



Development Plan Document

**Core Strategy:
Summary of Responses
received to Preferred
Option (June 2009)
Core Policies L2, L4
(L4.13, L4.14, 9.19 and
9.21), L5, W1 and R5**

November 2009

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GUJARATI

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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 representations on the Core Policies

ID	Name
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
1040	Bellway Homes Manchester
1045	Peel Holdings c/o Agent
1047	Northwest Regional Development Agency
1050	Unnamed Clients c/o Emery Planning Partnership Ltd
1051	The National Trust
1055	Brixton Plc c/o Agent
1064	Manchester Airport
1066	Greater Manchester Ecology Unit
1072	APSL c/o Agent
1073	Highways Agency
1074	English Heritage
1077	Friends, Families and Travellers
1078	Redrow Homes
1089	United Utilities Property Solutions Ltd
1093	4NW (Formerly North West Regional Assembly)
1096	Environment Agency
1100	Stevenor Invest c/o Agent
1104	Pioneer Property Services
1120	Trafford College
1129	Salford City Council, Strategic Planning
1130	Anstee, Sean
1135	Young, Michael
1140	Wareing, Nicola
1145	Labour Group
1146	Williams, Jerry
1150	Thompson, Peter J
1152	Nikal Ltd c/o Agent
1154	Friends of Longford Park
1157	McCarthy and Stone Retirement Lifestyles Ltd c/o Agent

Core Strategy: Summary of Responses received to Preferred Option (June 2009)
Core Policies L2, L4 (L4.13, L4.14, 9.19 and 9.21), L5, W1 and R5.

ID	Name
1158	Homestar Investments Limited c/o Agent
1160	Green Spaces for Altrincham
1164	BWEA
1165	The Crown Estate c/o Agent
1169	Comments From Special Neighbourhood Forum - Altrincham
1170	Comments From Special Neighbourhood Forum - Urmston

Responses to 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 para 7.17)

ID	Summary of response
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 para 43 Circular 1/2006). The core strategy should also give consideration to likely forms of tenure of planned sites and make provision in a similar way as for affordable housing.
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-para L2.3 should be redrafted to require developers to demonstrate that the proposed housing mix will reflect demand, as well as local needs, as set out in the Housing Strategy and SHMA. This change would recognise that house builders have a role in satisfying peoples wants and aspirations, as well as their immediate housing need, if everyone is to have the opportunity of a decent home. For example many single person households opt to purchase two or 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 para L2.5 should set out an affordable housing target as required by PPS3 (para 29), based on the findings of the SHMA and having regard to an assessment of the economic viability of the land. Such fundamental policy decisions should not be delegated to SPD, which should only be used to provide greater detail and clarity.
1078	Sub para L2.7 a) will create unnecessary uncertainty. The words "but preferably 3 bed roomed", should be deleted.
1078	Sub Para 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 para 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	Para 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

ID	Summary of response
	<p>for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured. Whilst an economic viability assessment has been undertaken, and identified that a range of affordable housing targets are viable within different locations in the Borough based on an examination of the housing market, there is no plan wide target as such. Furthermore it is proposed that the definitions of these areas will be delegated to a subsequent SPD (para 7.12) as will the size threshold (para 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 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	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.

ID	Summary of response
	<p>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	<p>Whilst welcoming the inclusion of a section within the policy considering the provision of older persons accommodation, this should seek to positively promote the further provision of a range of forms of housing for the elderly in terms of both type and tenure. The increase in the elderly population has been well documented and the Core Strategy should seek to reinforce the message set out in the 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.</p>
1157	<p>Para 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.</p>
1158	<p>It is noted that in the Preferred Option consultation that the greater need for affordable housing falls within the Southern Housing sub market (para 7.9).</p> <p>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.</p>

Responses to L4 (L4.13, L4.14, 9.19 and 9.21)

ID	Summary of response
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?
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.

Responses to 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 para L5.3 should be removed, as the introduction of such as standard would be a material consideration in its own right.
1050	Para 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 para 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, this

ID	Summary of response
	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	Para 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 para 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 para 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.

ID	Summary of response
	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, 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: <ol style="list-style-type: none"> 1. Set out target percentage of the energy to be used in new development to come from decentralised and renewable or low-carbon energy sources, where it is viable. The target should avoid prescription on technologies and be flexible in how carbon savings from energy supplies are to be secured; 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; 3. Set out size and type of development to which the target will be applied. 4. Ensure there's a clear rationale for the target and it is properly tested.
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.

Responses to 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

ID	Summary of response
	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	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. The NWDA are conducting a review into new sites and these two streams of work should be brought together.
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	Policy W1 only considers industrial, commercial, warehousing and storage uses associated with Manchester Airport. There is insufficient reference to the importance of Manchester Airport as an economic driver, given its proximity to the Borough.
1100	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. Trafford Employment Study states that the potential of Carrington to attract high profile uses is complemented by its proximity to Manchester Airport, therefore it should retain specific reference to airport-related uses.
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	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.

ID	Summary of response
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.

Responses to R5

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.