

Regulation 18 Local Plan - Issues Paper Consultation Form (July 2018)

Any comments you have on the Local Plan Issues Paper can be submitted using this consultation response form.

Please note, not all questions are mandatory.

Comments, using this form, can be submitted by email to localplan.consultation@trafford.gov.uk or by post to Strategic Planning, Strategic Growth Services, Trafford Council, Trafford Town Hall, Talbot Road, Manchester, M32 0TH.

If you have any enquiries regarding the Local Plan Issues Paper, please email localplan.consultation@trafford.gov.uk or call 0161 912 3149 and a member of the Strategic Planning Team will be able to assist.

Comments are invited on the Issues Paper from 23rd July 2018 until 14th September 2018 when the consultation will close.

Data protection

Please note all comments will be held by the Council and will be available to view publicly. 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 Your personal information such as your postal and e-mail address will not be published, but your name and organisation (if relevant) will.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 matters such as the Local Plan. In responding to this consultation your contact details will automatically be added to the consultation database (if not already held). If you do not want to be on the consultation database and therefore not be contacted about future strategic planning consultations please state this in your response.

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Scope and contents of the Local Plan

Do you agree with the scope and contents of the Local Plan?

The scope of the Local Plan should include reference to the Development of Sustainable Communities, including how Trafford will undertake GENUINE consultation with residents about the future their local area.

In addition to 'Climate change mitigation and adaption, conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure', it should cover how Trafford will preserve green belt status (with changes only being made after all other avenues have been thoroughly exhausted) and also how Trafford will safeguard the habitats of declining bird species and protected wildlife.

The scope of the Local Plan should also include reference to ensuring equality across the borough, tackling major issues, such as homelessness and poverty.

It should also emphasise the importance of traffic-free links, out of town parking and improved public transport, to decrease the use of the road networks and, therefore, significantly reduce air and noise pollution.

Should any assumptions be made for development beyond the end of the plan period in line with the emerging GMSF?

To respond to this question, one would have to review the details on the GMSF website. It would have been helpful to include the period in question.

Whilst there are certainly some policies which should not be determined by the GMSF period, I would make an assumption that the Local Plan will be reviewed several times prior to the end of that period (which according to the website is 2035). As there could be many changes to population statistics and other evidence that will impact development decisions, during the period, it may be challenging for this Local Plan to make reasonable assumptions beyond that date.

How can we ensure a 'presumption in favour of sustainable development' runs through the Plan?

Sustainable development is not defined in the glossary but the most common definition is that it refers to '*development that meets the needs of the present without compromising the ability of future generations to meet their own needs*'. (International Institute of Sustainable Development: <https://www.iisd.org/topic/sustainable-development>).

With that goal in mind, planning policies need to be agreed which support this aim, including policies to preserve the natural resources available in Trafford for the benefit of future generations of residents. This also means more work needs to be done to ensure we are making the most of brownfield sites and other areas which could be used for further development, rather than just approving 'easy' developments that comply with the GMSF!

We should also put in place policies (and include conditions for developers) which focus property development on specific housing need. Any development in Trafford should address housing need in Trafford. If the housing need assessment determines that small homes (1 bedroom, 2 bedroom) are needed for young people and young families, that is what should be built, not 3, 4 and 5 bedroomed houses that leave local people still fighting to find somewhere to live! This also fits with the "Nobody is Held Back, Nobody is Left Behind" principle.

I have suggested some additional policy themes in my response to 'Are there any other key issues relating to Green Belt and countryside you feel the Local Plan could address?' below, which would also support a presumption in favour of sustainable development running through the plan.

Vision and objectives for the Borough

Do you agree that the Local Plan should have its own spatial vision?

Yes, just as it is important to recognise the distinct places that make up Trafford, it is equally important to recognise that each of the 10 Authorities involved in the GMSF have their own unique identity too.

The redrafted spatial framework will aim to make the most of Greater Manchester's brownfield sites and reduce the impact on greenbelt. It will also set out how we enhance and protect the quality of the natural environment, conserve wildlife and tackle flood risks, so that we can accommodate growth sustainably. Trafford needs to understand whether the GMSF vision meets Trafford's specific needs and whether additional policies are needed to secure Trafford's future vision.

What do consider are the key spatial priorities which should be included in a Local Plan Vision?

Recognising the distinct places that make up Trafford, whilst shaping a Trafford identity, should be a key principle in our planning policies. Merging Carrington, Partington, Sale and Warburton together (which is what the current GMSF plan will do) is not recognising the different and distinct cultures in each of these communities! It is also not meeting the green belt principles to prevent urban sprawl.

Another key spatial priority is to enable Trafford to become a **Centre for Digital Transformation**. This will attract businesses and will mean we not only require the right infrastructure to support such a goal, but our residents will need to be trained to work in this sector (our young people will be able to help and mentor older generations – we can get some inter-generational initiatives going). Infrastructure is needed not just in the business parks but also there should be key links between higher education and digital businesses. Some of this work for this new industry sector can be done from our residents' homes, which means that parents of young children, or people caring for elderly relatives, can get back into the working environment sooner (assuming their homes are technically enabled and they have the capabilities to be part of this exciting initiative. Digital Transformation is key to all businesses to retain competitiveness and enable future growth – Trafford should be at the forefront of this.

