandoned, or at the very least reduced to 10%.</p> <p>There is comfort in SO1 under 'Altrincham &amp; Neighbouring Communities' and the retention of the existing Green Belt but it is believed these strategies will be put under a lot of pressure unless the voluntary uplift is abandoned.</p>
1076	According to the June 2009 consultation, 42% of new housing development was to be concentrated within the Regional Centre and Inner Areas of the borough in line with RSS policy. This figure is now only 30% according to the latest consultation document. This is a huge strategic change in direction making a lot of the previous consultation somewhat irrelevant.
1085	Object to the inclusion of Viaduct Road as a housing site in SHLAA. Should be retained for business uses.
1093	<p>L1.1 Would like clarification on "affordable by all sectors of the local community" and what is the meaning, as not all new housing provision will be affordable by all sectors of the community.</p> <p>L1.2 The policy should refer to the spatial development framework not the</p>

	<p>distribution framework.</p> <p>L1.5 4NW note that 30% of housing development will be in the Regional Centre and Inner Areas and 70% in the South City Region area of which 50% supports key regeneration priorities and/or strengthens Trafford's town centres. Paragraph 11.8 says that the distribution takes into account the Council's wider objectives, the SHLAA and SFRA. There is some variation between the focus set out in RSS Policies MCR1, 2 and 3 and this distribution, so the evidence to support this, and how it will support regeneration and meet local needs will need to be clearly set out.</p> <p>It might be helpful to show in table L1 what proportion of housing development is being directed towards identified regeneration priority areas identified in Policy L3.</p>
1158	<p>R4 should allow for local detailed boundary changes to the Green Belt where it would support development and meet a specific local need. This is provided for in the Regional Spatial strategy Policy RDF4. Allowing for Greenbelt review in the Sale and Ashton Upon Mersey areas for new housing development would help meet the increased housing development targets proposed for "Other South City Region Sites" in table L1.</p> <p>Table L1 identifies 11,860 units to 2025/6 compared with an RSS Growth point requirement of 11,450. This gives little margin for uncertainty. Allowing Green Belt Boundary Changes and allocating the Ashton Upon Mersey site would give greater robustness to the identified housing land supply.</p> <p>Considered essential that flexibility to amend the Green Belt boundary is provided for to allow for the development of new affordable housing which should be provided for on sites of sufficient size rather than piecemeal on smaller sites.</p>
1192	<p>Greenspace and gardens in the borough are gradually being eroded bit by bit as the area for new development is bigger than existing plots. This loss should be prevented and the wording of the policy is not strong enough. What is meant by the wording "due regard"?</p>
1197	<p>It is considered unclear how the phased delivery of housing will be possible so that in the period 2011 - 2016 the rate of building will more than double from that in the earlier period. It is suggested that although house building rates will be expected to rise if the Strategic Locations are successfully delivered, it cannot be controlled.</p> <p>A more detailed explanation of the figures set out in table L1 is considered necessary along with the revision of the SHLAA. It is suggested that the SHLAA is based on information from previous Core Strategies and therefore does not provide an evidence base that explains table L1.</p> <p>It is suggested that despite best endeavours by all involved, SL2, SL3, SL4 &amp; SL5 will not be delivered as expected and the 3.5% over provision will turn into a substantial under-provision.</p> <p>The Plan is considered vulnerable as some of the Strategic Locations and other sites may deliver at a much lower rate than expected and there is no Plan B to resort to if issues arise.</p> <p>A formal review of the Plan is not considered an appropriate way of address this issue as by the time an emerging problem is identified it may be too late to address the problem. Incorporating a Plan B is considered a necessary step to ensure that the Council is in a position to react quickly.</p> <p>It is suggested that the area of 'Other Protected Open Land' at Warburton be identified as a reserve site within the Plan to be used where it is clear that the sites</p>

	<p>in table L1 are not delivering sufficiently. This site is considered to be appropriate due to its exclusion from the Green Belt, it is a greenfield site and its development will assist in the regeneration of Partington.</p> <p>The Council's strategy is considered to be high risk with considerable uncertainty. The inclusion of a Plan B would be considered a more balanced strategy that recognises the uncertainties.</p>
1209	<p>Support the hierarchy for the delivery of new housing throughout the plan period in that the priority is derelict, vacant or under-used land within the Regional Centre and Inner Areas.</p> <p>Table L1 provides a prescriptive approach to housing supply throughout the plan period, which contradicts with the 5 year monitoring approach advocated elsewhere in the wording of Core Policy L1. The table in effect 'allocated' individual sites for residential development without identifying them as Strategic Sites. This approach requires a substantial set of criteria to be fulfilled in relation to evidence base work and demonstrating delivery. Suggest that in the Core Strategy any reference to housing supply should refer to broad locations, with specific housing numbers for individual sites being dealt with the Site Allocations DPD and other monitoring evidence base documents such as the SHLAA or the emerging Trafford Park Masterplan.</p>

#### Further Consultation on the Preferred Option (June 2009) responses – L2

ID	Summary of response
1018	Whilst fully aware of Trafford's needs for more intermediate units, in the current market, the proposed 50:50 split between intermediate and social rented units could be too high because of the difficulty in gaining mortgages etc. At certain times it may, therefore, be necessary to maximise rented units on site due to certainty over rental income versus shared ownership. Flexibility should be built into the policy.
1018	Clarification is required as to whether the requirement that at least 50% of affordable housing provision will be required to be family accommodation would apply to replacement development. E.g. flexibility should be built in terms of one for one replacement of flats etc.
1018	The Policy should recognise that a different approach may be appropriate when dealing with an affordable developer (Housing Association) than with a private sector developer as a Housing Association would, in the main, be developing for an affordable housing market it already has in place.
1031	The way in which affordable housing is dealt with needs to be considered further. The policy should set out the overall target for the amount of affordable housing to be provided. It should also set out the range of circumstances in which affordable housing will be required, including the minimum site size threshold. The policy currently fails to do all of this and relies inappropriately on SPD to handle some of these matters.
1031	The approach to viability as set out in paragraph 7.12 should be included in the policy and the areas referred to should be identified within the Core Strategy. In light of the above comments, further consultation may be necessary on this policy. It is noted that the approach to developer contributions is set out in Policy L8.
1040	Affordable Homes - with a reduction in completions, the number of affordable homes delivered (almost regardless of policy) will decline. The Council should consider the terms of disposal of their own land in order to achieve the delivery of affordable homes in Trafford (at appropriate locations).
1045	Where references are made in the "Development Requirements" sections in



	respect of Strategic Sites these state the development should make a contribution to affordable housing provision "of at least" (x or y%). Objection to the principle of this being set as a minimum requirement because this is not supported by the Economic Viability Study which expresses the various figures in its findings as "targets" and a starting point for negotiations with developers/landowners. Given the acknowledgement in the EVS that it represents a "snapshot" in time and that sites will need to be subject to reappraisal in the market conditions in which they are brought forward in planning applications and with regard to other costs that may apply, the setting of minimum level of affordable provision for individual sites is not appropriate at this stage.
1073	Appropriate housing types should be located in appropriate locations to ensure the operation and safety of the Strategic Road Network is not compromised by unsuitable land allocations.
1074	Policy L1 sets the framework for the supply of land for new housing and includes reference to the conversion and sub division of existing properties at L1.3. Policy L2 sets out criteria for new development including L2.2c that development will be required not to harm the character or amenity of the immediately surrounding area. Whilst there is a need to read the document as a whole and the policies on design and the historic environment will be relevant it is suggested that in addition to the surrounding area the criteria could also apply to the site itself.
1077	The intension to make appropriate new provision for Gypsies and Travellers in Trafford is welcomed. The need identified in the RSS Draft proposed policy is 25 residential pitches and 10 transit pitches to 2016.
1077	Some of the criteria contained in the policy may be ineffective and misunderstand the needs of Gypsies and Travellers. Additionally the policy should make it clear that the criteria will be used to judge applications arising from unexpected demand (though this point is covered in paragraph 7.17)
1077	Criterion b) within the Gypsy and Travellers' section is unnecessary as Circular 1/2006 makes clear that setting maximum numbers as a blanket policy is arbitrary. In addition the requirement that each site should be large enough to provide for adequate on site facilities may arise from a misunderstanding of the Site Design Guidance issued by CLG, which is intended for RSL sites. Small family sites can and do work well in our own experience and each application should be judged on its merits. Without an explanation of what adequate on site facilities should be and their relationship to site size it is impossible to understand exactly what this part of the criterion is intending to do. A statement such as 'sites should be capable of being adequately serviced' would be more appropriate in this context.
1077	Criterion c) within the Gypsy and Travellers' section should only apply to transit sites. It would be onerous and counter productive to require residential sites to be so located. This criterion appears to arise from a misunderstanding of the lifestyle of Gypsies and Travellers resident on permanent sites. It is clear that land designated for general housing is equally suitable for Gypsy and Traveller sites. This criterion should be amended so that it refers solely to transit sites.
1077	Given the urgent need for sites for Gypsy and Travellers, the Core Strategy should set out a timetable for provision. If inclusion of sites is to wait until the LADPD, the Council should give consideration to preparing this DPD in parallel or in advance of the Core Strategy (see paragraph 43 Circular 1/2006). The core strategy should also give consideration to likely forms of tenure of planned sites and make provision in a similar way as for affordable housing.
1078	It is noted that the Core Strategy attempts to delegate a number of important policy decisions to Supplementary Planning Documents (e.g. affordable housing targets, thresholds for qualifying sites and commuted sums). This approach is contrary to both PPS3 and PPS12 and will create unacceptable uncertainty.

1078	Sub-paragraph L2.3 should be redrafted to require developers to demonstrate that the proposed housing mix will reflect demand, as well as local needs, as set out in the Housing Strategy and SHMA. This change would recognise that house builders have a role in satisfying people's wants and aspirations, as well as their immediate housing need, if everyone is to have the opportunity of a decent home. For example many single person households opt to purchase two or more three bedroom housing because of a desire for more space and the flexibility it offers to accommodate changing lifestyles.
1078	Delete sub paragraph L2.3c) because it is unnecessary and unreasonable for all developers, regardless of where the site is, to demonstrate how their particular proposal will increase the provision of family housing in the north of the Borough. Sub paragraph L2.5 should set out an affordable housing target as required by PPS3 (paragraph 29), based on the findings of the SHMA and having regard to an assessment of the economic viability of the land. Such fundamental policy decisions should not be delegated to SPD, which should only be used to provide greater detail and clarity.
1078	Sub paragraph L2.7 a) will create unnecessary uncertainty. The words "but preferably 3 bed roomed", should be deleted.
1078	Sub paragraph L2.7 b) is over prescriptive and will not lead to the creation of well balanced communities.
1078	Social rented housing has a dramatically greater impact on economic viability (contrary to the remarks at paragraph 7.13) and it is not sufficient to say that exceptional circumstances to justify varying the tenure split will be set out in SPD because that simply creates further uncertainty. The social rented requirement should be expressed as a range (e.g. 10-30% of the affordable element) to provide necessary flexibility.
1078	The Core Strategy attempts to delegate a number of important policy decisions to supplementary planning documents (e.g. affordable housing targets, thresholds for qualifying sites and commuted sums). This approach is contrary to both PPS3 and PPS12 and will create unacceptable uncertainty.
1104	<p>Paragraph 29 PPS3 requires that in Local Development Documents, Local Planning Authorities should set an overall (i.e. plan-wide) target for the amount of affordable housing to be provided. The target should reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured. Whilst an economic viability assessment has been undertaken, and identified that a range of affordable housing targets are viable within different locations in the Borough based on an examination of the housing market, there is no plan wide target as such. Furthermore it is proposed that the definitions of these areas will be delegated to a subsequent SPD (paragraph 7.12) as will the size threshold (paragraph 7.15).</p> <p>Paragraph 6.1 of PPS3 advises that a planning authority may prepare Supplementary Planning Documents to provide greater detail on the policies in its DPDs. SPDs should not be prepared with the aim of avoiding the need for the examination of policy which should be examined.</p> <p>Thresholds and targets for affordable housing provision should be subject to independent examination and inspector scrutiny and should not be circumvented by seeking to delegate these crucial policy requirements to an SPD.</p>
1104	<p>Paragraph 22 of PPS3 requires that affordable housing policies within Local Development Documents to be informed by a SHMA.</p> <p>The evidence base referred to in the Trafford Core Strategy is an HMA undertaken in 2006. Evidently this cannot be considered a PPS3 compliant SHMA</p>

	<p>as it was undertaken in advance of the guidance being issued. Furthermore having examined the 2006 HMA it is not considered robust and credible and provides neither all the core outputs, or demonstrates compliance with the required process checklist in CLG guidance.</p> <p>As the HMA would in any event be approximately 5 years old when the Core Strategy is likely to be adopted. Paragraph 4.37 of PPS12 states that 'Evidence gathered should be proportionate to the job being undertaken by the plan, relevant to the place in question and as up-to-date as practical having regard to what may have changed since the evidence was collected.</p> <p>A new PPS3 compliant SHMA should therefore be commissioned to inform the future development of any affordable housing policy.</p>
1120	Policy L2 (Meeting Housing Needs) is acknowledged.
1130	Caution must be given in creating mixed communities at all costs without paying due regard to the history or character of an area. There should be no area of Trafford where any of our residents feel uncomfortable to live, but to force a change by permitting ill thought out schemes will do more to damage community relations, than it will enhance them.
1130	Affordable homes must be a priority for the Authority and it is pleasing to see that L2 and L3 have identified that.
1145	There should be a higher percentage figure, than that currently recommended in the strategy for affordable homes built in any new housing to be developed in the Borough. It is essential with over 12,000 people now on Trafford's housing waiting list that new housing is developed for rent, to buy and shared ownership schemes, all of which should be affordable. The main groups of people needing housing are families and single people.
1145	It is important that the Council defines what is meant by "Affordable Housing".
1145	In relation to the land around the Trafford Centre, where it's proposed to develop housing, there should be a higher target for the number of affordable dwellings to be built in the area.
1145	There is a need for affordable housing in Sale.
1145	There is a need for affordable homes in Altrincham in order to enable people to stay in the area that they grew up in.
1152	<p>In terms of dwelling type and size, the policy explains that the provision of smaller units of accommodation, particularly 1 bedroom accommodation, will only be acceptable for schemes that support the regeneration of Trafford's town centres and the Regional Centre. In all circumstances, the delivery of such accommodation will need to be justified in terms of clearly identified need. The reasoned justification explains that the Greater Manchester SHMA recognised that alongside a sustained emphasis on family housing, it is important that the town centres across the Borough (including Altrincham) continue to attract high quality residential uses to ensure the ongoing renaissance of the town centres and to ensure that they continue to develop as vibrant centres of activity. On this basis it is important that the implementation of Policy L2 is sufficiently flexible to recognise the need to permit smaller residential units including apartments within town centres such as Altrincham.</p> <p>The redevelopment of the Altair site will significantly contribute towards the regeneration of Altrincham town centre by securing a mix of uses including an ice rink and a hospital. The scheme will be iconic and contemporary and therefore will comprise apartments instead of family housing. It is important for the financial viability of the scheme that high end value uses such as residential apartments are included to ensure that all the other uses that will provide wider community benefit can be delivered.</p>
1157	Whilst welcoming the inclusion of a section within the policy considering the provision of older person's accommodation, this should seek to positively promote

	the further provision of a range of forms of housing for the elderly in terms of both type and tenure. The increase in the elderly population has been well documented and the Core Strategy should seek to reinforce the message set out in the Governments publication entitled, "Lifetime Homes, Lifetime Neighbourhoods - A National Strategy for Housing in an Ageing Society", that there is a need for good quality specialised housing to promote greater choice for the elderly. Stay put and adapt is not a solution for all and can lead to the inefficient use of the housing stock with the under occupation of inappropriately located accommodation.
1157	Paragraph L2.4 within the Policy refers to smaller units of accommodation and reference is made to the need for special justification to be put forward in terms of demonstrating a need. Given that specialised accommodation for the elderly often involves the provision of small units (e.g. sheltered housing) and the Government encourages the provision of a range of types of accommodation for this sector of the community, the policy should be clarified to make it clear that special justification does not need to be provided for such schemes. In other words this aspect of the policy should only relate to open market (i.e. non age restricted) smaller units and this should be made explicit within the policy text.
1158	It is noted that in the Preferred Option consultation that the greater need for affordable housing falls within the Southern Housing sub market (paragraph 7.9). In order to meet local affordable housing need, there should be sufficient flexibility in relation to the Green Belt Boundary to allow for the development of new affordable housing. Development of affordable housing on sites of sufficient size is considered more likely to be successful in the current housing market than piecemeal provision on smaller sites.

**Further Consultation on Core Policies L2, L4, L5, W1 and R5 (November 2009) responses – L2 Meeting Housing needs**

ID	Summary Of Representation
1018	General agreement to the "Cold, Moderate and Hot" approach. However concern is raised over Old Trafford being identified as a "Cold" area. The proposed Old Trafford Masterplan is looking to transform the area over the next 10 years. This will lead to substantial demolition of affordable housing and there will therefore be the need to offer replacement accommodation. A 5% contribution on new developments to provide affordable housing therefore seems too low and this may need further consideration in practice.
1018	A 50:50 split on affordable housing between intermediate accommodation and rented may be far too aspirational in the current climate. Due to difficulties around mortgages and finance there would be a reluctance to develop a scheme on this basis. A 70:30 split would be more practical.
1026	This policy cannot be reviewed in isolation from Policy L1. It is unclear as to how all new residential development proposals are to be assessed, unless they are to be tested against all the points contained within the policy. It may be preferable if the policy were to be broken down into separate policies, one for each of the housing need areas. The use of "Cold", "Moderate" and "Hot" market conditions is not clear and could change should for example the proposed mixed use sustainable community at Carrington go ahead. It is not appropriate to include such prescriptive and inflexible policies in a Core Strategy. Despite its shortcomings the wording of Policy L2 in the June 2009 version of the Core Strategy is a more appropriate policy.
1045	Support for the introduction of a "target" for affordable housing provision, rather than a minimum requirement.

