Altrincham	Neighbourhoo	d Busine	ss Plan	
Comments	Form – 30th A	ugust to 1	1thOctober	2016

Office Use Only		
Date		
Ref		
Ack		

PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO: strategic.planning@trafford.gov.uk

Name:	John Gibson	Agent (if applicable):
Organisation		Organisation
(if applicable):		(if applicable):
Address:	REDACTED	Address:
Postcode:	REDACTED	Postcode:
Tel:	REDACTED	Tel:
Fax:		Fax:
Email:	REDACTED	Email:

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Strategic Planning Trafford Council Trafford Town Hall Talbot Road Stretford M32 0TH

All comments must be received by 5pm on Tuesday 11th October 2016.

Would you like to be notified of Trafford Council's decision to 'make' the Altrincham Neighbourhood Business Plan?



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Do you support, oppose or h	ave general comments about	the plan?		
Support	Object		General Comment	x
	nents below. If you are objection in the Basic Condition in the Basic Condition in the Basic Condition is the Basic Condition in the Basic Condition is the Basi		out what changes you cor	nsider are
to have both full size store businesses can benefit. (in Waitrose have taken many to a George Street site that Major up market retailer si success in York and Chelt Market House has succes	y old Woolworth stores- they at Enables collect by car, as hould be encouraged like "V tenham, as the new Bistrot I eded through major use of se ail on Oxford Road to be ch	es should extend y should be enco per M&S. Vhite Company" Pierre concept is pocial media. The	I free parking to 4 hours s ouraged to move from Bro and other stores that are s. at is the way forward.	o other oadheath a

From: Pemberton, Rebecca [mailto:REDACTED]
Sent: 12 September 2016 16:06
To: Strategic Planning
Subject: Altrincham Town Centre Neighbourhood Business Plan

Dear Neighbourhood Planning Team,

Altrincham Town Centre Neighbourhood Business Plan

Thank you for your email and links to the draft neighbourhood plan.

You may be aware that we work closely with Trafford Council to understand future development sites so we can facilitate the delivery of the necessary sustainable infrastructure at the appropriate time.

It is important that United Utilities are kept aware of any additional growth proposed within your neighbourhood plan over and above the Council's allocations. We would encourage further consultation with us at an early stage should you look to allocate additional development sites in this area in the future.

If you wish to discuss this in further detail please feel free to contact me.

Best regards

Becke

Rebecca Pemberton Planning Analyst Developer Services and Planning Operational Services United Utilities T: REDACTED unitedutilities.com

From: REDACTED Sent: 12 September 2016 22:10 To: Strategic Planning Subject: Altrincham Neighbourhood Business Plan

Dear Sirs,

I would like to express support for the excellent work in the production of the Business Plan.

I only have some more minor comments as follows:

- 1. Norway and Holland are likely to move to a position that all new cars must be electric cars in the next 10 years. It is likely other countries will follow suit, which hopefully will include the UK, which is already committed to boosting electric and full hybrid car ownership. People living in flats will find it difficult to have private charge points installed, so in addition to the charge points in the Regent Road car park, more charging spaces should be made available in the town centre car-parks.
- 2. I endorse the need for overnight parking. With more flats being built, some without parking, this will become increasingly important.
- 3. I do not think Plan 5 is quite correct. Edged and tinted purple is an area denoted as a leisure and supermarket zone. It appears to include all of the land to the west of the railway along Denmark Street and the path leading into the interchange. Once you go beyond the cinema on one side and the car-park for Total Fitness on the left, the remaining 90 pc of Denmark Street is residences. There are in fact 77 dwellings on Denmark Street that have been designated as leisure and retail. I would suggest they are correctly designated as residential.
- 4. There are no schools in Altrincham Town Centre and yet the population is to increase. This needs additional school accommodation in the surrounding zone.

Yours faithfully

Stephen Birchall REDACTED From: Sarah Ludlam [mailto:REDACTED]
Sent: 05 September 2016 11:07
To: Strategic Planning
Subject: Altrincham Town Centre Neighbourhood Business Plan: Regulation 16 Consultation

Dear Sir/Madam

In respect of the above, we own business premises on the fringe of the boundary and would like to meet to discuss the plan and its impact with the Project Director.

If someone could contact me to arrange it would be appreciated.

Kind Regards,

Sarah Ludlam Project Co-ordinator Amstone Developments Ltd 3 Hollins House 331 Hale Road Hale Barns Altrincham Cheshire WA15 8TS Telephone: REDACTED Fax: REDACTED e-mail: REDACTED Trafford Council Trafford Town Hall Talbot Road Stretford M32 0TH Our ref: SO/2006/000285/OR-15/PO1-L01 Your ref:

Date: 16 September 2016

Altrincham Town Centre Neighbourhood Business Plan: Regulation 16 Consultation

Thank you for submitting the above document for our review which was received on 30th August 2016.

We have no comments to make to the Altrincham Neighbourhood Business Plan document.

Yours faithfully

MISS LAILA SMITH Planning Advisor

Direct dial REDACTED Direct e-mail REDACTED

Office	Use	e (Only	
Date				
Ref				
Ack				

From: Helen Wright [mailto: REDACTED] Sent: 25 September 2016 16:28 To: Strategic Planning Subject: completed form

Name:	Helen Wright	Agent (if applicable):	
Organisation (if applicable):		Organisation (if applicable):	
Address:	REDACTED	Address:	
Postcode:	REDACTED	Postcode:	
Tel:	REDACTED	Tel:	
Fax:		Fax:	
Email:	REDACTED	Email:	

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Yes	\checkmark	
No		

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Do you support, oppose or have general comments about the plan?					
Support		Object		General Comment	
Please provide your comm necessary to ensure the pl			ease set o	out what changes you con	sider are
parks be used in more flexibl they are now i.e. 2h for JS cu be used for free general park have no parking space and a those using Altrincham interce evening. The restriction on h empty, yet it can be difficult t	not nece at Sainst e way? (ustomers ting? This lso would change to ours in th o find a s	ssarily be readily available fo burys and Tesco car parks tal Given that during the daytime and 3h for Tesco customers, s would provide overnight par d provide parking for people g	r some of ke up a lot , say, 08.0 , surely ou rking for th going out ester/Salfo that often ark. Once	this accommodation. I would t of space in the area, could 00 – 17.00, restrictions shou itside those hours, the space in enew residential developm in the evening in Altrincham ord Quays/Old Trafford for the in an evening they are almost the Altair development gets	d like to their car ld be as e could ents that and for ne ost

Please continue on a separate sheet if required.