Proposed wording changes to the graphic on page 13:

Change to: Strong **and fully engaged** Communities

Change to: Accelerate **the right** housing

Change to: Optimising **digital** technology to improve lives and productivity **and enable the creation a virtual Centre for Digital Transformation**

Spatial profile of the Borough

Does the diagram (page 16 of the Issues Paper) provide a good representation of Trafford?

There are some key points missing:

- Ashton on Mersey should be listed as a district centre
- Carrington should be an employment area
- Why is only Longford Park mentioned? What about all our other parks that are key landmarks in our neighbourhoods?
- Carrington Moss should be mentioned specifically as an important peatland, woodland (identify Dainewell Woods which are mentioned by City of Trees in their leaflets)

This representation shows the existing green belt which Trafford should protect and preserve.

Should the Local Plan identify different distinct "Places" to those in the Core Strategy?

To respond to this question, one would have to review the Core Strategy. No links were provided and no summary of the 'places' in the Core Strategy was provided.

Whilst there would undoubtedly be benefits of breaking down some areas into smaller districts (ie Sale could include Ashton on Mersey, Sale West, Sale Moor, Central Sale, etc), there are important elements of the existing Core Strategy that should be reinforced in the Local Plan, including the following:

- Protect the areas of high biodiversity importance
- To tackle the quality of and uneven distribution of accessible green space and play facilities in the area – particularly in Ashton-Upon-Mersey, which is deficient in green space
- To safeguard and protect, from inappropriate residential development, the character; appearance; and amenity of Warburton, Dunham Town and Dunham Woodhouses and the Green Belt.
- To improve access to and maximise the potential of this valuable informal recreation resource (*Trafford's rural communities*), to improve the health of Trafford's residents.
- To safeguard and enhance the landscape character, environment, biodiversity, amenity and visual attractiveness of the area for the recreational use of residents and visitors to the Borough.
- To protect and enhance the very high quality natural environment, archaeological features and landscape character of the area (*Trafford's rural communities*).
- To improve biodiversity for example by recreating Mossland habitat and connecting up protected sites both within Trafford and across boundaries with Warrington and Salford (*Trafford's rural communities*).
- To secure improvements and use of pedestrian and cycling facilities along routes such as the Bridgewater Canal and Trans Pennine Trail.
- To protect and enhance the Mosslands as a natural carbon sink to mitigate the effects of climate change (*Carrington*).
- To protect, improve and enhance the quality and accessibility of biodiversity and green spaces (*Carrington*).