	<p>Concern is raised over paragraph L2.12 which defines a geographically variable target for affordable housing which will be applied to all qualifying developments “under normal market conditions”. Currently the document does not define what may be defined as “normal” conditions. Without such a definition, this part of the policy provides little certainty for either the LPA or a developer.</p> <p>It is therefore important that the proposed policy contains a level of flexibility for each development site to be considered on an individual basis as circumstances dictate.</p>
1050	<p>Objection to the 40% affordable housing target being applied to sites of 5 dwellings or more in the Altrincham, Mersey Valley and Trafford Rural Communities, as it could result in smaller schemes being unviable. This rate should only be applied to sites of 15 dwellings or more.</p> <p>The requirements and thresholds for the other areas are supported. It is not considered necessary to specify the level of units for frail elderly persons as RSS does not require such a target. It is acknowledged that the Trafford HMA estimates the number of such households and those in unsuitable accommodation, however a query is raised as to how the figure of 500 dwellings was arrived at and as to whether it would be sufficient to meet the needs over the Plan period.</p> <p>Also clarification is sought as to:</p> <ul style="list-style-type: none"> <li>-How the provision will be monitored as some of the accommodation may be outside of use class C3 – residential accommodation and some general housing may be suitable for this category, but not tied specifically to it and;</li> <li>-Whether or not affordable housing contributions would be sought in these developments. It is considered not as they are already meeting a specified need.</li> </ul> <p>Therefore given that there is no regional or national requirement for such targets, this section of the policy should be omitted or it should be re-drafted to encourage the provision of accommodation for frail elderly persons, with no specified target and without the need for the provision of affordable housing.</p>
1051	<p>It is noted that the overall housing target for the Borough is set out in this policy. The distribution of this development should be dealt with through the forthcoming Land Allocations DPD and in accordance with the overall Spatial Strategy (consideration should be given to making this element of the Plan a Spatial Strategy Policy; the Key Diagram; the Strategic Locations and Sites and; other suitable sites identified by more detailed analysis, such as the HMA work).</p>
1073	<p>Housing developments should be located to ensure the SRN is not impacted on by unsuitable land allocation. The requirements for new developments could be strengthened to support this by including a need to be in accordance with policy L4 as it is already included for L7.</p> <p>As a general rule any large scale housing developments will be discouraged close to the SRN which may have an adverse or a material impact on safety and operation, unless it is demonstrated within the accompanying LDF documents or evidence base that the impact on the SRN can be minimised through the use of sustainable modes.</p>
1093	<p>RSS Policy L5 requires plans and strategies to set out quotas and thresholds for affordable housing provision along with an indication of the type, size and tenure of affordable housing. The proposed amendments to Policy L2 are in line with RSS Policy L5.</p> <p>The additional text in relation to older persons is welcomed as it is in line with Policy L4.</p>

1150	Support for more residential development within the town centre, however concern is raised over the possibility that as developments become more marginal this policy may come under pressure from cheaper green-field developments.
1150	Whilst supporting the affordable housing element of the policy, concern is raised over the possibility that the properties may not remain affordable in perpetuity, particularly if they change hands.
1152	<p>It is important that the implementation of part L2.7 (that relating to dwelling type and size) is sufficiently flexible to recognise the need for residential units, including apartments within town centres such as Altrincham.</p> <p>Paragraph L2.9 identifies Altrincham as being within a “hot” location and therefore capable of providing 40% affordable housing contributions on sites of 5 units and above. This part of the policy must be applied with sufficient flexibility to enable agreement between developers and the LPA to be reached over appropriate and viable levels of contributions. The reasoned justification states that the affordable housing SPD will provide further guidance in relation to the level of evidence that will be required to secure variations to affordable housing contributions based on viability matters. It is important that this document is subject to public consultation before it is adopted.</p> <p>The policy threshold of 5 dwellings will need to be applied with caution. Whilst PPS3 makes it clear that LPAs can reduce the standard (15 units) threshold, it should be done where it is viable and practicable. Local authorities will need to undertake an assessment of the economic viability of the thresholds.</p>

### Further Consultation on the Preferred Option (June 2009) responses – L3

ID	Summary Of Representation
1013	Support the concept of reducing inequalities. There is some concern that the reduction of inequalities appears only to refer to appropriate regeneration of disadvantaged communities. This in itself is imperative. However, the reduction of inequalities can only take place if there is sufficient redistribution of resources; otherwise the gaps will remain and could conceivably worsen even if limited improvement takes place in disadvantaged areas. Would like to see a more implicit indication that sufficient local authority resources for effective regeneration will be targeted on those areas with greatest need.
1026	<p>Partington is effectively at the end of a cul-de-sac and its regeneration is primarily linked to land allocated for residential development and associated improvements to its shopping centre. There are no employment proposals proposed as part of the regeneration and there is no possibility of improving highway and public transport access to the area.</p> <p>Carrington and its redevelopment as a mixed use sustainable community holds the key to the successful regeneration of Partington because the scale and mix of the proposed uses at Carrington can be delivered with the associated infrastructure improvements, community benefits, access to green space and the improved public transport connections.</p>
1028	Why is reference made to 'the provision of further cultural facilities' in Old Trafford but not Sale West and Partington?
1047	The Policy is intended to regenerate disadvantaged communities and reduce inequalities in accordance with Strategic Objective SO2. However rather than supporting and encouraging regeneration as suggested in L3.1, the rest of the Policy imposes additional information requirements on developers wanting to build in these areas. Some of these requirements (e.g. L3.6) are not expressed very clearly. It is suggested that the policy requires substantial revision to

	positively encourage the types of development from which the regeneration areas would benefit, rather than adding to the burden of information on prospective developers.
1050	Policy L3 relates to regeneration areas and inequalities. The identified areas have been recognised as in need of regeneration for a number of years. The key issue in the regeneration areas is ensuring private investment that will provide investor confidence and encourage others to also invest in these areas. Investors and developers need encouragement to do this.
1050	Our concern with Policy L3 is that it is too restrictive and will discourage developers from investing and developing in this area.
1050	The Policy sets out the Councils support for the regeneration of the Old Trafford, Partington and Sale West areas as a priority but then goes on to set a number of criteria which must be met for development to be acceptable. Paragraph L3.2 of the policy is not precisely worded and is open to misinterpretation. It is also very restrictive to the types of development that will be allowed in the regeneration areas. For example the intension of the policy seems to be to restrict new development in Old Trafford to new housing, commercial, cultural and community facilities. This should be deleted from the policy.
1050	Paragraph L3.3 states that in 7 further locations, developers will be required to demonstrate how their proposal addresses and reduces inequalities. This is non specific and it is not clear what is being asked of the developer in order to show that inequalities would be reduced by a proposed development. Further information should be set out either within the Policy or the explanatory text.
1050	L3.6 states that where a development proposal outside an identified regeneration area would be required to provide facilities that would also be of significant benefit to one or more of the identified regeneration areas, this would be a material consideration in the determination of the application. The purpose and intension of this paragraph is not clear and it is not clear to what circumstances it relates. Furthermore, there is no explanation of what is considered to be a 'significant benefit'.
1050	The Policy states that it is the intention to prepare supplementary planning documents and development briefs for each of the identified areas. In the absence of these development briefs, it would be very difficult to show how these criteria can be achieved. It is considered that the information in L3.7 would be more appropriately set out in supplementary planning documents once these have been prepared.
1073	Encouraged by Trafford's intention to regenerate deprived areas, this should not be at the expense of unsustainable land allocations being brought forward with inappropriate or insufficient infrastructure.
1073	Encouraged that Core Policy L3 aims to improve access to employment opportunities and community facilities. Access should be improved by focusing on or promoting sustainable modes of travel in the first instance.
1129	The mix of uses to be brought forward within Strategic Locations, particularly those within the North of the Borough, should be determined having regard to potential impacts on regeneration priorities within Trafford, adjoining areas and the wider City-Region.
1130	Affordable homes must be a priority for the Authority and it is pleasing to see that points L2 and L3 have identified that.
1145	The Old Trafford Neighbourhood area - There is an improved need for youth and community facilities.
1145	Stretford Neighbourhood Renewal area - need for improved youth and community facilities.
1145	Town Centre shops need redeveloping as a matter of urgency. There is a real need to develop a better mix of Social/Private housing. A comprehensive strategy

	is needed to address the isolation of Partington (road and public transport) More job opportunities need to be created for the people of Partington.
1145	In the Urmston Neighbourhood area there is a need for youth and community facilities
1145	Needs to be much more emphasis on the Borough's more deprived areas such as Sale West, Sale Moor, Lostock, Broadheath, Old Trafford, Partington, Lostock, Broomwood. There should be improved environment, youth, leisure, education, health, community facilities, jobs and support for those neighbourhoods.
1145	There is a lack of youth facilities in Old Trafford, Stretford, Lostock, Urmston, Flixton, Davyhulme, Sale and other areas of the Borough.

### Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – L3 Regeneration and Reducing Inequalities

ID	Summary Of Representation
1026	Support policy L3
1040	This policy needs to be consistent and support the site specific policies. There is repetition with those policies.L3 should focus on regeneration and reducing inequalities.
1045	It is considered these policies subject to the conclusions of a corrected SFRA should require a detailed FRA to be completed and submitted alongside any application which proposes development of "more vulnerable uses" within Flood Zone 3, not as is presently stated that these uses be located outside of zone 3.
1047	The 'other regeneration areas' to which paragraph L3.8 refers should be named within the policy.
1073	The Councils intention to support appropriate development(s) within these regeneration areas that 'will secure regeneration benefits; creating sustainable communities; and make positive contributions to achieving the Plans strategic objectives and relevant place objectives' is welcomed.
1093	Concerned regarding Carrington and particularly Partington in terms of sustainability due to the limited highway access. Both of these sites border the Manchester Ship Canal and a disused railway line has been mooted in the past as a link into Carrington. The DaSTS Study 3; Access to the Port of Liverpool is now looking at increasing the use of the canal for distribution rather than road, this may increase the opportunity for industrial/distribution uses for Trafford Park and perhaps proposals for Carrington if highway access issues can be resolved.
1197	It is suggested that reference should be made to the potential for more than 850 dwellings at Partington, if it proves necessary to bring forward the proposed reserve site South of Partington.  It is considered that the requirement for development on greenfield land to make a contribution to the improvement of existing open space cannot be viewed as being compliant with Circular 05/2005 guidance.

### Further Consultation to the Preferred Option (June 2009) responses – L4

1013	Support the introduction of policy L5 at a local level. There is a need to link the policy with transport and design, currently its focus is too narrow.
1013	There should be more encouragement for small scale enterprise, dispersed across the Borough. Focusing on major employment sites is contrary to sustainability principles and leads to more travel over greater distances. To develop small scale industries in residential areas is a more sustainable pattern of living.
1013	The concept of sustainable transport must focus on reduction in private car usage.



	This is not made clear in the policy which indicates that highway schemes that will increase capacity may be acceptable. A successful integrated transport policy must radically switch the emphasis from car usage to a comprehensive, safe, convenient and economical system that incorporates and emphasises public transport, cycling and walking. The problem of the A56 and the way that it effectively splits communities highlights the need for a radical reappraisal of its impact and future planning. Furthermore, the local highway network needs to be placed in the context of a safe, pedestrian-friendly environment, with a commitment to 20mph zones with traffic calming.
1026	The vision for Carrington will deliver a number of transport and accessibility improvements however it was made clear that this site alone cannot deliver all of the improvements envisaged in the Plan. For example the new crossing over the Ship Canal is within the gift of others and will be dependent on links to the M62 and the release of land within Salford for development. In fact there are a number of developments approved or proposed in and around the Carrington area that can collectively contribute to the delivery of infrastructure. However, the land within the ownership of Shell and included within our Vision can deliver a significant element of the infrastructure requirement that will help to regenerate Partington.
1031	L4.13 refers to the setting of maximum levels of parking. It should make clear that such standards will be set out in a DPD (PPG13 paragraph 52). It also needs to be explained that such standards will need to be in line with, or more restrictive than, the standards set out in RSS.
1031	Does the Car and Cycle Parking SPD, referred to in L4.14 already exist?
1045	In view of the uncertainty with regard to the construction of Metrolink through Trafford Park and the alternatives now being considered it is proposed that Section L4.5 be reworded to read: 'The improvement and extension of Metrolink and/or provision of some alternative more deliverable high frequency public transport option.'
1045	Support the reference in Policy L4.10(c) to the Manchester Ship Canal and for the commitment, at Paragraph 9.16, to consultation and liaison with the Manchester Ship Canal Company in terms of development proposals adjoining the Manchester Ship Canal.
1045	The text in Paragraph 9.15 should be expanded to state that the enhanced role and capability of inland waterways, including the Manchester Ship Canal, for freight distribution and the ensuing environmental benefits and positive implications in terms of climate change and reduced lorry miles should be considered to be of overriding benefit.
1047	Both L4.1(d) and L4.4 refer to SPD1. It is understood that this is the Council's approved SPD on Developer Contributions to Highway and Public Transport Schemes but this is not clear from either the policy or supporting text. We suggest it is amended accordingly.
1055	Fully supports the principles set out in this Core Policy. In order to ensure that Trafford Park continues to fulfil its role as part of the Regional Centre and attract investment and development, further investment should be concentrated on the Strategic Highway Network, Integrated Public Transport Network and Freight Transport Network. Without continued support, the aims and objectives for Trafford Park as set out in this document will struggle to be realised.
1064	Disappointment voiced that the Core Strategy contains no aspiration to either improve access to/from the airport or to take advantage of the proximity of the airport which would enable the Borough to capitalise on the economic activity arising from having a major gateway airport on its boundary. In that respect it is considered that the Core Strategy is still rather inward looking and does not fully reflect emerging thinking for the Manchester City Region and the case for sustainable economic growth arising out of such work as the Manchester

	Independent Economic Review (MIER). Both of these see the airport as one of the major assets of Greater Manchester and with considerable potential to stimulate economic activity which is even more pressing given the current economic conditions. Trafford is extremely well placed to accommodate both our intermediate supply chain activities and also those activities which find it necessary or beneficial to be located very close to a major international airport.
1064	The work relating to "Airport City" has now been progressed further and has confirmed that a significant opportunity exists for a major air freight logistics operation. This was first set out in the Airport's Masterplan 2030 and through previous consultation responses to Trafford's Core Strategy. The LDF process should consider the allocation of land for this type of strategic economic development. This type of development has to be a 'near airport' location, with suitable convenient access to the Airport site.
1073	Distinction should be made to sites within the SS/SL (with specific reference to the LIP and its infrastructure measures) and developments that are as yet unidentified. Such a worded policy would give some surety that development both within and outside of the SS/SL will come forward on a sustainable basis.
1073	In order for Core Policy L4 to benefit in terms of the SRN, the wording should be altered to explicitly reference the 'Strategic Road Network' to ensure that planning permission is not granted for new development that is likely to have a significant impact on the SRN.
1073	Encouraged by the principles set out in Core Policy L4 as it aims to improve and enhance existing public transport networks and routes, as well as ensuring new development is delivered with infrastructure which will improve accessibility and sustainability.
1073	Suggest that this Core Policy should focus upon ensuring access to sustainable choices rather than overall accessibility. The Core Policy supports all aspects of sustainable travel, and if it can be delivered and implemented alongside Trafford's development aspirations, then sites should emerge on a sustainable basis, and not adversely affecting the SRN.
1073	Policy W1.9 should include - sites that are accessible by a range of alternative modes other than the private car.
1073	Encourage by the following statement: 'The Council will not grant planning permission for new development that is likely to have a significant adverse impact on the safe and efficient operation of the highway network unless and until appropriate transport infrastructure improvements and/or traffic mitigation measures and the programme for their implementation are secured.'
1093	In terms of transport we recognise that Core Policy L4 commits to accessible locations for development, however question the inclusion of Partington and Carrington. Both of these locations are only served by a single road in/out, they are 'rural' in nature and are severed from the network by the Manchester Ship Canal. The sustainable nature or lack of, at these locations has been raised before.
1093	Feel there is a point to raise from a regional highway perspective regarding the amount of development prioritised for the Trafford Park area. This area is adjacent to the M60, which at this particular location (around Junction 9/10) suffers from acute congestion, one main reason being the Trafford Centre. It will be necessary to ensure further development does not have an adverse impact on this situation.
1093	Would encourage the Core Strategy to have emphasis on development and proposals which will improve pedestrian and cycle access as well as provide additional bus/train services. This will further encourage sustainable travel in line with RSS policies DP5, RT3 and RT9. The importance of Travel Planning and Travel Assessments is also encouraged; the inclusion of walking and cycling to work are important modes to target.

1129	The Core Strategy should make it clear (at 14.7) that PPS6 considerations apply within strategic locations outside of the Regional Centre or town centres and that such uses should be highly accessible by a choice of transport modes and should only play a secondary or supporting role.
1130	The Core Strategy has to be able to address the present inequality of public transport provision, not only in deprived areas such as Partington, Sale West and Broomwood, but also in the relatively prosperous areas of Dunham Massey, Warburton and parts of Bowdon. Emphasis should be placed on promoting sustainable public transport in all areas of the Borough, through extended bus lanes, park and ride schemes and close partnership working with GMITA.
1135	There is a need for adequate parking at the main Metro Stations in the South of the Borough to allow people, including those from outside the Borough, to park whilst commuting into the Regional Centre. At the moment from Brooklands south there are problems caused by commuters parking all day and denying the residents and shoppers parking spaces.
1145	Improved public transport is needed in Carrington.
1145	Cycle lanes should be considered where possible throughout the borough. There should be more emphasis on improved road safety schemes in the borough to protect pedestrians, cyclists, and all road users.
1145	A comprehensive strategy is needed to address the isolation of Partington - road and public transport.
1154	Should enforce 20mph zones in all residential areas. No airport expansion.
1170	Has there been any change to the raising of Hardy Lane, (Jacksons Bridge?) alongside tram link, linking Chorlton and Sale Moor?

**Further Consultation on Core Policies L2, L4, L5, W1 and R5 (November 2009) responses – L4 Parking Extract of Policy L4 – Sustainable Transport and Accessibility**

ID	Summary Of Representation
1018	Agree with the proposals around having maximum car parking spaces for residential properties. This needs to be seen as a maximum guidance and not what should be provided. Some concern over having 3 maximum spaces on 4 bed properties as this can impact heavily on a developments' viability and on an affordable housing development can reduce the number of homes which can be provided for this reason.
1026	A detailed land use policy in a spatial strategy is inappropriate. There is no need to include Borough wide parking standards, these should be more appropriately incorporated into a DPD following the approval and adoption of the Core Strategy. We would also question the appropriateness of these minimum standards across the Borough in the absence of a commitment to the delivery of high quality public transport infrastructure and, the individual needs of a business that may employ a number of people from outside the Borough who, because of working patterns and lack of alternatives to the car, find that car parking standards do not allow sufficient on site parking for essential staff. The wording of the policy should allow for some flexibility and not seek to impose rigid standards regardless of the circumstances of the particular case. We therefore object to the wording of this policy.
1035	Thank you for including theatres in Table L4. Please note that parking for theatres should also include adequate turning and loading facilities for at least one coach and/or a 16.5m lorry.
1041	Support the principle of using maximum parking standards to encourage a modal shift to more sustainable modes of transport. It is noted that paragraph 3.3 defines three types of accessibility categories and that the parking standards are related to these three types. Trafford's SPD1 includes an accessibility plan in Appendix 4

	which also shows three different types of accessibility within the Borough. It is suggested that these are used to guide the location of new development and that all housing, employment and key facilities such as health and education, should be located in areas well served by public transport. The three types of accessibility defined in SPD1 are different to those being proposed in paragraph 3.3 and therefore, for clarification purposes, it is considered that there should be some cross-referencing and clarification of these different definitions to enable a clearer understanding of 'accessibility categories'.
1047	In line with previous comments, pleased to note that relevant details are included within this policy, rather than simply cross-referring to an associated SPD. Whilst we do not wish to comment on the detailed parking standards set out in Table L4, their inclusion within the policy provides greater transparency to prospective developers.
1050	Three areas are listed for which different parking standards will apply. It is considered that a plan should be prepared to show the boundaries of these areas for clarification. Alternatively, it should be clarified that reference to town centres means the town centres as defined on the proposals map.
1064	The protected alignment for Metrolink is identified in Policy T11 of the Unitary Development Plan and Policy L4 of the Core Strategy Preferred Option. It is suggested that this is retained as a transport corridor. It has two benefits: - the potential to provide improved accessibility to the airport and motorway from the west (including Wythenshawe Hospital). This fits with the Wythenshawe Regeneration Framework. - as part of improved orbital links to the Airport as set out in the Ground Transport Strategy. The Altrincham - Airport - Stockport corridor is our first priority for such improvements by both road and public transport.
1073	Support the principle of Policy L4 as it aims to promote sustainable travel choices as part of a package of measures. The parking extract taken from Policy L4, has been reviewed, and it is considered that this should enhance the opportunities to locate development in the most sustainable locations.  Encouraged by the following statement within Core Policy L4: The standards are intended to mitigate the impact of parking needs and encourage a modal shift to more sustainable modes of transport and minimise the dangers to public highway safety and the loss of amenity and convenience likely to be caused by on-street parking.
1093	In our previous response to policy W1, we had concerns with Carrington and Partington in terms of their sustainability due to the limited highway access, and this is still the case and is particularly relevant for Partington, where new housing is the focus of proposals. Both of these sites border the MSC and a disused rail line has been mooted in the past as a link into Carrington, in light of this (for your information) the DaSTS Study 3: Access to the Port of Liverpool is now looking at increasing the use of the canal for distribution from the Port of Liverpool rather than road, this may increase the opportunity for industrial /distribution uses for Trafford Park (in general) and perhaps for the proposals at Carrington; if the highway access issues we have mentioned above can be resolved.
1150	Although some parking space is needed to make a development work, this emphasis on encouraging a modal shift away from car usage is welcome and necessary.
1173	It is noted that the parking standards that you intend to adopt follow very closely those that have been submitted as part of the partial review of RSS as are the three accessibility area types. AGMA in their response to the partial review were concerned about the application of these area types to a conurbation like Greater Manchester. The EIP panel (which sits in March 2010) have decided to examine

	<p>issues surrounding Regional Parking Standards. It is also understood that the panel feels that there may be errors in the proposed table 8.1 and have asked 4NW to produce a paper to deal with this and the issues identified above.</p> <p>It is likely that the final form of the RSS may be different to the current draft. In light of this it may be appropriate to add a 'health warning' to the supporting text to Policy L4 as you are most likely to be publishing your Core Strategy before the approval of the partial review of RSS.</p>
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#### Further Consultation to the Preferred Option (June 2009) responses – L5

ID	Summary of response
1013	Support the introduction of policy at a local level. There is a need to link the policy with transport and design, currently its focus is too narrow.
1018	Support is given to the policy and standards set within it.
1019	In paragraph L5.3 The Code for Sustainable Homes Level 6 may not be attainable without the rain water or grey water recycling within new homes. Research studies have demonstrated that they are expensive to install, maintain and use significant amounts of energy. As yet their acceptability and sustainability is yet to be proven and so a recommendation for seeking them as a requirement can not be given.
1019	Support for the reference to the use of flood risk assessment to advise on the risk of flooding.
1019	Paragraph L5.15 is supported. Developers should pay attention to the building design to conserve potable water. This could include water saving devices such as low-volume taps and showerheads, dual flush toilets, save a flush devices, water efficient washing machines and dish washers.
1031	This policy should reflect PSS1 and thereby state a target percentage of energy to come from decentralized and renewable energy or low carbon sources to be used in new developments. Also where there are particular opportunities for greater use of decentralised energy than the target percentage then site specific targets should be set. In bringing forward targets: set the threshold to which these targets will be applied; and ensure there is a clear rationale for the target and it is properly tested. These targets should be in the Core Policy and not in an SPD.
1031	It is unclear what targets are being referred to in L5.6 and paragraph 10.14
1047	L5.11 will restrict renewable energy generation due to the wording 'Proposals for new sources of renewable energy generation will be encouraged where it can be demonstrated there are to be no adverse impacts on the local environment'. PPS22 states we need to encourage renewable energy development and inevitably there will be some adverse impacts. The wording should be changed to 'Proposals for new sources of renewable energy generation will be supported except where they would have an unacceptable impact on the local environment'.
1050	Policy L5 is generally supported.
1050	The wording 'until a higher national standard is required' from paragraph L5.3 should be removed, as the introduction of such a standard would be a material consideration in its own right.
1050	Paragraph L5.7 needs to clarify the level of carbon reduction that needs to be achieved. A further sentence should be added to L5.7 - it is suggested 'The energy statement should demonstrate how 10% of predicted energy requirements would be from decentralised and renewable or low carbon sources, unless it can be demonstrated by the applicant this is not feasible or viable'.
1051	A specific policy on climate change is welcomed.

