



**Trafford Core Strategy:
Summary of Responses to
Further Consultation on the
Preferred Option (June 2009)
and
Further Consultation on the
Vision, Strategic Objectives
and Delivery Strategy (March
2010)**

Other Documents

September 2010

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PUNJABI

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SOMALI

اگر آپ کو یہ معلومات سمجھنے میں مدد کی ضرورت ہے تو براہ مہربانی کسی سے کہیں 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

ID	Organisation
1019	United Utilities
1026	Shell Chemicals UK and Shell Property Co Ltd c/o Agent
1034	The Woodland Trust
1037	Natural England
1040	Bellway Homes Manchester
1041	GMPTE
1045	Peel Holdings c/o Agent
1051	The National Trust
1072	APSL c/o Agent
1073	Highways Agency
1078	Redrow Homes
1082	Barclays Bank 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
1103	The Coal Authority
1130	Anstee, Sean
1136	Church Commissioners for England c/o Agent
1145	Labour Group
1152	Nikal Ltd c/o Agent
1158	Homestar Investments Limited c/o Agent
1161	Daniel, Anthony and Partners c/o Agent
1169	Special Neighbourhood Forum - Altrincham
1181	Trafford Council, Location Workshop 24 Sept 09
1211	Royal London Asset Management

Core Strategy: Further Consultation on the Preferred Option (June 2009) – Responses – SHLAA

ID	Summary Of Representation
1019	Inspection of the consultation documents indicates that this is an update of the 2008 version and it is assumed that investigations carried out last year do not need to be repeated. When the allocation of sites is reached further information will be provided in terms of capacity to serve those sites.
1026	<p>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.</p> <p>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.</p>
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.
1158	<p>It is noted that Land off St Martins Road, Ashton Upon Mersey has not been included within the above assessment. It is also noted that this site (Ref LA73) was discounted from the assessment in 2008 as it comprises "Open land designated as Green Belt and Protection of Landscape Character Area."</p> <p>It is considered that this site should be developed within the next 5 years for housing to specifically meet local and/or affordable housing need and that this use would have an important role in addressing short term housing and regeneration need in the south of Trafford's Borough. RSS allows for local detailed boundary changes through the LDF process and a related submission is made in respect of your Councils proposed Green Belt - Policy R4.</p>
1158	It is considered that an affordable housing scheme on this site has the

	<p>potential to deliver housing in the short term in the current housing market and in this respect both support housing delivery within the Borough and meet specific needs within the Ashton Upon Mersey area.</p> <p>The site is located immediately adjacent to the existing urban area and has defendable boundaries which could form a logical future Green Belt boundary enabling a potential local detailed Green Belt boundary amendment based upon policy that might be adopted within the LDF. The site is considered to be sustainable and it is requested that its potential to contribute to Traffords housing land supply and need be reconsidered within the SHLAA and other forthcoming LDF documents.</p>
1161	<p>Despite representations made to the 2008 SHLAA report the 2009 SHLAA Review has discounted the site (SHLAA Ref 1626). Because the site remains in active employment use and it is presently uncertain when the site could become available for redevelopment. The site has therefore been discounted from the 2009 SHLAA until such time as its future availability can be determined. It is requested that TMBC do not discount the site and reconsider it as part of the SHLAA for residential development.</p>
1161	<p>Given that the existing tenants lease is due to expire in August the site will then become available. The site occupies a highly sustainable location with excellent access to the Metrolink and bus services. Despite its employment allocation, it is located within a predominantly residential area which would be well suited to redevelopment for housing. As the site is due to become vacant in the near future the prospect of a residential development being delivered within 5 years is therefore achievable. On this basis the site is "deliverable" in PPS3 terms and should therefore be included in the 2009 SHLAA.</p>
1037	<p>Do not wish to comment on the SHLAA or suggested sites for development, it is requested that full consideration to the representors interests in assessing land with potential to be developed for housing. These interests include Biodiversity and geodiversity, landscape character and quality, greenspace, access to the countryside and other greenspace, soil conservation, sustainable design and construction, and environmental land management. It is also recommended that proposals which show both adaptation to and reduction in the contribution to climate change.</p>
1037	<p>It is noted that the SHLAA will be used as an evidence base for the Local Development Framework. Similarly do not wish to suggest sites for development the representor requests interests to be fully considered in the process of selecting and assessing sites for development and in protecting sites from development.</p>
1037	<p>While it is acknowledged that the SHLAA report is unlikely to require Habitats Regulations Assessment, it is recommend that consideration of the requirements of the Habitats Regulations be included as part of the assessment of suitability of sites and land in terms of the impacts of development on European sites. Draw attention to the duty in relation to biodiversity introduced in the Natural Environment and Rural Communities Act (NERC) 2006 section 40.</p>
1040	<p>Existing commitments – Will need to assume that many higher density schemes (apartments especially) will not be developed, given the poor state of the market. In excess of 50% of commitments may need to be discounted (depending on the proportion of apartments) to reflect this.</p>