- To improve and enhance the appearance and quality of the environment, including green and open spaces for recreational purposes and the public realm (*Carrington*).
- To maximise the re-use or redevelopment of the substantial amounts brown-field land (*Carrington*).
- To protect and enhance areas of environmental importance (*Carrington*).
- To provide clearly defined green corridors to join the urban fabric with the surrounding greenspace assets (*Carrington*).
- To improve access to the surrounding open countryside (*Carrington*).
- The Council will continue to protect the Green Belt from inappropriate development.
- New development, including buildings or uses for a temporary period will only be permitted within these areas where it is for one of the appropriate purposes specified in national guidance, where the proposal does not prejudice the primary purposes of the Green Belt set out in national guidance by reason of its scale, siting, materials or design or where very special circumstances can be demonstrated in support of the proposal.
- The Council will protect existing agricultural land as an important resource for Trafford's local economy. In particular, the Council will seek to protect the Borough's: **(a) Richest soils located south of Carrington Moss (Settled Sandlands) for agricultural purposes;** and (b) Pastural landscape located within the Timperley Wedge for agriculture and recreational purposes.
- In order to support Trafford's agricultural community, the Council will consider appropriate farm diversification proposals where it can be demonstrated that the proposal would not: (a) Replace the existing agricultural use; (b) Have a detrimental impact on the existing ecology and landscape of the area; and (c) Be contrary to Government Guidance or other policies within this Plan. Other Protected Open Land
- The Council will protect the following areas of open land (that are not included within the Green Belt) from development: (a) Land in Warburton (immediately to the south of Partington); and (b) **Land south of Shell, Carrington.** Development on this land will **only be permitted** where it is: (a) Required in connection with agriculture or forestry; or (b) Proposed for agricultural diversification in accordance with national guidance and other Policies in the Development Plan for Trafford; and (c) Would not prejudice the future use of the land.
- Within the Green Belt, development will be restricted to those uses that are deemed appropriate in the context of national guidance and which maintain openness. For all other types of development it will be necessary for the applicant to demonstrate very special circumstances to warrant the granting of any planning permission for development.
- **The main purpose of the Green Belt in Trafford is to keep land open and free from development to maintain the character and identity of individual settlements and to enhance the environmental and recreational value of the countryside.**
- This Policy will assist the Council in its aim to create sustainable communities by concentrating new development in urban areas particularly the regional centre and inner area and town centres.
- National planning guidance covering Green Belt describes the purpose of including land within the Green Belt, the objectives for the use of land in the Green Belt, defines appropriate and inappropriate development in the Green Belt, and advises on defining Green Belt boundaries for the long term and on safeguarding land to meet future development needs.
- This Core Strategy Policy sets out strict control of development in the open countryside areas. For the avoidance of any doubt no new building other than that covered by national guidance will be allowed in the "washed over" village settlements of Dunham Town, Dunham Woodhouses and Warburton. National guidance states that Green Belt boundaries in development plans should be altered only exceptionally and should not normally be needed to be altered at the end of the plan period. National guidance details that Safeguarded land can be identified in order to meet long term development needs stretching well beyond the plan period.
- By protecting the land as Countryside the Council is maintaining its approach to delivering a balance of growth and regeneration which is consistent with the thrust of the Government's "Plan for Growth" document and the duty incumbent upon local planning authorities to work with developers.
- The Policy requirements set out at R4.4 ensure the Policy's compliance not only with "Plan for Growth" but also with national guidance.
- It is recognised that there are areas of countryside around urban areas that are highly valued locally, are important to those who live in nearby urban areas and provide the nearest and accessible countryside for those urban residents. Accordingly, any development meeting the criteria of Policy R4.4 will also be required to deliver concurrently the existing proposal for a 99ha rural park to protect, enhance and manage the land adjoining the development site for ecological interest, recreational access and farming.
- National guidance sets out the general guiding principles for sustainable development within rural areas and recognises that the presence of a successful agricultural economy can be essential to the sustainability of these communities. In order to ensure the long term economic viability of agriculture in Trafford, the Council also recognises the role that appropriate agricultural diversification can play within this Policy.
- However, the sub division of agricultural land into smaller plots can cause problems. It can create an eyesore which detracts from the openness of the countryside, and when plots are sold and no longer in agricultural use this can lead to neglect, with owners being hard to trace. Furthermore, the subdivision of fields gives the impression that development of land is bound to occur, regardless of any Green Belt status. Therefore where agriculture in Trafford takes place within the Green Belt any appropriate agricultural diversification will be determined in line with National guidance.

- **The Trafford Landscape Strategy identifies land to the south of Carrington Moss, known as Settled Sandlands, as the area with the richest soils to support arable farming, and Timperley Wedge in the East with less rich soils to support a mixture of pasture and horticulture together with recreational uses.**
- Applications for agricultural dwellings or buildings and for the removal of agricultural occupancy conditions will be determined in accordance with National guidance and SPDs, where relevant. Other Protected Open Land
- The areas of protected open land detailed in R4.7 that are excluded from the Green Belt and not allocated for development in the Core Strategy or Land Allocations DPD may be required to meet development needs beyond the Plan period. Therefore, these areas will be protected from all but limited essential development to enable them to make a contribution to meeting future, as yet, unquantified needs. This will reduce the need for the Council to consider alterations to the Green Belt boundary to accommodate the future allocation of land for development in the Borough.
- The land in Warburton, south of Partington and the land south of Shell, Carrington are the only significant areas of land (not within the Green Belt) which are not identified for development within the Plan Period. Therefore until such time that a strategic review of the Green Belt takes place they are being protected for potential residential use and potential economic development respectively
- Green spaces are important to local communities. The availability of open space, sport and recreation facilities are key factors to the quality of life and physical wellbeing of people and can, by adding to the attractiveness of the Borough, encourage potential investors and thereby help stimulate urban regeneration. The Council is keen to raise and sustain an awareness of the health and other benefits of leisure pursuits amongst all ages of the local population.

Economic Growth

Economy

Do you think the key issues identified and how the Local Plan could address the key issues in relation to economy is appropriate?

Focusing employment uses in allocated employment land, such as at Trafford Park and Carrington, is a good idea. Consider making some previous employment sites (particularly along the A56 corridor) into residential accommodation. For example, is there really a need for ANOTHER supermarket on the old PC World site! That is prime land for multiple residential properties, suitable for creating homes for young people and small families.

Planning appropriately for growth in the digital sector is essential. Trafford should become a Centre for Digital Transformation. This will need investment in high speed connectivity and the development of the right skills in schools and colleges. Many young people, in particular, can get involved in digital projects as work experience. Understanding 'Agile' methodologies will be critical to future digital developments. Establishing Digital Technology Centres in our schools and colleges will help to facilitate the transition to the jobs of the future but will require the right infrastructure, the right 'teaching and coaching' resources and the right equipment to be in place.

It should also be recognised that, in the digital economy, many people can work from home and many others can work from shared workspaces (again with the right infrastructure in place). This should be taken into consideration in the allocation of 'land' for employment.