Altrincham	Neighbourhood Business Plan	
Comments	Form – 30th August to 11thOctober 20)16

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PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO: strategic.planning@trafford.gov.uk

Name:	Sue Nichols	Agent	-
		(if applicable):	
Organisation	Bowdon Downs Residents'	Organisation	-
(if applicable):	Association	(if applicable):	
Address:	REDACTED	Address:	
Postcode:	REDACTED	Postcode:	
Tel:		Tel:	
Fax:		Fax:	
Email:	bowdondownsra@gmail.com	Email:	

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strategic.planning@trafford.gov.uk

Do you support, oppose or ha	ave general comments about t	he plan?		
Support	Object		General Comment	X
	ents below. If you are object an meets the Basic Conditio		out what changes you co	nsider are
The latest title 'Altrincham To	THE PLAN TO 'CENTRAL AI wn Centre Neighbourhood Bu n acronym but also is not an ac	siness Plan' (AT	CNBP) is not only far too lo	,
For an initiative that is meant to it well into the future, it is ti	to be community-orientated it me-wasting.	is very off-putting	g and for professionals who	will refer
We are not aware of any pub	lic consultation on this latest c	hange of title.		
Clearly the few businesses o described as the 'town centre	n Barrington Road and the pul e'.	os in the Sandiwa	ay area cannot in any way b	e
areas which are impacted up However there is a long estal actual 'town centre' and this	original Plan boundary was w on by what happens in the act blished and very distinct chang needs to be protected. If the c reas even more vulnerable to t	ual 'town centre' ge of use and cha urrent title is retai	and are adjacent to it in sol aracter between these area ned for the Plan it will dilute	me cases. s and the
out-of-town uses detrimental	ms and delays in the future as to the residential areas and th <u>e</u> in the 'town centre' because	e actual town cer	ntre itself, could argue that	
The current title weakens one	e of the main purposes of the o	document and is	contrary to its content.	
West Ealing Centre Neighbo a looser description and serv	ther of the examples of Ealing urhood Plan'). We prefer the f es to distinguish the Plan area ham' from a postal and region	irst or better still t extending out fre	he last one below as the 'C om the town centre from the	entral is a e areas
Altrincham Central Neighbo	ourhood Plan (ACNP)			
Or				
Altrincham Centre Neighbou	urhood Plan (ACNP)			
Or it could be				

Central Altrincham Neighbourhood Plan (CANP)

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You will of course observe that the word 'Business' has been removed.

Both the two Ealing Plans are 'Business' Neighbourhood Plans but they have not seen the need to include that in their title.

We understand that due to the unfortunate 'BNP' that it had to be 'NBP' if 'Business' was to be included.

However, we have always objected in a variety of ways to the phrase 'Business Plan' as the government initialised and approved title of a major planning type of document i.e. 'Neighbourhood Plan' has been lost. The current title sets Trafford apart from every other area in the country. Milton Keynes stuck with 'Milton Keynes Business Neighbourhood Plan'.

It is still causing confusion amongst residents who think it is a 'Business Plan' to do with budgets as that it is what it says in the title - and not much to do with planning and the other issues it covers.

The Council <u>itself</u> is also confused in that the link says this below (but gets it the right way round as 'Neighbourhood Business Plan' on the next page)...

Neighbourhood Planning in Trafford

• Designated Neighbourhood Areas in Trafford:

Altrincham Town Centre Business Neighbourhood Plan

The getting the order of the title wrong will be the case for the life of the Plan whenever it is referred to if the word 'Business' is to continue to be very awkwardly to be inserted as follows even with a more descriptive first part of the title....

Altrincham Central Neighbourhood Business Plan (ACNBP)

Or

Altrincham Centre Neighbourhood Business Plan (ACNBP)

Or it could be

Central Altrincham Neighbourhood Business Plan (CANBP)

In conclusion, we propose that the title is clearly and simply...

Central Altrincham Neighbourhood Plan (CANP)

which is an easy acronym and is clear and accurate description.

2. BOUNDARY

These points have been made repeatedly right from the start in a variety of ways but to no avail.

2.1 New Street boundary

The housing arrangement on the ground is complex which is why it is best to fully consult and listen to those who actually live in the area concerned. On the map of the 'Designated Business Neighbourhood Plan Boundary' (still confusion there in the name!), many of the residents on New St have had the line drawn right between their house and back garden.

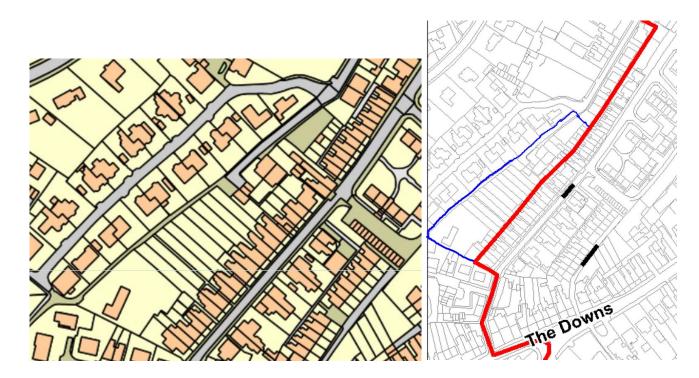
It also means that at least part of The Narrows is excluded yet is features in key greenway and ginnel links to the town centre to be improved and promoted.

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Here is a more accurate boundary which we request is changed as it is very annoying as well as being against best planning document practice to ignore existing legal property boundaries.

The arrangement of houses and back gardens at the north entrance to The Narrows is very complex so that in addition to the missing back gardens, four extra houses have been added to that area.



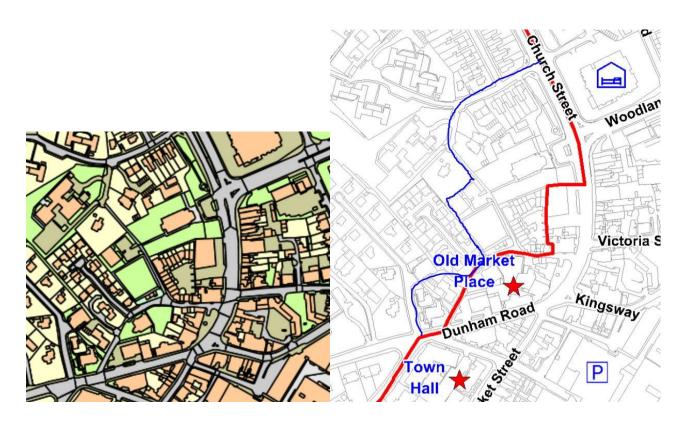
2.2 Exclusion of key features and historic core area of the town

It is unacceptable that the following have been excluded..

- The ancient and historic core of the town centre which shows an Anglo-Saxon urban grain even predating the 1290 Market Charter has been cut in two by the Plan – half within and half outside it
- Altrincham's parish church of St George's
- The parish centre which is a community facility which should fall within the boundary for that reason
- The United Reform Church and parish hall again key community hubs
- The 19th century heritage asset of the bowling green which is a vulnerable green space
- The green spaces of St George's Church and that opposite the Cresta Court which need protecting
- The ancient routes around St George's leading from residential areas to the town centre, which like The Narrows are in need of promotion and improvement
- The businesses in the buildings to the north of St George's

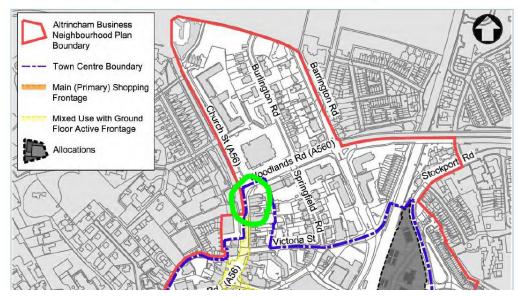
On the next page is a map showing the features, routes and green spaces and how the boundary should be drawn as this area can only ever be considered part of the Central Altrincham Neighbourhood Plan and part of no other. It is ridiculous to have the pubs a mile away from the town centre but not the features outlined above which are only metres away from it.