	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. Failure to make these adjustments will inflate commitments beyond what will actually be delivered.
1040	The Councils 5 year supply will need to be amended accordingly to reflect current market conditions. This will have implications for the SHLAA as sites might need to be brought forward earlier than previously envisaged. As a consequence there will be greater pressure to identify within the SHLAA sufficient (new?) sites for the Core Strategy period.
1040	<p>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. It is therefore requested 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>
1040	It is requested that Council owned land and surplus property be positively utilised to deliver new homes and recommend a coordinated approach (Estates and Planning) be adopted.
1040	The representor is experiencing resistance from landowners to sell PDL at an appropriate value: their expectation is that values will rise and this is halting the release of PDL for development. An over reliance on PDL could jeopardise the delivery of RSS targets (as well as Growth Point uplift for the City Region).
1051	Having reviewed the documentation no specific comments to make on this occasion.
1073	Sites which are new to the SHLAA 2009 have been identified and the representor is satisfied that these sites do not warrant comment over and above that of the previous review.
1073	<p>The inclusion of information from the Local Infrastructure Plan - Infrastructure Capacity Assessment to inform the SHLAA is encouraged provided that the LIP-ICA represents an evidenced based assessment of the infrastructure (transport) capacity, however following review of the document, it is not currently considered to be the case.</p> <p>In addition the representor would encourage that, where data from the LIP-ICA is to be used in the SHLAA the way in which this is done should be made clear in order that its suitability can be assessed.</p>
1073	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, and the representor would take this opportunity to stress the need to ensure that the SHLAA addresses this shortfall, with any proposed large housing sites supported by sustainable transport measures.

1073	<p>To reiterate the findings of the previous response to the SHLAA 2008, which are still applicable to the SHLAA 2009, in terms of the sites of concern, these are listed as follows: LA96 Trafford Boulevard, LA90-91 Taylor Road, LA92/93/94 Barton Dock Road, LA39 Davyhulme WWTW and LA70 Old Trafford Cricket Ground.</p> <p>At this stage the representor cannot encourage these sites to be promoted through the LDF process due to their likely impact on the operation and safety of the SRN. Unsuitable and unsustainable sites should not be promoted through the LDF process and the sites which are being brought forward should be supported by a sound transport evidence base in conjunction with the Local Infrastructure Plan.</p>
1073	In general terms the representor welcomes the principle of access to key services as developing a sound evidence base as it will help to ensure only the most sustainable sites that are promoted through the LDF process and that appropriate infrastructure is both identified and delivered to support sustainable future development.
1073	Keen to see housing sites allocated in areas of good accessibility, close to key services and sustainable transport routes and links as this will help to reduce the need to travel by private car and consequently the impact at the SRN.
1078	It is considered that the evidence base which supports the Core Strategy is neither credible nor robust. With particular regard to the SHLAA, there needs to be more active engagement with house builders as required by the Practice Guidance; a point recently emphasised by a letter to all Chief Planning Officers from Steve Quartermain. It is considered that this is best achieved by quickly establishing a housebuilders panel which will systematically assess the deliverability/developability of all sites already within the planning process and potential new sites.
1078	This table identifies that a significant number of sites (and potential housing completions) are within Flood Zones 3a and 3b. The Council say that these sites will be reviewed following a more detailed flood risk assessment, but it is considered that they should be excluded from the SHLAA as unsuitable, because there are alternative sites with a lower risk of flooding available, pending the results of the flood study.
1078	<p>It is considered that the table grossly exaggerates the deliverability of housing completions from the Strategic Sites and Locations. Also no net site density is quoted for each of the sites/locations which is unhelpful and clouds the assumptions being made about the contribution of high density apartment building. In fact, it would greatly assist the reader if a further table could be included which showed the assumed split between family housing and apartments over each five year period.</p> <p>The delivery of completions is felt too ambitious even in a moderate housing market, which is not presently the case. Hence the number of completions in each of the periods needs to be reduced significantly and this may result in a need to identify additional sites/outlets to make up the shortfall.</p>
1078	There is no evidence in the SHLAA of there having been a systematic reassessment of the deliverability/developability of sites already in the planning process. Rather it seems that such sites have simply been carried forward into the deliverable supply. As required by paragraph 58 of PPS3 LPAs should not include sites which they have granted planning