	With regards to adaptation measures further consideration is required for impacts on specific areas such as nature conservation.
1051	The Stamford Brook development has adopted a more holistic approach to water management, for example measures have been introduced to reduce water use, to achieve environmental benefits whilst reducing the risk of flooding as a result of a river restoration project.
1066	The wording in paragraph L5.11 to change to 'where it can be demonstrated that there will be no adverse effects on the natural environment' is welcomed. However an addition to the policy should be considered of the need for new developments to maintain links and provide space for habitats and species to adapt to climate change.
1073	There is no assessment of impact on climate change due to transport emissions, and this needs to form part of the LDF modelling and evidence base. It is not possible to undertake this cumulative assessment at the planning application stage, once the sites have been allocated for development. The public transport provision as suggested by Trafford should have a positive influence.
1073	Wording in the policy that development should not worsen air quality is welcomed. The cumulative impact of the development of the strategic sites and locations should form part of the evidence base.
1078	Paragraph L5.8 is too prescriptive and focuses on energy generation, rather than recognising that carbon reduction measures can be achieved at a much lower cost, by the use of modern construction materials. It is more likely that carbon reduction will be achieved by a combination of measures.
1089	The principle behind this policy is supported, but it is too onerous on the developer and suggests the whole policy should be subject to tests of achievability.
1089	There is concern about new housing developments achieving Code for Sustainable Homes Level 6 by 2016; and the measures which are sequentially required in paragraph L5.8.
1089	The production of this policy should be undertaken in close consultation with the development industry, so the delivery of development in Trafford is not compromised.
1093	Encourage Trafford to work with Water Companies and the Environment Agency when planning the location and phasing of any development to locate development where there is capacity within the existing water supply and treatment infrastructure. Where this is not possible, new developments should be phased to allow new infrastructure to be put in place without environmental harm.
1093	Policies L5 and L7 need to work effectively together.
1093	There is no separate policy on water management to deal with RSS Policy EM5. The promotion of SUDs should be encouraged including retro-fitting and future developments.
1093	It is recommended that new development is located in areas of low flood risk and that measures are taken to minimise the risk of flooding. Development should be guided by the SFRA.
1096	It is not recommended that the Preferred Option is endorsed until the flooding evidence is available.
1096	In paragraph L5.15 it is suggested that the policy gives an emphasis on avoiding developing in areas of high flood risk, as the policy currently only relates to the mitigation of flood risk.
1096	Careful consideration of developments in areas highlighted as areas of concern for sewer capacity and drainage issues will be required.
1096	The management of water resources is crucial to ensuring developments are sustainable. An integrated approach to the management of all aspects of water cycle, demand, supply, quality and flooding should be adopted, as per the Future Water (2008). This can be demonstrated via a water cycle study, which can

	contribute towards the implementation and monitoring of sustainable developments. The draft NW River Basin Management Plan describes the main issues for each river basin district and details action to deal with them.
1096	The publication by The Environment Agency 'Water for People and the Environment' sets out how water resources should be managed throughout England and Wales to year 2050. The strategy considers climate change, population increase, changes in lifestyle.
1135	There should be a minimum requirement for the use of recycled materials in new constructions (between 25 to 30%).
1140	Suggest that new buildings are made sustainable to fight waste and climate change.
1154	Climate change policies should apply to all activity, especially old buildings which need insulation.
1164	Recommend the introduction of specific policies designed to deliver greater production of renewable energy and increased levels of energy efficiency, in order to minimise the impacts of climate change. Recommend avoid using the use of generic terms such as "encourage the use of energy efficiency, renewable energy and the minimisation and reduction of pollution and waste." Recommend developing a policy which is over-arching and addresses all of the above, with the inclusion of discrete and proactive policies.
1164	Recommend the use of specific development control policy on renewable energy, focusing on key criteria for applications to be judged with and providing direct reference to PPS22 Renewable Energy.
1164	Recommend policies to be designed to safeguard the area, listed buildings, conservation areas and greenbelt, should have regard to the positive contribution renewable energy can make towards reducing CO2 emissions and mitigating against the environmentally damaging effects of climate change.
1164	Landscape and conservation should not be reasons alone to refuse renewable energy planning applications, and they should be assessed against criteria based policy. The protection of local landscape and townscape is consistent with PPS22.
1164	Consideration to assumptions made with regards to the technical and commercial feasibility of renewable energy projects (e.g. identifying sites based on the minimum wind speeds). As technology progresses this means that current sites which may not be suitable now, may become suitable.
1164	All information requested of applicants should be proportionate to the scale of the proposed development, its likely impact on and vulnerability to climate change and be consistent with that needed to demonstrate conformity with the development plan and PPS1. Specific stand-alone assessments should not be required if this information can be provided by other submitted documents e.g. as part of the Design and Access Statement or Environmental Assessment.
1164	The contribution renewable energy infrastructure can make, should be recognised and reflected in policy with the mandatory requirement for on-site renewables. Such a policy would require on-site renewables to provide electricity for 10% of all new developments (including refurbishments) in addition to stringent energy efficient building performance requirements.
1164	Recommend the inclusion of a discrete policy on design and construction and inclusion of minimum energy efficiency standards for extensions, change of use conversions, refurbishments and listed building restorations. This would improve energy efficiency in existing building stock.
1164	In accordance with PPS1, local authorities should have an evidence-based understanding of the local feasibility and the potential for renewable and low carbon technologies including microgeneration, to supply new developments in their area. From this evidence Local Authorities should: 1. Set out target percentage of the energy to be used in new development to come

	<p>from decentralised and renewable or low-carbon energy sources, where it is viable. The target should avoid prescription on technologies and be flexible in how carbon savings from energy supplies are to be secured;</p> <p>2. Where there are particular and demonstrable opportunities for greater use of decentralized and renewable or low-carbon energy than the target percentage, bring forward development areas or site-specific targets to secure this potential; and, in bringing forward targets;</p> <p>3. Set out size and type of development to which the target will be applied.</p> <p>4. Ensure there's a clear rationale for the target and it is properly tested.</p>
1164	Recommend that a brief outline of the different renewable energy generation technologies is included and equally encourage and promote the use of all types. The potential for Energy Services Company and on-site wide CHP should also be considered for inclusion.
1169	Is there a target in the plan to reduce CO2 emissions by?
1170	What will be done to improve the energy efficiency of old developments? For example existing developments should be prioritised for insulation.

**Further Consultation on Core Policies L2, L4, L5, W1 and R5 (November 2009) responses – L5 Climate Change**

ID	Summary Of Representation
1026	<p>The proposed policy is far too complex and should form a separate DPD outside of the Core Strategy. As drafted it is far too complicated and in our opinion because of this virtually useless as a policy that everyone will be able to understand and implement. Any thresholds should only relate to the standards in place at the time and which can be implemented with the technology available and at a reasonable cost. To ask for anything else, whilst laudable, is unrealistic and the policy as drafted is far too complicated with the justification running into 5 additional pages. Once again this is a very detailed policy inappropriate to a spatial strategy that could be more appropriately incorporated into a DPD. Therefore object to the wording of this policy.</p>
1045	<p>In a letter dated 22nd December concern was expressed with regard to the draft wording of Policy L5 concerning climate change and a holding objection was registered to that policy to allow further consideration of the possible implications of the draft policy for its land holdings and development aspiration.</p> <p>Since issuing the holding objection, a copy of the AGMA Decentralised Energy Report has been obtained which is referred to at paragraph 1.14 of the November Interim Consultation Paper, in order to assist our understanding of the draft policy, the targets set out and the justification for these.</p> <p>However this document has proved not to be available either on the Council's website or that of AGMA and, in an email received from your colleague, have now been informed that the Council does not know when this document will be made available to those wishing to make representations to the Core Strategy.</p> <p>It is clear that the Council relies heavily upon the AGMA report both to inform and justify draft Policy L5 and that it will be a key part of the Evidence Base for the Core Strategy. Hence its lack of availability to interested parties during the public consultation is, in our view, most unsatisfactory and calls into question the validity of that consultation insofar as Policy L5 is concerned.</p> <p>The position of the representor is that it is not possible to either assess or make comment on the draft policy and its associated text without having first had sight of</p>



	the AGMA report. The Council should therefore treat this as registering a formal objection to draft policy L5. This objection will be maintained until further written notice.
1045	Welcome the proposed alignment of the Council's policy regarding sustainable construction with the Code for Sustainable Homes and Part L Building Regulations. However the proposed target framework for reducing CO2 emissions is not readily comprehensible and it is still being considered whether it is sufficiently clear and, if so, what the implications of this would be. In the mean time wish to lodge a holding objection with regard to Policy L5.
1047	It was considered that the previous draft of this policy took an unduly negative approach to proposals for new sources of renewable energy generation. It is pleasing to note that Clause L5.9 has been amended along the lines suggested.
1050	<p>Paragraph L5.5 of the policy makes reference to the need to reduce carbon emissions for developments of 10 or more homes or 1000 sq m of floorspace or more. RSS requires targets for decentralised and renewable or low carbon energy sources to be set in plans and this is supported. It is however considered that the targets set out in the policy are not transparent. The questions on page 26 help identify what target area a site may be within, however even then the document is not clear. For example a plan is required to identify where existing and proposed district heating and cooling networks are. Further information is required on what targets will be required to be achieved in geographical areas of the borough. The policy should also set out ways in which the use of low or zero carbon energy can be achieved.</p> <p>The policy should avoid onerous CO2 emissions reductions targets which would prohibit development. Table L5.1 sets out targets devised from the AGMA Decentralised Energy Study. The representor has not been able to obtain a copy of this document. It is not therefore clear how these targets were derived or what public consultation they were subject to. The evidence base must be robust and transparent.</p>
1051	No comments to add to those previously submitted. The intention to produce a SPD relating to climate change considerations is welcomed.
1066	Unfortunately the amended policy has not addressed the issues raised in a previous letter of 5th August. One of the key principles of PPS1 is that "local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change - through policies which... take climate change impacts into account in the location and design of development". This includes maintaining links between sites and providing space for species and habitats to adapt to climate change.
1073	It has been previously noted that there were concerns with regard to the lack of assessment of developments upon air quality. It is unclear whether these assessments have been identified therefore it should be reiterated that air quality assessments of the strategic sites and strategic locations should be undertaken to differentiate between the impacts of planned and unplanned developments.
1093	Policy L5 - Climate Change is strong but could maximize the role of green infrastructure in mitigating and adapting to climate change. It would be useful if the policy promoted the positive functionality of green infrastructure for example integrating sustainable design such as SUDs. RSS policies DP9 and EM5 emphasise the importance of this approach. Similar comments were in an earlier response at the preferred option stage.
1096	Overall there is no objection to the policies as suggested. With regards to Policy L5 and the issue of flood risk, the approach taken is supported and this policy may be further informed once the Strategic Flood Risk Assessment (SFRA) has been finalised. This is particularly important with regards to the identification of critical

	<p>drainage areas within the Borough where there may be more stringent requirements for flood risk assessments and reduction of surface water run off to greater standards than PPS25 requires.</p> <p>Note that the policy makes reference to guidance for developers on surface water as part of a Sustainability SPD, and would seek that any requirements from the SFRA are outlined within this.</p>
1150	<p>Much detailed work has clearly gone into this section. If the measures it seeks are all implemented the benefits should be considerable. However there are concerns over the seemingly complete omission of aviation, because the environmental impact of its uncontrolled growth will negate many of the gains hoped for in L5. Air noise and water pollution as well as road traffic (car and lorry) will all increase, thus adversely affecting directly the airports local inhabitants in 3 council areas, as well as adding to cumulative overall emissions.</p>
1152	<p>Policy L5 requires new development to minimise contributions and to mitigate the effects of climate change and maximise its sustainability by adopting measures that reduce carbon emissions. The policy sets out a number of thresholds and targets in relation to sustainable construction, CO2 emissions reductions, pollution and water. Support is given to part L5.8 which explains that if particular circumstances of the development suggest that the requirement of the policy are not viable, the applicant must provide information to demonstrate this. Notwithstanding the above, the policy should be applied on a site by site basis.</p>
1188	<p>Whilst Policy L5 fully addresses the requirement to integrate renewable energy generating equipment into new development, it does not address how stand-alone commercial renewable energy applications will be handled. It is recommended that the Core Strategy includes a local criteria based policy which supports stand alone renewable energy installations in the Borough, where they contribute towards meeting and exceeding the minimum renewable energy targets set out in the RSS, and where there are no significant unacceptable affects which cannot be mitigated or are not outweighed by the national and regional need for renewable energy development or the wider environmental, social and economic benefits that the scheme may bring.</p> <p>The emerging evidence base should also be used to determine the local criteria against which the council will assess commercial renewable energy proposals; this would provide clarity to developers and ensure that significant impacts are addressed.</p>
1188	<p>Support the inclusion of Core Policy L5 and commend the Council's commitment to ensuring new development reduces its carbon footprint through sustainable construction and utilising low/zero carbon infrastructure which will ensure a more holistic approach to carbon abatement. However, the 'on-the-ground' actions required to conform with the carbon emissions reduction target framework contained in the policy will require further clarity; therefore encourage the Council to begin work on the accompanying Sustainability SPD as soon as possible to ensure that it can quickly become operational once the Core Strategy is adopted. This will ensure that developers fully understand the measures required to adhere to the carbon reduction targets and equip the case officer with the sufficient assessment information to implement the policy, therefore avoiding any unnecessary delays when future planning applications are submitted.</p>

#### Further Consultation on the Preferred Option (June 2009) responses – L6

ID	Summary Of Representation
1013	<p>The comment supports the policy.</p> <p>Would like to see clear links between design and climate change through the</p>

	consideration of the inclusion of energy-efficiency construction and innovative eco-friendly design, links with micro-generation of energy and traffic calming. There is a need for greater cross referencing with policies L4 and L5.
1026	A Biomass plant has potential to use a significant amount of recycled timber and off cuts that would otherwise go to landfill and could therefore help to reduce the amount of waste generated in the region
1038	The proposed waste policy covers all the necessary issues in what looks to be a comprehensive manner yet allows scope for the GM Joint Waste Development Plan Document to fill in the policy detail at a later stage. The final point (vi) appears negative, given that the previous point refers to recognising the potential benefits of waste facilities. It is assumed that this point is to simply ensure that any negative impacts associated with waste developments do not cause any problems in particular areas singled out for regeneration efforts.
1051	Support is given to those matters covered in the waste policy. However it is considered that there are waste related issues in respect of sustainable development that have not been picked up here or in the policies relating to climate change or design. Specifically, more encouragement should be given to reducing the impact upon natural resources during construction, e.g. by greater use of recycled materials, including those generated on site as part of the development through demolition works.
1073	It is considered more appropriate to comment on the GM Joint Waste Development Plan Document that Trafford is working on jointly with other Greater Manchester districts.
1093	The approach contained in both RSS and the Regional Waste Strategy should be reflected within the Trafford Core Strategy. Particular attention should be paid to EM10, EM11, EM 12 and EM13 which establish a framework for sustainable waste management.
1096	<p>Although Policy L6 does require the use of site waste management plans for all major construction projects, RSS Policy EM11 goes further than this to say that every type of development, redevelopment and regeneration project, should: adopt best practice techniques to prevent and minimise waste during the design and construction phases of development.</p> <p>More emphasis should be placed upon this within Policy L6 in order that waste can be "designed out" of a development tackling the minimisation of waste and which can compliment an "end of pipe" solution like a site waste management plan.</p>
1096	<p>Whilst recognising many good sustainable waste management practices and principles, this policy does not appear to capture the requirement in the NW Regional Spatial Strategy regarding the provision of accessible recycling facilities both for residents within Trafford and in the design of new residential properties.</p> <p>The RSS policy EM11 states that every type of development, redevelopment and regeneration project, should provide infrastructure that facilitates and meets the needs of local residents, businesses and industry for segregated storage, collection and recycling of waste materials; incorporate sufficient space to separate and store segregated waste streams waste and enable kerbside collection of materials.</p>
1100	There is an inconsistency between policy L6 and SL8, whereby in L6 Carrington is identified as a location for waste management, but there is no mention of this in SL8.
1100	The term "identified by the Council as being in need of investment" is imprecise and gives insufficient guidance to developers. The policy should preferably refer to a specific policy designation.

1100	Support is given to this policy, particularly its commitment for Trafford to work to identify and safeguard sites for waste management in appropriate locations which include Carrington.
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#### Further Consultation on the Preferred Option (June 2009) response – L7

ID	Summary Of Representation
1013	The comment supports the policy. Would like to see clear links between design and climate change through the consideration of the inclusion of energy-efficiency construction and innovative eco-friendly design, links with micro-generation of energy and traffic calming. There is a need for greater cross referencing with policies L4 and L5.
1013	Support the introduction of policy L5 at a local level. There is a need to link the policy with transport and design, currently its focus is too narrow.
1019	The comment supports wording in paragraph L7.3 (d), which states development must ... be satisfactorily served in terms of key utilities such as water, electricity, gas and telecommunications.
1051	This policy satisfactorily addresses a number of key issues, in particular those relating to Design.
1066	The following from PPS9 to be incorporated within the policy wording - 'development proposals provide many opportunities for building in beneficial biodiversity or geological features as part of good design'. The use of planning obligations to help delivery is suggested.
1070	Suggest linking with Policy R1 to ensure the development within conservation areas and adjacent to them has to meet the special design qualities and requirements for conservation areas.
1073	Support - as policy aims to provide safe and convenient links to public transport and thereby reduce private car travel.
1074	Support policy. Suggest making reference to CABE/English Heritage guidance Building in Context in justification text. Suggest introducing a Tall Buildings section within policy. Recommend using 'CABE English Heritage Tall Buildings' guidance document.
1093	Policies L5 and L7 need to work effectively together.
1145	Any new development within the Borough should be augmented with tree and shrub planting, to improve our environment.
1170	Need to give consideration to the materials used to construct roads particularly those that reduce noise.
1170	What will be done to improve the energy efficiency of old developments? For example existing developments should be prioritised for insulation.