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3. PLAN 6 MINOR EXTENSION TO 'MIXED USE'

This correction was accepted and it is simply an oversight in that the change to Plan 6 was not made. The yellow strip of 'Mixed Use' retail needs to be marked right the way along the buildings east side of the Old Market Place as there are active retail businesses in place there (and there have in fact been so since 1290).



Plan 6: Proposed Town Centre Boundary & Allocations

From: I'm In Altrincham [mailto:info@myaltrincham.org]
Sent: 05 October 2016 16:08
To: info@myaltrincham.org
Subject: Online form submitted - My Altrincham

ID: 30317 Date: 05/10/2016 16:08:02

name: Fran McArthur email: REDACTED telephone: REDACTED

message: May I suggest that in order to reflect the revolution in electric vehicles and the prediction that 80% of vehicles will be electrically powered by 2025/30, that planning for new parking spaces (be they public or residential) within the area should be granted only if electric charging points are provided. Say a min of 50% of residential spaces might be considered and 10-20% of public spaces.

As someone living in a development less than 4 years old, who is unable to make the environmentally more friendly switch to an EV due to lack of charging facilities, I would like to see such a catastrophe avoided for the wider community.

I do hope that we can grasp this opportunity at the build phase, rather than a more cumbersome and costly retrofit within a few years.

Kind regards

Fran McArthur



strategic.planning@trafford.gov.uk;

BY EMAIL ONLY

Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ

T 0300 060 3900

Dear Sir

Altrincham Town Centre Neighbourhood Business Plan: Regulation 16

Thank you for your consultation on the above dated 30 August 2016, and the opportunity to comment on the submitted plan.

Natural England does not have any specific comments on this neighbourhood plan.

For clarification of any points in this letter, please contact Becky Pitt on For any further consultations on your plan, please contact: <u>consultations@naturalengland.org.uk</u>.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours faithfully

Becky Pitt Cheshire, Greater Manchester, Merseyside and Lancashire Area Team Natural England From: e-mail marcusnaylor [mailto:REDACTED]
Sent: 07 October 2016 13:27
To: info <<u>info@myaltrincham.org</u>>
Subject: Re: Altrincham Neighbourhood Business Plan (test)

Hi,

I've reviewed the Altrincham Neighbourhood Business Plan and am overall very impressed and pleased with the content. I do not think that feedback has been invited but here are some points I'd like to make:

- the relocation of the builders merchants from the centre is a positive move
- I support the digital strategy as more and more people are working remotely and should be able to do so in the town centre (free of charge for WiFi access)
- the leisure centre redevelopment is critical as a community hub and promoting activity for all ages. The plan to ensure that there is continuity of availability for use is important
- there is limited open air social space in the town centre which limits business for people looking to socialise in fair weather. Any opportunities to provide better options should be considered

Thanks,

Marcus Naylor

REDACTED

Altrincham	Neighbourhoo	d Busine	ss Plan	
Comments	Form – 30th A	ugust to 1	1thOctober	2016

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Date		
Ref		
Ack		

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Name:	Damian Cross	Agent (if applicable):
Organisation		Organisation
(if applicable):		(if applicable):
Address:	REDACTED	Address:
Postcode:	REDACTED	Postcode:
Tel:		Tel:
Fax:		Fax:
Email:	REDACTED	Email:

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Do you support, oppose or h	ave gene	eral comments about the pl	an?		
Support	x	Object		General Comment	
Please provide your comm necessary to ensure the pl			please set	out what changes you con	sider are
I welcome the decision to dra considers this to be an under businesses should be locate a wide range of public transp will help to both reduce reliar and promote the creation of a commercial and social intera	sirable d d in clos port optio nce on th an urban	evelopment, and takes step e proximity to residential are ns, which is beneficial from he private car (with the cons centre that encourages, by	os to reverse eas and in le both social equent rede its layout a	e this process. It proposes the ocations that are easily acce and environmental standpo uction in the area's carbon for	nat retail essible by ints. This potprint)
In particular, I welcome the r conversion of underused offi broadly based range of retail storage in residential develop	ce space l outlets i	e), the development of 'shar ncluding local food stores.	ed space st	treets', and the provision of a	a more
However, the provision of sh to the progressive replacement avoid a net increase in carbon national policies that stipulate traffic might also contribute to appropriate to include planni into consideration when deci spaces, in order to encourage transport.	ent of exi on emissi e stringe o an incr ng guida ding whe	sting spaces that have bee ons due to increased car tr nt emissions reductions tar ease in pollution by nitroge nce that the provision of ch ether to grant planning perm	n removed a affic. Such a gets over th n oxides an arging point hission to a	as a result of development, i an increase would be contra le lifetime of the Plan. Increa d particulates in AQMAs. It v ts for electric vehicles should development that features of	in order to ry to ised car would be d be taken ar parking
On balance, with the above r in the vitality of Altrincham to sustainable community in the conservation aspects of the t	wn centi e longer t	e in a way that enables the term, while ensuring a high	creation of	an economically and enviro	nmentally



EST. OVER 55 YEARS

Planning Department Direct Line 01625 588466 Fax 01625 588 386 E-mail:

PLANNING DEPARTMENT

Strategic Planning Trafford Council Trafford Town Hall Talbot Road Stretford M32 0TH GRAHAM A BEE BSC DIPTP MRTP1 MATTHEW T DUGDALE BA MCD MRTP3 KERREN J PHILLIPS BSC TOM LOOMES BA DIPTP MRTP1 ANGELA DC PENNY

Our ref: MD/Planning

[by email and by post]

10 October 2016

Dear Sir/ Madam,

RE: SUBMISSION DRAFT ALTRINCHAM TOWN CENTRE NEIGHBOURHOOD BUSINESS PLAN (AUGUST 2016) -- CONSULTATION RESPONSE ON BEHALF OF ORBIT INVESTMENTS (PROPERTIES) LIMITED

I am writing to provide comments on behalf of Orbit Investments (Properties) Limited regarding the above consultation.

The comments relate to Orbit's ownership of Charter House, which is located on Woodlands Road within Altrincham Town Centre, as illustrated by the enclosed plan (847-LEG-8028). Orbit have previously made comments directly to the Neighbourhood Business Forum as part of the consultation exercises conducted in March 2015 and February 2016.

Orbit request that the submitted comments are provided to the appointed Planning Inspector for consideration during the Examination. I would also be grateful if you could please ensure that our details are registered on your Local Plan consultation database, so that we are kept informed of any further consultation stages.

Yours faithfully,

Matthew Dugdale <u>Planner</u>

Enc.