	permission unless they can demonstrate based on robust evidence, that the sites are developable and are likely to contribute to housing delivery at the point envisaged. This represents a step change in assessing housing land supply and needs to be addressed by establishing a house builders panel which can provide the necessary local knowledge, technical expertise and market knowledge to determine the deliverability/developability of particular sites.
1078	It is considered that engagement with stakeholders has been very limited to date. In order to produce a robust and credible SHLAA a house builders panel should be established to agree a methodology and properly scrutinise the deliverable and developable housing land supply. If preparation of the SHLAA is not subject of more meaningful stakeholder involvement, it will not provide a sound evidence base for the Core Strategy.
1089	Support the identification of 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. Given this size it is suggested this site should be included in Table 4: Strategic Sites and Locations Summary Table.
1089	For confirmation, paragraph 7.3 and table 6 identify site 1591 Davyhulme Wastewater Treatment Works as a 'Further Site Suggestion'. This is incorrect as the site was already included in the July 2008 SHLAA.
1093	Welcome the inclusion of the economic vitality of each site and the specific maps.
1093	Welcome the inclusion of the Employment Land Study details to tie in with housing need and allocation. In relation to this it is noted that some of the sites identified for housing are also identified as employment sites which should be retained in the ELR. Although it is not for the SHLAA to resolve this issue it is suggested that some text is included within the report to say how the issue will be addressed.
1094	It is clear that the availability of the site is a key constraint for the Bakemark site to be considered further for potential residential use. Over recent months Bakemark have been reviewing their ongoing operations within the UK. Bakemark have the intension of vacating the Skerton Road premises in 2015. We are advised by Bakemark that in order to exit the site in 2015 they will need to start the preparation for vacating the site three years prior to this. It is hoped that based on this information the Council can now consider the site further as a potential housing site in the emerging LDF.
1096	<p>It is noted that table 3 has identified sites which are located in high risk flood areas. As with the previous consultations on the SHLAA support the removal of sites that fall within the functional floodplain (Zone 3b).</p> <p>According to Planning Policy Statement 25 (Development and Flood Risk) Annex D, only the water compatible uses and essential infrastructure should be permitted in the areas of functional floodplain (Zone 3b). As such the representor would object to any other development proposals that are to be located in Zone 3b.</p>
1096	The current Greater Manchester Strategic Flood Risk Assessment is only at its first sub regional stage and has yet to undertake a more detailed level two assessment which considers flooding from all sources (Canals,

	<p>Sewers, Pluvial etc).</p> <p>Without having the evidence base in place to consider the flood risk from all sources it would be difficult to determine whether other sites would be suitable for development within the SHLAA (e.g. those adjacent to canals. Based on these concerns a further review of the SHLAA would be welcomed on completion of the level 2 SFRA.</p>
1103	No specific comments to make on the SHLAA at this stage.
1136	Site suggestion form submitted for Land south of Bow Green Road, Bowdon.
1152	The capacity of 150 units identified in the SHLAA stems from the approved outline scheme from August 2008 (LPA Ref: H/OUT/68603). As a result support the projected forecast for housing at the site as the outline planning permission represents committed development. It is understood that the Strategic Sites, including Altair, will be specific allocations for development in the Core Strategy along with 13 Strategic Locations, including Altrincham TC, which will provide the high level spatial guides to physical change to key areas in the Borough.

Core Strategy: Further Consultation on the Preferred Option (June 2009) – Responses – Infrastructure Capacity Assessment

ID	Summary Of Representation
1041	As you are aware, AGMA approved a Greater Manchester Transport Fund in May 2009 and has prioritised a number of public transport schemes to be delivered over the next few years including the proposed new Interchange at Altrincham. However funding for public transport is likely to be limited, and delivery may well depend on the extent to which the developers themselves can provide funding. Trafford's SPD 1, which collects monies on a formula basis towards public transport, is a useful source of funding which can be targeted at new developments identified as part of the LDF process.
1041	The 'Next Steps' outlined in Section 13 will be a critical part of the process and it is important that GMPTE, as one of the key partners, is involved in future discussions to ensure that you are kept fully informed of future planned public transport improvements.
1041	Paragraph 7.6 Network Rail is planning to revise the names and numbers of their routes so it may be better to just include the names of the individual lines. The reference to the mix of fast stopping services only applies to the 'CLC' route. On this route'... capacity is fully utilised.' and therefore service enhancements are constrained throughout the line between Manchester and Liverpool via Warrington.
1041	Paragraph 7.7. Revenue is not a good proxy for passenger numbers.
1041	Paragraph 7.14 makes reference to Appendix 2 which details bus services within Trafford. The Appendix does not reflect the current network and requires considerable updating. It is worth noting that bus services are constantly being changed and therefore these tables will need to be regularly reviewed.
1041	Paragraph 7.15 describes responsibility for maintenance and renewal of bus stop infrastructure but does not specifically mention the provision of shelters. Would expect a reference to shelters in this section.
1041	Paragraph 7.25 The analysis used to identify areas of 'good accessibility' uses "agreed parameters" - it would be useful to know what these were.

