



Strategic Housing Land Availability Assessment

Draft Report

Consultation Statement

December 2008

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PUNJABI

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SOMALI

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URDU

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1. Introduction

- 1.1 In accordance with Planning Policy Statement 3: Housing (PPS3) Trafford Council has prepared a draft Strategic Housing Land Availability Assessment report (SHLAA) as part of the evidence base to be used to inform the preparation of the Councils Local Development Framework.
- 1.2 The draft SHLAA report was made available for consultation for a 6 week period alongside Trafford's Core Strategy Preferred Options document between 16th July 2008 and 27th August 2008.
- 1.3 Stakeholders including landowners, developers, infrastructure service providers, other interested parties and Council service departments, were invited to make comments on the initial findings of the Assessment undertaken by the Council. In particular information and comments were sought on sites included in the report in terms of site constraints, housing potential, and the deliverability and developability of sites that may influence and therefore alter the development capacity and/or the timing delivery of that capacity as recorded in the report. A list of the stakeholders consulted is included at Appendix 1.
- 1.4 Stakeholders were also given the opportunity to submit new information about additional sites that could further augment the potential supply of land for development that could be included in a revised published version of this first assessment.
- 1.5 The purpose of this report is to summarise the key comments received during the consultation exercise and to outline how these comments will help to shape the final published version of this first SHLAA assessment. This report will also outline the additional work which now needs to be done in order to produce a revised version of the report.

2. Summary of Responses

2.1 A total of 26 responses were received from a variety of interested stakeholders during the consultation. A list of those stakeholders who submitted comments can be found at Appendix 2.

2.2 In addition to the individual responses a total of 16 site suggestion forms were submitted suggesting new sites which may now be suitable to be considered for development. A list of the additional sites suggested can be found at Appendix 3.

2.3 A brief summary of the key points raised as part of the consultation process is included below. A full summary of comments received and the Council's response can be found at Appendix 4.

Methodology

2.4 The following general points were made as a result of the draft report consultation regarding the methodology used:

- Trafford SHLAA should not be a stand alone study;
- There is no market testing of the sites identified, no sustainability assessment and no assessment of availability or deliverability;
- Employment sites should not be discounted pending the results of the Employment Land Review;
- Methodology does not comply with CLG Guidance, conclusions regarding deliverability and developability of the sites has not been informed by detailed consultation with stakeholders;
- There should be further consultation on the draft report prior to completion of a final report;
- A further assessment of sites will need to be undertaken when Level 2 SFRA data is available.

Housing Requirement

2.5 The following general comments were made as part of the draft report consultation in relation to Trafford's housing requirement:

- There are not enough sites identified within Trafford to deliver the annual minimum housing numbers;
- The figures need to allow for the Growth Point uplift;
- Concern that existing commitments include a significant number of apartment schemes which will not be built, an accurate estimate of allowance should be made which will significantly reduce the level of supply in Trafford;
- Annual completion rates are too generic;
- Given that a number of sites have not been tested for deliverability/developability Councils estimate of supply should be treated with caution;
- Assumptions made regarding developable supply are too simplistic.

Site Specific Issues

2.6 The following general comments were made as part of the draft report consultation in relation to site specific issues:

- Objection to the discounting of employment sites pending the completion of the Employment Land Review;
- Objections to the discounting of specific sites on grounds of policy designation;
- Concern regarding the development of specific sites for apartment developments;
- Completion rates for particular sites (e.g. in some cases too low and in some too high);
- Estimation of housing potential for particular sites (e.g. in some cases too high and in some too low);

Sustainability

2.7 The following general comments were raised as part of the draft report consultation in relation to sustainability issues:

- Endorse the approach of using site surveys to determine the sustainability of sites;
- All new developments should be focused on sites that are accessible by modes of transport other than the private car.

3. Next Steps

3.1 In light of the comments received during the consultation period a range of further tasks will need to be undertaken prior to the publication of a revised version of this first SHLAA assessment. The table below outlines the tasks to be undertaken and the anticipated timelines for completion where known.

Table 1: Additional tasks to be undertaken as a result of the draft report consultation

Task No.	Description of task	Timeline/Status
1	Review the findings of the Employment Land Review (ELR) to determine the nature/scale of the potential contribution of surplus employment land to the future supply of housing across the Borough.	<p>Consultants are currently carrying out the Employment Land Review on behalf of the Council.</p> <p>It is anticipated that a draft ELR report will be to the Council for comment in December 2008. The findings of the draft report will then be subject of a period of public consultation.</p> <p>The findings of the ELR will be reviewed and taken into account prior to the publication of a revised SHLAA assessment.</p>
2	A viability study is to be commissioned by consultants in order to test the deliverability of a range of	To be complete prior to the publication of a revised assessment.

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Task No.	Description of task	Timeline/Status
	sites contained within the SHLAA database.	
3	Review the SHLAA database to (i) Update the planning permission and development status of sites contained therein (ii) Add any new developments granted planning permission by the Council.	It is anticipated that the database will be updated by January 2009.
4	Update the SHLAA database to include the additional sites suggested by land owners etc.	To be complete prior to the publication of a revised assessment.
5	Review the findings of the published SFRA and update the flood risk assessment of sites recorded in the SHLAA database.	Level 1 SFRA data was received by the Council in October 2008. It is anticipated that the SHLAA database will be updated by January 2009.
6	Update the accessibility assessment of sites recorded in the SHLAA to take account of new data supplied.	Data has been received from GMPTE it is expected that the SHLAA database will be updated by January 2009.
7	Review the large/key strategic sites proposed in the LDF Core Strategy Preferred Options Document to determine the nature/scale of any revisions to be made to the data recorded in the SHLAA database.	To be complete prior to the publication of a revised assessment.
8	Housing requirement figures are to be updated in order to reflect the increased housing requirement for the Borough which derive from Trafford's new Growth Point status.	To be complete prior to the publication of a revised assessment.
9	Review the remainder of the sites recorded in the SHLAA database to take account of the comments received in relation to capacity build rates etc.	To be complete prior to the publication of a revised assessment.
10	Subject to the satisfactory completion of the above tasks	Spring 2009

Task No.	Description of task	Timeline/Status
	publish a revised report for public consultation purposes.	

4. Conclusion

- 4.1 It is clear from a review of the consultation responses and the above table that there are a range of tasks which will need to be undertaken to take account of comments received to inform the preparation of a revised SHLAA report.
- 4.2 It is anticipated that subject to the satisfactory completion of the above tasks that a comprehensive revised SHLAA report will be made available in Spring 2009.
- 4.3 The Council will then seek to move forward to commence the preparation of an updated 2009 report for inclusion in the 2009 AMR.