Are there any other key issues relating to economy you feel the Local Plan could address?

Agriculture and food production is not mentioned as key to the local economy, along with horse-riding (there are over 1000 horses in the Carrington Moss area alone) and associated livery / training fees. There is also massive potential for solar energy production in the area. These 'industries' will require appropriate land/space to function which should be incorporated into the Plan.

Is there any other key evidence relating to economy you feel the Local Plan should have regard to?

Evidence related to the requirements of the Digital Economy, including what is needed for people working from home, for people who may need to share workspace. This area of business is changing rapidly and we need to keep pace with what is happening elsewhere.

Evidence related the requirements of industries in Trafford including agri, horse-riding, solar-power.

Town centres and retail

Do you think the key issues identified and how the Local Plan could address the key issues in relation to town centres and retail is appropriate?

Reliable, affordable, public transport is essential to re-energising the town centres (particularly to support entertainment / 'evening economy' outlets) and to inspire further investment/retail in our out-of-town Trafford Centre.

It is a great idea to encourage residential developments in/near the town centres. This will be good for both young and old residents. Essential shops should be in the town centres (supermarkets, chemists, etc) but otherwise major shopping centres should be in easily accessible out of town centres, with smaller, local and boutique type shops in the district centres.

Are there any other key issues relating to town centres and retail you feel the Local Plan could address?

Free out of town parking, with good (and affordable) public transport links, will reduce traffic on the roads in the area. If shops spring up where the 'park and ride' schemes are - they will get lots of passing trade. This includes South of the Borough where traffic comes in to pass through on their way to Manchester. We should make it attractive for this traffic to stop at park and ride areas and travel in on public transport (with some fast links directly to the city centre).

Ashton on Mersey should be included as a 'district centre'. There may be others missing from the list. It is important that the list is inclusive, rather than exclusive.

Community businesses (like the Sunshine Café) should be encouraged and supported – with a focus on healthy foods, possibly shared spaces where a range of different cultural options can be tried and tasted. We should also be encouraging other start-up business (such as crafts, etc), again in those shared spaces where it is affordable for people to try out their business plans. It is a real shame the Water-Taxi died a death - that sort of unusual option should be encouraged. Can it be resurrected with community involvement?

There are niche purchasers whose needs should be recognised, for example, people with dogs need places to go too. They will pay to be able to enjoy an evening's entertainment, a meal or family fun with their pet.

Is there any other key evidence relating to town centres and retail you feel the Local Plan should have regard to?

What do communities want in their area? None of the evidence listed appears to be asking residents what they would like and where. There will be local needs (district-related), not just town centre requirements.

For retail/evening economy/entertainment requirements it is important to understand the key trends and get ahead of the game. Where are the 'gin palaces' in Trafford – this has been an enormous money-spinner for several years - we are definitely behind this curve.

What are the requirements for locations – is the future trend for more 'shared' accommodation – a café during the day/a bar at night?

On-line shopping is obviously a key trend but there is a social aspect to shopping, to say nothing of being able to understand the various sizing of different retail outlets (so ability to try things on can be useful). The retail park of the future may include the option to try locally but buy on line, to pick up and drop off purchases and returns, to eat, drink and socialise whilst seeing what you want to buy (space for fashion shows, furniture exhibitions, etc etc).

Culture and tourism

Do you think the key issues identified and how the Local Plan could address the key issues in relation to culture and tourism is appropriate?

See comments above regarding appropriate and affordable public transport, this is essential to encouraging tourism and the night-time economy.

We need to make more of Trafford's unique differentiators – this includes the green spaces we have across the borough. Our parks should be highlighted, along with the sports stadiums (one size does not fit all). These are great (and free) places for people to meet and enjoy their leisure time together. We should support Friends of Parks groups to maximise these areas, improving play equipment, access and security (where needed).

Depending on what is considered the definition of the 'Mersey Valley', this may not be sufficient to become a significant visitor attraction on its own. Much of what locals consider the 'Mersey Valley' is a flood plain and is often inaccessible. In addition to Sale Water Park, promoting the role of Carrington Moss to become a significant visitor attraction should be included in this aspiration. This is a beautiful green area of ecological importance, including agricultural land and woodlands. Resident and visitor access to cycling tracks, horse-riding, bird-watching, nature-spotting should be encouraged. The Peat Moss should be preserved and enhanced. It could be developed as Carrington Country Park and made very attractive for visitors.

Are there any other key issues relating to culture and tourism you feel the Local Plan could address?

Again, there is no reference to community involvement in determining or supporting the Culture and Tourism aspirations.

Consider celebrating the differing cultures across Trafford – maybe with a Trafford Culture Day once a year, encouraging communities and residents to share their stories, their cuisine, their traditional dress, their flowers. A festival of sorts to attract more visitors/tourists.

Consider a Digital Technology showcase, both a permanent feature that tourists and interested individuals can visit and possibly an annual event which gives local businesses and individuals an opportunity to present their innovative ideas to a broad audience.