#### Further Consultation to the Preferred Option (June2009) responses – L8

ID	Summary Of Representation
1026	Any planning obligation must have regard to economic viability and not imposed inflexibly. The contributions listed should be reasonable and related in the development.
1035	Policy R6.3 mentions seeking planning obligations for existing and new cultural facilities but this is not listed in Policy L8.
1073	This policy is welcomed. However the level of contributions required for public transport infrastructure should be covered in the financial section of the LIP and not left till the planning application stage to avoid shortfalls.
1078	It is also noted that the Core Strategy attempts to delegate a number of important policy decisions to supplementary planning documents (e.g. affordable housing

	targets, thresholds for qualifying sites and commuted sums). This approach is contrary to both PPS3 and PPS12 and will create unacceptable uncertainty.
1078	The Core Strategy attempts to delegate important policy decisions to SPD e.g. commuted sums creating unacceptable uncertainty. This is contrary to PPS3 and PPS12.
1096	The use of planning obligations should be encouraged particularly to combat climate change and provision of Green Infrastructure
1135	Funding from planning gains to allow improvements to conservation areas should be included
1145	A proportion of S106 monies should be set aside for local events/festivals etc.

#### Further Consultation on the Preferred Option (June 2009) responses – W1

ID	Summary of response
1013	There should be more encouragement for small scale enterprise, dispersed across the Borough. Focusing on major employment sites is contrary to sustainability principles and leads to more travel over greater distances. To develop small scale industries in residential areas is a more sustainable pattern of living.
1026	Support for the identification of sufficient quality and choice of land to deliver new employment land, however the spatial distribution of employment land should be more closely aligned to the provision of land for housing where possible, and areas such as Carrington should be identified for mixed use development.
1031	This policy will need to be informed by the GM Employment Land Study, which will examine how to apportion the RSS employment land requirement. The policy should indicate the proposed distribution of employment land and state the percentage of the overall requirement across the Borough.
1035	Support for the protection and enhancement of leisure and cultural facilities through Policy W1 which recognises that creative industries are an important growth area.
1045	Policy W1 needs to detail how employment uses are defined and how this policy should be read against the Strategic Sites and Locations section.
1045	Support for the list of economic growth sectors to focus economic development.
1045	There is a need to provide clarification as to how land uses identified within the key economic sectors, that do not fall within the employment uses listed in the Use Classes Order, can be justified in the Strategic Locations.
1045	Support the wider range of economic uses in the Strategic Locations.
1045	Section W1.10, detailing steps for the development of alternative uses on existing employment sites, needs clarification as to what uses would be determined as "alternative uses". This section of the Policy appears to be in conflict with sections W1.3 and W1.6 and the broader range of uses within the Strategic Locations section.
1047	Additional work is needed to quantify the Borough's employment land requirement in the context of the sub-regional requirement for Greater Manchester as set out in the RSS.
1047	The contribution of housing and employment land requirements detailed in the Strategic Sites needs to be assessed and quantified. The submission draft should state the balance between numbers of residential units and hectares of employment land in each the Strategic Sites.
1047	It is noted that the Employment Land Study details there is sufficient supply of sites without the need to retain Davenport Green, additionally it should be noted that the site has been removed from the NWDA's list of strategic regional sites

1055	Support expressed for the inclusion of Wharfside, Trafford Park Core and Trafford Centre Rectangle as Strategic Locations for the focus of economic activity.
1064	Disappointment voiced that the Core Strategy contains no aspiration to either improve access to/from the airport or to take advantage of the proximity of the airport which would enable the Borough to capitalise on the economic activity arising from having a major gateway airport on its boundary. In that respect it is considered that the Core Strategy is still rather inward looking and does not fully reflect emerging thinking for the Manchester City Region and the case for sustainable economic growth arising out of such work as the Manchester Independent Economic Review (MIER). Both of these see the airport as one of the major assets of Greater Manchester and with considerable potential to stimulate economic activity which is even more pressing given the current economic conditions. Trafford is extremely well placed to accommodate both intermediate supply chain activities and also those activities which find it necessary or beneficial to be located very close to a major international airport.
1064	The work relating to "Airport City" has now been progressed further and has confirmed that a significant opportunity exists for a major air freight logistics operation. This was first set out in the Airport's Masterplan 2030 and through previous consultation responses to Trafford's Core Strategy. The LDF process should consider the allocation of land for this type of strategic economic development. This type of development has to be a 'near airport' location, with suitable convenient access to the Airport site.
1064	<p>A representation was made to the NWDA, as part of its recent Review of Strategic Sites, to designate the Airport and its environs as a designated Strategic Site and it had been expected that the future of Davenport Green would be part of this.</p> <p>The NWDA are conducting a review into new sites and these two streams of work should be brought together.</p>
1072	The Employment Land Study does not form a robust and credible evidence base.
1073	Policy W1.9 should include - sites that are accessible by a range of alternative modes other than the private car.
1093	It is noted that the Regional Centre will be the primary economic driver and the focus for retail, culture and tourism, in accordance with MCR2.
1093	The Proposed approach of 6 areas of economic growth in Trafford is broadly consistent with RSS policies W1 and MCR5, however the approach does include some dispersed development in smaller settlements, which need to be justified in terms of delivery to ensure general conformity with RSS.
1093	The Policy recognises the importance of improving the Borough's economic performance, reducing unemployment levels and diversifying employment opportunities, which conforms with RSS Policy W1.
1100	There is a need to define terms such as economic activity and economic development, which are not defined in RSS. RSS currently defines some, but not all, of the terms used in its glossary.
1100	"Bad neighbour industries" do not have a formal definition, and the environmental control attached to certain of these 'non standard' economic uses, such as modern waste to energy plants, would avoid any material harm to amenity.
1100	<p>Policy W1 only considers industrial, commercial, warehousing and storage uses associated with Manchester Airport.</p> <p>There is insufficient reference to the importance of Manchester Airport as an economic driver, given its proximity to the Borough.</p>

1100	<p>There is a need to justify the case for not carrying forward the UDP Policy E15 - which relates to Carrington providing land for off-airport car parking, passenger and baggage terminal facilities and airfreight handling facilities for Manchester Airport.</p> <p>Trafford Employment Study states that the potential of Carrington to attract high profile uses is complemented by its proximity to Manchester Airport, and therefore it should retain specific reference to airport-related uses.</p>
1100	There is a need to revisit Policy W1 and Carrington Strategic Location to address the potential of airport-related development.
1129	The Core Strategy should make it clear (at 14.7) that PPS6 considerations apply within strategic locations outside of the Regional Centre or town centres and that such uses should be highly accessible by a choice of transport modes and should only play a secondary or supporting role.
1129	The mix of uses to be brought forward within Strategic Locations, particularly those within the North of the Borough, should be determined having regard to potential impacts on regeneration priorities within Trafford, adjoining areas and the wider City-Region.
1146	Support for the decision to not roll forward the UDP allocation for a high amenity employment site at Davenport Green in to the LDF.
1150	Support for the decision to not roll forward the UDP allocation for a high amenity employment site at Davenport Green in to the LDF.
1150	<p>The policy lacks safeguards for Davenport Green, given that Airport expansion is likely to be the biggest threat to this area.</p> <p>The absence of a summary of RSS Policy RT5 makes it impossible to make a more informed objection.</p>
1152	The content of Policy W1 is supported. It is important to guide economic regeneration and development in such locations as Altrincham town centre in order to assist growth of the City Region. Altair is specifically recognised as one of the most important regeneration sites in Altrincham town centre and represents an opportunity to enhance the town centre's viability and contribute towards Altrincham's role as a sub-regional centre. The mixed use regeneration of the site will encourage shoppers and business to Altrincham.
1165	The economic growth sectors as identified in W1.3 should be expanded to include retail and leisure development - in accordance with draft PPS4.

#### Further consultation on Core Policies (Nov 2009) responses – W1 Economy

ID	Summary Of Representation
1026	Policy does not consider the wider sustainability criteria for employment uses and the opportunity that exists to create a mixed use sustainable community at Carrington. It continues to see Carrington as a purely employment allocation. The policy does not recognise the major brownfield mixed use sustainable opportunity in Carrington.
1031	It is unclear how the policy accords with PPS6 as regards the location of new office development. B1 uses are said to be focused in the Regional Centre (Pomona and Wharfside) and the Town Centres. Whilst RSS policy MCR2 says that the Regional Centre of the Manchester City Region should continue to develop as the primary driver providing the main focus for business, retail, leisure, culture and tourism development in the City Region, this needs to be read in the context provided by PPS6 which identifies offices as a town centre use. Office proposals will need to be consistent with national policy in terms of the need for

	development and the sequential approach.
1031	Not clear the extent to which office developments would take place in other locations outside the Regional Centre listed in W1.3., for example at Trafford Centre Rectangle. The Policy will need to be clear how the proposals are consistent with PPS6.
1031	Concerns in regards to delivery of strategic locations. It is assumed that this information is being set out else where in the Core Strategy. There needs to be sufficient evidence to show in principle that the proposals for strategic locations are capable of being delivered. It would need to be demonstrated that the infrastructure could in all probability be provided and that there are probable and timely solutions to any concerns. More detailed delivery information would need to be set out in subsequent DPD dealing with the allocation of sites.
1045	Objects to the proposed removal of the reference to the key economic growth sectors (W1.3) as this reference was much broader than the currently proposed B1, B2, and B8.
1045	Object to the proposed wording of Policy W1 in particular the proposed distribution and allocation of employment land contained within Table W1 on the basis that the justification and assumptions used to determine these figures are unclear. It is suggested that further information be made available with regard to how these figures have been arrived at with reference to the evidence base.
1045	Reiterate concern with regard to the proposed paragraph W1.5 (formerly W1.10) and the policy hurdle created for developing alternative uses on existing employment sites. Maintain previous objection to the use of the tests set out in paragraph W1.5 which contradict the Core Strategy's aspiration for a broader range of uses to be brought forwarding the Strategic Locations [sic].
1047	Welcome the inclusion of Table W1 in the policy.
1047	It is noted that Table W1 relates to the supply of land for 'B' uses. The supporting text at paragraph 5.7 however, refers to the wider range of 'town centre uses' as identified in PPS6, adding that proposals for such uses will be determined in the context of the tests set out in PPS6. Whilst these uses provide employment opportunities, many of them (leisure, entertainment, arts and tourism) fall outside Use Classes B1, B2 and B8. Suggest paragraph 5.7 is amended to explain that such uses, where permitted, will not be treated as contributing towards the employment land figures in Table W1.
1051	Support the approach proposed in particular the reference to spatial locations in Policy W1 and the identified Strategic Locations and Sites identified in Part D and the sites identified through the forthcoming Land Allocations DPD.
1051	Concern about Employment Land Study as this has not been the subject of any formal consultation and contains incorrect information – specifically in respect of land owned by the National Trust at Broadheath as investment land for disposal at the appropriate time. The detailed information on which Table W1 is based is inaccurate, being based on incorrect assumptions, and has not been the subject of proper scrutiny.
1064	Welcome the recognition of the role and importance of the Airport in the Trafford economy through additions to both the policy wording of W1 and the supporting text, particularly paragraph 5.8.
1064	Concern regarding work carried out to identify the locally derived employment land needs of Trafford (a 'bottom up approach') this seems to close the door on the prospect of economic development that is part of a wider sub-regional, or even regional objectives (a 'top down approach'). The bullet points in paragraph 1.4 of policy W1 should be altered to allow the prospect of such a site within the Borough with the inherent wider benefits and effects.
1072	This policy purports to show how the Council will meet the need, identified in RSS and the GM Employment Land Statement for some 170 hectares of land for



	employment in the period 2021. Factually this appears to be incorrect in that Table W1 only shows 128 hectares as available for development in this period; the balance of 62 hectares is available after 2021 so cannot count towards the requirement for 170 hectares.
1072	Policy fails to address the objectives which it is designed to achieve for the city region.
1072	Policy fails to relate the sites identified to particular sectors of activity or types of investment.
1072	Paragraph W1.3 indicates that “the detail of the employment uses within these places is shown in Table W1”. Table W1 makes no reference at all to employment use types.
1072	Similarly paragraph 5.6 (Justification) states: “The range of activities to be prioritised and encouraged in each of the Strategic Locations is summarised below”. No such summary is provided.
1072	Reference is also made (in paragraph 5.6) to the Strategic Locations section of the Plan, but, in relation to Pomona, Wharfside and Altrincham town centre (the three locations/sites identified for office uses) the Plan merely indicates a possible floor area of B1 use. There is therefore no evidence of how the sites identified will meet a variety of employment uses other than in very broad use classes.
1072	The present consultation (paragraph 5.5) dismisses Davenport Green as an employment site on the ground that the Council has a sufficient supply of suitable and developable employment sites to meet the requirement for 170 hectares. However this finding is not justified; assessment of the candidate sites (for example at Appendix D of the Employment Land Study) has not evaluated sites in terms of their scale, quality and location, to meet different sectors of demand in the market. The sites identified in Policy W1 appear to be justified purely on supply side grounds (they are available and the Council wants to see them developed) without any interrogation of the potential supply from the perspective of the market. Demand is only considered by reference (paragraph 5.4) to a list of growth sectors; the requirements of these sectors or of different types of firm within these sectors are not considered. This is the very unsure foundation on which the Council reaches its “sufficient supply” conclusion and on which it dismisses Davenport Green.
1072	Specifically in relation to Altrincham town centre there are considerable discrepancies between the allocations shown in different documents: 1.the present Consultation shows a total of 10 hectares for employment use 2.the Trafford Employment Land Study (May 2009) shows 2.99 hectares of employment land 3. The Strategic Locations section of the Plan/Core Strategy (29/06/09) shows 10,000 sqm of office development in the town centre.  Such discrepancies raise serious doubts about the soundness of the evidence base for the Core Strategy. This is important as the land in Altrincham is the only land identified in the south of the Borough/conurbation, where the demand is concentrated.
1072	In relation to the ambitious objectives for economic development, there is a lack of any site that is capable of competing for regionally, nationally or internationally mobile investment, the class of investment that would be capable of delivering net additional employment and economic activity i.e. contributing to the growth of the City Region. This omission is confirmed by the fact that the Council has not identified any of the sites in Policy W1 as Locations for Regionally Significant Economic Development (RSS Policy W2).
1072	The Council makes some acknowledgement of the role of industrial, commercial, warehousing and storage development in association with Manchester Airport, but

	only in the Justification (paragraph 5.8). It states that the appropriateness of proposals will be determined in relation to the provisions of RSS Policy RT5. This latter policy opens with recognition of the economic driver role of the Airport: "Plans and strategies should support the economic activity generated and sustained by the Region's airports, in particular, the importance of Manchester Airport as a key economic driver for the North of England..." It refers to the need for Manchester Airport to prepare a Master Plan, which has already been done and which shows an arc of development to the north of the Airport including Davenport Green as a development site.
1072	Suggest that part of the Justification (paragraph 5.8) be made part of the Policy W1 itself as it is a new line of policy and not a justification for what is in the Policy.
1072	Pomona Island was not considered in the site assessments which supported the Employment Land Study (Appendix D), however it is considered in Policy W1 as a focus for employment uses, with 8,000 sq m of office space proposed (p.89 of the Core Strategy Further Consultation). There is therefore concern that the site has not been subject to an appropriately rigorous assessment.
1072	Paragraph W1.3 in relation to Trafford Park refers to the need to improve the public transport infrastructure to link the location with surrounding residential and commercial areas. This has been a concern for at least 25 years and it has not been addressed satisfactorily in spite of the area having been the subject of a very successful Urban Development Corporation investment and development programme. This demonstrates again the inconsistent treatment of sites in that, in paragraph 23.10 of the Core Strategy Further Consultation Final Report, Davenport Green is dismissed (amongst other factors) because "It is in an inaccessible location with limited public transport access"; there is no recognition of the public transport measures that would be delivered through a s.106 agreement by the developer and which have been agreed with the Council.
1073	The transformation of the industrial storage and distribution units should benefit the whole of Trafford. The aspiration to improve the transport infrastructure, particularly in relation to the improvements that would facilitate more integrated and frequent services are supported.
1073	Any significant development proposed should be undertaken using a masterplan approach to ensure that public transport improvements are in place before new developments are occupied.
1073	The statement that allocation of employment land outside of the core areas would only be permitted where there is access to other modes of transport to the private car is supported.
1073	In Table W1 Carrington is identified as having the highest allocation of new employment land. There is concern over the development aspirations for Carrington due to its poor transport accessibility and the potential for adverse impact to arise at the SRN if the area is developed without infrastructure. Public transport infrastructure needs to be explicitly identified and phased in accordance with any development proposals at this site, to ensure that any impacts at the M60 are kept to a minimum.
1093	Welcome the inclusion of Table W1.
1093	Note that the policy is in line with RSS requirements in relation to the ELR.
1093	Further detail would be welcomed for Carrington and might be worth stating that the majority of the employment development would be storage and distribution in the policy.
1093	The inclusion of the statement on B1 uses in the regional centre and town centres is welcomed and in line with RSS Policies W3 & MCR2.
1100	W1.5 (previously W1.10) has now also been amended with the word 'alternative' replaced by 'non-employment uses'. It is assumed that under this policy such non-employment uses are classed as anything other than B1, B2 and B8 and that this

	includes a waste management facility with ancillary energy production. An application for this form of development would therefore be subject to the criteria in W1.5. It is considered that this approach is fundamentally misguided.
1100	The North West RSS defines 'employment uses' broadly as 'any undertaking or use of land that provides paid employment'. It is not accepted that it should be necessary to show that the site is not required for B1, B2 or B8 purposes, or that there are no suitable alternative sites for the proposed development, when the proposal would have the characteristics of an employment use in terms of appearance, economic benefits and environmental impact.
1100	The policy should explicitly state that waste treatment facilities are acceptable in principle on employment land. The Council may wish to qualify this by setting out the criteria which would be taken into account in looking at the suitability of individual locations.
1100	There are certain locations in which additional conventional power generation facilities might be acceptable on land identified as suitable for employment purposes, as has previously occurred in the Strategic Location of Carrington (SL8). It is therefore considered that the draft policy should be amended to set out how further proposals for economic development outside of the standard B1, B2 and B8 use classes will be assessed.
1100	Policy W1.6 (previously W1.11) does refer to "bad neighbour" industries albeit it under a heading "Hazardous Installations". However, bad neighbour industry does not have a formal definition, and we would argue that the environmental controls attached to certain of these "non standard" economic uses, such as modern waste to energy plants, would avoid any material harm to amenity, thus making this approach inappropriate.
1100	While the policy has been amended since previous representations, it is not considered that it provides sufficient clarity for employment uses such as waste treatment facilities with ancillary energy production or for conventional power stations, which do not fall under the policies definition of "employment uses". A degree of re-wording is therefore required to provide clarity on the issues raised. This is particularly the case as power generation facilities have already been deemed acceptable on employment land within the Strategic Location of Carrington and are not adequately covered by other Core Strategy policies.
1150	Object to the phrase "including development proposed to support economic activity associated with Manchester Airport". Why is the airport specifically mentioned here? It's outside the Trafford MBC boundary. This statement should say that any development proposals in TMBC's area associated with Manchester Airport will not be given any special or exceptional treatment. Such wording would protect Trafford residents from the alarming spatial demands of an unrestrained, unregulated aviation industry.
1150	Davenport Green must be protected from any development which prevents it from being used for agriculture and/or horticulture (including allotments worked by people living locally). This would offset future loss of UK farmland to increased flood plains and/or rises in sea levels.
1150	This paragraph does not state that Manchester Airport is outside the TMBC boundary and within the Manchester City Council area. Nor is it clear whether it refers to airport proposals to and sited within the MCC boundary but adjacent to TMBC, or to airport proposals to be sited within TMBC's boundary. This paragraph also seems to imply that whatever the Airport wants it will get, irrespective of the impact on nearby inhabitants. This paragraph should state that any airport related proposals will not receive any exceptional or special treatment, and that TMBC will protect its residents from the alarming spatial demands of an airport whose parent council seems to give it everything it demands (e.g. the recent Hasty Lane planning decision).