**Appendix 1 - Stakeholders consulted as part of the draft
 SHLAA report consultation**

First Name	Last Name	Organisation
Jennifer	Hadland	SmithsGore
Sian	Hughes	Lancashire Gardens Trust
Christine	O'Carroll	Indigo Planning Limited
Janet	Belfield	Natural England
Leon	Armstrong	Mosaic Town Planning
Edward	Shorto	
Stephen	Dunbar	Manchester Meeting Room Trust
Caroline	Taylor	Emery Planning Partnership
Andrew	Leyskens	United Utilities
Lauren	Ashworth	HOW Planning
Emma	Mann	Dalton Warner Davis
Ian	McDonald	Strategic Planning Advice Ltd
Sylvia	Heron	Planning Liaison Officer
Aashim	Dhand	
Simon	Artiss	Bellway Homes
Graham	Hitchen	Graham Hitchen Associates
Tom	Loomes	Cunnane Town Planning
Mark	Russell	
N M	Heslip	Heslip Architects and Surveyors
Joanne	Dawson	Great Places Housing Group
M	Roberts	Partington Housing Association
John	Bowker	Trafford Housing Trust
Garnet	Fazackerley	Adactus Housing Group
Stephen	Walker	
Brian	Green	Sport England
Beverley	Dyer	Partington Town Council
Mrs J	Cuff	Ramblers Association (Manchester & High Peak)
Ken	Smith	Rochdale MBC, Strategic Planning Service
Micheal	Jones	Royal Mail Property Group
Mrs P D	Coulburn	Sale Civic Society
Ian	Wray	North West Development Agency
Arthur	Jurgens	Council for the Protection of Rural England
Derek	Richardson	GM Ecology Unit
Krista	Patrick	GM Geological Unit
Chris	Findley	City of Salford
Mr. G.T. Flood		Timperley Civic Society
Ian	Bradley	Trafford Healthcare NHS Trust
M	Bretherton	National Grid (NW Area)
		Advisory Council for Education of Romany & Traveller
Keith	Lumley	Network Rail
		British Telecom

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Mr S	Nield	Carrington Parish Council
Alan	Thornley	Cheshire County Council
Peter	Noble	Altrincham & Bowdon Civic Society
Alan	Bradley	Bowdon Conservation Group
Mrs K	Cozens	Dunham Massey Parish Council
Sylvia	Heron	Environment Agency
Mark	Priestner	Warburton Parish Council
Andy	Farrall	Warrington Borough Council
Nick	Clarke	Wigan MBC
Annette	De Pol	De Pol Associates
David	Holland	Arcon Housing Association
Nick	Sandford	Woodland Trust
Lisa	Walker	Irwell Valley Housing Association
		Powergen Plc
		Salford & Trafford Health Authority
Beverley	Hughes	MP Stretford & Urmston
Carole	Mulroney	Denton Wilde SAPTE
Mrs Eileen	McDonnel	Friends of Old Trafford
Mr Mark	Rubin	Altrincham Town Centre Partnership
Jo	Birch	Old Trafford and Gorse Hill Partnership Board
Ms Jessica	Reece	Sale Town Centre Partnership
Chris	Driver	Cheshire Wildlife Trust
Nigel	Blandford	Red Rose Forest
Keith	Jones	Forestry Commission
Mark	Gallagher	GM Fire and Rescue Service
Jon	Bottomley	Manchester Airport
		Lichfield Planning
Andrew	Wells	Nathanial Lichfield and Partners Ltd
Gary	Deane	Barratt Manchester
Caroline	Taylor	Emery Planning
Simon	Artiss	David Wilson Homes (North West)
Peter	Babb	Manchester City Council
Steven	Edwards	SP Energy Networks
		Health and Safety Executive
Kristian	Marsh	Highways Agency
Gina	Bourne	Home Builders Federation
John	Knight	Macclesfield Borough Council
Alan	Hubbard	National Trust
		North West Strategic Health Authority
Diane	Bowyer	DPDS Consulting Group
Ray	Collins	Persimmon Homes (North West)
		Nuclear Electric Ltd
Derek	Wilshaw	Altrincham Association Football Club Ltd
Duncan	McCorquordale	North West Regional Assembly
Colin	Parry	CB Richard Ellis Ltd
A. K.	Nicholls	Alyn Nicholls & Associates
John	Adams	Drivers Jonas
Emma	Latimer	Knight Frank
Peter	Ashburner	Frank Marshall & Co.

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Simon	Artiss	Bellway Homes Ltd
Laurence	Holmes	Development Planning Partnership
Paul	Smith	George Wimpey
Sarah	Williams	Indigo Planning Ltd
Suzanne	White	Tribal MJP
Justin	Paul	J10 Planning
Garnet	Fazackerley	Adactus Housing Group
David	Hardman	United Utilities
George	Johnstone	Manchester United Football Club
John	Ashton	Shell Chemicals UK Ltd
M	Leslie	South Trafford College
Emma	Singleton	How Commercial Planning Advisers
Vera	Williams	John Rose Associates
Clive	Sellers	Arcus Consulting
Mr Richard	Moffat	Dunlop Haywards Lorenz
William	Wood	Gerald Knight Associates
Chris	Worman	Kelloggs
Patrick	Kiernan	Harvest Housing Association
Andy	Frost	Jones Lang Lasalle
Robin	Buckley	Redrow Homes (NW) Ltd
Jermaine	Campbell	Arley Homes
John	Smith	Altrincham Chamber of Commerce, Trade, Industry
Yvonne	McDermott	St Vincent's Housing Association
Leon	Armstrong	Bidwells
Peter	Jackson	Hallam Land Management Ltd
David	Walker	David L Walker - Chartered Surveyors
Mike	Hopkins	King Sturge & Co.
Catherine	Stephens	GVA Grimley
Gary	Staddon	Lafarge Aggregates
Peter	Bojar	Great Places Housing Group
Sarah	Smith	Paul Butler Associates
Judith	Nelson	English Heritage
Janette	Findley	Barton Willmore
A M	Hutton	Smiths Gore
Alan	Tate	Tung Sing Housing Association
Vicki	Richardson	Walton & Co
		Department for Transport (Rail Group)
Munir	Ahmed	Ashiana Housing Association
		Norweb Energi
R	Palmer	Shell UK Pipelines
Jonathon	Symms	The Cedar Rest Home Ltd
Carolyn	Wilson	Mobile Operators Association
Ian	McDonald	Strategic Planning Advice Ltd
Ms Judy	Gough	Gough Planning Services
Angela	Mealing	Higham & Co
Hugh	Wilson	Bridgewater Meeting Room Trust
Terry	O'Brien	Stretford Town Centre Partnership
Derek	Webber	Taylor Woodrow Developments Limited
Hayley	Knight	GL Hearn