Is there any other key evidence relating to culture and tourism you feel the Local Plan should have regard to?

Need to be clear about the differing cultures across Trafford. Do we know what we have here – we are a melting pot of diverse communities who live and work together. Let's promote, share and celebrate it.

Understand the facilities and infrastructure needed to achieve our Culture and Tourism aims.

Inclusive Growth

Housing

Do you think the key issues identified and how the Local Plan could address the key issues in relation to housing is appropriate?

There should be a link to the Green Belt theme later in the document, including:

- continued strong protection for our green belt, with change of status only acceptable if all other options have been thoroughly exhausted
- any plans to change the status of green belt (including those which come via the GMSF) should be subject to GENUINE public consultation
- the policy relating to build on brownfield first should be fully complied with
- very specific conditions should be put on all build on green belt – for example, ALL homes to be built on green belt should be affordable in the true sense of the word – ie social housing (not 3, 4 and 5 bed roomed homes with large gardens), no homes built on green belt should be allowed to be sold to investors.

See comments in Green Belt section below.

All new build should be subject to provision of appropriate green spaces for residents, parks, cycling and walking routes (traffic free), etc.

Are there any other key issues relating to housing you feel the Local Plan could address?

How will we ensure that developments meet identified need, for example, if the housing needs assessment determines that the priority for new homes built should be for social housing – this is what should be built!

A proportion of housing developed should be made available for the homeless (even if those homeless people are not currently 'living/existing' in Trafford). This suggests that some homes should be suitable for single people, possibly with short term needs.

How will the reduction in required retail space (due to many retailers facing closure or downsizing) be taken into consideration to support housing need?

Encourage more new homes along the A56 corridor.

How do we control the number of similar retailers in one area (I understand the need for competition but do we really need another supermarket in the old PC world building when there are three others in the vicinity)?

How is the environment and climate change being considered in the planned new builds? There should be conditions on environmentally friendly builds with solar power built in from day 1, for example. All new builds should include traffic free links and have commitment to public transport to reduce the need to build more new major roads and encouraging residents to leave their car at home.

How will security considerations be addressed in new builds – more (and high quality) CCTV should be included as part of the builds.

What is the real need for accommodating the Gypsy, Roma and Traveller communities and travelling show-people in Trafford? By the very definition of their culture, they will not all be in the area at the same time, so any site made available should be appropriate to need. A site manager, who understands the culture of these communities and

who can assist with access to public services (schools, medical care, etc), should be based at the location. There should also be some conditions of use of the site (clearing up litter, etc before they leave).

Is there any other key evidence relating to housing you feel the Local Plan should have regard to?

There needs to be a clear understanding of the sites suitable for building developments available – whilst a brownfield register exists, is it a true list of brownfield sites??? There are still properties all along the A56 corridor which could be redeveloped to make better use of this excellent, and very convenient, route.

Trafford's Economic & Housing Growth Framework document does not consider the benefits or worth of the ecological value of existing assets (green belt), nor the cost to Trafford of losing those assets. The impact on the health of our populations due to increased air and noise pollution and loss of green belt land, should be calculated, along with the value of preserving and protecting land for declining bird species and other wildlife.

Inclusive neighbourhoods

Do you think the key issues identified and how the Local Plan could address the key issues in relation to inclusive neighbourhoods is appropriate?

There are a number of gaps, including the following:

- Work with Community groups and Friends groups to ensure active involvement (eg community groups could identify themes for each area/locality to help address specific local issues and drive inclusion)
- Improve public transport and traffic-free routes to reduce isolation
- Encourage the development of more Neighbourhood Plans and seek ways of involving residents more actively in local decision-making.

Are there any other key issues relating to inclusive neighbourhoods you feel the Local Plan could address?

Just to re-emphasise - there is no mention of the importance of community groups in addressing inclusive neighbourhoods. I have suggested below that this is a huge gap in the whole of the Plan. Community action to support Inclusive Neighbourhoods is essential.

Accessibility needs to include a focus on traffic free routes so that walking and cycling to work are safe means of travelling.

Is there any other key evidence relating to inclusive neighbourhoods you feel the Local Plan should have regard to?

What are the root causes of the inequalities experienced in some neighbourhoods – for example, is it lack of English language skills, lack of reading/writing ability, lack of work experience? These are the issues that need to be tackled (maybe with the support of some community groups).

Transport and accessibility

Do you think the key issues identified and how the Local Plan could address the key issues in relation to transport and accessibility is appropriate?

You have not included a link to the 2040 Transport Strategy. The key elements should be summarised so that this section can be commented on properly – rather than just seeing lots of references to a strategy that most people are not familiar with!

Many of the key objectives in the Local Plan are reliant on good, affordable public transport and traffic free routes to be successful. It is, therefore, essential that Trafford has real solutions to overcrowding and limited services (not just waiting for the 2040 strategy to deliver the answers).