1 x Estate Plan (847-LEG-8028) 1 x Response Form (Orbit Investments (Properties) Limited)

DIRECTORS: PE JONES OBE (CHAIRMAN) ME JONES (DEPUTY CHAIRMAN) AE JONES AC WEATHERBY BA (Law) (SECRETARY) J EDWARDS BSE (Hons) FCMA CGMA (FINANCIAL) SP WILSON JP BURGESS BA (Hons) Law MST ROYLE BA (Arch) JR CLABER BSE (Hons) NON-EXECUTIVE DIRECTORS: AJ WHITE BENG A JONES THE LORD LEE OF TRAFFORD DL FCA JP ALLEN ACIB DIPFS EMERSON DEVYLLOPMENTS (HOLDINGS) LTD REGISTERED OFFICE: EMERSON HOUSE HEYES LANGE ALDERLEY EDGE CHESHIRE SK 97LF REGISTERED ND. 1170304 (ENGLAND & WALES) Tet: 01625 588400 Fast: 01625 585791 DX: 15421 Alderley Edge

www.emerson.co.uk

Altrincham Neighbourhood Business Plan Comments Form – 30th August to 11thOctober 2016

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Name: Organisation (if applicable):	Orbit Investments (Properties)	Agent (if applicable): Organisation (if applicable):	Matthew Dugdale The Emerson Group
Address:	Emerson House Heyes Lane Alderley Edge Cheshire	Address:	Emerson House Heyes Lane Alderley Edge Cheshire
Postcode:	SK9 7LF	Postcode:	SK9 7LF
Tel:		Tel:	
Fax:		Fax:	
Email:		Email:	

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way.

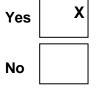
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Support	Object	x	General Comment	
	ents below. If you are obje e plan meets the Basic Con		out what changes you con	sider
consultation exercises and February 2016. T Woodlands Road withi	made comments directly to conducted on the Altrincham he comments related to Orb n Altrincham town centre, as n quality office accommodatio	Neighbourhood E it's ownership of s illustrated by M	Business Plan ("NBP") in Ma Charter House, which is lo ap 1 below. Charter House	rch 2015 cated on
	WOODLANDS ROAD Charter Ho		Methodist Church	
	Map 1: Charter Hous	se, Woodlands Ro	ad	

1.2 **Orbit are strongly concerned** that the Submission Draft Altrincham NBP (i) is not in general conformity with Trafford Council's strategic policies and (ii) that it does not have full regard to national policy.

(i) the Submission Draft NBP is not in general conformity with Trafford Council's strategic policies

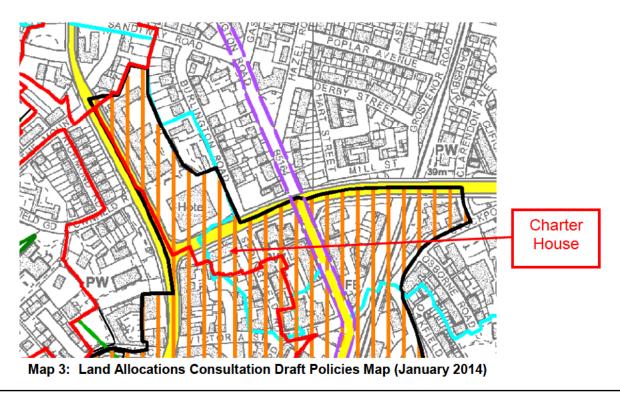
1.3 Policy W2 of the adopted Trafford Local Plan: Core Strategy (January 2012) designates Altrincham as the Principal Town Centre in the Borough's retail hierarchy. The Core Strategy does not define any town centre boundaries and instead delegates this duty to the emerging Trafford Local Plan: Land Allocations. In the meantime, the current town centre boundary is designated by Policy S5 of the Trafford UDP (June 2006), as shown by Map 2 below (the existing town centre boundary is shown with a thick blue border and vertical blue lines). Currently, Charter House does not fall within the designated town centre, but can be considered to be "edge of centre".

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Map 2: Adopted UDP Policies Map (June 2006)

1.4 Paragraph 14.15 of the Trafford Local Plan: Land Allocations Consultation Draft (January 2014) explained that town centre and retail matters relating to Altrincham town centre would be dependent on the emerging Altrincham Neighbourhood Business Plan. However, the Land Allocations Consultation Draft Policies Map (January 2014) did define a proposed town centre boundary for Altrincham, which included Charter House within it, as shown by Map 3 below (the proposed town centre boundary is shown with a black border and vertical orange lines). As can be seen, the Land Allocations Consultation Draft (January 2014) proposed to extend the existing town centre boundary to include non-retail main town centre uses, comprising offices and a hotel along Woodlands Road and Church Street.



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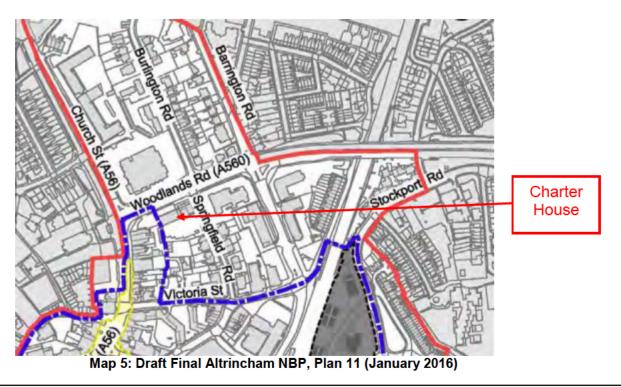
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1.5 The town centre boundary proposed by the Land Allocations Consultation Draft (January 2014) was closely reflected by Plan A of the Draft Altrincham NBP (February 2015), as shown by Map 4 below (the proposed town centre boundary is shown by the dashed blue line). This extended boundary also included Charter House and the other non-retail main town centre uses along Woodlands Road and Church Street.



Map 4: Draft Altrincham NBP, Plan A (February 2015)

1.6 In response to the consultation on the Draft Altrincham NBP (February 2015), Orbit submitted comments in March 2015 to support this proposed town centre boundary. It was stated that Orbit were encouraged that the designation would give greater protection to Charter House under the National Planning Policy Framework (NPPF) and increase the chances in securing full occupation of the building going forward.



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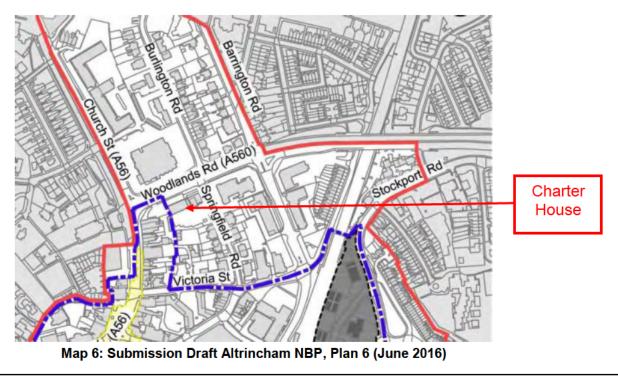
- 1.7 However, in response to an unexpected "U-turn" in approach, Orbit submitted comments in February 2016 to the consultation on the revised Draft Altrincham NBP (January 2016) to state that they were both concerned and surprised to discover that the proposed town centre boundary shown on Plan 11 of the Draft Altrincham NBP (January 2016) had been amended to exclude Charter House (and the other non-retail main town centre uses along Woodlands Road and Church Street), as shown by Map 5 above.
- 1.8 Orbit were particularly concerned that paragraphs 2.1 (Executive Summary, p.3) and 2.3.3 (p.14) of the Draft Altrincham NBP (January 2016) stated:

"2.1 D. The town centre boundary has been adjusted to reflect the position on the ground and <u>care has</u> been taken to guard against including areas which might be the subject of future town centre retail development applications which would not be located in the Main Shopping or Mixed Use areas. In particular, the important main offices area on the north side of the town centre remains outside the town centre boundary although its role as an office location remains unaffected..." [our emphasis]

"2.3.3 (f) <u>The proposal to amend the Town Centre boundary on its northern side to run along Woodlands</u> <u>Road was agreed*</u>. The new Town Centre boundary will also need to be the subject of the Strategic Environmental Assessment and the outcome of that will be reported to the Forum for consideration of the need for any further change.