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Mrs F.M.	Woodbine	Ashley Parish Council
Mrs F.M.	Woodbine	Rostherne Parish Council
Mrs J.A.	Allen Jr	Agden Parish Meeting
Mr G.	Kelsall	Little Bollington Parish Meeting
Mrs Y.P.	Cook	Lymm Parish Council
Mrs I.M.	Lowe	Rixton with Glazebrook Parish Council
Mr P.	Johnson	Ringway Parish Council
Michael J	Crawley	
P	Middleton	G E Middleton & Co Ltd
Malcolm	Walker	Peacock & Smith
Paul	Foster	GM Chamber of Commerce
Phil	Lally	GONW
Steve	Melligan	Church Commissioners for England
Stewart	Ross	Stewart Ross Associates
Rosemary	Olle	GMPTE
Frances	Taylor	Salford City Council
Andy	Brown	Colliers CRE
Annette	Elliott	United Co-operatives Ltd
Andrew	Chalmers	Bolton Council
Ali	Abbas	Manchester Friends of the Earth
Richard	Knight	Turley Associates
David	Barker	Cyclist Touring Club
Dr Simon	Wright	Greater Manchester Police - Altrincham Area
Ian	Betts	Peel Holdings
Mr S	Wildman	Fusion Online Limited
Chris	Thomas	Chris Thomas Ltd
Trevor	Adey	Savills
Tom	Loomes	Cunnane Town Planning LLP
Claudia	Gilbert	Urban Splash Ltd
Adele	Snook	DTZ
Herb	Booth	
Mathew	Evans	Erinacous Planning
Tim	Noden	Wainhomes NW Ltd
Debbie	Thompson	Trafford Economic Alliance Partnership
Louise	Cumberland	Quality Homes For All Partnership
Graham	Parry	Clean and Green Partnership
Geoff	Ball	Better Transport Partnership
Helen	McFarlane	Safer Trafford Partnership
Jan	Walker	Healthy Living Partnership
Milorad	Vasic	Brighter Futures Partnership
David	McNally	Life Begins at 50 & Over Partnership
Teresa	Marriott	Everyone & Everywhere Matters Partnership
Debbie	Cowley	Culture Partnership
Peter	Cunliffe	Peter Cunliffe Chartered Surveyors
Frazer	Sandwith	King Sturge LLP
Louise	Armstrong	Gerald Eve
Austin	Mackie	DTZ
Peter	Wishart	Viridor Waste Management
The Planning Department		The Emerson Group

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Emma	Mann	Dalton Warner Davis LLP
Janet	Belfield	Natural England
Pauline	Matthews	Sale Moor Community Partnership
Bernie	Jones	Trafford Leisure Trust
Mark	Allcock	National Grid Property Ltd
Hannah	Cash	Rapleys LLP
Jane	McCall	Trafford Housing Trust
Graham	Brady	MP Altrincham & Sale West
Paul	Goggins	MP Wythenshawe & Sale East
Katherine	Calladine	Equity Housing Group
		Positive Partington Partnership
Richard	Solly	Traveller Law Reform Project
Bernard	Murray	Urmston Town Centre Partnership
Chris	Edge	David Mclean Homes Limited
Khan	Moghal	Voice of BME Trafford
Ralph	Rudden	Community Cohesion Community Forum
Vanessa	Tucker	Trafford MBC
Chris	Owens	NJL Consulting
Daniel	Owen	City Residential
Lisa	Roberts	Asda Stores Ltd (Client)
Aaron	Smith	Caldecotte Consultants
Michael	Nuttall	Peel Land and Property Limited
Will	Taylor	Shell International Ltd
Samuel	Martin	TMBC Overview and Scrutiny Committee
Sian	Hughes	Lancashire County Gardens Trust
Andy	Pepper	McInerney Homes North West

**Appendix 2 - Stakeholders who submitted comments as part
 of the draft report consultation**

Organisation	Agent
Bellway Homes	
Dalton Warner Davis	
Northern Trust Co Ltd	De Pol Associates
LCCC and Ask Property Developments Ltd	Drivers Jonas
Howard Holdings PLC	Drivers Jonas
Shell Chemicals UK Ltd and Shell Property Company Ltd	DTZ
Brixton plc	DTZ
JD Davidson	Edmund Kirby
Environment Agency	
Trafford College	Gee Squared
Bakemark UK	Gerald Eve
GMPTE	
Greater Manchester Ecology Unit	
Highways Agency	
United Utilities Property Solutions	HOW Planning
United Utilities Property Solutions	HOW Planning
Russell Homes	HOW Planning
Tim Jacomb and Anna Cooper	Leith Planning
Natural England	
Redrow Homes	
Reflect Developments	
Mr Welch	Steven Abbott Associates
Taylor Wimpey	
The National Trust	
Peel Group	Turley Associates
Warburton Parish Council	

Appendix - 3 Additional site suggestions

Organisation	Agent	Site Size (Ha)	Site Location
Shell Chemicals UK Ltd	DTZ	654	Land at Carrington
Brixton plc	DTZ	2.7	3 Wharfside Way, Trafford Park
Brixton plc	DTZ	0.97	9 Wharfside Way, Trafford Park
Brixton plc	DTZ	1.52	Elevator Road, Trafford Park
Brixton plc	DTZ	0.42	Trafford Gateway, Trafford Park
Brixton plc	DTZ	6.45	Trafford Point, Trafford Park
Brixton plc	DTZ	6.45	Circle South, Trafford Park
Brixton plc	DTZ	3.0	26 Europa Way, Trafford Park
Brixton plc	DTZ	1.08	Canalside, Trafford Park
Brixton plc	DTZ	0.45	Europa Triangle, Trafford Park
Taylor Wimpey		0.58	Norman Road, Altrincham
Taylor Wimpey		1.0	Norman Road, Altrincham
Taylor Wimpey		0.12	Norman Road, Altrincham
Trafford College	Gee Squared	Not known	Trafford College, Talbot Road, Stretford
Trafford College	Gee Squared	Not known	Technology Centre, Moss Road, Trafford Park
Northern Trust Co Ltd	De Pol Associates	0.12	Warwick House, Warwick Road, Stretford

**Appendix 4 - Summary of comments received and Councils
response**

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Name	Topic Area/Chapter	Para No./Pg	Summary of Response	Councils Response
DTZ on behalf of Shell Chemicals UK Ltd and Shell Property Company Ltd	Methodology	P6 Para 2.5	Trafford SHLAA should not be a stand alone district wide study. Question the soundness of the SHLAA as it does not meet the core outputs and requirements of all the process criteria.	The Council is actively working with its GM colleague authorities to co-ordinate SHLAA and other housing evidence gathering work. Paragraph 2.5 of the draft report states that <i>“Future assessments will be produced co-operatively at the sub regional AGMA level as effective working arrangements are put in place to achieve this end.”</i> The SHLAA is being produced by a necessarily staged and iterative process to meet the process requirements and produce the core outputs prescribed in the published guidance.
	Methodology	P9-11 Para 3.7	The methodology for selecting sites to be included in the assessment does not represent a robust and credible evidence base. There is no market testing of the sites identified, no sustainability assessment and no assessment of availability or deliverability.	The sites included in this initial assessment have been identified from a range of sources including local land owners and developers. The data collected has been published in order to obtain the views/opinions of land owners and developers to inform the market testing, sustainability, availability and deliverability assessment work that will be necessary to complete the appraisal.
	Methodology		The SHLAA does not follow the published guidance and gives no consideration to housing needs and demands in all housing sectors and an assessment of the key drivers and relationships within the housing market.	The published document is a draft and acknowledged “work in progress” document. It has been published in order to obtain the views/opinions of interested parties on the matters referred to in this response. Co-operative working at the GM level is in hand to provide housing market area evidence to support the progression of the SHLAA assessment. This evidence is due to be published shortly for all parties to consider.
	Housing Requirement Chapter 5	P23 Para 5.1-5.5	In relation to the increase in housing no’s for Trafford there are not enough sites identified through the SHLAA to deliver the annual minimum housing numbers.	The Council would suggest that such an opinion may be premature at this point in time. Other representations and Section 5 of the draft SHLAA report itself suggest an alternative and more optimistic supply position than is suggested.
	Site Specific (LA72)	P39 Appendix 3	LA72 (Land at Carrington) Considered for an ECO-Town and see no reason why this	The initial assessment and the draft SHLAA report has taken a view of the ECO-town proposal that can be