There should be a focus on reducing the traffic which uses the Borough as a 'rat run', causing lots of traffic problems on local routes. Schemes, such as 'park and ride' from the South of the Borough, should be considered.

Reducing the need to travel by car will only be an option if improved public transport and more traffic free links are available.

HS2 – Trafford should take a stand on this. It is not needed. I travel to London regularly for work and have never even been asked if improvements are needed to this route – so why are we fixing something that is not broken (spending £billions to do it and ripping up lots of ancient woodlands on the way)! I have never had to stand on the way to or from London but I also travel regularly to Newcastle and those trains and the line itself are horrendous. There are multiple problems, massive overcrowding, people regularly have to stand all the way (or sit in the corridors), trains are cancelled at very short notice or run very late, so unreliable. We need better transport in the North and should be focusing on that.

Are there any other key issues relating to transport and accessibility you feel the Local Plan could address?

Reliable, affordable public transport is a key issue across most of the policy themes. Could some form of subsidy be offered to those who need it (maybe a bit like the food vouchers)?

If more traffic free links become available, a bike loan scheme could be introduced which would help people get to work for free.

What is the plan for a Greater Manchester 'Oyster' type card? This should be a key priority and would be a great improvement. It should be possible to offer discounts for on-line purchasing (which could be done in libraries or other public buildings, as well as at home), for example £25 worth of journeys if you buy £20 of GM transport credit.

How can we make better use of the canal as a transport route?

Where are traffic calming measures in the plan?

What measures can be put in place to discourage travel by car?

Is there any other key evidence relating to transport and accessibility you feel the Local Plan should have regard to?

What evidence do you have that HS2 is needed? At least consider the evidence that Transport requirements for the North should be prioritised.

What evidence do you need for traffic free routes and where to place them?

Design and place shaping

Do you think the key issues identified and how the Local Plan could address the key issues in relation to design and place shaping is appropriate?

What about giving Trafford a theme – like the Manchester Bee – maybe something which signifies an aim to be a digital hub/transformation centre?

Guidance on tall buildings should include appropriateness of location, security, safety (no cladding), accessibility, etc. Multi-storey – yes, including in places which are currently not, however, the Trafford landscape should not be destroyed by very tall buildings in inappropriate places. Multi-storey does not have to mean 40 floors!

Are there any other key issues relating to design and place shaping you feel the Local Plan could address?

How can we share space (eg multipurpose buildings – say for retail (daytime)/evening economy (night) – pop-up shops/café's/bars should be encouraged as this will generate interest in our centres. Also different religious groups could use existing spaces better and, at the same time, improve relations/understanding between those religions – eg many existing churches are under-used and could be made available to other religious groups rather than building other huge buildings for those groups).

Promotion of our parks and green spaces should be a key theme for Design and Place Shaping. We should also be including how we accommodate other species (birds and wildlife) as well as residents, in our area.

Is there any other key evidence relating to design and place shaping you feel the Local Plan should have regard to?

What environmental targets will we be aiming to achieve?

What evidence is needed about the benefits of our green spaces, our woodlands and our agricultural areas? Is the ecological value of our green spaces understood and recognised?

Infrastructure and planning obligations

Do you think the key issues identified and how the Local Plan could address the key issues in relation to infrastructure and planning obligations is appropriate?

Whilst I understand the link to the GMSF, there should be more emphasis on what Trafford, and its communities, know it needs and how the Authority will engage with communities to understand their requirements. Resolving some infrastructure requirements could address the root causes of other issues which are apparent in the communities.

Are there any other key issues relating to infrastructure and planning obligations you feel the Local Plan could address?

How can we share infrastructure services across districts (and perhaps with other GM Authorities) to maximise service availability and optimise service costs?

How will the community be involved in identifying infrastructure requirements?

Is there any other key evidence relating to infrastructure and planning obligations you feel the Local Plan should have regard to?

Understanding the best approaches for collection of community information/requirements.

What are the needs of surrounding Authorities, how can we share skills, infrastructure, etc (including, for example, specialist health or educational resources).

Environmental sustainability

Climate Change

Do you think the key issues identified and how the Local Plan could address the key issues in relation to climate change is appropriate?

There are a number of key gaps (see below), including:

- the benefits of restoring and preserving Carrington Moss as a peat bog
- how the community can be involved in climate change initiatives in Trafford
- promotion of traffic-free routes – policy not to build more roads
- protection of existing green spaces

Are there any other key issues relating to climate change you feel the Local Plan could address?

Trafford should be supporting the national strategy to conserve and enhance its peat bog and protect some of England's most scarce habitat. From a climate change perspective, having what is essentially a carbon sink in our area is a real benefit. It follows that new developments that would impact Carrington Moss should not be approved as the annihilation of this unique area would be contrary to our climate change aspirations. It is a well-researched fact that the destruction of peat bogs contributes to global warming as well as destroying important wildlife and bird habitats.