1152	It is important to guide economic regeneration and development in such locations including Altrincham Town Centre and represents an opportunity to enhance the town centres viability and contribute towards Altrincham's role as a sub-regional centre. The mixed use regeneration of the site will encourage shoppers and businesses to Altrincham which will assist the local economy, provide local job opportunities and provide enhanced facilities for local people.
1189	It is not considered that the planning policy framework has significantly changed since the adoption of the UDP in 2006 or that there has been a significant change in the need to provide employment sites within the borough that both meet both a local need, and a wider regional and sub-regional need.
1189	It is not considered that the identified supply of employment land is deliverable. Much of the land identified is subject to considerable constraints, and the supply has been significantly over-estimated.
1189	The identified supply of employment land (190ha) is heavily reliant upon the development of the Carrington site (75ha). This site is subject to numerous constraints, most notably contaminated land and flood risk. The deliverability of this site is seriously questionable. Additionally, this location is likely to be better suited to heavy industrial uses, and is an unattractive location for high quality employment land.
1189	The NWDA has removed the site from its list of strategic regional sites. However, it is understood that the decision to remove the site was made as part of a review driven by a reduction in funding. This, combined with a lack of development progress on the site, is the likely reason behind the omission of the site.
1189	It is noted that a number of proposed employment allocations are carried over from the UDP, despite failing to attract employment development since being designated. There is concern that these sites are rated at 5/5 for 'commercial viability' in the Employment Land Study, whilst Davenport Green scores just 1/5. This scoring is inaccurate, and there are concerns over the robustness of this element of the LDF evidence base.
1189	The Employment Land Study concludes at section 5.9 (2) that there is a general view that sites such as Davenport Green are attractive to the market for employment development. It is not considered that there are any existing constraints that could prevent the site coming forward for development. This finding is contrary to the 1/5 score the site receives in the same document for 'commercial viability'.
1189	Representations to previous stages of the Core Strategy have supported the continued allocation of Davenport Green. It is not considered that the omission of the site from the NWDA's list of strategic sites alters deliverability of the site, or its potential contribution to the regional and local economy.
1189	The proposed development at Davenport Green provides an opportunity to accommodate high quality employment land, preventing this potential displacement. Such displacement would lead to development pressures elsewhere, and could result in a need to release greenfield sites for industrial development.
1189	Development of the site would be accompanied by improvements to the transport infrastructure, and once developed would represent a highly accessible location. It is noted that previous UDP policies have taken this into account.
1189	The deliverability of the Council's Employment Land Study is questionable. It is also considered that the current employment land supply is unlikely to provide high quality employment land without displacing existing businesses.

**Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – W1 Economy**

ID	Summary Of Representation
1026	Support Policy W1.
1031	<p>The particular aspects of PPS4 that it would seem should be addressed are the need for these uses, paragraph EC5.1(a), and whether a sequential approach to site selection has been followed, paragraph EC5.2. It is assumed the Town Centre Uses Study is considered to provide robust evidence to fully satisfy these points. Has the joint working with Manchester and Salford on Regional Centre issues covered the questions of need and the sequential approach? It is also relevant to note the following extract from the Inspector's note of the recent advisory visit in respect of the emerging Salford Core Strategy:</p> <p>In the Inspector's view the 'Regional Centre of Manchester City Region' as identified in the RSS was more of an economic development designation and did not absolve the Council from a requirement to locate 'town centre' uses sequentially in line with PPS4. The Inspector did not see any inconsistency in this approach.</p>
1035	<p>Although 13.4 on page 62 states that one of the key economic growth factors is the cultural and creative industry, this is now omitted from the policy. It is noted that the subsidised arts play a major role in attracting in bound tourism (worth £16.3b in the UK) and that 4 million overseas visitors to Britain went to the theatre, ballet, opera or a concert in 2008. Support for both subsidised and commercial arts is vital in maintaining the quality and access that makes the arts, culture and creative industries so successful.</p>
1040	<p>This should avoid repetition with site specific policies and could just refer to them where employment use is referred to and then focus on statements relating to areas outside of these areas.</p>
1045	<p>Objects to the proposed removal of the reference to key economic growth sectors (as in W1.3 of earlier document) as this is broader than B1, B2 B8.</p> <p>Object to the proposed distribution and allocation of employment land in table W1 on the basis that the justification and assumption used to determine these figures are unclear with insufficient supply identified in some areas. It is requested that further information be made available regarding how these figures have been derived.</p> <p>Concerned about W1.5 and the policy hurdle created for developing alternative uses on existing employment sites. Object to the use of the tests which contradict the Core Strategy's aspiration for a broader range of uses.</p> <p>Welcome the reference to office uses being appropriate at Pomona and Wharfside.</p> <p>Prefer W1 to confirm that residential development and office development which is not ancillary to existing or proposed employment uses will not be supported at Trafford Park Core.</p> <p>Requests that third bullet point within paragraph 13.4 to read as "Cultural, creative and media industries".</p>
1047	<p>Paragraph W1.3 says the Trafford Park Core 'will be the principal location for employment development in the Borough', this is not borne out by table W1 which shows Carrington providing the greatest proportion of allocated employment land in the Borough. It is therefore assumed that the figures exclude redevelopment/intensification of sites currently in use within Trafford Park.</p>
1051	<p>Attention is drawn to the representor's previous comments on W1 and subsequent helpful discussions with officers regarding sites in Broadheath and in particular the Trust's investment land in the area. It is noted that the evidence base is likely to be reviewed, in particular the employment land study. In practice it is likely to be</p>

	necessary to incorporate additional land at Broadheath beyond that identified in the Study as this amounts to a little less than the 10 hectares identified in table W1 in order to ensure that an appropriate quantum and choice of land is available (as referred to at W1.7)
1064	It is premature to exclude land at Davenport Green from consideration. There is ongoing work at regional and sub regional level looking at strategic locations for economic activity. Suggest that this work should inform the Core Strategy along with further assessments of sustainable transport and regeneration opportunities in the area.
1064	<p>The 8 sites identified under policy W1 – Economy, have been derived to meet the local employment needs of Trafford and Trafford only. While W1.4 addresses employment proposals outside the identified employment sites, this does not go far enough to realise the aspirations of the wider City Region and North West Region in terms of growing a strong and vibrant regional economy. As a result, the Core Strategy is very inward looking and does not reflect emerging thinking from the Manchester City Region and the case for sustainable economic growth arising out of such work as the Manchester Independent Economic Review (MIER). Both of these see the Airport as one of the major assets of Greater Manchester; with considerable potential to stimulate and attract economic activity, which is an important consideration given the current economic conditions.</p> <p>The Manchester Airport Master Plan to 2030, which was published in November 2007, identified the challenges, the opportunities and the actions that need to take place in order to grow the Airport to the Government’s envisaged level of throughput. One of the key aspects of the Airport Master Plan is to define land requirements to support future activity and to set out the policy framework to guide and deliver sustainable growth. While the Master Plan identifies proposed extensions to the Airport Operational Area (AOA), it should be noted that the Master Plan does not propose any extensions to the AOA within the borough of Trafford. It does however recognise that in order to meet the envisaged level of throughput, not all airport business activities and land uses will be located in the AOA, but will still require a location in close proximity to Manchester Airport.</p> <p>The Master Plan and ideas emerging from the “Airport City” work both identify a significant opportunity for the development of a major airfreight logistics operation that is focused on the Airport, to be located on an adjacent or ‘near’ airport development site. It is therefore for the LDF process to consider the opportunities to capitalise on the Airport’s economic impact and the suitability of land, premises, transport links and skills to match. However, for an airfreight logistics operation to take full advantage of the range of facilities and activities such an opportunity would bring, proximity and accessibility to the Airport is essential.</p> <p>The Wythenshawe Strategic Regeneration Framework (2004) first established the idea of development corridors (East and West), in order to incorporate “the new retail / service centre proposal at Baguley, Roundthorn Industrial Estate, Wythenshawe Hospital and any future development at Davenport Green”.</p> <p>The Airport Master Plan to 2030 reflects this arc of development extending from Roundthorn Industrial Estate in the west, via Wythenshawe Hospital and Davenport Green to the Airport and beyond in the east, and is designed to maximise the opportunities for Wythenshawe residents and others to benefit from access to employment opportunities both on and off the Airport site</p>
1093	Concerned regarding Carrington and particularly Partington in terms of sustainability due to the limited highway access. Both of these sites border the Manchester Ship canal and a disused railway line has been mooted in the past as

	a link into Carrington. The DaSTS Study 3; Access to the Port of Liverpool is now looking at increasing the use of the canal for distribution rather than road, this may increase the opportunity for industrial/distribution uses for Trafford Park and perhaps proposals for Carrington if highway access issues can be resolved.
1093	Recognise that justification for office use outside centre locations, is included which refers to a section on PPS4 testing and discussion of the study on other main town centre uses including B1 office. This would suggest that within the context of PPS4 and policy EC5 office development would be appropriate in certain non-central sites as there are not enough suitable and available sites to meet need. The location of office in Pomona and Wharfside would be supported as being in the regional centre, however further justification may be required for other areas such as Carrington in line with RSS policies W3 and MCR1, in terms of the location of office development.
1100	Our client, or a potential end user, should not have to submit a statement under paragraph W1.4 to justify a 'non employment use' at the 15 ha Carrington Vehicle Storage site which is currently identified as part of an employment location under Policy E15 in the Trafford UDP, if the proposed use is power generation and/or a waste to energy facility, which is regarded as a 'similar appropriate use'.
1100	Paragraph 13.5 refers to waste management facilities as a one of several 'other key growth sectors' and cites the separate waste policy that covers these, but is not contained in the present consultation. Given the relationship between more conventional B1/B2/B8 uses and waste to energy, it is essential that both policies are properly cross referenced to deal with the highly likely scenario of co-location.
1100	If discussion of airport parking is not considered appropriate under the Economy policy, it should be considered elsewhere in the Core Strategy.
1100	The phasing of employment land development appears to be somewhat arbitrary, as it is assumed to be equal for each of the 5 year periods used. In reality, this will depend on the economic climate, funding and the availability of essential infrastructure. Do not consider it appropriate for the plan to be over-prescriptive and it should make it clear that such targets are only indicative and will not constrain viable development proposals of which the impacts have been demonstrated to be acceptable.
1100	Support the pragmatic approach advocated by the Council in allowing some office development in Carrington, where it will involve previously developed land and link to existing employment uses, and provide access to jobs for local residents.
1209	<p>Concerned that Trafford Park Core is no longer identified as a Strategic Location. The additional reference and further emphasis of its important role as a key regional employment location within Policy W1 is strongly supported and goes some way to addressing concerns should the decision be taken that it is no longer a Strategic Location.</p> <p>Trafford Park Core is a key component to delivering economic prosperity to Trafford Park and the Regions economy. It is noted and welcomed that the focus in the Trafford Park Core will be on the provision of modern industrial accommodation, storage and distribution and where appropriate supporting office accommodation. Believe the range of uses considered suitable for development at Trafford Park Core should also include ancillary uses to support the primary purpose of Trafford Park. Such uses could include car show rooms, small scale retailing, trade counters, leisure and A3 uses.</p> <p>Strongly support the continued inclusion of Trafford Wharfside, Trafford Park Core and Trafford Centre Rectangle as locations to focus employment uses.</p>
1211	This omission on the part of Trafford is considered to be in conflict with the advice in PPS12. It is suggested that major opportunities for the delivery of benefits for the

	communities in Trafford are omitted from consideration in the Core Strategy. The Airport is considered to be a very significant gap in the Trafford Draft Core Strategy. It is proposed that Davenport Green should be designated as a Strategic Site.
1211	Having reviewed the Council's evidence, it is considered that the Locations identified in Trafford Park and at Carrington represent a 'business as usual' approach with little 'significant change' and a 'failure to identify appropriate land'.
1211	The emerging Core Strategy of the City of Manchester provides for the growth of the Airport. Therefore it is considered unjustifiable that Trafford Council show no major sites for economic development in the South of the Borough which has excellent accessibility by road and public transport & which is highly accessible to the large and skilled work force resident there. Altrincham is the only location identified in Policy W1 (W1:3) for office development.

### Further Consultation on the Preferred Option (June 2009) responses – W2

ID	Summary Of Representation
1031	W2.13 is confusing. A plan-led approach is needed rather than relying on proposed floorspace additional to that committed in national policy.
1031	It is said that development proposals must be supported by a full range of PPS6 (or its replacement) assessments to ensure that any proposed development would not have a negative impact on surrounding areas. Given that the proposal is to identify a strategic area to accommodate a mix of uses including substantial retail development, this assessment should be carried out prior to the publication version of the plan so that its impact on surrounding town centres is clear. Again, a site will need to be identified and allocated via a subsequent DPD.
1035	Support of policy which now includes cultural facilities as contributing towards the vitality of centres.
1045	Wording does not accurately reflect what is said in Policy W5 of RSS. There is no justification to adopt a more restrictive policy which should be revised accordingly.
1045	No justification for the Core Strategy to adopt a restrictive policy and draft policy W2.11 and the related paragraph 15.6 should be revised accordingly.
1051	Local centres must be clearly defined by name/location somewhere in the document. It is suggested that new retail and related facilities at Stamford Brook do constitute a Local Centre.
1073	Support for sequential nature of policy and is in accordance with government policy.
1073	Encouraged by the presumption of out-of-centre development as developments outside town centre are likely to impact the SRN.
1082	It is hoped that the DPD's being produced will not affect the significant contributions made already to vitality and viability in a negative way.
1082	Banks are important contributors to the visitation of town centres and play a critical role in underpinning town centres and the health of town centres.
1082	Development of Altrincham TC as the priority for development should be encouraged but the delivery of this aim will depend on major financial investment by private sector stakeholders, and therefore planning policies should not discourage that investment.
1082	There is concern regarding the Retail and Leisure Study as a background document to core strategy which seems to reiterate "outmoded" thinking behind UDP policies on non-A1 usages within primary and secondary frontages. Object to use of SPD to control uses within frontages. Policy W2.9 makes brief reference of changes of use from A1, although with the absence of boundaries that the Land Allocations DPD will set out, it is not clear what form any policy will take.



1082	The percentage of usages within frontages appears to be the reaction to a "perceived concentration of non-retail A3-A5 uses" and does not appear to stem from perceptions of A2 uses.
1082	Policy SL13 requires development to "positively enhance the vitality and viability of town centres" but this is not compatible with seeking to limit other than A1 uses in prime shopping frontages.
1082	Greater encouragement should be given to financial services sector because of its contribution to the vitality and viability to town centres.
1082	There is concern that unjustified restrictions on A2 uses should not be continued in production of DPD's. Banks are subject to high levels of visitation.
1082	Banks have become more modern and more flexible in order to be sensitive to requirements of each building occupied.
1082	There is no planning reason to restrict presence of banks at ground floor level in shop frontages and the importance of banks should be reflected in the wording of the LDF. Policies should be clear that A2 uses will be appropriate uses in all shopping frontages and should allow flexibility in change of use from A1 to A2.
1082	Improvements to shopping provision should be met by improvements to financial services retailing. This can only assist in providing confidence and commercial viability necessary for a programme of regeneration and investment that the core strategy envisages.
1082	The core strategy should make it clear that A1 and A2 uses are appropriate in all shop frontages.
1093	It is noted that the Regional Centre will be the primary economic driver and the focus for retail, culture and tourism, in accordance with MCR2.
1093	Altrincham is identified as the primary focus for development in line with RSS and second priority for Urmston, Sale and Stretford.
1106	Support is made to the document which seeks to maintain and enhance Altrincham as the primary focus for development, followed by Sale, Urmston and Stretford.
1140	It is suggested supermarkets be replaced with independent shops. There's no greengrocer in Sale.
1145	It is important to protect Trafford's existing Town Centres and therefore the Plan should state clearly that the land around the Trafford Centre where it's proposed to develop housing, will not be designated a "Town Centre". Also there should be a higher percentage of affordable properties built in this area.
1145	It is suggested local shopping parades in Old Trafford be protected as they are the life blood of the community.
1145	Tesco land on Chester Road at the rear of the Stretford Leisure Centre should not be allowed to increase its present planning permission size of 48 000 sq ft. Anything above this would have a detrimental effect on Stretford TC and other town centres in the Borough.
1145	There is a need to protect the small shopping parades in communities.
1145	There is a need to protect small shopping parades in communities for example Altrincham and Sale.
1145	Need to protect small shopping parades in communities.
1145	In Partington Town Centre shops need redeveloping as a matter of urgency.
1145	In the Urmston Neighbourhood area there is a need for youth and community facilities.
1145	Superstores should not be supported out of town centres.
1145	It is suggested the Council's Core Strategy recognise the value and contribution that local neighbourhood shopping makes to community wellbeing; these small concentrations perhaps as few as three shops together often with a shared

	forecourt are important.
1145	The Council needs to be more proactive in coming forward to take over vacant properties for community use in local shopping parades.
1145	The Core strategy should state the case for the balanced provision in locations of shopping parades. Identifying something exists is often the vital first step.
1147	Tesco would have a detrimental effect on Stretford Mall and the diversity of local shops and would encourage car usage away from Stretford TC which in turn increases congestion on the A56. Tesco should be part of redevelopment of Stretford Mall similar to development of Sainsbury's in Urmston. Land at Gorse Hill could then be used for sport excellence activities, which is more relevant to that area.
1152	The content of Policy W1 is supported. It is important to guide economic regeneration and development in such locations as Altrincham town centre in order to assist growth of the City Region. Altair is specifically recognised as one of the most important regeneration sites in Altrincham town centre and represents an opportunity to enhance the town centre's viability and contribute towards Altrincham's role as a sub-regional centre. The mixed use regeneration of the site will encourage shoppers and business to Altrincham.
1152	Support Altrincham as the primary town centre as a location where comparison retailing facilities should be encouraged and enhanced.
1165	The policy guidance for out of centre development set out in paragraphs W2.10 and W2.12 is objected to. PPS 4 emphasises and supports development that provides employment opportunities and achieves sustainable economic growth and should be considered in tests in accordance with PPS6.
1165	It is inappropriate to limit further development at Altrincham Retail Park and the borough's existing retail warehouse parks only where such sites are located in accessible mixed use areas.
1165	The limitation of goods sold should be left to the case for development against national PPS 1 and PPS 6 criteria. The text "any further development within the retail warehouse parks..." should be removed from paragraph W2.12.
1166	Paragraph W2.3 should be amended to state that: "Within these centres as a minimum there will be a focus on the consolidation and improvement of the convenience and comparison retail offer, with the potential to strengthen and enhance the retail offer where suitable, as well as diversification to other uses such as office, leisure, cultural and residential as appropriate".  This approach will better maintain the strength, diversity, viability and vitality of the town centres.
1167	Paragraph W2.13 should be amended to refer to a large superstore instead of a new food store to reflect the nature of the need and the terminology used in PPS6. In order to maintain consistency with policy SL4, the policy should also make clear that the superstore would be cross funding the redevelopment of LCCC. The last sentence should be deleted as it is unnecessary to refer to PPS 6.
1169	Questions robustness of RSS as it seems to restrict development in town centres.
1169	Improvements to the market in Altrincham are needed as other areas are better (e.g. Bury).
1169	There is concern regarding the fate of the market. It is suggested a "Friends of the Market" group should be set up. The Council should not to be too prescriptive about the Altrincham market until more is known about the hospital site. Whatever happens to the hospital site will impinge upon the market.
1169	Parking in Altrincham TC is poor which is affecting the main shopping centre. Large supermarkets are killing small businesses and the Council should subsidise

	small shops and TC should have a good mix of type of shops.
1170	How are towns, districts and local centres designated? Why are Partington, Ashton Village and Sale Moor excluded?

**Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – W2 Town Centres and Retail**

ID	Summary Of Representation
1026	Support policy W2 but would suggest that it should also make provision for the development of a new local centre to support the emerging new community at Carrington.
1031	Policies SL3 and W2 refer to a new superstore on Chester Road. The Policy needs to be clear about the justification for this and explain how it accords with PPS4.
1035	Pleased that the cultural offer had been retained within W2.4 although the expanded policy is in danger of being too detailed.
1045	<p>There is objection to the stated presumption against the expansion of the 3 existing retail warehouse parks unless it can be justified against tests set out in Government Guidance. Requests that W2.14 be redrafted to read "Proposals to expand any of the three existing Retail Warehouse Parks (White City, Trafford and Altrincham) should be justified against the tests set out in Government Guidance."</p> <p>Object to the proposal to limit further development within the retail parks to bulky comparison goods only.</p> <p>W2 should be expanded to confirm the borough's existing out of centre retail developments should be the preferred focus for further retail development of an appropriate scale that cannot be accommodated within or on the edge of a relevant town centre and that it be clarified that local services (that might include retail as part of a mixed use development) will not be prohibited in key locations such as Pomona, Wharfside or Trafford Quays.</p> <p>Support the provisions of W2.10 which recognises the need to redevelop the local centre at Partington to create a modern shopping centre including a medium sized supermarket and other retail units.</p>
1051	The comments previously submitted by the Trust continue to apply i.e. "No objection to the Policy wording but in terms of Local Centres it is important that they are clearly defined somewhere. At present it is unclear which locations are being classified as Local Centres, although the intention to define their boundaries in the Land Allocations DPD is noted. It is considered that they need to be identified by name/general location at this stage. It is considered that the new retail and related facilities at Stamford Brook do not constitute a "Local centre".
1081	<p>In preparing the Technical Note, It is understood that Trafford Metropolitan Borough Council have not discussed the strengthening and enhancement of Sale Town Centre with any interested party.</p> <p>Following this consultation on the Core Strategy a delivery strategy can be discussed with the Council in order to provide additional information to detail when, how and who can strengthen and enhance Sale Town Centre before the preparation of the Publication Draft of the Core Strategy. This information would provide the Council with the details of the delivery proposals for Sale Town Centre, sufficient to address the second Strategic Locations identification bullet point.</p> <p>It is considered that Sale Town Centre meets the criteria and should therefore be reinstated as a Strategic Location.</p>

1081	<p>With regards to the options to achieve a strengthening and enhancement, support is given to an improvement to the mix and general quality of the existing retail offer; however the new retail floorspace should be focused around "The Square" and serve to improve the quality of both convenience and comparison provision within the centre, which can be best achieved through increasing the scale of the unit shops and enlarging the Tesco foodstore. As such, a maximum level of retail floorspace should not be contemplated, as it may unnecessarily restrict the appropriate level of development required.</p> <p>Accordingly Paragraph W2.5 should be amended to be read as follows:</p> <p>In Sale the aim is to strengthen and enhance the town centre through:</p> <ul style="list-style-type: none"> <li>-Improvements to the mix and quality of the existing retail offer;</li> <li>-New retail floorspace focused around The Square to increase the range and size of the unit shops, and extension of the Tesco foodstore to improve the quality and choice of the retail offer;</li> <li>-New commercial office accommodation;</li> <li>-Additional leisure and community facility development; and</li> <li>-Additional residential accommodation.</li> </ul>
1081	<p>In relation to Sale it is considered that paragraph W2.5 should support the "strengthening and enhancement" of the centre, rather than the "consolidation and improvement" which is proposed. This approach would increase the economic and social benefits and assist in enhancing the vitality and viability of the centre.</p>
1082	<p>Strategic Objective SO4 sets a clear intention to "Revitalise Town Centres" but it is difficult to reconcile this with the paucity of retail policy in the draft Core Strategy. Policy W2 contains a list of aspirations, noting in its 'justification' that "funding will primarily be through private sector investment", but it does nothing to address the matters repeatedly raised.</p> <p>The justification still seems to rely on the 2007 Trafford Retail and Leisure Study, the shortcomings of which have already been raised, and makes reference to a "forthcoming land allocations DPD" that will set "the precise boundaries of.....the primary and secondary shopping areas". However there is no mention whatsoever of any policies that may apply within those designations. This is simply unacceptable, particularly as the next stage of the Core Strategy should be the Submission version for the Secretary of State, prior to its examination by an inspector to determine its soundness.</p> <p>On the matter of policy formulation, PPS12 is clear that all DPDs must be:          "Founded on a robust and credible evidence base; and the most appropriate strategy when considered against the reasonable alternatives"; and must be          "Consistent with National Policy"</p> <p>Policy in the existing UDP sets out arbitrary restrictions on non A1 uses. This is unjustified and unsupported by any evidence. The Council's intention to seek to attract private sector investment in town centres does not sit well with any continuation of previous policies seeking to limit certain Part A uses in primary shopping frontages.</p> <p>The implication that only A1 uses are appropriate derives from very out moded and discredited thinking that other uses such as A2 detract from the vitality and viability of town centres. By definition, uses that fall within Part A of the Use Classes Order are appropriate in town centres as they are "shopping area uses" and are acceptable without any need for restriction or qualification.</p>

	<p>This is particularly the case for the financial services sector. ODPM Circular 03/2005 "Changes of Use of Buildings and Land" which accompanied the last major revisions to the Use Classes Order specifically states in relation to the A2 Financial and Professional Services use class (which was created to separate those uses "serving the public, from other office uses not directly serving the public" - Paragraph 32), that the class is also "designed to allow flexibility within a sector which is very much part of the established shopping streetscene, and which is expanding and diversifying." The uses within class A2 are noted as being those "which the public now expects to find in shopping areas" (paragraph 38). The wider role played by town centres than a pure shopping function is recognised throughout Government Policy on town centres.</p> <p>Government policy in PPS6 has been replaced by the publication of PPS4 "Planning for Sustainable Economic Growth", although this continues the thrust of policy in PPG6 relating to town centres. Policy EC3.1C states that Planning Authorities should: "at the local level, define the extent of the centre and the primary shopping area in their adopted proposals map". They should have considered whether there is evidence of a need to designate "realistically defined primary and secondary frontages in designated centres". A strong emphasis upon the promotion of town centre vitality and viability remains in the new PPS and the Government is clear that there should be a positive attitude towards all development which generates wealth and creates employment. The "overarching objective is sustainable economic growth" (paragraph 9). The Government wants town centres to offer a wide range of services to communities in an attractive and safe environment and remedy deficiencies in provision in areas with poor access to facilities. There should be enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres" (paragraph 10). Policy EC10.1 states that: "Local planning authorities should adopt a positive and constructive approach towards planning applications for economic development. Planning applications that secure sustainable economic growth should be treated favourably". It is therefore important that local policies should facilitate this.</p> <p>It is not agreed that the approach taken in the UDP policy is apparently to be continued within the LDF as this is likely to work against the objectives of the Government and the Council to promote vitality and viability in town centres. To succeed, town centres need to provide a full range of services and these often need to be located in ground floor premises in accessible locations. There is objection to the omission from policies of the Core Strategy of any intention to review UDP policies that seek to restrict A2 uses, particularly as the Council has provided no evidence to justify their position on such policies and has not given consideration to reasonable alternative strategies.</p> <p>As the quantity and quality of shopping is improved so should the quality of provision of other activities. Banks have moved away from the traditional style of frontage, preferring to have an open, visually interesting and attractive face to the 'high street' increasingly retail in its presentation and introducing an innovative 'flagship' branch design, which has been developed in association with its customers, to transform banking into what it terms as "a retail focussed experience."</p> <p>Whilst the design of every new branch has to be flexible in order to be sensitive to the requirements of each building occupied, the aim is generally to ensure that in excess of 70% of the internal space at ground floor is accessible to customer Managers regularly report that upon the opening of a flagship branch the customer</p>
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	<p>visitation levels significantly increase and thus the level of activity helps to underpin pedestrian flows to the to the benefit of surrounding traders. It is therefore important that the Council recognises the benefit of A2 uses in fostering footfall and pedestrian activity and that planning policies should encourage flexibility to allow changes of use between the A1 and A2 use classes.</p> <p>Class A2 retailers routinely experience very high levels of customer visitation, contributing significantly towards pedestrian movement and therefore the vitality and viability of town centres. A number of comparative footfall surveys in connection with current acquisitions programme have been undertaken in various towns and cities in the UK these conclusively show that the level of footfall associated with bank branches is commensurate with, and often higher than, the best known national multiple Class A1 traders. These surveys have been key in helping to change the attitudes towards Class A2 and even those planning authorities that once strongly resisted Class A2 uses in their primary areas have recently granted permission (following receipt of applications which have been supported by evidence of high footfall), include Leicester, Manchester, Plymouth, Reading, Sheffield, Southampton, Kensington &amp; Chelsea.</p> <p>The Council recognises the need for significant private sector investment in town centres. The opportunity provided by the preparation of the LDF should be used to reappraise out of date policies and give greater encouragement to 'appropriate' Part A uses to invest and to improve the quality of their representation. It is believed that there is no good planning reason to restrict the presence of class A2 uses at ground floor level in any shopping frontages. Indeed there would be considerable benefit to shopping centres in seeking to attract A2 users such as banks who provide a high level of investment in, and maintenance of, their premises resulting in active and attractive street frontages and who also foster very significant footfall and pedestrian activity. This can only assist in providing the confidence and commercial viability necessary for any programme of regeneration and investment.</p> <p>The Council should recognise the important contribution of financial service retailers such as banks in both bringing investment and acting as attractors for investment by others in the wording and application of policies in all the relevant LDF documents. This will help to achieve the Core Strategy's strategic objective to revitalise town centres. Planning policies should therefore encourage flexibility to allow appropriate changes of use between the A1 and A2 use classes where this will support vitality and viability.</p> <p>Pursuing restrictive policies to keep significant generators of footfall out of central shopping areas will actively work against the achievement of the Core Strategy's strategic objectives and is inconsistent with national policy. In fact there is nothing in Government policy that recommends or supports imposing constraints upon acceptable town centre uses at all. The continuation of historic primary frontage policy is not supported by any robust and credible evidence and the Council has provided no explanation for decisions it has taken about the most appropriate strategy to follow when considered against the reasonable alternatives.</p> <p>The Council's documents show no indication that it has gone through an objective process and audit trail of assessing alternatives, or indeed that alternatives have even been considered at all. At present the Council's approach to A2 uses is neither justified nor consistent with national policy so the Bank therefore objects to the omission from the Core Strategy of any intention to review policies that seek to restrict A2 uses.</p>
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1093	The hierarchy approach is in line with PPS4. Altrincham as the principal town centre is in line with RSS policy RDF1 and W5. The presumption against out of town centre development including The Trafford Centre and other out of centre retail parks is supported in the context of RSS policy W5 and PPS4.
1106	Support for W2 which seeks to maintain and enhance the role of Altrincham as the main town centre, and Sale, Urmston and Stretford as town centres.
1195	The strategy seems to halt at White City retail park, given its current run down position how does the strategy/Council intend to support regeneration of this area? This is a vital retail area for the Stretford and Old Trafford areas. The Council cannot stand by and watch it fail.
1207	The fourth bullet point of Paragraph 14.9 should be amended as follows "Local Centres, including Partington and Hale Barns".
1207	Paragraph 14.5 justifies the particular need for retail investment within Partington as set out by Policy W2.10. Representation made to amend W2.10 to refer to extant planning permission for redevelopment of Hale Barns centre. Paragraph 14.5 should be amended to justify the need for investment within Hale Barns local centre. Suggest the text "The Square, Hale Barns has been the subject of a planning permission for its comprehensive regeneration, comprising of a retail food store and 14 additional retail units, plus residential development" should be inserted.
1207	Policy W2.10 identifies a particular need for retail investment within Partington including a medium sized foodstore. This is justified due to the presence of a planning permission for a residential and retail scheme (see paragraph 14.5 and Policy L3) for the regeneration of Partington Local Centre.  The policy does not refer to the other local centres by name. However, Hale Barns Local Centre also has an extant Planning Permission (H/69733) for the redevelopment of the square for retail and residential uses including a new foodstore, hence Hale Barns should be referred to explicitly in Policy W2. Policy should read: "There is a particular need to redevelop the existing Local Centres in Partington and Hale Barns to create a modern shopping centre including a medium sized supermarket and other retail units in both locations."

#### Further Consultation on the Preferred Option (June 2009) response – W3

ID	Summary Of Representation
1038	The proposed policy covers all the necessary issues in what looks to be a comprehensive manner, whilst allowing scope for the Joint Minerals DPD to fill in the policy detail at a later stage.
1073	It is considered more appropriate to comment on the GM Joint Minerals Development Plan Document that Trafford is working on jointly with other Greater Manchester districts.
1103	There are no mining legacy issues or coal resources capable of extraction by surface mining methods in Trafford.

#### Further Consultation on the Preferred Option (June 2009) responses – R1

ID	Summary Of Representation
1013	The historic environment of Trafford makes it distinctive. Local heritage must be protected and enhanced. Suggests placing emphasis on the Bridgewater Canal as a key unifying feature of the Borough. Its capacity as a major corridor for recreation, wildlife and transport needs should be recognised and its historic significance underpinned in Borough-wide heritage strategy.
1045	Policy states a requirement that development which affects the historic

	environment should preserve and enhance that environment. This exceeds the requirement in national guidance. Recommend the amendment of this policy wording in the absence of justification for the stringent requirement.
1051	At R1.3 the draft Policy fails to recognise the broader influence of conservation areas beyond their boundaries, including views into and from a conservation area. Suggests amendment to incorporate the wider setting. Suggests 'In respect of these Areas and their wider settings, the Council will...'. Suggests introducing the impact of development upon trees as a particular issue and consideration in Trafford.
1051	Suggests that at R1.6 and R1.7, the wider settings of all historic assets listed should be recognised and considered. Relevant in the case of the historic Park and Garden at Dunham Massey and its designed vistas. Suggests reference to settings to be made in each bullet point at R.1.6 and R1.7. Suggests inclusion of Schedule Ancient Monument. Similar additions would be necessary for the justification text.
1074	Policy supported for comprehensive treatment of the historic environment. Suggests that publication of draft PPS15 will require justification text to be updated.
1074	SL8 includes a Grade 2* listed Church, this should be referred to in the development requirements.
1093	Reference could be made to Biodiversity Resource and Opportunities Map in RSS. Expand and buffer biodiversity resources.
1093	The core strategy supports RSS Policy EM1. Important to reflect upon the North West Joint Character Area Map. Core Strategy could be stronger in terms of landscape to comply with RSS Policy EM1(A). Reference should be made to Policy EM1(A) and promotion of landscape character assessments and strategies.
1132	1) This refers to the Historic Built Environment but what about archaeology should this have a separate policy heading as much of it cannot be classified as 'built' heritage? There are a number of archaeological heritage assets across the borough (both designated and non-designated) which are below-ground archaeological remains such as Watch Hill motte and bailey castle and Timperley Old Hall Moat which contribute to the character of the borough. Should the policy just be Historic Environment?
1132	Recommend change to policy wording to include the following: "The importance of protecting archaeological remains, which are a non-renewable and fragile resource, is addressed in PPG16 which sets out national planning guidance on archaeology"
1132	Recommend change to policy wording to include the following: "Developers will be required to identify the presence or absence of remains of archaeological significance" and take into account the potential for new finds.
1132	Recommend change to policy wording to include the following: "Heritage Assets" In addition to preserving or enhancing Conservation Areas, the Council will identify, preserve, protect and enhance the positive features and characteristics of Trafford's historic environment, through the Land Allocations DPD, "maintenance of the Historic Environment Record", the preparation of local lists, Supplementary Planning Documents and development briefs, as appropriate.  Accordingly developers will be required, where appropriate, to demonstrate how their development will protect, preserve and enhance: Listed buildings and their settings; "Scheduled Monuments Sites of archaeological significance"



1132	Developers must demonstrate how development will complement and enhance existing "heritage assets, in particular in relation to Conservation Areas and other designated and non-designated heritage assets", and that the proposed development will not have any unacceptable adverse impact on the same
1132	6) 1.13 Could do with a section on the Historic Environment Record to complement the HLC data. Would you like me to provide a few sentences?
1132	5) 1.11 remove 'built'. Also mention that these heritage assets give a sense of place and distinctiveness and foster community pride.
1132	4) Under 1.10 the Trafford HER comprises 1014 entries, which include 526 archaeological monument entries and 40 historic places.
1132	2) Under justification, a new PPS on the historic environment is due out in draft form at the end of July. This will replace PPG 15 and 16. We anticipate there being more emphasis on community benefit arising from archaeological works/surveys etc, historic landscape and local lists.
1132	Trafford has a significant number of historic assets: 21 Conservation Areas, over 240 listed buildings, three registered parks and gardens of special historic interest, one Scheduled Monument "and over 500 non designated sites and monuments with known or potential archaeological significance"
1132	3) Could you expand 1.8 to say that the HER is maintained by GMAU.
1132	Recommend change justification text to the following: The Draft Heritage Protection Bill December 2008 states there will be a requirement for Local Authorities to provide for a Historic Environmental Record. "This is maintained by the Greater Manchester Archaeological Unit on behalf of Trafford MBC."
1132	Recommend change to policy wording to include the following: "The Greater Manchester Historic Environment Record is a database comprising records of heritage assets, investigative events, sources, landscape and character data. The database sits on a geographic information system, and is linked to a substantial paper and digital image archive, and supported by the expert knowledge of GMAU staff. It is used for objective decision making in planning process, provides an evidence base for local authority spatial strategies, and is a key educational, research and public information tool.  The HER should be used to assess the extent, significance and condition of known heritage assets and the contribution that they may make to future development in the area. It should also be used to help predict the likelihood that new heritage assets, particularly sites of historic and archaeological interest, will be discovered, including through the development process"
1132	Recommend change to policy wording to include the following: "Public access to the historic environment, both intellectual and physical, plays strongly into the local sense of place and place-making policy. Local communities should access to their local heritage. Where the impact of a development potentially involves a loss of significance to a heritage asset the developer will mitigate this by setting out opportunities for participation and access to be included as a public benefit. This might for example, include guided tours or even hands-on experience on archaeological excavations or historic building surveys, interpretation panels on the history and archaeology of a site, publications, website information and heritage trails."
1132	Recommend change to policy wording to include the following: "Where a development site includes or has the potential to include heritage assets with an archaeological interest, or where there is evidence for the potential of such assets being present, local planning authorities should require developers to carry out appropriate desk-based assessments, building assessments, building recording, and this work as part of any application for consent. They should refer

	to the results of these evaluations when determining the design of the proposed development. A copy of the outcomes of such work should be deposited in the relevant historic environment record."
1132	<p>Trafford's historic environment makes a major contribution to the attractiveness and local distinctiveness of the Borough "and can have a significant positive role in heritage led regeneration. It is made up of designated heritage assets, which include Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, and Conservation Areas, and non-designated heritage assets such as archaeological remains, historic landscapes, buildings and sculptures of local architectural, historic or artistic interest. The significance, character, and appearance of these heritage assets are qualities that will be protected, maintained and enhanced.</p> <p>Alternative definition of historic environment (as in PPS15) which could be used: "The historic environment is defined as a building, monument, site, or landscape of historic, archaeological, architectural or artistic interest whether designated or not."</p>
1132	<p>Recommend change to policy wording to include the following: "Planning Policy Statement No. 15 'Historic Environment' (due out Spring 2010) replaces PPG15 and PPG16. PPS15 sets out a holistic approach to the management of the historic environment and heritage assets through the planning system. It comprises 13 key policies, supported by Historic Environment Planning Practice Guide produced by English Heritage".</p>
1135	Suggests inclusion of a policy specifically to improve conservation areas. E.g. the Linotype Estate is in need of external appearance improvements.
1145	<p>Core Strategy needs a Policy which supports building heritage, historical buildings and buildings of great interest, for protection and preservation, e.g. Sale Hotel. Council should protect this building and those of similar importance. The historic environment provides a unique sense of identity and heritage should be incorporated into mainstream activities as a way of delivering core indicators. Strong management of the historic environment can have a positive effect on resident satisfaction and community cohesion and will ensure that important assets receive the best possible protection.</p> <p>The Council will consult with local people and organisations and examine proactively the establishment of further Conservation Areas in the Borough.</p>
1155	R1 is particularly important.
1159	Support intention to carry out Conservation Area appraisals as current are out-of-date, general and inadequate. They are essential tools in protecting the vulnerable and eroding character of the Conservation Areas.
1164	Recommend policies to be designed to safeguard character and setting of listed buildings, conservation areas and greenbelt, should have regard to the positive contribution renewable energy can play towards reducing CO2 emissions and mitigating against the environmentally damaging effects of climate change.
1169	How will heritage be dealt with in the plan and what will happen to Altrincham Market?
1169	Will the document have proper consideration for Conservation Areas and will they be reviewed and extended if necessary?
1170	Stretford Town Hall should not be demolished.
1190	There is an additional new circular to refer to that is relevant to the historic environment.
1190	<p>Consider inclusion of consideration of listed buildings and heritage assets term in paragraph R1.2 (2nd paragraph) of policy text.</p> <p>Consider inclusion of consideration of listed buildings at Paragraph 1.3 (2nd paragraph under justification heading) in justification text of Core Policy R1.</p>