1041	Paragraph 7.26 states "The map shows that most of the existing urban areas have relatively good access to key services." A location which has access to only 4 of the 7 service types is still coloured green which may be misleading in terms of the level of accessibility.
1045	This paragraph should emphasise the distinction between the Trafford Centre area including specific reference to the existence of the Trafford Bus Station, and the rest of Trafford Park.
1045	Should acknowledge the positive findings of the Trafford Park and Salford Quays Accessibility Study (which concludes that "the Trafford Centre is well served by buses") in relation to the high degree of public transport accessibility which the Trafford Centre and its immediate surroundings already enjoys.
1045	Appendix 2 - the list of bus services which use the Trafford Bus Station is incomplete, a full list is attached to this representation.
1051	Overall concerned that the approach is generally one of 'how much have we got', 'how much will we need', and 'how will we provide it'. Rather than consideration of a more sustainable approach based on how we will manage our resources, use them more prudently and reduce demand so that they will go further. This is applicable to many areas, e.g. transportation, water, energy... and indeed land. As noted previously there are some very complex issues here - the example of the practices of hill farming in the Lake District and the implications of this system of land management for Traffords water supply was noted as a case in point.
1051	On one area of concern is that the latest document continues to suggest that the Boroughs archaeological resources are limited to one Scheduled Ancient Monument. Whilst it is acknowledged that work on historic landscape characterisation is taking place (and indeed that is welcomed) it will largely concentrate on ground level and above ground attributes - whereas Trafford's Sites and Monuments Record includes information on a range of below ground finds as well and demonstrates that there is important, albeit not scheduled, archaeology across the Borough.
1073	Encourage improvements and measures which enhance public transport utilisation and patronage. Capacity improvements to the Metrolink will help to ensure the continued use and future growth of this non-car mode and thus reduce car borne trips on both the local and strategic road networks.
1073	Encourage improvements and measures to enhance utilisation and patronage of rail services with improvements to station facilities (e.g. enhancement of park and ride) encouraged by the Agency.
1073	Encourage policies which seek to promote the distribution of freight by multi-modal methods (especially) rail as this reduces the global trip burden across the wider SRN.
1073	It is recognised that Trafford Park, Carrington and Partington are identified as areas within Trafford that lack good public transport accessibility, particularly bus coverage. If Trafford seeks to promote development of these areas through the LDF process, investment in public transport infrastructure will need to be identified and delivered through the LDF process to support sustainable development at these locations.
1073	This approach is recognised and welcomed as it will help to ensure only the most sustainable sites are promoted through the LDF process and that appropriate infrastructure is both identified and delivered to support

	sustainable future development.
1073	Paying cognisance to the current and projected network (stress) condition of the M60, the representor will not be able to support unsustainable land allocations located close to the SRN. Sites being promoted through the emerging LDF will need to be supported by the appropriate infrastructure and be accessible by public transport, cycling and walking to reduce the need to travel by private car.
1073	Moreover, it is recommend that when looking at the impact on the SRN, focus should be placed upon the current operation of the network and the impacts resulting from land allocation from the emerging LDF. In addition to stress 'level of service' performance indicators should form part of the evidence such as journey time analysis and average peak hours speed etc.
1073	The A56 is the main transport corridor through the borough providing radial connectivity between the SRN, the Regional centre and several Trafford Towns. Encouraged by measures that aim to reduce congestion along this corridor from private car use and focus on improving access to public transport opportunities.
1073	Support travel plans and other measures which reduce the demand to travel by private car by promoting travel by more sustainable modes.
1073	Acknowledge that the ICA has recognised the impact that commuter travel and school travel have on journeys made by private car within the borough; and the positive role travel plan initiatives play in promoting travel by sustainable modes.
1073	Support the school travel initiative being promoted by Trafford and seeks to work with the council by supporting policies and incentives emerging through the LDF processes which aim to influence the demand for travel to promote sustainable travel choices.
1073	Seek to work closely with Trafford to ensure that a policy driven strategy for managing the car parking within the borough emerges as part of the LDF process, as car park provision is a key determinant in influencing the demand for travel by private car.
1073	Encouraged by Trafford's objective of increasing the levels of cycling, both on-highway and along leisure routes being promoted through the LDF.
1096	Sewer capacity and drainage highlighted (e.g. Partington, Carrington and Media City). As significant developments are planned for those areas these issues will need very careful consideration in any planning applications and developments.
1096	An integrated approach towards the management of all aspects of the water cycle; water demand, water supply, water quality and flooding should be adopted as per the Governments vision published in Future Water (2008). This can be demonstrated via the water cycle study which would contribute to the monitoring and implementation of sustainable development principles.
1096	Pleased that, under Section 10, the document now recognises a number of watercourses as 'valued natural areas.'
1096	The draft North West River Basin Management Plan has recently been published for consultation. The draft River Basin Management Plan describes the main issues for each river basin district and highlights some key actions proposed for dealing with them. The NW River Basin Management Plan comes into effect in December 2009.
1097	National Grid Gas Distribution owns and operates the local gas

	distribution network in the Trafford Council area. Site specific advice should be sought from: Plant Protection Team, National Grid Gas, Lakeside House, The Lakes, Bedford Road, Northampton NN4 7SN.
1097	The spatial strategy for Trafford will not present a major supply issue for National Grid's substations in the Trafford Council area.
1097	The following requirements can be confirmed: Daines - no further development foreseen at present; South Manchester - system reinforcement may be required; Carrington - potential requirement for new 400kV substation within the confines of the substation.
1097	Carrington and South Manchester substations are located within areas identified as Green Belt in the Preferred Option document. Both substations are an essential part of the electricity transmission network and have an important role in maintaining the supply of electricity to homes and businesses throughout Trafford and the wider area. The sites are "Operational Land", and there is a need for further essential utility development at the sites in the future. This work may need to take place outside National Grid's existing landholding and therefore Permitted Development Rights may not exist for extensions to the substations. Request that both substations are identified as major developed sites in the Green Belt.
1145	There is a need for improved health care facilities in Lostock and Stretford.
1169	Schools in Trafford are over subscribed, rather than just building more houses, this should be planned for and addressed.
1169	Pressure on schools is immense. People move to Trafford to obtain school places in the borough. The only way to build more schools is to make a bid to the Government through 'Schools for the Future'.
1181	It was agreed that schools are under an enormous amount of pressure and with students travelling from outside of the area to attend successful schools; this contributes considerably to the pressures facing schools.