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Name	Topic Area/ Chapter	Para No./Pg	Summary of Response	Councils Response
			should change. Shells occupation of the land will decrease over the next 10-15 years and the land will become available for re-development.	revised as appropriate as the proposal is developed by the land owner. Development of the current outline proposal to a fully worked up development scheme will take some time to bring about. The representation acknowledges that the proposal is a long-term future development opportunity.
Natural England			Do not wish to comment in detail on the SHLAA.	Noted.
			Natural England is concerned to see proposals which show adaptation and reduction in the contribution to climate change.	The comment is noted.
			Do not wish to suggest sites for development but wish their interests to be considered in the process of selecting and assessing sites for development.	The request is noted.
Bellway Homes	Site Specific		Refer to development at Wharfside, Trafford Centre, Pomona and LCCC. Concern over the development of these sites for predominantly apartments. The sites may not deliver the residential numbers referred to and will result in a shortfall in delivery against the RSS target. Serious consideration needs to be given to the capacity/density of sites, their appropriateness for residential use in this market and the need for additional sites elsewhere to meet RSS minimum housing figures.	The points raised by this representation are noted and will be addressed within the context of the developing strategic housing market and other evidence base material that is being collected by the Council. Further large/key strategic sites appraisal work is in hand and will be reported and consulted upon in due course.
	Site Specific (LA96)	Appendix 9	Greenfield land release at the Trafford Centre (LA96). It is not an established living area, additional community facilities will be	The points raised by this representation are noted and will be addressed within the context of the developing strategic housing market and other evidence base

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Name	Topic Area/ Chapter	Para No./Pg	Summary of Response	Councils Response
			required and it is removed from the Metrolink system and bus routes which only serve the Trafford Centre.	material that is being collected by the Council. Further large/key strategic sites appraisal work is in hand and will be reported and consulted upon in due course.
	Housing Requirement	p23	Need to allow for the Growth Point uplift. Concern that existing commitments in the SHLAA include a considerable amount of apartments which will simply not be built, therefore an accurate estimate of allowance should be made which will significantly reduce the level of commitments/supply in Trafford.	The points raised by this representation are noted and will be addressed within the context of the developing strategic housing market and other evidence base material that is being collected by the Council. Further large/key strategic sites appraisal work is in hand and will be reported and consulted upon in due course.
GMPTE	Accessibility		A plan has been provided showing Trafford's potential housing sites in terms of their accessibility to public transport.	The Council is grateful for the supply of this important data. It will allow the public transport site accessibility appraisal work to be undertaken in an accurate and consistent manner.
	Accessibility		GMPTE would wish to see all new developments being focussed on sites that are accessible by modes of transport other than the private car. Where developments are not accessible then GMPTE would expect developers to make a financial contribution to the local transport infrastructure.	The request is noted.
	Accessibility		The sites that have been identified in the consultation document are mostly located in areas of high accessibility and GMPTE welcomes this.	The comment is noted.
Turley Associates on behalf of Peel Group			Draw reference to a number of additional documents submitted: <ul style="list-style-type: none"> • General Representations • Trafford Centre Rectangle 	The receipt of the additional support material is welcomed. The points raised by this additional material will need to be assessed within the context of the developing strategic housing market and other

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Name	Topic Area/Chapter	Para No./Pg	Summary of Response	Councils Response
			<p>Development Framework</p> <ul style="list-style-type: none"> Trafford Quays Concept Statement 	<p>evidence base material that is being collected by the Council. Further large/key strategic sites appraisal work is in hand and will be reported and consulted upon in due course.</p>
	Methodology	P9-10	<p>Note that the draft SHLAA excludes some employment sites until an ELR has been carried out. The Council should consult further once the draft SHLAA has been updated in light of such a review before finalising the document.</p>	<p>The Employment Land Review is being produced as part of the LDF evidence base and will be published and consulted upon in its own right. Further consultation to refine the findings of the SHLAA in the light of the findings of the ELR will also be undertaken.</p>
	Methodology		<p>In some instances it is considered that the methodology adopted does not comply with the DCLG guidance with the variation in approach not being justified in the document. Suggest the Council reviews its methodology prior to issuing a revised draft for further consultation.</p>	<p>The SHLAA is being produced by a necessarily staged and iterative process to and meet the process requirements and produce the core outputs prescribed in the published guidance. The published document is a draft and acknowledged “work in progress” document. It has been published to obtain the views/opinions of interested parties to enable the assessment to be developed and progressed to a conclusion.</p>
		P15	<p>Conclusions regarding the deliverability and developability of the sites has not been informed by detailed consultation with stakeholders contrary to advice contained with CLG guidance. Para 2.6 indicates that the consultation has only gone as far as a limited ‘call for sites’ exercise. State that the Councils conclusions should be viewed with some caution.</p>	<p>The sites included in this initial assessment have been identified from a range of sources including local land owners and developers. The data that has been collected has been published precisely to obtain the views/opinions of land owners and developers on the potential supply of development sites and to inform the market testing, sustainability, availability and deliverability assessment work relating to those sites that will be necessary to complete the appraisal.</p>
	Methodology		<p>Consider that there should be further consultation on a final draft prior to the final report being finalised and adopted.</p>	<p>This intention is stated in the draft report document.</p>

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Name	Topic Area/Chapter	Para No./Pg	Summary of Response	Councils Response
	Housing Requirement	Para 3.39 P17-18	Reports that all large development sites are assumed to make a contribution to potential housing supply at annual rates of completion ranging from 60 to 80 dwellings per annum. It is considered that this approach is too generic and believe that this has resulted in an under estimation of the contribution which certain sites can play in meeting housing land requirements. Object to the fact that it contrasts with the approach taken for other (non large sites) where recorded developer aspirations were taken into account (para 3.40).	The points raised by this representation are noted and will be addressed within the context of the developing strategic housing market and other evidence base material that is being collected by the Council. Further large/key strategic sites appraisal work is in hand and will be reported and consulted upon in due course.
	Site Specific		In terms of TC Rectangle Council assumed 60 dwellings per annum can be completed. Client believes that a more realistic figure is 100 dwellings per annum (i.e. an additional 40 dwellings per annum).	See the above comment.
	Site Specific		LA96 (Trafford Quays) – Site has far more potential to accommodate a higher number of dwellings than is being estimated or being planned for during the plan period. Peel estimate that 1275 dwellings within the plan period and a further 1725 thereafter.	See the above comment.
	Site Specific		Object to the estimate of residential development in the Trafford Centre Rectangle (600 units in the plan period) is inconsistent with the provisions of the CSPOD which identifies TC rectangle as having capacity to accommodate between 700 and 1000 dwellings in the 15 year plan period. The SA originally assumed 1200	See the above comment.