"*This boundary has been the subject of further discussion as <u>it was considered that there is a risk,</u> however limited, that a future proposal to develop a convenience store or similar sized retail outlet on a <u>current office site between Woodlands Road and Victoria Street could be made</u>, which might succeed if a suitable site was not available at the time in the area allocated Main Shopping or Mixes Use with Ground Floor Active Frontage. <u>To offset this risk (and to further support the policy of focussing the retail core) the</u> <u>boundary now runs along Victoria Street as indicated on Plan 11</u>." [our emphasis]

1.9 The explicit statement that the town centre boundary had been amended to exclude the offices between Woodlands Road and Victoria Street in an attempt to guard against future retail development applications coming forward in this location is of great concern. Orbit consider that this decision should have been based on robust evidence, rather than as a deliberate ploy to prevent new development.



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1.10 Despite Orbit's submitted objection and the fact that the change was not supported by evidence, the boundary has been carried forward into Plan 6 of the Submission Draft Altrincham NBP (June 2016), as shown by Map 6 above. Consequently, Orbit remain concerned that Charter House (and the other non-retail main town centre uses along Woodlands Road and Church Street) have been superficially excluded from the proposed town centre boundary. Therefore, Orbit contest that the Submission Draft Altrincham NBP is not in general conformity with Trafford Council's strategic policies.

(ii) the Submission Draft NBP does not have full regard to national policy

- 1.11 As advised in Orbit's consultation response to the Draft Final Altrincham NBP in February 2016, the above point also runs contrary to national policy and is not supported by evidence.
- 1.12 NPPF Annex 2 (Glossary) defines offices as a "main town centre use", together with many other non-retail uses, including leisure, entertainment, recreation, arts, culture and tourism etc. As such, the Government's definition of a town centre comprises "...the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area".
- 1.13 In this regard, it should be noted that the area now excluded from the proposed town centre boundary along Woodlands Road and Church street comprises a significant number of main town centre uses, including multiple office buildings and a hotel. Such uses are clearly an important component of any properly and healthy performing town centre, which does not solely function around retail development. The approach taken by the Submitted Draft Altrincham NBP on this point is not positive and reflects why many town centres across the country have been experiencing decline.
- 1.14 Despite a proposed town centre boundary with a focus on retail uses, the Submission Draft Altrincham NBP designates a "Main (Primary) Shopping Frontage", but falls short of defining a "primary shopping area", which is required by NPPF paragraph 23 (alongside the requirement to define the extent of a town centre). NPPF Annex 2 (Glossary) defines a "primary shopping area" as an area where retail development is concentrated. When assessing planning applications for retail development against national policy, it is the primary shopping area in the first instance (rather than the town centre boundary) that national policy dictates that that such developments should be located. Other main town centre uses (such as offices) are directed in the first towards the whole (and wider) town centre boundary. The lack of a primary shopping area will lead to ambiguity and uncertainty when determining planning applications.
- 1.15 Orbit do not agree that Charter House as an office building should have been excluded from the proposed wider town centre boundary, but would concede that it should not form part of the primary shopping area as a non-retail use. Offices and other such main town centre uses clearly form an important part of any town centre and should not be excluded from their boundaries on the basis of trying to prevent future retail development and without any clear or robust supporting evidence.
- 1.16 On this point, the fact that the Submission Draft Altrincham NBP is not supported by any supporting retail or main town centre uses evidence is of great concern. Without this, it is assumed (because there is no reference to any new evidence, except for views expressed to the public consultation exercise) that the plan relies upon the retail evidence which was submitted as part of the Core Strategy Examination, some of which dating back to November 2007 and the most recent of which dating back to January 2010. Given that the NBP will (if adopted) form part of Trafford Council's Development Plan and guide decisions on relevant planning applications, it is wholly unreasonable that such an important policy guiding the development of Altrincham town centre is not underpinned by evidence. Consequently, Orbit contest that the Submission Draft Altrincham NBP does not have full regard to national policy.
- 1.17 National Planning Practice Guidance in relation to evidence needed to support a neighbourhood plan in paragraph 040 (Reference ID: 41-040-20160211) states:

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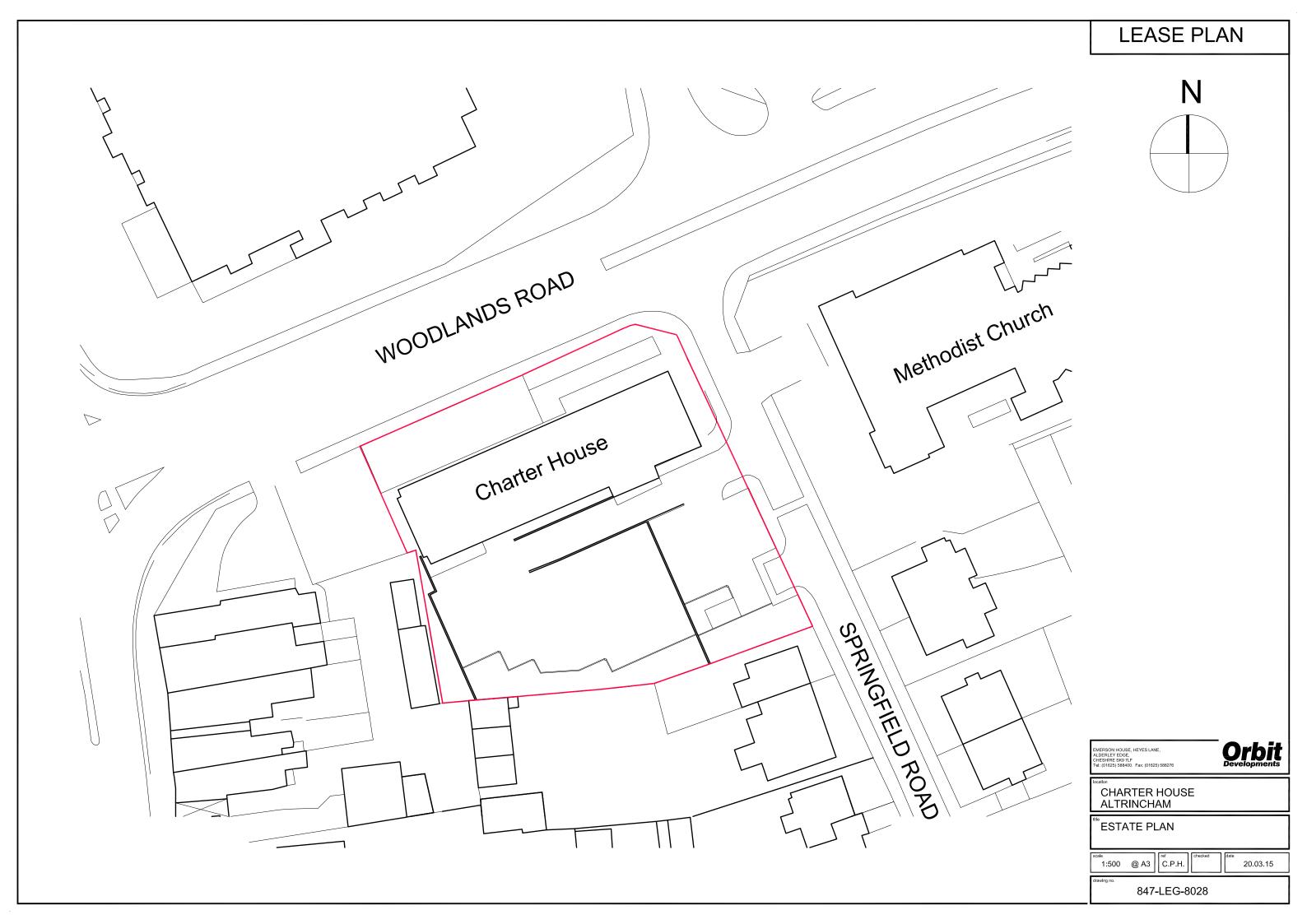
"...While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. <u>Proportionate, robust evidence should</u> <u>support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order..." [our emphasis]</u>