Core Strategy: Further Consultation on the Preferred Option (June 2009) – Responses – Issues to be Addressed in the LIP Report

ID	Summary Of Representation
1073	Encouraged that Trafford has identified that working closely with regional organisation and cross boundary co-operation will be the key to the success of LIP and infrastructure planning in the Borough.
1073	Encouraged that the Issues to be Addressed Report (IAR) recognises the need for better integration and co-operation at the sub regional (Greater Manchester) level with reference to the LTP. Historically the representor has been unconvinced by links between land use and transport when being considered through the planning process. However would suggest that there is a need to be mindful of the assumptions on which the LTP is developed and its accompanying limitations when being considered in the context of the emerging LIP.
1073	Encouraged that the Trafford LIP will aim to make better use of existing infrastructure provision before tackling identified deficiencies and looking to meet new demands. This will support sustainability and lead to better demand management.
1073	Recognise that the Trafford LIP acknowledges the Council's continuing role in the delivery of new infrastructure to support development to be

	delivered through the emerging LDF. Furthermore would encourage that the LDV should be considered in the context of the whole plan, not just Housing Growth Points.
1073	Welcome that in examining future infrastructure requirements, Trafford state that there should be an emphasis on better management and making better use of existing provision before tackling identified deficiencies and looking to meet new demands.
1073	Encouraged that the IAR identifies that Trafford's LIP will take a hierarchical approach to assist the prioritisation of infrastructure needs. Would suggest that the definition of 'Critical' be reviewed or further clarity given when applied to the sites emerging through the LDF as opposed to existing sites. Perhaps it would be better to define this as the infrastructure required to deliver the Strategic Sites as identified in the LDF.
1073	Do not agree that the Infrastructure Capacity Assessment identifies the current infrastructure requirements and initial infrastructure needs (transport) as it currently stands. Further comment on this is provided in the Infrastructure Capacity Assessment Review which is undertaken in a separate note.
1073	Acknowledge that the Council is not proposing to use the Community Infrastructure Levy (CIL) through this Core Strategy, but will give full consideration to the possibility of CIL replacing some planning obligations in the future.
1073	Encouraged by the IAR when it states that the LIP, in conjunction with the Core Strategy of the LDF, will assist Trafford in providing a clear basis for infrastructure providers to plan future investment and service delivery across the Plan period to 2026. Moreover the Trafford LIP will be a 'live' project management tool that brings together a wide range of delivery agencies and can be updated over the Plan period.
1073	Encouraged that Review of the LIP (as part of the AMR) has been identified and would further add that a mechanism should also be in place to ensure that significant changes to the plan are both picked up by and able to trigger review of the appropriate sections of the LIP where necessary.
1073	Have concerns if any of the proposed strategic sites are brought forward without appropriate infrastructure to promote sustainable development and minimise the impact at the SRN.

Core Strategy: Further Consultation on the Preferred Option (June 2009) – Responses – Employment Land Study

ID	Summary Of Response
1045	There appears to be some confusion in Appendix D of the ELS as to whether the Argos site is available or unavailable for new employment use as it appears in both lists; however if the test of availability is current use it should be regarded as being unavailable as it is still occupied and used by Argos at the present time. However assuming that Employment use in this context refers to those uses within Class B of the use classes order, its inclusion in the study is questionable since the Council has granted planning permission for a change of use to a museum and it is intended to implement the change of use once Argos vacate the building.