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Name	Topic Area/ Chapter	Para No./Pg	Summary of Response	Councils Response
			dwellings at TC rectangle in Option 2.	
	Site Specific	Appendix 4	Some sites appear to have been overlooked e.g. sites LA90-94 appear in Appendix 4 are not counted in Appendix 6 as being discounted and do not appear in the supply Appendix 7.	These sites are listed in Appendix 6 as being discounted on pages 74 & 75.
	Housing Requirement	Para 5.1	Section should be updated to reflect the increased housing requirement for the Borough which derive from Trafford's new Growth Point status.	The need to take account of the Growth Point initiative is acknowledged.
	Housing Requirement	Para 5.4	No of dwellings identified in 15 year plan period (10,266) is only just above the Councils housing land requirement (if NGP status factored in).	The comment is noted.
	Housing Requirement	Table 5	Given that a number of sites have not been robustly tested for deliverability/developability the Councils estimate of supply should be treated with caution. Need for caution reinforced when one considers that a large proportion of the sites are small scale (i.e. below 0.8 hectares) and as a consequence cannot be guaranteed to come forward.	The published SHLAA document is a draft and acknowledged "work in progress" document. It has been published to obtain the views/opinions of interested parties to enable the assessment to be developed and progressed to a conclusion. Further large/key strategic sites appraisal work is in hand and will be reported and consulted upon in due course.
	Site Specific		TC Rectangle and Trafford Quays has potential to make a far greater contribution to meeting housing land requirements than is currently being estimated.	See the above site specific comment responses.
	Site Specific	P73 Appendix 6	LA88 Broadheath West, Sale – The site (Craven Road) has recently been awarded outline planning permission on appeal for residential development. It should therefore be identified within the SHLAA in the category of sites within the planning process.	The comment is noted.

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Name	Topic Area/ Chapter	Para No./Pg	Summary of Response	Councils Response
			Estimate capacity of 50 dwellings.	
	Site Specific		LA83/LA49 Former Boat Yard, Edge Lane, Stretford – the site is identified as having potential for 44 units. Peel consider the site has potential for more than 44 units and are currently investigating this.	The SHLAA record for this site details currently known/confirmed data. The comment, however, is noted.
	Site Specific		LA86 Lock Lane Partington – The site is identified as having potential for 550 units. Peel considers that the site has potential for more than 550 units and are currently investigating this.	The SHLAA record for this site details currently known/confirmed data. The comment, however, is noted.
The National Trust			Do not wish to submit any specific comments.	Noted.
Dalton Warner Davis	Site Specific	p104	Welcome the inclusion of the site within the SHLAA (SS18 47-676 George Street, 3-15 Cross Street and 48-50 Stamford New Road). No further information provided regarding the site at this time.	The comment is noted.
DTZ on behalf of Brixton plc	Site Specific		Object to the red outline referring to Trafford Wharfside (LA84) map 2 is incorrect and conflicts with the plan for the same area shown on page 61 of the Core Strategy preferred Options document. Request that the plan is amended to show the full development potential of Trafford Wharfside.	LA84 was submitted as a potential development site by another party to the consultation exercise. The proposal was put forward as a specific development opportunity within the Salford Quays/Media City regeneration area and was acknowledged to be “a part of the larger Wharfside area”. The Council notes the sites indicated for future reference as the assessment is progressed.
			As part of the redevelopment of Trafford Park and regeneration of Old Trafford/Gorse Hill (identified in CS) major investment will be directed to this area to improve and provide new community infrastructure to support new residential and employment development.	The comment is noted.

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Name	Topic Area/ Chapter	Para No./Pg	Summary of Response	Councils Response
	Methodology/ Site Specific		Object to the fact that Trafford Wharfside is discounted from the overall supply pending completion of the Employment Land Review as outlined in Appendix 6. However given that Trafford Wharfside has been identified in the Core Strategy to deliver significant new housing the SHLAA consultation which forms an essential element of the Core Strategy should be postponed until the ELR is complete.	See the above response to site LA84. In addition to this site one further potential Wharfside contribution to the supply of sites has been included in the SHLAA – site 63230. The Employment Land Review is being produced as part of the LDF evidence base and will be published and consulted upon in its own right. Further consultation to refine the findings of the SHLAA in the light of the findings of the ELR will also be undertaken.
Drivers Jonas on behalf of LCCC and Ask Property Developments Ltd	Methodology	P7 para 3.1	Broadly supportive of the parameters and adopted methodology.	The supportive comment is noted.
	Site Specific	P91 Appendix 9	Support the findings of the draft assessment results and in particular the identification of Old Trafford Cricket Club (LA70). The boundary of the site (LA70) shown on map 2 is also supported.	The supportive comment is noted.
	Housing Requirement (Growth Point)		In relation to the New Growth Points Initiative note that further support for development around LCCC is supported.	The supportive comment is noted.
Greater Manchester Ecology Unit	Site Specific		LA39 (Davyhulme WWTW) – Site is almost entirely within a Grade A Site of Biological Importance (SBI). The Ecology unit would object to any housing allocation at this location and any allocation is likely to be contrary to the natural environment policies in the LDF.	The comment is noted for future reference as the assessment is further progressed.
	Site Specific		LA96 (Trafford Quays) – Site includes part of	The comment is noted for future reference as the

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Name	Topic Area/ Chapter	Para No./Pg	Summary of Response	Councils Response
			an existing wildlife corridor along the edge of the Manchester Ship Canal. Any development in this location would need to retain this corridor.	assessment is further progressed.
	Site Specific		LA12 (Crampton Lane, Carrington) – The site appears to be up against the banks of the River Mersey. Given the highly active nature of the river, sufficient room would need to be left to allow natural geo-morphological processes to continue (i.e. establishing a new river channel)	The comment is noted for future reference as the assessment is further progressed.
	Site Specific		LA02 (Mill Bank Hall Farm, Partington) – Site appears to include an area that is shown on the Ancient Woodland Inventory. Reference made to PPS9.	The comment is noted for future reference as the assessment is further progressed.
	Site Specific		LA15 (Land at Moss Lane South of Red Brook) – Concern regarding the impact of this site on Red Brook (appears site has been discounted)	The comment is noted. The site has been discounted from the initial draft assessment.
	Site Specific		UP68 – OS map shows a pond at this location if it is still present would need to survey the pond for great crested newts. Any loss of ponds is contrary to GM Biodiversity Action Plan and replacement ponds would be needed as mitigation. The site lies within an existing wildlife corridor which would need to be retained.	The comment is noted for future reference as the assessment is further progressed.
	Site Specific		23130/00 – Area appears to include part of a Grade B SBI, Ashley Heath Wood. The unit would be likely to object to any development proposal/allocation that affects this SBI.	The site already has planning permission for development.
	Site Specific		43274/00 – This area includes part of a	The site already has planning permission for

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			Grade B SBI, Bentley and Tomfield Banks, that is also an ancient woodland. The unit is likely to object to any allocation or development that would affect the SBI or the woodland.	development.
Highways Agency			Agency would have concerns if as a result of intensification of land use that the levels of traffic on the network would lead to an exacerbation of existing safety problems.	The comment is noted.
	Methodology		The Agency endorses the approach in using site surveys to determine the sustainability of each site being proposed within the document. It appears however that from the sites discounted after the site survey stage (appendix 5) that none of the sites were discounted specifically for issues relating to sustainability.	The endorsement is welcomed. All the sites will be assessed against the accessibility information that has been provided by the GMPTE.
	Site Specific		Sites of greatest concern to the Agency are LA96, LA90-91 and LA92/93/94 the sites are all located close to the Trafford Centre, an area termed the 'Trafford Centre Rectangle' in close proximity to junctions 9 and 10 of the M60.	The comment is noted for future reference as the assessment is further progressed.
	Site Specific		It is acknowledged that sites LA90-91 (Taylor Road, Trafford Centre Rectangle) and LA92/93/94 (Barton Dock Road/Mercury Way, Trafford Centre Rectangle) have been discounted pending the results of the ELR. These sites currently host operational industrial premises, however if they were converted to residential, which generate more trips in the morning and evening peaks,	The comment is noted for future reference as the assessment is further progressed. The Employment Land Review is being produced as part of the LDF evidence base and will be published and consulted upon in its own right. Further consultation to refine the findings of the SHLAA in the light of the findings of the ELR will also be undertaken.