1.18 Furthermore, Planning Practice Guidance in relation to how policies in a neighbourhood plan should be drafted in paragraph 041 (41-041-20140306) states:

"A policy in a neighbourhood plan should be clear and unambiguous. <u>It should be drafted with sufficient</u> <u>clarity that a decision maker can apply it consistently and with confidence when determining planning</u> <u>applications. It should be concise, precise and supported by appropriate evidence</u>. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared." [our emphasis]

Requested amendments to the Submission Draft NBP

- 1.19 Therefore, <u>Orbit strongly request</u> that the town centre boundary proposed by Plan A of the Draft Neighbourhood Business Plan (February 2015), as shown by Map 4 above, be re-instated to include Charter House and the other main town centre uses around Woodlands Road.
- 1.20 **<u>Orbit also strongly request</u>** that an appropriately more limited area of the town centre covering predominantly retail uses be defined as the "primary shopping area". This will help draw a distinction between the two boundaries and ensure that their role and function is clear.



Altrincham	Neighbourhood Business Plan	
Comments	Form – 30th August to 11thOctober 20)16

Office Use Only		
Date		
Ref		
Ack		

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Name:	K. Kitt	Agent (if applicable):
Organisation		Organisation
(if applicable):		(if applicable):
Address:	REDACTED REDACTED	Address:
Postcode:	REDACTED	Postcode:
Tel:	REDACTED	Tel:
Fax:		Fax:
Email:	REDACTED	Email:

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way.

This form is in 'Word' format and you can type in your response and return it as an e-mail attachment to strategic.planning@trafford.gov.uk.

Alternatively, completed comment forms can be returned by post to the address below.

Strategic Planning Trafford Council Trafford Town Hall Talbot Road Stretford M32 0TH

All comments must be received by 5pm on Tuesday 11th October 2016.

Would you like to be notified of Trafford Council's decision to 'make' the Altrincham Neighbourhood Business Plan?



Data Protection Notice:

Please note all comments will be held by the Council for Local Plan production purposes and will be available to view publicly (including on the Council's website). Comments cannot be treated as confidential. Your personal information such as your postal and e-mail address will not be published, but your name and organisation (if relevant) will. Trafford Council maintains a database of consultees who wish to be kept informed about Strategic Planning. In responding to this consultation your contact details will automatically be added to the Council's Local Plan consultation database. If you do not want to be contacted about future Local Plan consultations please state this in your response.

Altrincham Neighbourhood Business Plan Comments Form – 30th August to 11th October 2016 PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:

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Do you support, oppose or h	ave gene	eral comments about the plan	1?		
Support		Object		General Comment	X
Please provide your comm necessary to ensure the pl			ease set o	out what changes you con	sider are
Having read through the onli Denmark Street as a dumpin however, I can only assume	ig ground	I for the council's contractors	(which it h	nas been for over a year nov	
I accept that one 'can't make respondents said they wante should necessitate turning th and temporary fencing. I can	ed to see his part of	less litter, that the interminat the town into a giant tip, with	le pavement heaps of	ent resurfacing work in Altrin	icham
Over the last few weeks, I has the site but honestly, what ca be argued that they're makin if any councillors lived here t whether they would care for	an anyon g the plac hemselve	e say to them when they're s ce look any more unsightly th es then an alternative location	imply follo nan it does າ would qເ	wing the council's lead? It ca already. I can't help suspec uickly have been identified. (an hardly cting that I wonder
I am also curious as to how r when those who apparently r Given the uncertain economi will have retailers and other r forced to pay for it?	represent ic outlook	t us have recently seen fit to take anyone ge	withdraw f nuinely be	unding for other services in lieve that replacing a few for	the area. otpaths
If Trafford Council genuinely police patrols between midni vandalism that nearby reside glitzy as a 15-foot steel mone	ght and 3 ents often	Bam around Goose Green, w have to tolerate, particularly	hich might at weeke	t reduce the levels of noise a noise and s. I appreciate this wouldr	and n't be as
Personally, I am past caring £1000 in council tax every ye from Salford two years ago, found it to be very much the	ear to live	on one of the noisiest, mess t it to be a reasonably peace	siest roads	I have ever known. I moved	d here
I'm sure the pavement will lo	ok lovely	when it's finished, though.			

Please continue on a separate sheet if required.

Altrincham	Neighbourhood Business Plan	
Comments	Form – 30th August to 11thOctober 20)16

Office Use Only			
Date			
Ref			
Ack			

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Name:	Kevin West	Agent (if applicable):	
Organisation (if applicable):		Organisation (if applicable):	
Address:	REDACTED	Address:	
Postcode:	REDACTED	Postcode:	
Tel:	REDACTED	Tel:	
Fax:		Fax:	
Email:	REDACTED	Email:	

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way.

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Do you support, oppose or have general comments about the plan?									
Support	Y	Object		General Comment					
Please provide your comments below. If you are objecting please set out what changes you consider are necessary to ensure the plan meets the Basic Conditions.									
I completely support and welcome the idea of investment in Altrincham.									
I am happy to see that provision of short stay car parking has been thought about but I'm unsure that the plans go far enough. I am surprised that it is predicted that only 55 car parking spaces will be lost when the ice rink car park is built on.									
Will the council or the planners release the number for total car parking spaces in Altrincham town centre before and after the proposed development?									



Stephen James (Head of Strategic Growth) Strategic Planning Trafford Council Trafford Town Hall Talbot Road Stretford M32 OTH

Our ref: PL 00038115 & 38119 Your ref: E-mail 30th Aug 2016 Telephone:

10th October 2016.

Dear Stephen,

Re: Altrincham Town Centre Neighbourhood Business Plan & Integrated Impact Assessment SEA

Thank you for consulting Historic England on the draft Neighbourhood Business Plan and Integrated Impact Assessment SEA. I have now had the opportunity to consider the documents and offer the following advice.

Neighbourhood Business Plan

Historic England is pleased to see that "conserving and enhancing the historic environment" is a key aim of the plan. We support your requirement for Historic Environment Impact Statements to be submitted with planning applications. We commend the vision for Altrincham (C3.1) to build upon the towns "History and Heritage" and "Unique 1290 Market Charter". We fully support your policy intent to achieve high standards of design for the public realm, new development and refurbishments, along with the other objectives set out at (3.2- p9).