1045	The ELS places these sites outside of the Inner Area and bases its policy analysis on that premise. Representations to the proposed definition of the Inner Area boundary within the draft Core Strategy do therefore have implications for the policy ranking of these sites as well.
1045	The main concern with regard to the ELS is the proposal that these 5 sites should be retained for employment use which would appear to conflict with their inclusion in the TCR Strategic Location under Policy SL6 which envisages a much broader range of uses than those covered by Class B. This conflict mirrors the apparent conflict between Policy W1.10 and SL6 to which objections have been raised on the draft Core Strategy and needs to be resolved. Also object to the suggestion in the ELS that development in any of these sites should be employment led. Again this is inconsistent with its allocation as a Strategic Location under SL6 and the aspiration within that allocation that the TCR should help to provide for Trafford's housing development requirements. Whilst it may be possible that residential might be brought forward in mixed use schemes there appears to be no justification as to why there should be a requirement for such schemes to be employment led. Such a restriction would limit the scope of the mixed opportunity which the TCR presents to provide for a wide and diverse range of development needs which is complementary to those that are better suited to the Trafford Park Core or Wharfside.
1045	It is noted that the site specific assessment in respect of the Kratos site in Appendix D is out of date in that it does not make reference to the second and larger scale outline permission on the site or not that this site is available.
1045	The table on page E5 of Appendix E suggests that there would be concerns with regard to residential development at Trafford Quays because of its proximity the Davyhulme WWTW. This is not the conclusion reached by the consultants in the Air Quality technical appendix to the Trafford Quays Delivery report which is being submitted to the Council in support of these representations. Reference is made there to the site boundary odour measurements that United Utilities have themselves carried out as part of their planning application for an Advanced Sludge Treatment project at the Davyhulme site. UU found that odours were not detectable beyond the site boundary (under existing operations). Given that these conclusions have been accepted by Trafford Council in resolving to grant planning permission for the sludge treatment facility there would appear to be no sound basis for the comments made regarding this in the table at section E5 and these should therefore be deleted.
1045	In respect of the section E1.4 consultants have assessed the capacity within the utility infrastructure to support the development of TQ and have concluded that there are no specific issues in this respect, this is dealt with in the Capita Symonds report which is appended to the TQ delivery report. Finally in respect of Appendix E it is of concern that the section dealing with highways infrastructure pays no regard to the WIGIS proposals even though they have been in the planning system for over 5 years now and has the benefit of planning permission.
1094	It is clear that the availability of the site is a key constraint for the Bakemark site to be considered further for potential residential use. Over recent months Bakemark have been reviewing their ongoing operations within the UK. Bakemark have the intension of vacating the Skerton Road premises in 2015. Bakemark have stated that in order to exit the

	site in 2015 they will need to start the preparation for vacating the site three years prior to this. It is hoped that based on this information the Council can now consider the site further as a potential housing site in the emerging LDF.
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Core Strategy: Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) - Responses – Employment Land Study

ID	Summary Of Representation
1211	<p>It is suggested that the Employment Land Study failed to consider the quality of sites and their ability to compete with regional and national or international alternatives. Having examined competing developments at a number of sites in the UK and the rest of Europe it is considered that there is no evidence of the Council considering either the requirements of mobile investors or the nature of the development offer made by locations that compete for such investment.</p> <p>It is suggested that there was nothing in the Trafford Economic Strategy or Manchester Economic Development Plan that justified the deallocation of Davenport Green; and an Employment Land Review (Study) had not at that time been completed.</p> <p>It is considered that the Council's reliance on the Economic Development Plan is undermined by the chronology of the publications concerned. The Council confirmed Davenport Green as a major high amenity site for employment in the Review of the UDP in 2006, which was after the publication of the Economic Development Plan in 2005.</p> <p>The Council justified the non allocation of Davenport Green by reference to the Employment Land Study, in which the NWDA's review of Strategic Sites proposed - though at that point had not confirmed - elimination of Davenport Green because of its non-implementation.</p> <p>The Employment Land Study is considered to have wrongly stated that Davenport Green is in the Green Belt and that it's focus was principally on the quantitative need for additional land, not the need to identify particular classes of site which is considered the reason that Davenport Green was not appropriately considered.</p> <p>It is suggested that Davenport Green was ruled out by the Council on the basis of their own site assessment which is not considered to have taken account of the special role and function of Davenport Green. The Councils assessment scores Davenport Green differently from its own assessment at the time when it was an adopted policy of the UDP, in most cases it is suggested, without any justification for the change of judgement.</p>
1211	<p>It is considered that there are shortcomings in the evidence base which mean that the evidence on which the Core Strategy is founded can be considered neither robust, nor credible, therefore it is suggested that the Core Strategy is not fully justified. For example, sites for economic attractiveness have not been assessed sufficiently in terms of market attractiveness, nor have sites been given equal treatment in the assessment</p>

Core Strategy: Further Consultation on the Preferred Option (June 2009) – Responses – Sustainability Appraisal

ID	Summary Of Representation
1045	Paragraph 4.1 does not explain why development in Partington and Carrington has particular potential to exacerbate air quality issues. Conclusion seems to be contrary to council objective of generating employment opportunities in this area so that travel to other areas of the borough is reduced.
1045	The SA concludes that Trafford Quays has a 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 scoring of the TQ site against the objectives understates the contributions that the development will make to these objectives e.g. S3, S4, S7, S8, EC2 and EC5.
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.
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 bus station is categorized as a Category B Major Transport Interchange by GMPTE. It is considered that the conclusions in relation to accessibility are flawed and require revision.
1072	It is not clear if the SA mitigation suggestions are taken into account in the assessment scoring. Development at Davenport Green would be at such a scale to support new public transport links. It is surprising the SA assessment of S3, S5 and EC2 are so negative given the UDP stated it will promote regeneration by creating accessible jobs.
1072	The disparity between the detail in the SA Appendix and the evidence submitted by the representor to the Strategic Sites assessment (Jan 09) is very different and the SA unduly negative. The repetitive nature of the SA comments suggests the assessment has not been sophisticated.
1072	Concerned that consultation responses received by Trafford Council as part of the Strategic Sites Self Assessment have not been included in the SA assessment. Would like an explanation of how these comments were taken account of.
1072	Sympathise with the view from community group workshop that Trafford had already decided on the Plans they wished to take forward before the

	start of the consultation period.
1072	The summaries in the SA are inconsistent between sites. SL5 and SL6 note the need for mitigation to improve public transport. However the summary to Davenport Green does not include such a statement. In previous information submitted improvements to public transport were guaranteed before occupation of development. In general the Council has not identified any new evidence against Davenport Green that had not been considered and addressed in the UDP.