1190	Suggest the inclusion of the HLC to 'other sites, on a local list, of significant historic designed landscape'. The HLC for purpose of landscape characterisation.
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### Further Consultation on the Preferred Option (June 2009) summary response – R2

ID	Summary Of Representation
1034	Results from data on The Woodland Trust Woodland Access Standard show that in Trafford, only 10.2 % of people have a small wood within 500m of their home and 58% have a larger wood within 4km. The Woodland Trust woodland Access standard should included in the Council Greenspace Strategy and Assessment of Need.
1034	There is an implication here that there would be a possibility that ancient woodland could be allocated for development in the Land Allocations DPD. As it is an irreplaceable habitat, the wording of the policy should be strengthened to give ancient woodland absolute protection.
1045	Section R2.1 (a) requires that developers should demonstrate how their proposals protect and enhance the character of the area covered by this policy. This goes beyond what is required in national guidance and, in the absence of any justification as to why a more stringent requirement should apply within Trafford, should be revised accordingly.
1051	Support the general principles however there is some concern about the allocation of undeveloped land to the south of the former railway line and any new development on it. It should be given greater consideration as it is located approximately 100metres from the historic agricultural estate of Dunham Massey. Thereby development proposals consider their impact on the landscape of the surrounding area.
1051	The proposed Policy is considered to be appropriate to the specific natural environment attributes of the Borough. The reference to wider surroundings at R2.1a is particularly apposite.
1066	Support the principles outlined under this Policy. However note should be made that Cheshire's Biodiversity action plan does not cover Trafford and reference to this document (paragraph 18.15) should therefore be removed to avoid confusion. In addition, the list of priority habitats and species has been updated. Rather than list all of the species present it is suggested that in paragraph 18.15 and 18.16 the wording be changed to "In Trafford these include" and "these species occur in the priority habitats present in Trafford including" respectively. Alternatively the lists of habitats and species would need to include all priority habitats and species.
1076	Paragraph 18.10 doesn't seem to make much sense and it is not clear what is being referred to. It seems as though it has been taken from another document in isolation.
1096	Within the justification of this policy, reference is made to Trafford's Climate Change Strategy, which encourages returning watercourses back to their old state. This could include opening culverts and pulling development back from the river frontage. It is recommended that further reference to this document within the policy wording itself is made. One of the aspirations for the River Basin Management Plan (NorthWest) is to facilitate the opening up of culverts within the region. Not only is there a flood risk and biodiversity benefit, water quality can also be improved.
1160	Despite there being 4 Policies covering the topic of green spaces, not one of them mentions the intention to protect any of the smaller green open spaces under 2000sq metres, which are not currently protected under the UDP. These smaller green spaces are very vulnerable to development, despite them being essential for the environment and visual amenity. Currently and in the future, any

	planning application to build upon them will not be rejected, as no policy protects them, this is a serious oversight in the document.
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### Further Consultation on the Preferred Option (June 2009) summary response – R3

ID	Summary Of Representation
1026	This policy is supported and discussions with the Council's Green Strategy team have explored the opportunity presented at Carrington for a mixed use development to open up the site but also the adjoining open land to link into the wider Green Strategy agenda in Trafford of linking the Mersey Valley through to Dunham Massey.
1034	The green infrastructure policy is very strong on the benefits of GI to wildlife and the link to enabling adaptation to climate change.
1034	The Open Space policy states the benefits of access to open space in improving the health and well being of people in the local community. This is particularly true of natural green space and especially woodland so it would be good to have a mention of health/well being benefits in the GI policy.
1051	A specific policy on climate change is welcomed. With regards to adaptation measures further consideration is required for impacts on specific areas such as nature conservation.
1051	The overall approach appears to accord with adopted RSS and adds an appropriate local dimension.
1066	The wording in paragraph L5.11 to change to 'where it can be demonstrated that there will be no adverse effects on the natural environment' is welcomed. However an addition to the policy should be considered of the need for new developments to maintain links and provide space for habitats and species to adapt to climate change.
1066	The principles outlined under this policy are welcomed, in particular the prominence given to nature conservation and biodiversity.
1066	Since the Spatial Profile has the objective to explore opportunities for green roofs and tree planting in the Stretford area, it is suggested that these be included within the Development Requirements.
1073	The Policies will help to promote the use of cycle ways and greenways, which are more sustainable forms of travel resulting in less use of the private car to make journeys.
1074	The reference to the historic environment in Policy R3 and its justification are welcomed.
1093	The inclusion and promotion of multi-functional green infrastructure network within the borough is welcomed. The policy is positive, and complies with most of RSS EM3 policy.
1093	The policy could do more to ensure the enhancement of functionality and accessibility. It would be useful if the policy linked to climate change and promoted the positive functionality of GI for example integrating sustainable design such as SUDs. RSS policies DP9 and EM5 emphasise the importance of this approach.
1096	The importance of GI is recognised and the development of GI networks is supported. These can help deliver a range of EA objectives including the Water Framework Directive, as well as wider community benefits. Identifying land as GI where there is a high level of flood risk (i.e. functional floodplain) will provide opportunities to mitigate against flooding and provision of additional compensatory flood storage. This may reduce flood risk at a strategic level and enable development to take place elsewhere. It is recommended that the findings of the SFRA are used to inform the issue of flood risk and GI.

1145	Any new development within the Borough should be augmented with tree and shrub planting, to improve our environment.
1160	Despite there being 4 Policies covering the topic of green spaces, not one of them mentions the intention to protect any of the smaller green open spaces under 2000sq metres, which are not currently protected under the UDP. It is understood that neither the Green Space Strategy, nor the Integrated Green Plan will mention them or protect them in any way. Yet these smaller green spaces are very vulnerable to development, despite them being essential for the environment and visual amenity. Currently and in the future, any planning application to build upon them will not be rejected, as no policy protects them, this is a serious oversight in the document.

#### **Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – R3 Green Infrastructure**

ID	Summary Of Representation
1026	Support policy R3.
1037	It is asked that the policy wording expanded to go beyond assessing and mitigating any potential loss to biodiversity to see a policy where biodiversity interests are both conserved and enhanced.
1040	Reclamation of brownfield land should be included within this category as contributing to environmental improvements. Residential developments through their provision of private and public open space accord with the objectives. Improvements to existing green infrastructure are welcomed.
1051	This policy is supported and in particular the addition of the second bullet point at R3.1 which specifically recognises the health and well-being benefits provided by Green Infrastructure is welcomed.
1093	Changes to policy R3 look positive. It is noted that the policy includes a strong focus on climate change which helps to promote the positive functionality of Green Infrastructure. Using examples of integrated sustainable design such as SUDs as previously suggested is welcomed.
1096	Support the inclusion of this policy within the Core Strategy DPD, particularly in its relation to its function as a flood storage and biodiversity asset.

#### **Further Consultation on the Preferred Option (June 2009) responses – R4**

ID	Summary Of Representation
1026	Policy R4.6b suggests that land to the south of Shell will remain as Protected Open Land. Paragraph 20.15 states that the land could be used for employment use. Should be more certainty in the wording. Support the retention of the majority of the open land to the south of Carrington in long term employment but would like flexibility to accommodate Biomass plant on this site in the short term.
1031	It is unclear from R4.1 whether it is the intention to protect all Green Belt from inappropriate development. The policy only refers to 4 broad areas.
1031	It is understood that the Council no longer wishes to include Davenport Green in the NWDA's list of strategic sites for economic development. Is it proposed to add land at Davenport Green back into the Green Belt?
1047	Carrington is not designated as a strategic regional site by the NWDA.
1047	The strategies approach to farm diversification may need to be revised to reflect

	the more flexible approach advocated in the recent consultation draft PPS4.
1047	New consultation draft PPS4 states that planning authorities should 'support diversification for business purposes that are consistent in their scale and environmental impact with their rural location removing the current PPS7 requirement that farm diversification schemes should help to sustain the agricultural enterprise.
1051	It is especially welcomed in the latest document that the role of agriculture within the Borough is recognised and the need to look positively at opportunities for rural diversification (especially if viable uses are to be found for important historic and vernacular buildings in such areas.
1066	The principles outlined in this policy are welcomed, in particular the prominence given to nature conservation and biodiversity.
1073	The content and aims of the Policy to protect Green Belt and other protected land is supported. Development in these locations/redesignation could impact upon the Strategic Road Network.
1076	The retention of the Green Belt is supported. Also, the protection of the Protected Open Land from development during the plan period (to 2026) and the recognition of the importance of the agricultural land in Warburton and Dunham, not only to the rural community of Trafford but also as a contributor to the nation's food supply - an issue of increasing importance.
1076	Paragraph 20.15 should read "land in Warburton" (south of Partington) as it does on page 76 (R4.6) as the land is in Warburton and should be recognised as such.
1078	Insufficient land has been identified within the Plan to meet requirements and provide flexibility/contingency. The land in Warburton immediately south of Partington was previously protected to provide a suitable reservoir of land outside the Green Belt to meet Trafford's housing needs post 2016. Its suitability for housing has therefore long been established and recent work undertaken by GMPTE confirms it is well located in relation to frequent bus services, underlining its sustainability credentials. Development here would also significantly assist the regeneration of Partington and lead to the creation of a more balanced and sustainable community. The land to the north of Moss Lane and east of Warburton Road should be excluded from the Protected Open Land and identified as a reserve housing site, which could be released in the event of a shortfall in deliverable housing supply.
1097	Substations are vital to the efficient operation of the electricity transmission network for switching circuits or transforming voltage. Both National Grids, Carrington and South Manchester substations are located in areas identified as Green Belt are an essential part of the transmission network and have an important role to play in maintaining the supply of electricity to the local distribution network operation and therefore ultimately to homes and businesses throughout Trafford and the wider area.  The sites are therefore "Operational Land" and as outlined above there is a need for further essential utility development at the sites in the future. This essential development may need to take place outside National Grid's existing land holding and therefore permitted Development rights may not exist for extensions to the substations. It is therefore requested that both substations are identified as major development sites in the Green Belt.
1114	Policy R4 of the core strategy seeks to continue to protect the Green Belt in four broad areas; one of which is the area to the south of Hale and Bowdon to the Bollin Valley and the Greater Manchester County southern boundary. The general thrust of this policy direction is supported as it would accord with national guidance in PPG2.
1114	Policy R4 should be reconsidered in respect of Brooks Drive. Brooks Drive and

	Hasty Lane are the only residential roads in Hale Barns that are excluded from the settlement boundary and included in the Green Belt. The characteristics of Hale Barns are suburban and similar to a large part of Hale Barns. PPG2 states that Green Belt Boundaries should be carefully drawn so as not to include land which it is unnecessary to keep permanently open. There is no requirement to keep Brooks Drive permanently open on the basis that it is already a ribbon of development. On this basis it is considered that Brooks Drive should be removed from the Green Belt. This would not comprise exceptional change to the Green Belt and would accord with the RSS.
1114	Should the Council consider that it is not appropriate to release Brooks Drive from the Green Belt then it should be washed over by the Green Belt on the basis that it comprises a ribbon development but identified in the development plan as an area in which limited infilling can take place in accordance with the text at 2.11 of PPG2. R2 should be amended to identify Brooks Drive and the policy should state that the first four categories of appropriate development set out at paragraph 3.4 if PPG2 would be acceptable along Brooks Drive.
1130	The term "unsuitable development" needs to be clearly defined within the core strategy and planning policy.
1146	The paragraph 20.9 that for the avoidance of doubt the land identified within the adopted UDP for a Major High Amenity employment site at Davenport Green will be retained within the Green Belt in accordance with Policy W1 of this plan is strongly supported.
1150	Support for the decision to not roll forward the UDP allocation for a high amenity employment site at Davenport Green in to the LDF.
1150	The policy lacks safeguards for Davenport Green, given that Airport expansion is likely to be the biggest threat to this area. The absence of a summary of RSS Policy RT5 makes it impossible to make a more informed objection.
1150	It is unclear if the 90 acres of Davenport Green which were removed from the Green Belt Status in the UDP for the purpose of becoming a Major High Amenity site are still proposed to remain outside the Green Belt. This would not be supported. The past decade of "boom" has not resulted in the site being developed and it is unlikely that the high quality client specified in the Planning Inspectors Report on the UDP will ever emerge. The Green Belt Integrity of Davenport Green must be restored and maintained not only because of its inherent quality as Green Belt but because of its use as a source of local food production.
1158	The policy should allow for local detailed boundary changes where it would support development that meets specific local need. Providing development close to existing urban areas and in areas of need is likely to prove to be the most sustainable way of achieving the Core Strategies wider objectives and in supporting regeneration.
1158	Flexibility to amend the Green Belt boundary to allow for new affordable housing is essential. Development of affordable housing on sites of sufficient size is more likely to be successful in the current housing market than piecemeal provision of smaller sites.
1160	Despite there being 4 Policies covering the topic of green spaces, not one of them mentions the intention to protect any of the smaller green open spaces under 2000sq metres, which are not currently protected under the UDP. They will not be mentioned in either the Green Space Strategy or the Integrated Green Plan or protected in any way. Yet these smaller green spaces are very vulnerable to development, despite them being essential for the environment and visual amenity. Currently and in the future, any planning application to build upon them

	will not be rejected, as no policy protects them, this is a serious oversight in the document.
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**Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – R4 Green Belt and Other Protected Land**

ID	Summary Of Representation
1026	<p>Suggest that Policy R4 is revised to allow the Council to consider local changes to the Green Belt where this facilitates sustainable development and can be justified with regard to the scale and phasing of the development proposal.</p> <p>With regard to the protection of open land south it is suggested that this allocation is reviewed in the next 10 years as this land forms a natural and long term extension of the proposed sustainable community at Carrington.</p>
1031	It is noted that the issue of the exceptional circumstances for the proposal to restore Davenport Green within the Green Belt has been addressed. In providing justification for the proposal, the core strategy should also have regard to the five purposes of including land in Green Belts, as set out in paragraph 1.5 of PPG2.
1040	Policy R4 should include reference to a strategic review of Green Belt from 2011 onwards if it is needed, based on assessment of its land supply as this is in accordance with RSS policy.
1047	<p>Paragraph 4.4 proposes that Davenport Green is returned to the Green Belt. The supporting text at paragraph 16.14 acknowledges Davenport Green's demotion from NWDA's list of strategic regional sites. However as drafted, it implies that this was merely a reflection of the current position. Suggest it is amended to read:</p> <p>"Additionally, following NWDA's review of its strategic regional sites, Davenport Green has been removed from the list of designated sites. This reflects a refocusing of NWDA priorities taking account of the changing policy and market context, and consideration of the criteria for ERDF funding under the North West Operational Programme".</p>
1051	Support this Policy in line with earlier comments.
1064	It is premature to exclude land at Davenport Green from consideration. There is ongoing work at regional and sub regional level looking at strategic locations for economic activity. Suggest that this work should inform the Core Strategy along with further assessments of sustainable transport and regeneration opportunities in the area.
1076	Paragraph 16.16 gives the impression that agriculture in Trafford only takes place in the Green Belt, agriculture also takes place on Protected open land.
1076	Commenting on Redrow's representation stating that the suitability for housing of the land in Warburton, south of Partington, has long been established. The Inspector's Report on Alterations to the Adopted UDP in 2003 (HOU 21.9.186) states "I express serious reservations about the sustainability of such a large peripheral housing development in Partington". The Red Brook and its associated flood plain would prevent this area from assisting in the regeneration of Partington in becoming a more sustainable community.
1150	<p>The reasoning at the six paragraphs 16.3 then 16.10 to 16.14 is fully supported. The return to green belt of the land removed in the 1996 UDP will restore the integrity of Davenport Green as a whole and will enable it to better fulfil its role specified at paragraph 16.3, especially given the presence of the Airport and the heavily built up areas of Wythenshawe, Hale/Hale Barns and Timperley.</p> <p>The return to green belt reinforces the beneficial view that new development should be located in areas already provided with the various supporting infrastructures.</p>
1158	Policy R4 should allow for local detailed boundary changes to the Green Belt



	<p>where it would support development and meet a specific local need. This is provided for in the Regional Spatial strategy Policy RDF4. Allowing for Greenbelt review in the Sale and Ashton Upon Mersey areas for new housing development would help meet the increased housing development targets proposed for "Other South City Region Sites" in table L1.</p> <p>Table L1 identifies 11,860 units to 2025/6 compared with an RSS Growth point requirement of 11,450. This gives little margin for uncertainty. Allowing Green Belt Boundary Changes and allocating the Ashton Upon Mersey site would give greater robustness to the identified housing land supply.</p> <p>Considered essential that flexibility to amend the Green Belt boundary is provided for to allow for the development of new affordable housing which should be provide for on sites of sufficient size rather than piecemeal on smaller sites.</p>
1196	<p>Resident of Hale and travels to Wythenshawe, the Airport and other areas beyond. Considers would be affected by extra traffic if the area were to be developed. Development of Davenport Green would significantly reduce the green belt or possibly take away an important and valued green area that helps to off set the heavily populated areas and the airport that surround it. I think that any commercial development of the site will have an overall negative impact on the area given the under utilised office and commercial facilities in the surrounding areas.</p> <p>Support the Trafford proposal R4.4 which will remove any concerns over the threats to representor's local neighbourhood and the environment.</p>
1197	<p>It is suggested that an additional point is inserted as follows: Required to be developed in order to provide for the required rate of housing development through the Plan period.</p> <p>It is suggested that Paragraphs 16.19 and 16.20 should be amended to reflect the change. The final sentence under paragraph 16.20 is not clearly understood and it is suggested that this be revised.</p>
1198	<p>Support the return of Davenport Green area to Green belt status, separating the very distinctive types of settlement that have grown up over the years. Considers the Council should not attempt to build up against another Council's boundary as envisaged by previous development plans.</p>
1199	<p>Supporting the return of Davenport Green back to Greenbelt. It is important to retain this green belt area and not to develop it commercially. It is one of the few remaining green areas close to Newall Green and devastating to lose it. There are already areas set aside for commercial activity which are underused. The former proposal to develop the area would have a detrimental effect on development and employment in other industrial areas in Wythenshawe. These areas have already suffered due to the decline in the economy. Another reason is the increase in traffic that would accompany any commercial development. The completion of the M60 and possibly the increased use of car satellite navigation systems has increased traffic in the area and the accompanying noise, fumes and dirt and risk of accidents.</p>
1200	<p>Support return of Davenport Green to Green Belt.</p>
1201	<p>Taking away the greenbelt would be detrimental to local residents. It provides a natural and beautiful barrier between Wythenshawe and Hale Barns. The current roads going through the area provide an antidote to excess traffic jams. This area provides a natural environment for plant and animal species and gives a more rural appearance to an otherwise built up area.</p>
1202	<p>Support the policy to make Altrincham and M56 accessible to Newall green, Access to countryside from Newall Green, to prevent further traffic pollution, to</p>

	safeguard wildlife, to restrict traffic congestion on surrounding roads, to preserve a rural haven, to stop Newall Green and Hale Barns merging, to allow recreation in the countryside, to maintain the rural character of the area and to stop unwarranted developments.
1203	Land at Davenport Green should be returned to the Greenbelt to preserve rights of way, to avoid excess traffic and to protect the character and rural aspect of the area.
1204	Support return of Davenport Green to Green Belt.
1205	Support return of Davenport Green to Green Belt.
1206	This policy protects the countryside. It is important to keep these areas undisturbed.
1208	Pleased that the Council has decided to put back this area into "Green Belt" designation. Hope that all the area of Davenport Green will be included. It is the last 'Green Lung' on the Timperley side of the motorway. It is particularly needed because of the huge storage depot to be built on the airport side and accompanying new roadway. Valuable open space and hope that it will be left open for future generations.
1211	It is suggested that there is no reason to assume that the retention and development of the Davenport Green site outside the Green Belt, would not continue to satisfy Green Belt purposes and objectives to the same degree as has been the case since the UDP was adopted.
1211	It is considered that the proposed change to the Green Belt at Davenport Green is contrary to Government Policy in respect of Green Belts, is inconsistent with the Regional Spatial Strategy and is moreover unjustified within the terms of the Core Strategy.
1211	<p>The proposed addition to the Green Belt is not considered to be justified on positive Green Belt grounds but is predicted wholly on a negative assumption regarding employment. The justification is considered silent on the very issue that Policy R4 addresses.</p> <p>It is suggested that if the soundness of the Core Strategy rests on the demonstration of its justification by reference to a robust and credible evidence base, Policy R4 is considered to be defective. A major change to Green Belt boundary is not considered a matter which can be dealt with so briefly. Modifications to Green Belt should be viewed as a change to Greater Manchester Green Belt, not Trafford Green Belt.</p>
1211	There is a twin requirement to permit a local authority to make major modifications to Green Belt boundaries, to acknowledge the need to do so in the RSS and demonstrate exceptional circumstances. It is considered that neither of these requirements has been fulfilled.
1211	<p>It is considered wrong to assume that the non-implementation of a previous owner's planning consent as the only indicator of the site's value as a strategic high amenity employment site as this is not evidenced in any way.</p> <p>It is also considered wrong to see the Council's current proposal as some form of minor tinkering with the Green Belt boundary. To justify this change, two matters would need to be addressed: If there is any sub-regional economic case for the removal of a site and are there any exceptional benefits that would accrue to the Green Belt by extending it. Exceptional circumstances may be considered only if both answers can be answered affirmatively.</p>