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			the Agency may have to resist such applications due to the impact on the operational SRN.	
	Site Specific		LA96 (Trafford Quays) has been included and unlike the other sites is vacant. Due to the location of the site and the indication that some 2000 units are to be delivered, if this site was to become allocated and then developed the Agency would require consultation to take place at the earliest opportunity in the master planning stage with on-going pre app discussion, due to the potential impact on the SRN.	The comment is noted for future reference as the assessment is further progressed.
	Site Specific		LA39 (Davyhulme WWTW) is located to the west of J10 of the M60 on Greenfield land in the proximity of Davyhulme WWTW. Due to the location of the site to the north of Urmston it is expected that some traffic would use J10 of the M60. For this site to be realised improvements to public transport routes will need to be realised to reduce the need to travel by car.	The comment is noted for future reference as the assessment is further progressed.
	Site Specific		LA70 (Old Trafford Cricket Ground) The Agency acknowledge that this site benefits from the proximity of the Metrolink, however the Agency consider that there is potential for trips to other destinations which would necessitate the use of the M602. The Agency would also like to be consulted at the earliest opportunity regarding the future redevelopment of this site.	The comment is noted for future reference as the assessment is further progressed. Further large/key strategic sites appraisal work is in hand and will be reported and consulted upon in due course.
			Partington	The comment is noted for future reference as the

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			<p>Note that the area has been targeted for high levels of development within the Core Strategy. Unless public transport infrastructure and services are developed in this location it is assumed that sites in this area will generate high levels of private car trips in the morning and evening peak periods. Although the largest site has been discounted during the site survey stage, site LA86 located at Canal-Side could potentially realise 550 new dwellings.</p>	<p>assessment is further progressed.</p> <p>Further large/key strategic sites appraisal work is in hand and will be reported and consulted upon in due course.</p>
			<p>At this stage the Agency are not in a position to fully endorse the document or to reject the sites being proposed. The Agency has stated that they would like early involvement in the planning process.</p>	<p>The comment is noted. The Council fully intends to involve the Agency in the Local Infrastructure Plan and large/key strategic site appraisal work it will be undertaking to progress the preparation of the LDF Core Strategy.</p>
			<p>The Agency is keen to see housing sites in areas of good accessibility, close to key services and sustainable transport routes.</p>	<p>The comment is noted.</p>
<p>Warburton Parish Council</p>	<p>Site Specific</p>		<p>LA15 – Land at Moss Lane, South of Redbrook It is requested that the Council cease referring to this site as being in Partington as it is in Warburton.</p>	<p>The comment is noted for future reference as the assessment is further progressed.</p>
<p>Redrow Homes</p>		<p>P17 Para 3.37 & 3.38</p>	<p>Too simplistic to assume that all outline permissions will be implemented within two years and that all full permissions will contribute to the 0-5 years supply. Para 58 of PPS3 states LPA's should not include sites in the developable supply which they have granted PP unless they can demonstrate, based on robust evidence, that the sites are</p>	<p>The published document is a draft and acknowledged "work in progress" document. The sites included in the initial assessment it contains have been identified from a range of sources including local land owners and developers. The appraisal data collected has been published precisely to obtain the views/opinions of land owners and developers to inform the market testing, sustainability, availability and deliverability assessment</p>

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Name	Topic Area/ Chapter	Para No./Pg	Summary of Response	Councils Response
			developable and likely to contribute to housing delivery at the point envisaged. A thorough interrogation of all the potential housing sites involving key stakeholders needs to be carried out.	work that will be necessary to complete the appraisal. Co-operative working at the GM level is in hand to provide housing market area evidence to support the progression of the SHLAA assessment. This evidence is due to be published shortly for all parties to consider.
			All apartment schemes which are not currently under construction should be excluded from the 0-5 year supply due to the collapse of that market.	The comment is noted for future reference as the assessment is further progressed.
		P18 Para 3.39	The assumed completion rates for sites over 100 units are too ambitious. Even in a good market most housebuilders forecast a build rate of 30-40 dwellings per annum, based on a traditional housing scheme.	The comment is noted for future reference as the assessment is further progressed.
			A reduced rate of 20 units should be assumed for the first year of construction to take into account time lost for ground /engineering works. Only on very large sites (e.g. >300 units) where 2 housebuilders might build out the units, will a rate of 70-80 be achieved. The exception to this is apartment schemes, but due to recent market conditions a lower capacity should be assumed.	The comment is noted for future reference as the assessment is further progressed.
		P15 Para 3.28	The market for apartments in the NW has become so saturated it is now almost totally exhausted. As a result sales rates and values for many apartment schemes still in the pipeline will make those schemes unviable. More modest and realistic assumptions need to be made about the capacity of sites with permissions for high density apartments.	The comment is noted for future reference as the assessment is further progressed.

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Name	Topic Area/Chapter	Para No./Pg	Summary of Response	Councils Response
		P19 para 4.2	Consider that the overall supply figures contained in Table 1 grossly distort the real picture.	The Council would submit that such an opinion is premature at this point in time. Other representations and Section 5 of the draft SHLAA report itself suggest an alternative and more optimistic supply position than is suggested.
	Site Specific	P74 Site Ref LA15	Site should not have been discounted and represents a sustainable option for accommodating further growth in Partington which will support the strategic and place objectives of the Core Strategy. Reference to flood risk is exaggerated because only the margins of Red Brook are included within a Flood Zone and it does not represent a constraint to development.	<p>The comment is noted for future reference as the assessment is further progressed.</p> <p>The site was discounted principally because it is a large green-field urban area extension site of significant agricultural value.</p>
Reflect Developments	Site Specific		LA62 - Budenberg bowling green Been in discussion for some time with the Council regarding development of the land surrounding the green for residential development and a new club house. As a result of discussions believe that the site does have potential for residential development and would like confirmation that this is the case.	<p>The comment is noted for future reference as the assessment is further progressed.</p> <p>Confirmation or otherwise of the development potential of the site referred to can best be achieved via the pre-application consultation process that the prospective developer is already engaged with the Council in.</p>
Edmund Kirby on behalf of JD Davidson	Site Specific		LA89 – Viaduct Road, Broadheath Site submitted for consideration by Turley Associates on behalf of Peel. Site identified as having potential for 65 dwellings with land to be released within 5-10 years time. JD Davidson strongly object given that the business has been operating from the site for over 50 years and provides an important recycling service. Davidson's are an active	The comment is noted for future reference as the assessment is further progressed.