Core Strategy: Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) - Responses – Sustainability Appraisal

ID	Summary Of Representation
1211	<p>It is considered that there are several concerns on whether the Sustainability Appraisal formed a robust and credible evidence base:</p> <p>The SA suggests measures to mitigate negative impacts, however it is considered unclear whether the assessment for each site is inclusive of the mitigation measures proposed. The SA envisages negative impact from development at Davenport Green due to the lack of existing public transport. It is considered that the scale of development proposed for Davenport Green is likely to be sufficient to support new public transport links, and the site benefits from close proximity to Manchester Airport - described in the RSS as a 'key international gateway' and a significant multi-model interchange for sub-regional rail, bus and coach services, with Metrolink due to arrive in 2012. It is considered surprising that the SA assessment is so negative against criteria S3, S5 & EC2.</p>
1211	The main Sustainability Appraisal report, which summarises the detailed content in the Appendix is considered to be inconsistent between sites, in the summaries for SL5 and SL6 the SA notes that 'key mitigation actions relate to improving access by public transport' and 'improving public transport access will be a key mitigation measure;', respectively. No such assurances are provided in the summary of Davenport Green despite the existence of the Planning Brief; it is suggested that it was left to the developer to make suitable proposals. It is considered that the SA ignored the possibility of such mitigation in the case of Davenport Green but not in the case of the Trafford Park locations.
1211	The Sustainability Appraisal assesses the performance of Davenport Green against criterion E6. The assessment it made that 'the site comprises entirely of greenfield land and is situated in the Green Belt.' It is considered that this assessment is wrong and that the site has been outside of the Green Belt since 1996.
1211	It is considered that overall, the results of the SA to the Further Consultation do not suggest that other identified Strategic Sites and Locations would necessarily be more sustainable particularly with regard to flooding, infrastructure provision, contamination, transport, air quality. It is suggested that the results for Davenport Green shown at Appendix A3 to the Sustainability Appraisal are very similar and in some instances better.
1211	The Sustainability Appraisal is considered to perform a key role in providing a sound evidence base for the plan and to form an integrated part of the plan preparation process. Sustainability Assessment should inform the evaluation of alternatives.

1211	<p>It is suggested that the Core Strategy is unsound because of shortcomings in the sustainability appraisal:</p> <p>The Core Strategy: Issues and Options Paper provides three Spatial Options that could be followed in order to address the issues and challenges that we face and to achieve our spatial aims and objectives. A summary of the sustainability appraisal is provided in the Issues and Options Paper but the full Sustainability Appraisal was not published for consultation. It is therefore considered that the evidence on which the assessment of SA of each of the options was neither robust or credible as it was not made public.</p> <p>The Sustainability Appraisal is considered to have shortcomings at various stages of drafting meaning that reasonable alternative options have not been adequately considered.</p> <p>The Sustainability Appraisal Scoping Report states that it is advisable to carry out a comparison of the sustainability objectives with the key spatial objectives at the Issues and Options stage and that this will be undertaken.</p> <p>A summary of the sustainability appraisal is provided in the Issues and Options Paper but the full Sustainability Appraisal was not published for consultation, it is considered that an assertion on the evidence on which the assessment of the sustainability of each of the three options in Issues and Options is made cannot be made as to whether or not it is robust or credible because this information was not made public. It is considered contrary to guidance that there was no comparison of the spatial objectives against the sustainability objectives. The SA only tests the Spatial Options, there is no SA of Davenport Green, the Key Strategic Sites or the Core Policies.</p>
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Core Strategy: Further Consultation on the Preferred Option (June 2009) – Responses – Equality Impact Assessment

ID	Summary Of Representation
1130	Concerned about the lack of data informing the EIA. More work should be done to ensure that the decisions taken by the authority are made having all of the relevant information available, so that they meet the needs of all sections of the Borough's diverse community.

Core Strategy: Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) - Responses – SFRA

ID	Summary Of Representation
1045	Paragraph 3.1 reports that the Manchester Ship Canal company is a key stakeholder and has been consulted as part of the SFRA process. It is considered that the level of consultation has been inadequate. The SFRA as presently drafted is predicted on an incomplete, flawed and potentially unsound evidence base.
1045	Scenarios of gate failures are proposed which do not reflect the operational experience of the MSC since its construction over 100 years ago.
1045	The normal operation of the Manchester Ship Canal infrastructure should