We commend the design principles set out at p45-47. In this respect (at Appendix1 or 4) we recommend that you consider providing a web link to our national guidance "*Constructive Conservation Sustainable Growth for Historic Places*", this document shows the many ways in which historic buildings can contribute to job creation, business growth and economic prosperity. <u>https://historicengland.org.uk/images-books/publications/constructive-conservation-sustainable-growth-historic-places/</u>.

Our 2013 report "*The Changing Face of the High Street*" is also pertinent to this business NP. <u>https://historicengland.org.uk/images-books/publications/changing-face-high-street-decline-revival/</u>

At Appendix 3, you might also consider providing a web link to Trafford's Conservation Area Appraisals and Management Plans, referred to at various points throughout the plan.





I note that the outcome of the SEA is mixed, I concur with AECOM's summary which concludes "For the more socio-economic objectives it seems clear that the plan would result in a number of positive effects of which those on 'Land', 'Population and Community', 'Health', and the 'Economy' are likely to be significant. The 'negatives' centre on the potential effects on air quality and heritage assets in the area. Both of these effect predictions have a high level of uncertainty as so much is dependent on the details of the design of the developments."

Within the main SEA document at 4.4.3 we recommend that your density assumptions for sites within the Conservation Area potentially impacting upon heritage assets need to be reworked so they can be informed by the prior Historic Environment Impact Statements you require, and reference to the historic environment considerations at S12 in the NPPF. In essence, allocation sites A, B and E may ultimately prove to have less potential to harm heritage significance than sites D, C and F, for example, and thereby capable of taking higher site densities to enable overall target numbers to be met! At this stage the *Historic Environment and Landscape* sections of the SEA (4.6) do not fully screen or evidence potential heritage and setting impacts to justify the density policies as currently worded.

Please can you refer throughout your report to Historic England being the statutory consultee and not English Heritage; we would of course be pleased to offer our early pre-application advice on developments at proposed site allocations which require our prior notification. On the 11th January 2016 we provided advice on the former Altrincham General Hospital site (application 87009/FUL/15) and were disappointed to note that this application was approved against our advice.

I hope these comments prove helpful to the Forum as it finalises the draft plan prior to twin referendum.

Historic Places Adviser (North West) Historic England Telephone: E-mail:



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW Telephone 0161 242 1416 HistoricEngland.org.uk Please note that Historic England operates an access to information policy. Correspondence or information which you send us may therefore become publicly available.



<u>SEA</u>

Trafford Council response to the Altrincham Neighbourhood Business Plan Regulation 16 Consultation

General Comments

Since the outset of the plan preparation process the Council has developed and maintained a positive working relationship with the Forum. In particular Council officers have suggested a number of changes to the Plan which the Forum has taken on board and it is considered that the Plan, for the most part, is deliverable in planning terms. There are however a small number of issues which it is considered necessary to highlight. Some of these issues relate to new areas of policy introduced since the Regulation 14 consultation but others are long standing matters which have yet to be resolved between the Council and the Forum.

Legal Requirements

- The Altrincham Town Centre Neighbourhood Business Forum was formally designated by the Council's Executive on the 28th July 2014 as the qualifying body which has prepared the Altrincham Town Centre Neighbourhood Business Plan.
- The Neighbourhood Business Plan sets out policies in relation to the development and use of land for the defined neighbourhood area, which accords with the definition of neighbourhood plans in Section 38A of the Town and Country Planning Act 1990.
- The Neighbourhood Business Plan will have effect until 2030.
- The Neighbourhood Plan does not include policies on 'excluded' development relating to minerals, waste development or development consisting wholly or partly of a national infrastructure project.
- The Neighbourhood Business Plan relates only to the Altrincham Neighbourhood Business Plan area designated by Trafford Council on the 28th July 2014 (see Appendix 1) and there are no other Neighbourhood Plans relating to that area.

Meeting the Basic Conditions

Regard to national policies and advice contained in guidance issued by the Secretary of State

In line with national policy the policies and allocations contained within the Plan, amongst other things, seek to promote the vitality of the town centre, deliver residential development, promote high quality design and conserve and enhance the historic environment.

Contributes to sustainable development

It is considered that the Plan promotes sustainable development through its policies which seek to support the development of the town centre economy, support the delivery of more town centre homes supporting the creation of a high quality environment which seeks to provide local services meeting the needs of the community in addition to protecting and enhancing the natural, built and historic environment.

A Strategic Environmental Assessment has been prepared in order to support the plan, this report presents one recommendation for the inclusion of stronger policies on urban greening and green infrastructure. To address this comment the Forum has made some changes to Policy G1 (Green Infrastructure) detailed at paragraph 4.7.5. Therefore the Council does not wish to make any further comment in relation to this Policy.

General Conformity with the strategic policies contained within the Development Plan for the area

The Council formally adopted the Trafford Local Plan: Core Strategy on 25th January 2012. The Core Strategy provides the broad framework for the future development of the Borough until 2026. Following the adoption of the Core Strategy the Revised Trafford Unitary Development Plan (UDP) was partially superseded. The Core Strategy Vision for Trafford has been taken as the basis for defining the Vision for Altrincham. The Strategic and the Place Objectives contained within the Core Strategy have been taken as the basis for the development of the Neighbourhood Plan Objectives.

The Altrincham Neighbourhood Business Plan (ABNP) seeks to amend the Town Centre Boundary and the primary shopping area as defined within the UDP. These changes have been made in consultation with the Council and the Council is broadly supportive of these amendments.

Core Strategy Policy W2 (Town Centres and Retail) defines that Altrincham Town Centre is capable of delivering 20,000sqm of retail floorspace. The ANBP does not seek to set an alternative target for this neither does the plan seek to allocate sites to deliver this level of development. However the Council does not consider that this would represent an inappropriate strategy for Altrincham.

In terms of housing, Core Strategy Policy W2 defines that Altrincham Town Centre is capable of delivering 250 residential units up to 2026. The ANBP considers that at least 550 units could be provided within the Plan period up to 2030. Although this figure differs from that as defined in the Core Strategy the Council considers this is appropriate given the Council's housing land supply shortfall and the potential capacity of sites within the town centre.

EU Obligations

It was agreed with the Council that a Strategic Environmental Assessment (SEA) should be carried out on the Plan. The SEA and the non-technical summary prepared by Aecom have been submitted with the Plan.

Following screening it was determined that a Habitats Regulations Assessment (HRA) was not required. The screening report was consulted upon and there was no objection raised by any of the statutory consultees.

The Council is satisfied that the Neighbourhood Plan does not breach, and is compatible with, EU obligations and Convention rights (within the meaning of the Human Rights Act 1998) as stated in the Forum's Statement of Basic Conditions.

Plan Specific Comments

Policy D4 – Design

Design Policy D4 is a new policy, which has been introduced following the Regulation 14 consultation in order to strengthen the ability to retain and improve the historic ginnels in the town centre. Policy D4 states that *"Proposals to improve an historic town centre ginnel will be encouraged and supported. Any proposals that would result in the loss of an historic town centre ginnel will be resisted"*. It is considered that this policy is appropriate and in accordance with the recently adopted conservation area appraisals and management plans for Sandiway, George Street, Goose Green, Old Market Place, Stamford New Road, The Downs and Devisdale.