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Name	Topic Area/Chapter	Para No./Pg	Summary of Response	Councils Response
			scrap metal receiving, processing and recycling business.	
	Methodology	P13	ELR has not been completed. View that the Council should not put forward any sites until this study has been completed as it could result in an option which would prejudice the level of employment land in the Borough. This stage of the LDF process is therefore premature and likely to be challengeable.	<p>The SHLAA is being produced by a necessarily staged and iterative process to meet the process requirements and produce the core outputs prescribed in the published guidance.</p> <p>The Employment Land Review is being produced as part of the LDF evidence base and will be published and consulted upon in its own right. Further consultation to refine the findings of the SHLAA in the light of the findings of the ELR will also be undertaken.</p>
	Methodology		Also note the evolving joint waste plan for the GM which is at early stages of development. To make any decision on this land which would prejudice the existing use of the site would be imprudent.	<p>See the above comments regarding the SHLAA preparation process.</p> <p>Proposals arising from the Joint Waste Plan will be taken into account as the SHLAA assessment is further progressed.</p>
Steven Abbott Associates (on behalf of Mr Welch)	Site Specific	p40	LA36 – Hasty Lane, Hale Acknowledge that the site cannot be recognised at the moment as the site is located within the Green Belt. However wish the future re-allocation of the site out of the Green Belt to be considered. Site is immediately available and there has been market interest in the site over the years. Draws attention to the number of developments around the area in the last 15 years (e.g. Marriott, extensions and new houses), character of the area has changed.	The inclusion of this or any other site located within the established Green Belt within the SHLAA could only be considered upon the completion of a strategic review of the Green Belt within the Borough. The RSS clearly indicates that such a strategic review is not imminently proposed for Greater Manchester.
	Site Specific/		The emerging RSS targets for Trafford	See the above comment.

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Name	Topic Area/ Chapter	Para No./Pg	Summary of Response	Councils Response
	Housing Requirement		require an annual average increase of 308 dwellings and it is considered that the Hasty Lane site has the potential to ease the pressure on Greenfield sites in the Borough which may be in less suitable locations with many more constraints.	
			Disappointed that the Council is not using the LDF to make non-substantial strategic changes to the Green Belt boundaries in Trafford.	The comment is noted.
Taylor Wimpey	Site Specific		LA07 – L&M site Norman Road, Altrincham Support residential development on this site, existing employment use could be relocated to Broadheath. In the UDP site the site is identified for mixed housing and employment use.	The comment is noted.
		P17-18 Para 3.39	Rates for development shown in the table on page 18 are very high and unrealistic in current market conditions. Developers are now building at a rate of 25-30 dwellings rather than 60 as shown in the table.	The comment is noted for future reference as the assessment is further progressed.
	Site Specific		There are a number of sites in the first 5 years that are unrealistic and unaligned to PPS3 in being Deliverable, Suitable and Available. LA83/LA49 – Former Boat Yard, Edge Lane, Stretford – 44 units on 0.22ha UP2 (B) Land south of Edge Lane, Stretford – 107 units on 0.72 ha LA89 – Dalton House, Sale – 89 Units on 0.64 ha (the site is currently being refurbished by Bruntwood for office	The comment is noted for future reference as the assessment is further progressed.

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Name	Topic Area/Chapter	Para No./Pg	Summary of Response	Councils Response
			accommodation)	
			There is an excessive over reliance on apartment schemes across the Borough, which is unsustainable and weighs against all current market trends. Unlikely that many of these apartment schemes will be deliverable within the next 5 years.	The comment is noted for future reference as the assessment is further progressed.
HOW Planning (on behalf of United Utilities Property Solutions Limited)	Site Specific		LA38 – Hale WWTW, Bankhall Lane, Hale Object to the fact that the site has been discounted in the draft SHLAA. Acknowledge that the former treatment works is identified within the adopted UDP as within the Green Belt (Policy C4), as a wildlife corridor (Policy ENV10) and as protected landscape character (ENV17). Land shaded orange and red incorporates the same designations but in addition part of the land is covered by the River Valley Floodplain (Policy ENV13).	The inclusion of this or any other site located within the established Green Belt within the SHLAA could only be considered upon the completion of a strategic review of the Green Belt within the Borough. The RSS clearly indicates that such a strategic review is not imminently proposed for Greater Manchester. The published document is a draft and acknowledged “work in progress” document. The sites included in the initial assessment it contains have been identified from a range of sources including local land owners and developers. The draft report has been published precisely to obtain site characteristic information and the views/opinions of land owners and developers to inform the market testing, sustainability, availability and deliverability assessment work that will be necessary to complete the appraisal. The comment therefore is noted for future reference as the assessment is further progressed.

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Name	Topic Area/ Chapter	Para No./Pg	Summary of Response	Councils Response
		P13 para 3.24	Paragraph 21 of DCLG guidance states that the scope of the assessment should not be narrowed down by existing policies designed to constrain development. Where particular types of land are excluded from the assessment the reasons for doing so must be justified. The guidance also states that as a minimum all sites identified by the desk top review should be visited.	See the above comment.
	Methodology		Consider that the assessment is flawed as a site visit was not carried out for this site and the land shaded blue and red on the plan should be reconsidered.	See the above comment
		P19 para 4.2	Land shaded blue is available for immediate redevelopment under the terms of PPS3. Housing is considered deliverable and developable in the short term (0-5 years).	See the above comment
	Site Specific		Lands designation within the Green Belt is noted and it is considered that a small scale housing proposal could be accommodated which (adopting PPG2 footprint approach) would have no impact on the openness or purposes of the Green Belt.	See the above comment
	Site Specific		Development of the site would offer a beneficial new use for the site and would be able to incorporate affordable housing where affordable housing potential is likely to be limited.	See the above comment
	Site Specific		Site is considered sustainable, immediately available and should be identified as coming forward within 0-5 year timeframe. Due to the Green Belt status of the land	See the above comment

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Name	Topic Area/ Chapter	Para No./Pg	Summary of Response	Councils Response
			shaded red the Council are asked to consider the sites long term future housing potential and identify it within the 11-15 year time frame.	
HOW Planning (on behalf of United Utilities Property Solutions)	Site Specific	Appendix 9 p110	LA39 - Davyhulme WWTW Land is surplus to the operational requirements of United Utilities. Acknowledged that the site at present has a number of potential constraints in relation to access, pylons and wildlife corridors, these are being investigated further and given the significant size of the site and likely timeframe for the site to come forward (i.e. 10/15 years) these matters can be overcome with the commitment of the landowner, expert technical advice and a master planning exercise.	The comment is noted for future reference as the assessment is further progressed.
	Site Specific		The site at Davyhulme is considered developable as the site is in a location considered suitable for residential development and there is a reasonable prospect of it coming forward for development within the 10/15 year period identified.	The comment is noted for future reference as the assessment is further progressed.
	Site Specific	Appendix 9	Support is given to the Council to identify the site in the 10/15 year period in the final SHLAA.	The comment is noted for future reference as the assessment is further progressed.
Leith Planning (on behalf of Tim Jacomb and Anna Cooper)	Site Specific	Appendix 9 p107	LA43 - Land adjacent to 15 Westwood Avenue – Site has been included in the draft SHLAA and principle of residential development is being progressed through the development control process.	The comment is noted for future reference as the assessment is further progressed.