The community (from children in schools, to the elderly in sheltered homes), should be actively involved in climate change initiatives in Trafford. Encouraging libraries, schools and businesses to install solar panels on their sites could be a way of bringing a large number of people into the discussion.

The promotion of traffic-free routes should be a key pillar of the 'sustainable' travel objective, with a policy not to build any more roads (more roads means more cars and more air and noise pollution).

Existing green spaces in Trafford should be fully protected. They are needed to provide the clean air and pollutant-free spaces that our residents need for their health and well-being.

Is there any other key evidence relating to climate change you feel the Local Plan should have regard to?

Up to date and credible air and noise pollution statistics relating to our road networks.

What levels of renewable energy are currently in use in Trafford? What should our targets be?

Water

Do you think the key issues identified and how the Local Plan could address the key issues in relation to water is appropriate?

There is a gap:

- How will Trafford address the risks to neighbouring areas if regularly flooded land is built on?

Is there any other key issues relating to water you feel the Local Plan could address?

As mentioned above, our local peat moss, Carrington Moss improves water drainage and helps to retain water in a specific area which is not currently built on. If the current GMSF plans are approved, how will Trafford address the risks to neighbouring areas? There is not only a flood risk but the water coming from that often flooded area could be contaminated. This would bring health risks to neighbouring properties, wildlife and birds. Users of footpaths/bridleways could be impacted, along with their dogs/horses.

How can such flood water be captured and retained for periods when there is less water available for local wildlife? Could a 'Carrington Country Park' include a lake in which to drain water from surrounding land?

Are there any other key evidence base relating to water you feel the Local Plan should have regard to?

Credible information about water levels, not just by the River Mersey but on Carrington Moss too.

Minerals and waste

Do you agree that the Local Plan should include policies on minerals and waste, signposting to the Joint Minerals and Joint Waste plan respectively?

This is a sensible approach.

Historic environment

Do you think the key issues identified and how the Local Plan could address the key issues in relation to historic environment is appropriate?

Our historic environment is not just about buildings, our green spaces are historic too. There are layers of historic data in the rich biodiversity of Carrington Moss, which should be recognised.

Are there any other key issues relating to historic environment you feel the Local Plan could address?

Our unique Peat Moss should be preserved and enhanced and there should be more information about its formation, preservation and the UK Peatland Strategy in general.

Is there any other key evidence relating to historic environment you feel the Local Plan should have regard to?

How is 'the enjoyment of local people and visitors' currently measured and how will this be measured in the future?

Natural environment

Do you think the key issues identified and how the Local Plan could address the key issues in relation to natural environment is appropriate?

The plan needs to state how 'measurable net gain for the natural environment' will actually be calculated – how is ecological value determined? Net gain cannot be measured just in quantity terms (land size) – it must also be measured in qualitative terms (ecological value).

Are there any other key issues relating to natural environment you feel the Local Plan could address?

If, typically as a consequence of development, the biodiversity of a particular area is damaged or destroyed, how will the impact of that change be measured? For example, if breeding birds, particularly in declining species, can no longer use the environment they have made their home and they move to a neighbouring copse, then soon afterwards, that neighbouring copse is also developed, thus disturbing those creatures again, impacting their breeding, their habitat, and their future, how will this be recognised, monitored and prevented?

How is the rich biodiversity of places such as Carrington Moss recognised and measured? An important feeding and breeding ground, it provides a unique home in Trafford for a wealth of plants, animals, insects and birds (including declining species).

What policies will be brought into place to ensure the natural environment is preserved, such as policies to protect our woodlands, for example, (including that which is in the hands of private ownership), or policies to make it harder to re-designate land from green belt status.

What benefits of the natural environment will be taken into consideration, for example differences in Air Quality – how are these differences measured and communicated to Trafford residents?

Is there any other key evidence relating to natural environment you feel the Local Plan should have regard to?

How will 'net gain for the natural environment' be measured both now and in the future? If we 'Embed the concept of measurable net gain for biodiversity and the natural environment as part of new development', how will we know what has been achieved? What targets do we have in this area?

What is the current status of the 'natural environment' in Trafford? How does Air Quality in various parts of Trafford compare with Air Quality elsewhere in Trafford? What benefits of the 'natural environment' do we currently measure? What should we measure?

Green infrastructure

Do you think the key issues identified and how the Local Plan could address the key issues in relation to green infrastructure is appropriate?

Yes very admirable aims – see below.

Are there any other key issues relating to green infrastructure you feel the Local Plan could address?

How will we measure 'net gain for green infrastructure'? This is not just about the size / acreage it is about the biodiversity of that GI.

How will we ensure that any rich biodiversity that is lost through development is replaced elsewhere (not just in terms of quantity, but also in terms of quality)?

How will we identify and understand the impact of any loss of existing GI?

Is there any other key evidence relating to green infrastructure you feel the Local Plan should have regard to?

How will existing GI and its rich biodiversity be measured so we can determine whether there has been a 'net gain'?

Open space, sport and recreation

Do you think the key issues identified and how the Local Plan could address the key issues in relation to open space, sport and recreation is appropriate?