Policy CF1 – Community Facilities

Community Facilities Policy CF1 has been introduced in direct response to one of the representations received during the Regulation 14 consultation. It provides a mechanism for safeguarding existing valued local community facilities which include local shops, meeting places, sports venues, cultural buildings, public houses, places of worship. Whilst this type of policy is normally more suited to rural villages, no objection is raised to its introduction because the Plan recognises the different circumstances in Altrincham and sets out to prevent the loss of a last remaining community facility.

Integrated Car Parking Strategy and Digital Infrastructure Strategy

The proposals to produce an Integrated Car Parking Strategy (ICPS) and a Digital Infrastructure Strategy remain in the Plan, but they are no longer contained within policies requiring the Council to produce and adopt them. This is considered to be a more appropriate way to deal with these matters and reflect comments made by the Council at previous consultation stages.

Land Allocations

In terms of land allocations the Plan seeks to allocate six sites, including two Council owned sites, these are discussed in further detail below:

Site A – Oakfield Road/Balmoral Road Builders Merchant site

The site is identified within the Council's SHLAA and the density and yield identified in the Plan are reflective of the SHLAA.

Site B – Mayors Road/Manor Road Builders merchant site

The site is identified within the Council's SHLAA and the density and yield identified in the Plan are reflective of the SHLAA.

Site C – Ashley Road/St Johns Road (the former YWCA building)

It should be noted that planning permission was granted in March 2016 on the Ashley Rd/St Johns Rd site. This site is allocated in the Plan for residential development. The Forum has acknowledged this permission in the Plan, whilst maintaining the allocation as originally drafted, in the event that the permission is not implemented. It is assumed in the Plan that the site could yield 23 units whereas the planning approval is for 40 units. To the Council's knowledge development on the recently approved scheme has yet to commence formally. However should the status of the site change, the Plan will need to be updated in order to reflect its current status.

Site D – Old Altrincham General Hospital on Market Street/Greenwood Street

Planning permission was granted on this site for mixed use development. Although not necessarily contrary to the Plan the planning permission does not include any residential development, unlike the Plan. Whilst the Plan acknowledges this permission the Forum has decided to maintain the site allocation as originally drafted, in the event that the recent permission is not implemented. To the Council's knowledge development on the recently approved scheme has yet to commence formally. However should the status of the site change, the Plan will need to be updated in order to reflect its current status.

Site E – Altrincham Leisure Centre Site

The Plan seeks to allocate the Council owned leisure centre site and adjoining land, for leisure, residential, offices and car parking once a replacement leisure centre has been provided on the adjacent Altair site. The Council is broadly supportive of this allocation.

Site F - Regent Road Car Park Allocation

In relation to the proposed allocation of the Regent Road car park and adjoining land for mixed use purposes the justification now makes reference to the preparation of a 'Master Plan' which should be led by the Council. This statement has been introduced to the Plan since the Regulation 14 consultation. Whilst the Council is in discussions with neighbouring land owners with the aim of bringing forward development on a wider footprint to maximise potential of this site in the future, there are currently no plans to produce a masterplan for the site. As the land owner of the majority of the site, the Council is keen to see a comprehensive development scheme for the site, but this might not necessarily be through a masterplan.

It is suggested that the Policy wording of Site Allocation F could be amended as follows: *"Given the complexity of the site and the fact that several individual parts of it are likely to come forward for development at different times, an overall 'master plan' should could be prepared, led by the Council, to provide an integrated context within which proposals for individual developments can then be prepared."*

Referendum Area Boundary

As the ANBP is a Business Neighbourhood Plan there will need to be two referendums held, one for businesses and one for residents.

The Neighbourhood Forum has requested in their submission letter to the Council that it would like there to be two different boundaries set for the Referendums. They have suggested that the one for businesses should be limited to the Plan area only, while the one for residents should extend more widely and be reflective of the geographical spread of the comments received to its Regulation 14 consultation which would extend to include the following wards: Altrincham, Bowdon, Broadheath, Hale Barns, Hale Central, Timperley and Village (See Appendix 2).

The Council considers that to define two different boundaries would be inequitable and therefore there should only be one boundary. The Council's preferred boundary for both referendums is the Plan boundary (See Appendix 1). To define a boundary which is wider than the Plan boundary would place a significant financial burden on the Council which would not be fully covered by the funding which the Council is eligible to claim from CLG.

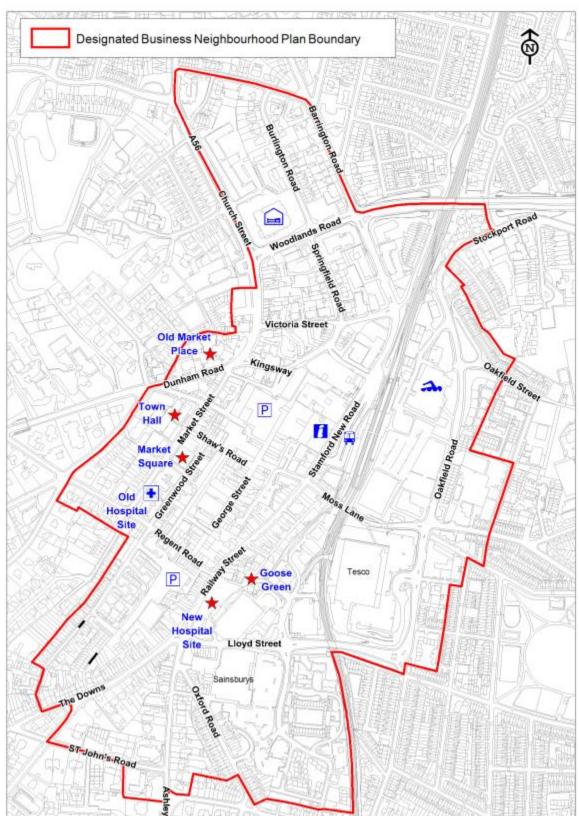
Notwithstanding this if the Examiner sees merit in extending the boundary beyond the Plan area, then it is suggested that a single extended boundary to include the wards detailed above would be a reasonable extension for both referendums.

In terms of the referendum date the Forum considers that it should be held as soon as possible after the Examination, so as not to lose momentum on the Plan. In relation to this it is noted that the Neighbourhood Planning (Referendums) (Amendment) Regulations 2016 came into force on the 1st October 2016. In the case of business neighbourhood plans, these Regulations state that the LPA has a period of 84 days to hold the referendums from the day after the LPA publishes its decision that a referendum must be held.

At this point in time the Council does not envisage any difficulties in complying with this timetable, however should the Examiner recommend an extension to the Referendum boundary the Council would welcome the opportunity to explore the possibility of combining the Referendums with another election such as the GM mayoral election in May 2017 because of the potential additional burden which would be caused by this.

Conclusion

Trafford Council has worked closely with the Altrincham Town Centre Neighbourhood Business Forum in the preparation of their Plan over the past 3 years and as such have developed a positive working relationship. Trafford Council is broadly supportive of the submitted version of the ANBP and welcomes its Vision, Objectives and Policies.



Appendix 1 - The Business Neighbourhood Plan Area

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Appendix 2 – Alternative Referendum boundary based on the Wards of Altrincham, Bowdon, Broadheath, Hale Barns, Hale Central, Timperley and Village