#### Further Consultation on the Preferred Option (June 2009) responses – R5

ID	Summary of response
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ID	Summary of response
1031	In line with PPG 17, standards for open space should be included in DPD's.
1031	It is not appropriate to use Greenspace Strategy in decision making as this could circumvent the provisions for consultation and SA in LDDs.
1034	Support to the wording of developing a Greenspace Strategy and an assessment of need for various different types of Green Space.
1089	Objection to identification of Altrincham Sewerage Works as an opportunity area for Open Space due to the site being required for future capital investment.
1130	A request for more protection of open space. Example given of Altrincham Preparatory School extending onto land designated as open space.
1145	Our Green Open Spaces should be protected.
1145	Our Green Open Spaces should be protected, particularly in our town centres and heavily populated areas.
1145	Within the Old Trafford Neighbourhood Area, there is a need for more open spaces for recreational use i.e. football, cricket, netball, tennis etc.
1145	There is a lack of youth facilities in Old Trafford, Stretford, Lostock, Urmston, Flixton, Davyhulme, Sale and other areas of the Borough.
1160	Despite there being 4 Policies covering the topic of green spaces, not one of them mentions the intention to protect any of the smaller green open spaces under 2000sq metres, which are not currently protected under the UDP. It is understood that neither the Green Space Strategy, nor the Integrated Green Plan will mention them or protect them in any way. Yet these smaller green spaces are very vulnerable to development, despite them being essential for the environment and visual amenity. Currently and in the future, any planning application to build upon them will not be rejected, as no policy protects them, this is a serious oversight in the document.
1170	There is a concern over how new open space and green infrastructure is secured, funded and maintained especially through developments such as LCCC. There is a role for Friends of the Parks and consultation with the local community in improving open spaces.

**Further Consultation on Core Policies L2, L4, L5, W1 and R5 (November 2009) responses – R5 Open Space and Recreation**

ID	Summary Of Representation
1026	The policy seeks to impose standards rather than adopt a spatial approach to open space and recreation and one of the major issues is one of ongoing maintenance of open space and facilities rather than provision. A major opportunity exists at Carrington to release, as part of the mixed use sustainable development, a major area of open space with public access that will have both sub regional and local significance however there is no mention of this opportunity in the policy. This policy is weak as drafted and offers no thought or ideas to the longer term provision and maintenance of open space and recreation facilities in Trafford.
1045	Paragraph R5.3 makes reference to the need for developers to demonstrate how a development will 'protect, make provision for and encourage the use of' Trafford's open space and sports facilities in accordance with the standards contained within the related table. This onerous requirement appears to be at odds with the paragraph R5.4, which states that all development will be required to contribute on an appropriate scale to the provision of the standards within the related table. It is important that this policy retains flexibility for each development to be considered on its own merits and that those contributions sought, either by way of an on site contribution and/or financial contribution are appropriate to the scale and nature of the proposal put forward.

1050	Objection to developers paying the proposed contributions to swimming pools and health and fitness facilities as the public pay for these. Also it is unlikely that contributions will go towards new swimming pools so this is in effect a tax on areas that are 1,800m away from where the authority proposes to build such facilities. There needs to be further justification as to why a 1,800m accessibility zone has been chosen. The policy should set out the level and thresholds for required contributions. The Council should provide justification for contributions to burial grounds and cemeteries. The Council should set out where open space and recreation contributions will be spent when development sites are more than 300m from an open space.
1080	Similarly R5.3 and the inclusion of standards within the policy – would required changes to these standards as a result of a revised/updated study mean that the whole policy needs to be formally reviewed?
1080	Concern over excluding hockey in the list of sports which have been assessed (but includes STP's) and it only seems to have assessed publicly accessible sites. TALPF makes it clear that all sites need to be included in the audit stage and only those with secured community use in place to be assessed as part of the playing pitch model. The omission of private sites and education sites from the assessment causes the problems for the operation of Policy R5 as it could be argued that private sites containing playing fields and those on education sites are afforded little or no protection.
1080	Although reference is made to Sport England toolkit – it is not clear what this is referring to i.e. is it Active Places Power, Facilities planning Model etc. There are concerns about the study making reference to use of national standards in the methodology and there is very limited information presented which shows the methodology used to assess supply and demand across the Borough. In terms of the use of Active Places Power, there are limitations with using this tool to assess supply and demand as whilst this will provide an overview at a Borough wide level and benchmark this against other Authorities and the North West, it does not provide a spatial breakdown of supply and demand for individual facilities, does not take into account issues of quality/condition or address cross boundary movements and should only be used to provide background information as opposed to assessing overall demand – a more detailed analysis using the Facilities Planning Model would be able to provide a more robust picture in this respect, however this does not seem to have been used as part of the study.
1080	Concerns about references to their being an 'oversupply' of sports halls in the Borough and would like to see how this conclusion has been arrived at together with a bit more information relating to the supply and demand analysis. In terms of the proposed policy wording, given that there is no standard included for sports hall provision in the Borough, does this mean that all sports hall buildings/sites (unless specifically allocated/designated for protection of in an Allocations DPD) are available for redevelopment or alternative use or is this explained further in the SPD?
1080	In terms of R5.2 the reference to specific documents against which the policy will be assessed in the policy wording could prove problematic – the Core Strategy extends to 2026 yet some of these documents will have limited shelf life's e.g. the leisure review only looks to 2018 – what would happen when these are no longer up to date, would you need to formally review this policy of the Core Strategy? These may be better articulated in any accompanying SPD relating to the operation of the Policy.
1080	The table does not include a quality standard for the various typologies and there is question as to how quality improvements will be justified for relevant planning applications given that there is no standard to work to?
1080	Paragraph 6.15 looks to define what an 'an unacceptable loss of open space, sport

	or recreation facilities' will mean in practise. An explanation of this approach is welcomed but there are concerns about references to improvements to the remaining area of a site being significant enough to outweigh any quantitative loss – this is a particular concern in relation to playing fields, as this does not follow the approach set out in paragraph 15 of PPG 17 and our playing fields policy. Would like to see this reference omitted from the explanatory text. Equally, the reference to a site being replaced elsewhere to an equivalent size would also need to factor in it being replaced to an equivalent or better quality in a suitable location
1080	The inclusion of a specific policy that relates directly to the protection, enhancement and additional provision of existing indoor and outdoor sports facilities to meet residents' needs as required by PPG17 is welcomed.
1080	Although reference is made to the use of Sport England's methodology for the production of playing fields assessments (Towards a Level Playing Field), and whilst it does provide useful information relating to some quality issues relating to sites it excludes a crucial element of the approach set out in this document - assessing demand for information. This is a critical element in identifying whether there are surpluses or deficiencies of outdoor sports provision within a Borough, without which it is not possible to say with any degree of certainty whether there is sufficient provision to meet current and future demand for pitches within the Borough.
1080	The study itself does not factor in future demand for pitches, which again raises concerns given that the Core Strategy is planning for housing growth of 11,800 new homes up to 2026. This level of growth is likely to result in additional demand for outdoor sports facilities, which improvements to quality alone are unlikely to address. The reasoned justification supporting the policy states that the existing standards contained within the UDP will be carried through into the Core Strategy - again without any robust information/data relating to current demand it is not possible to determine whether the current UDP standards of provision are adequate and equally this UDP standard was not based on the new levels of housing growth set out in RSS which the Core Strategy will need to deliver.
1080	Would recommend that the policy include reference to sport i.e. Open Space, Sport and Recreation, given that the policy covers this topic area and just to be clear.
1150	This policy is assumed, designed to prevent what is called "town cramming" which is obviously undesirable. Concern is that to implement this policy yet still secure the development the rules defending open spaces in far less congested areas might be side-stepped in order to keep the offered development within the overall TMBC boundary, instead of it migrating to another Council.
1186	There is a need to plan for burial grounds over the plan period. In particular there is a need to plan for sufficient numbers of segregated burial grounds, to accommodate different faiths. As a result Table R5 needs to be more explicit in terms of meeting the burial ground needs of all faiths over the plan period.

#### Further Consultation on the Preferred Option (June 2009) responses – R6

ID	Summary Of Representation
1028	The Policy needs to refer to Leisure Management review as detailed in the Cultural Strategy Action Plan and the Leisure Management Review July 2009.
1028	Please amend wording from 'The introduction of accessible cultural facilities can play a role....' to 'The introduction of accessible cultural facilities play a significant role....' Please also add 'in particular those of increasing participation, reducing crime, promoting learning.....'
1035	Policy supported as provides protection and enhancement for leisure and culture. Policy will support improvements and expansion to the cultural offer.

1045	Paragraph 22.3 should include a reference to the Trafford Centre as a major visitor attraction to provide for consistency with wording of draft Policy R6
1051	Whilst the inclusion of Dunham Massey as a cultural and tourism resource is welcomed it is noted that, as per earlier submissions, the significance is wider than just the Hall and Registered Park and Garden. Rather it encompasses the significance of the wider agricultural estate (including related buildings) and the ownership interests in the settlements of Dunham Town and Dunham Woodhouses, as well as related features such as the Mill at Bollington, the Estate Office in Altrincham and woodland areas.
1074	Policy supported and reference made to planning obligations (L8) that will address where the historic environment needs to be covered.
1093	It is noted that the Regional Centre will be the primary economic driver and the focus for retail, culture and tourism, in accordance with MCR2.
1145	Sale Waterside Arts Centre should continue to be managed by the Council for the benefit of the local community and arts organisations.

#### **Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – R6 Culture and Tourism**

<b>ID</b>	<b>Summary Of Representation</b>
1026	Support this policy
1035	Policy has been improved to include the protection of existing theatre venues. The protection of theatre use contributes to the Government's programme of creating sustainable communities and are their cultural anchors, offering opportunities for residents, businesses and visitors to be entertained, informed, challenged and educated. Theatres are essential for the maintenance of sustainable communities.
1051	The comments previously submitted continue to apply i.e. "Whilst the inclusion of Dunham Massey as a Cultural and tourism resource is welcomed it is noted that, as per earlier submissions, the significance is wider than just the Hall and registered park and garden - it encompasses the significance of the wider agricultural estate (including related buildings) and the ownership interest in the settlements of Dunham Town and Dunham Woodhouses, as well as related features such as the mill at Bollington, the Estate Office in Altrincham and woodland areas".
1093	Tourism and culture within the regional centre and hotels within town centre locations is in line with RSS policy W6/W7.

#### **Further Consultation on the Preferred Option (June 2009) responses – Part E Implementation**

<b>ID</b>	<b>Summary Of Representation</b>
1031	Paragraph 26.3 refers to a Local Infrastructure Plan being published alongside the Core Strategy at Publication Stage. It says that initial outcomes and headlines are set out but that the detail is limited at this stage but will be available by publication stage. Whilst the detail regarding planned infrastructure can be set out in supporting evidence such as the LIP, it is essential that the key infrastructure elements on which the delivery of the strategy is dependent are embedded in the core strategy itself. PPS12 says that the infrastructure planning process should identify and have evidence for, amongst other matters, cost and funding sources. If the intention is that the development itself will fund the infrastructure, viability evidence will be needed to show that such an approach is realistic and capable of delivering the infrastructure at an appropriate time. Where proposals are intended to be implemented in the early years of the plan there is an expectation that the detailed matters such as availability and infrastructure requirements will have

	been resolved. It may be necessary to carry out further consultation with key stakeholders regarding infrastructure provision so that there are no surprises for those who will be involved in implementation at the Publication stage.
1031	At publication stage the Core Strategy should include trajectories in respect of previously developed land and the rate of housing delivery in accordance with paragraphs 43 and 55 of PPS3.
1049	While there are no specific proposals for new prison development in Trafford at present nor specific sites identified, in line with Government guidance NOMS requests that consideration is made for the inclusion of a criteria based policy to deal with a firm prison proposal should it arise during the plan period. The representor would be please to propose a detailed policy for inclusion in the Development Plan Document and would welcome views on how this proposal should be taken forward.
1073	It is expected to see development aspirations being promoted through the Core Strategy go through an iterative selection process in conjunction with being supported by a transport evidence base incorporating the LIP (as set out in the IAR) that ensures a minimal level of highway based mitigation. Such a process will examine the transport impacts of each site in detail as well as examining the cumulative impact within Trafford and be consistent with emerging cross boundary infrastructure requirements for the neighbouring Boroughs and GM as a whole. This will allow unsustainable and unsuitable sites to be either reconsidered, relocated to more sustainable locations and/or have the appropriate sustainable infrastructure identified and promoted through the LIP.
1073	It is fundamental that the LDF Core Strategy and the LIP are not developed as if mutually exclusive of each other if the LDF is to have a sound evidence base. The Core Strategy should recognise that the ultimate success of the LDF process will be dependent on identifying existing constraints, determining resultant impacts of the broad land allocation options, identifying mitigation measures, establishing the effectiveness of the mitigation measures and deriving appropriate solutions (transport emphasis).
1073	Having been identified as a delivery agent within Core Policy L4, The Agency are happy to assist in this iterative process to ensure that development identified within the Trafford LDF is located in the most sustainable places and can be delivered, whilst having a minimal impact on the operation and safety at the SRN.
1073	There must be consistency between the information which is being used in the emerging LDF Modelling work and the development aspirations presented within the Core Strategy Preferred Option to ensure that the Core Strategy is assessed accurately. If this information is not consistent, then the modelling work will have to be revisited if there is to be confidence that the impacts predicted by the model are reflective of the current strategy.
1073	Whilst it is appreciated that the LDF Modelling work is ongoing and that outputs from the model are unavailable at the current time, this work should be referenced within the Core Strategy Preferred Option, with a clear commitment of using the model outputs to inform the LDF evidence base (transport emphasis) and shape the land use aspirations of the Trafford LDF where appropriate.
1073	One the modelling work is done a programme of delivery should be adopted. This will subsequently inform the phasing of the proposed SS/SL in the Strategy.
1097	As indicated in the Core Strategy Preferred Option document and LIP, the spatial strategy for Trafford will not present a major supply issue for National Grids gas and electricity transmission networks.
1170	How will infrastructure in the form of doctors, schools etc be catered for with new developments which will require such facilities?

**Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) responses – Chapter 18 Implementation**

ID	Summary Of Representation
1045	Requests an additional paragraph be added after 18.9 to read: "In accordance with the Trafford Statement of Community Involvement, it will be necessary in due course to consult with City Airport Ltd (a relevant aerodrome operator) in relation to development proposals in the vicinity of City Airport Manchester and include appropriate aerodrome safeguarding policies within the future Land Allocations DPD/any development control policy DPD.
1177	The document refers to working with CYPS and the PCT over Social Infrastructure but there is no reference to engaging with Adult Social Services or the voluntary sector.
1019	<p>Surface water</p> <p>In line with PPS25, no surface water shall connect into the public sewer either directly or indirectly; developers and local authorities should seek opportunities to reduce the overall level of flood risk in the area and beyond. Throughout the layout the appropriate application of sustainable drainage techniques should be employed.</p> <p>Land and subsoil drainage</p> <p>Land drainage or subsoil drainage water must not be connected into the public sewer system directly or by way of private drainage pipes. It is the developer's responsibility to provide adequate drainage without recourse to the use of the public sewer system.</p>

**Further Consultation on the Preferred Option (June 2009) responses – Part E Monitoring**

ID	Summary Of Representation
1042	In relation to section 27 Monitoring, sub section 4, Transport and Communications Indicators. Could the percentage of public rights of way that are easy to use when measured against BVPI178 be added?
1051	There are some concerns about the adequacy of the monitoring arrangements in respect of the historic environment. At present (as per Table 4) the indicators include simply the number of Conservation Areas present, not how many have an up to date (less than 5 years old) Appraisal and/or Management Plan. Furthermore there is no consideration of key items of the historic environment such as Listed Buildings and Registered Historic Parks and Gardens - for each there are now 'at risk' registers and the number of entries on each register would provide some indication of the condition of the Boroughs historic resources.

**Further Consultation on the Preferred Option (June 2009) responses – General Comments**

ID	Summary Of Representation
1013	As a preliminary general comment, it is unfortunate that a consultation on a major strategy document does not provide a mechanism for commenting strategically with a general holistic approach where appropriate. The idea of shoehorning all comments into specific paragraph or policy numbers encourages too focussed and narrow an approach to consideration of the overall document and the basic underlying themes of the Core Strategy. Also there are strong links between the Core Strategy and the Sustainable Community Strategy, but it is difficult to comment on these links under the system provided. Moreover, to fill a separate



	form in for each comment would cause a lot of interested members of the public to lose interest. We have tried to stick to the preferred format and focus on individual comments, but there are occasions when views cut across policy sections and consider the lack of important linkages.
1081	Comments were made at PP Stage with Maloneview (Sale) Ltd (1166) and with LCCC (1167).
1096	The Environment Agency is currently heading a project called Mersey Valley Life which aims to build on the benefits that improvements in water quality have brought about. This is an aspirational project that will address new challenges we now face. It aims to realise the socio-economic and ecological potential of our rivers by restoring degraded habitats, developing sustainable fisheries and improving access and recreation. We have begun by looking at the River Bollin, the River Goyt and the non-tidal section of the River Mersey. To help guide our actions, we have produced a Portfolio of potential projects which we will deliver through a phased programme of river restoration, working in partnership with businesses, local authorities, public bodies and communities. In this way we aim to deliver the economic and social benefits that sustained environmental improvements bring.
1170	Can you explain where the proposed canal crossings are?
1170	What consideration is given to the health requirements of the Borough? Fluoridisation in drinking water for example. The NW Health Authority and a government target area for fluoridisation.