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Name	Topic Area/ Chapter	Para No./Pg	Summary of Response	Councils Response
	Housing Requirement	P23	RSS published in March 2008 proposed a net average annual requirement of 578 dwellings per annum for Trafford up to 2021 once an allowance of 40 units per annum is made for clearance/replacement the minimum gross annual requirement for Trafford would rise to 618 units per year. This requirement may increase to some 694 units per year should the GM growth point bid be accepted.	
HOW Planning (on behalf of Russell Homes)	Site Specific/ Methodology	P73 Appendix 6	SS16 – Deansgate Lane, Timperley Request that the site is not discounted from the draft SHLAA as a result of the sites allocation as E7 and pending completion of the Employment Land Review.	<p>The SHLAA is being produced by a necessarily staged and iterative process to meet the process requirements and produce the core outputs prescribed in the published guidance.</p> <p>The Employment Land Review is being produced as part of the LDF evidence base and will be published and consulted upon in its own right. Further consultation to refine the findings of the SHLAA in the light of the findings of the ELR will also be undertaken.</p>
	Site Specific		Site currently in industrial/business use, occupied by Corrugated Paper Sales Ltd. Tenants lease is due to expire in July 2009.	The comment is noted for future reference as the assessment is further progressed.
	Site Specific		Site has good links to Metrolink and surrounding bus services. Number of shopping facilities close by and Altrincham Town Centre 1.2km to the south.	The comment is noted for future reference as the assessment is further progressed.
	Site Specific		Redevelopment of the site would bring significant regeneration benefits.	The comment is noted for future reference as the assessment is further progressed.
	Site Specific/ Methodology		Methodology - State that in accordance with CLG guidance that the Assessment should	The comment is noted for future reference as the assessment is further progressed.

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			not be narrowed down by existing policies designed to constrain development.	
	Housing Requirement		A residential use at this site would assist the Borough in achieving its annual housing targets. Reference to Growth Point Bid.	The comment is noted for future reference as the assessment is further progressed.
	Site Specific		Policy E7 'Main Industrial Areas' in the UDP does not preclude other appropriate development coming forward subject to relevant development control criteria being satisfied.	The comment is noted for future reference as the assessment is further progressed.
	Site Specific		Given that the existing tenants lease is due to expire in July 2009, meaning the site will be available, its occupation of a highly accessible location with access to Metrolink and bus services the prospect of residential development being delivered within 5 years is achievable.	The comment is noted for future reference as the assessment is further progressed.
			TMBC have not taken into account the aspirations of draft PPS4 in terms of not automatically carrying forward employment allocations.	The comment is noted for future reference as the assessment is further progressed.
Gerald Eve (on behalf of Bakemark UK)	Site Specific	P74 Appendix 6	LA81 – Land at Skerton Road, Old Trafford Site is currently occupied by a food processing plant. Suggest that the site would be suitable for a mixed use redevelopment scheme. Consider that sites should not be discounted from the Assessment merely because of their existing allocation. Suggest that a more appropriate approach to the SHLAA may be to retain all existing employment sites within the housing land assessment and undertake further work in	The SHLAA is being produced by a necessarily staged and iterative process to meet the process requirements and produce the core outputs prescribed in the published guidance. The Employment Land Review is being produced as part of the LDF evidence base and will be published and consulted upon in its own right. Further consultation to refine the findings of the SHLAA in the light of the findings of the ELR will also be undertaken.

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			terms of deliverability and developability until the results of the ELR state otherwise.	
	Methodology		Object to the lack of acknowledgement of the site within the PRA. Where there is a focus on residential led regeneration schemes of under used sites. It is considered that the Skerton Road site meets many of the criteria outlined in Policy H10 and the allocation should be given appropriate attention.	The comment is noted for future reference as the assessment is further progressed.
			In terms of contamination the site contains a number of industrial buildings of varying age and condition. Historically the site has been used as an industrial plant and therefore Environmental Site Investigation may be required to confirm if contamination does exist on the site.	The comment is noted for future reference as the assessment is further progressed.
Drivers Jonas (on behalf of Howard Holdings PLC)	Methodology	P7	Broadly supportive of the parameters and adopted methodology.	The supportive comment is noted.
	Site Specific	P156	63230/00 – Victoria Warehouse - In agreement with the draft assessment results and in particular identification of Victoria Warehouse. The boundary of the site as outlined on Map 2 is also supported.	The supportive comment is noted.
	Site Specific	Appendix 7,8,10,11	Request an amendment to the figures which currently read: 300 dwellings in the <5 year plan period and 88 dwellings in the 5-10 year plan period. Amendment requested to the above figures to reflect the current potential of the site and	The comment is noted for future reference as the assessment is further progressed.

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			<p>its progress within the planning process. The figures should read:</p> <p>605 dwellings in the <5 year plan period and 0 dwellings in the 5-10 year plan period</p>	
	Housing Requirement	P23 para 5.1	Full support is given to the Council's bid to become a new Growth Point Bid.	The supportive comment is noted.
Environment Agency	Methodology	P13 para 3.24	Support the removal sites within the flood plain as this accords with the principles of the sequential test in PPS25.	The supportive comment is noted.
		P13 para 3.24	Assumed that reference to the 'floodplain' means that sites within areas of flood zones 2&3 as shown on the Environment Agency Flood Maps. If this is not the case then need further clarification within the document.	The Council can confirm that use was made of the EA Flood Zone 2&3 maps.
		P15 para 3.32	Although supportive of the fact that sites in the floodplain are discounted, other sites which have been taken forward may be at risk from other sources.	The comment is noted. The Council intends to make use of the results of the detailed stage 2 SFRA work that is to be undertaken within the Borough to update the draft site assessments in so far as these other flood risks are concerned when they become available.
	Methodology	P15 para 3.32	<p>Current GM SFRA is at its first sub regional stage and has yet to undertake a more detailed level two assessment which considers flooding from all sources (Canals, Sewers, Pluvial etc) without having all the evidence base in place it is difficult to determine whether other sites (e.g. Those adjacent to the MSC, Trafford Park, Pomona) would be suitable for development within the SHLAA.</p> <p>Although it is not expected that these sites</p>	See the above comment.

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			would be discounted from the SHLAA reference should be made to those sites where it is considered that additional details will be required in undertaking level 2 SFRA. The results of which will have an impact on whether a site is 'developable' for housing.	
Gee Squared (on behalf of Trafford College)	Site Specific		The College is considering its future land holdings across the Borough. 2 site suggestion forms submitted.	The comment is noted for future reference as the assessment is further progressed.
De Pol Associates (on behalf of Northern Trust Co Ltd)	Site Specific		Site suggestion form submitted.	The suggestion is noted for future reference as the assessment is further progressed.