	be the basis of comparison as the standard case; the description "best case" for normal operation is misleading since this casts doubt on whether the normal operating conditions are achievable.
1045	The representation of the sluices of the MSC in the modelling of the Level 2 SFRA assumes that the discharge characteristics have reduced efficiency as being 'a reasonable representation of residual risk'. It is considered that there is no justification for this arbitrary choice.
1045	The breaching scenarios for the Bridgewater Canal give cause for concern as to the method used to identify potential breach locations and on the method used to determine the outflow hydrograph.
1045	Although the mapping of inundation extent might show areas which could flood under certain scenarios of canal embankment breaching, there is no assessment of the likelihood that should be associated with the breach.
1045	The Level 2 SFRA describes the approach as 'conservative' but without any assessment of the influence of this conservatism on the mapped area of potential hazard.
1045	The extent of the Flood Zones are overstated which will lead to a misrepresentation of the actual degree of flood hazard. A critical point is the interaction of the interpretation of these scenarios presented with the application of the Sequential and Exceptions Tests in planning decisions that flow from the SFRA.
1045	The sluices on the Ship Canal are not flood defences and should therefore be treated as operating normally for the purposes of modelling and mapping flood zones.
1045	Any re-application of the sequential test following the completion of a corrected SFRA must have regard to paragraph 4.38 of PPS25 which states that 'where redevelopment is ongoing as part of an existing regeneration strategy in Flood Zones 2 or 3 it has to be accepted that re-development cannot go elsewhere as there are no other reasonably available sites.... Regeneration should not be halted or compromised where a scheme is already partially complete' It goes on to suggest that, rather than dismissing such sites through application of the sequential test, the sites should be subject to the provisions of the exceptions test'.
1045	Pages 19-21 of the Exceptions Test document confirms that a hotel/bar would pass parts 1 and 2 of the 'test' but fail to pass part 3 on the basis that the risk of flooding from elsewhere (i.e. the Bridgewater canal) would be increased. This conclusion is challenged. Whilst the Level 2 SFRA confirms that there is a residual risk of flooding from canals such as the Bridgewater Canal this is 'usually associated with lower probability events such as overtopping and/or the breaching of embankments'. Further it confirms in paragraph. 3.2 that 'no attempt is made in this SFRA to assess this probability, other than noting that such events are rare.
1045	The HR Wallingford Report considers the methodology used to assess overtopping and breach scenarios to be missing critical element. HR Wallingford draw particular attention to the fact that the JBA Assessment does not give full and proper considerations to the inter-alia canal bank construction, canal bank surface cover, canal bank condition, maintenance or inspection regimes.
1045	The HR Wallingford Report concludes that the best use of the information would be to illustrate where a more definitive assessment might be needed, but the information 'cannot be sufficiently sound for

	making definitive planning decisions'
1045	Concerned regarding the recommendations of the SFRA in terms of its use within Urban design. The SFRA suggests that 'floor levels should be considered based on the residual risk scenarios rather than a traditional approach of adding free board to a pre-determined event'. This is a departure from current accepted practice which has not been explained or justified.
1045	<p>The representations and associated appendix draw particular attention to the fact that the level of consultation with the Peel Group of Companies has been inadequate notwithstanding their legitimate interest in the Level 2 SFRA in their capacity as a Navigation Authority, Statutory Undertaker and affected landowner. The lack of consultation is contrary to the provisions of PPS12 and PPS25 and the associated PPS25 Practice Guide.</p> <p>The representations highlight that the representor has significant concerns regarding the reliability of the Level 2 SFRA and soundness hence, as this is a critical piece of the evidence basis underpinning the emerging Core Strategy, regarding the soundness of the emerging Core Strategy itself'.</p>
1045	<p>For the Council to proceed without a completed evidence base on flood risk, having made decisions on policies and land use allocations based on incomplete and possibly unchecked information in respect of flood risk poses a high risk that the Core Strategy will be found to be unsound.</p> <p>The representor urges the Council to engage with it in further discussion to ensure the flood risk issues are properly understood and planning decisions properly informed before the emerging Draft Core Strategy proceeds any further.</p>

Core Strategy: Further Consultation on the Preferred Option (June 2009) – Responses – Green Space Strategy

ID	Summary Of Representation
1034	It is considered that Woodland Access Standard should be included in the Green Space Strategy and assessment of need.

Core Strategy: Further Consultation on the Preferred Option (June 2009) – Responses – Habitats Regulations Assessment

ID	Summary Of Representation
1037	Amendments are being made to the Habitats Regulations to reflect recent clarification of the status of as land use plans as 'plans or projects' under Article 6 (3) & 4 of the Habitats Directive. The representor is awaiting further guidance on how Habitats Regulations assessment procedures will need to be applied specifically in the case of Local Development Frameworks.

Core Strategy: Further Consultation on the Preferred Option (June 2009) – Responses – Retail Study

ID	Summary Of Representation
1082	Concerned that the Retail & Leisure Study is still perpetuating the

	outmoded thinking behind the UDP Policies about non-A1 uses within primary and secondary frontages.
1082	Concerned that this study does not reflect the important role played by financial services retailers in promoting vitality, underpinning town centres and assisting in regeneration.

Core Strategy: Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (March 2010) – Responses – Background Note on Davenport Green Proposed Site

ID	Summary Of Representation
1211	It is proposed that the note be changed to include a new section on Davenport Green.