There should be more emphasis on equality of access. Too many families cannot afford the equipment and kit that is needed to play/take part in some sports or in/outdoor activities. Horse-riding, for example, is not available to all families.

Are there any other key issues relating to open space, sport and recreation you feel the Local Plan could address?

Work in partnership with the community to identify both skills and experience in the area of indoor and outdoor sporting activities (they may be people who would be willing to volunteer to run clubs and mentor gifted youngsters). More support for the fantastic community clubs (such as Skills FC) which struggle to get the funding needed to put on free or very low cost activities.

Strategies for providing better access to sports for all, including shared/sponsored equipment/kits.

Partner strategies to include small niche clubs, and company clubs, as well the big sports clubs in the area

Identify, mentor and award gifted players of all types of sports.

Are new policies needed – ie clubs must work in areas with poor facilities as well as in areas where the facilities are better, to ensure equality of access to a range of sporting activities across Trafford

Is there any other key evidence relating to open space, sport and recreation you feel the Local Plan should have regard to?

What are the current metrics on accessibility of sport and recreational activities in Trafford?

How will success be measured?

Green belt and countryside

Do you think the key issues identified and how the Local Plan could address the key issues in relation to Green Belt and countryside is appropriate?

There is no mention of the importance of the Peat Moss environment on Carrington Moss, which should be repaired, preserved and enhanced as an important area of significant biodiversity.

No mention of protected species and declining bird species that have made Trafford their home. Identification and protection of such species should be a key priority in our plan.

Are there any other key issues relating to Green Belt and countryside you feel the Local Plan could address?

One of the key purposes of creating green belt land was to prevent urban sprawl, yet the current iteration of the GMSF, if approved, is likely to result in the merger of Sale with Carrington, Partington and Warburton, only separated by a major road. How will green belt principles be adhered to if the Trafford Plan only looks at what happens beyond the GMSF?

Policies should be agreed to ensure that any build on green belt satisfies the following:

- All flora/fauna surveys (bat, protected species, plant, etc) must be done at the right time of year (I have seen planning applications that say 'this survey was done in November when bats are no longer present' –

if the specialist writing the report acknowledges that the survey has been done at the wrong time of year, it should not be accepted!

- Genuine consultation will be carried out for all build on green belt land (not just the limited, pitiful actions that currently take place in the name of 'consultation')
- Only indisputably affordable homes will be built on green belt land (ie social housing)
- No homes built on green belt land will be sold to investors
- Green belt land will only be built on when all brownfield and other alternatives have been exhausted (changing use from industrial/retail to housing use should be made easy to achieve)
- Green belt build will not be approved if such build would put neighbouring areas at risk of (for example) flooding
- Traffic-free links will be provided across all green belt land.

Is there any other key evidence relating to Green Belt and countryside you feel the Local Plan should have regard to?

Non-green belt areas where alternative builds could be made should be identified. These may not be on the current brownfield register but, for example, increasing numbers of retail outlets are closing - how are these being forecast?

Continue to maximise the use of the existing urban areas, information about the options to support this is essential.

Summary questions:

Do you agree with the policy themes covered by the Local Plan

Yes subject to the omission below relating to the Development of Sustainable Communities (which is different to Inclusive Neighbourhoods).

Are there any other policy themes that should be covered in the Local Plan?

Develop Sustainable Communities should be a key policy theme. This is very important in encouraging cohesion and involvement. This policy theme should include, for example:

- How the community are more involved in decision-making in Trafford
- How the community are more involved in planning in Trafford
- How GENUINE consultation will take place, particularly on builds on land currently or previously designated as green belt
- Encouraging the development of more Neighbourhood Plans
- Encouraging the establishment of more community groups/friends groups.

People should not find out about major changes because a landowner puts up 'trespasser' notices on what are considered to be public rights of way. It is inappropriate to be content with the kind of limited communication, consultation and community involvement that has happened to date.

Not all 'infrastructure' requirements will be formal services. Some could be, for example, adult reading and writing classes in local libraries to help build confidence and skills, where needed, or perhaps mentoring (maybe business leaders mentoring aspiring entrepreneurs, mature, highly skilled and experienced employees mentoring young people who are about to start in the workplace, or perhaps the young people mentoring their older colleagues – particularly, for example, in the digital economy). How can we make the best use of the skills we have in the Borough to ensure these sorts of informal services are available?

Do you have any other comments to make on the Issues Paper?

The Local Plan should be easy to understand, transparent, honest and straightforward. We should not signal objectives (such as the 'Natural Environment' and 'Green Belt') if there is no intention to retain, preserve and improve some of our most unique and diverse green spaces.

There are lots of references to other reports for which there are no links and no summary information. This means that reviewing this document takes a lot longer for a layman than it should! My guess is most people will not have the time it takes to review this document and all the associated information that is needed to provide comprehensive commentary.

Thank you for the opportunity to comment on this Issues Paper.