APPENDIX 4 – HOUSING STRATEGY CONSULTATION RESPONSES – DIRECT COMMENTS

This report presents the record of the consultation responses made on the draft Trafford Housing Strategy 2018-2023 which were sent via email and received separately to the on-line survey responses and comments.

The report lists all five direct email responses to the draft Strategy made during the consultation period (22nd February – 22nd March 2018).

The Council will take all representations received into account in preparing the final Trafford Housing Strategy 2018-2023.

No.	Respondent	Comments	Response
1	Email Response Labour Group	We agree with the overall vision and the identified 7 priorities to; 1. To accelerate housing growth. 2. To support inclusive economic growth. 3. To create neighbourhoods of choice through a better mix of homes and attractive, accessible environments. 4. To reduce inequalities across the borough. 5. To improve residents' health and wellbeing. 6. To increase the range of, and residents access to, opportunities. 7. To reduce homelessness.	The Council welcomes the Labour Group's comments and their overall agreement and positively towards the Housing Strategy. The Council are happy that the Group agrees with the overall vision and identified seven priorities.
		The driving force of this strategy should be to reduce inequalities within the Borough and increase the opportunities for all residents. Through achieving these objectives we will considerably improve the health and well- being of the people of Trafford. This Housing Strategy is an extensive programme intended to deliver the housing and neighbourhoods needed to achieve The Trafford Vision 2031 and its role in Greater Manchester. It sets targeted objectives and measures over a 5-year period. These	The Council mirrors the Group's view to reduce inequalities and it is intended that this will be addressed through priority 4 along with the creation of Housing Propositions for each area in Trafford. The Housing Strategy and supporting Action Plan have been created to deliver the housing and neighbourhoods needed to achieve the Trafford Vision 2031.
		Trafford Vision 2031 and its role in Greater Manchester. It sets	neighbourhoods needed to achieve the Traffe

We support the objectives set out in the Housing White Paper to increase housing supply, however the main focus of this should be to provide affordable homes within Trafford. For those residents are able to buy their own homes we should also continue to help them with a wide range of initiatives.

We agree with the main thrust of this change, it is much better wherever possible to prevent homelessness, however we still need to provide more affordable homes for people when no other solution is possible. A greater volume of social housing in the Borough will help in this situation.

We support this change. (comment relates to the Care Act 2014 where it makes it explicit to integrate housing along with health and care via a 'duty to cooperate')

We support this change, however there does need to be an increase in the supply of suitable accommodation to enable this to be discharged properly.

(comment relates to the Children and Social Work Act 2017 whereby a new duty on LAs to publish a local offer for care leavers which included accommodation and support)

We believe that as a high demand area Trafford should seek to secure the extra borrowing capacity to secure new affordable homes (mainly social rented accommodation) especially of 1 and 2 bedroom properties. The scrapping of stamp duty does little to help the housing shortage in the Borough, in fact evidence suggests that it acts to raise house prices. We support the review of land banking and would be in favour of action to reduce this activity.

We agree with the stated objectives and accept the need to accelerate housing growth and mixed tenure neighbourhoods within the GMSF framework. This should not however take place in areas where this encroaches on greenbelt land or in areas where the infrastructure cannot sustain this development.

The Council is pleased that the Labour Group supports the objectives within the Housing White Paper and agrees that affordable housing provision should be the Council's main focus.

Homelessness Prevention is a priority for the Council and with the introduction of the new Homelessness Reduction Act 2017 and the new Prevention Duty the Council will ensure HOST utilise this duty to reduce homelessness crisis situations across the Borough.

The Council is working closely with the Registered Providers (RPs) and Strategic Housing Partnership (SHP) to increase affordable housing provision across the borough. Through the use of the proposed 'Delivery Mechanisms' and the government grants the Council intends to look to increase this provision collectively with partners.

The emerging draft GMSF will be going out for further consultation in Summer 2018 and there will be an opportunity for further comments and concerns to be raised during this period. The details regarding Greenbelt release will follow Lacking is an environmental focus, there is only mention of the environmental quality of sustainable neighbourhoods, rather than the buildings themselves.

There is some mention of helping the vulnerable with insulation, the Local Energy Action Plan, page 23, but there is a mention of only 160 referrals possible, which is far too few. Retrofitting should be a priority across the board, for everyone, not just vulnerable Group's, and would relate to the seven priorities mentioned in the introduction: 4. To reduce inequalities across the borough (this would make bills more affordable), and 5. To improve residents' health and wellbeing (the elderly especially need warm homes). It also relates to the vision set out by the Greater Manchester Strategy: "a place where people live healthy lives and older people are valued" (page 3).

We agree with much of the analysis and the need to develop a more balanced housing market, and especially help those residents living in the north of the Borough. We are sceptical of the prospects of significantly raising the volume of the private rented sector in Trafford, and therefore think that the increased provision of affordable social housing should be the main strategy. We do not see the private sector as a "flexible form of housing" (page 14), as it does not usually provide a secure home. Private sector renting is almost always insecure. Supporting the Build to Rent scheme is good, page 14, but there needs to be strict controls, and it would be preferable to focus on supporting the building of social housing.

We would support stricter regulation of the private rented sector and rent controls.

The demographic changes in Trafford will bring some major challenges and reducing the inequalities within the Borough should be our main focus. once the final GMSF has been approved, however as a priority the Council will look to increase housing provision on Brownfield sites initially.

The Council intends to promote the Local Energy Action Plan (LEAP) to increase referrals into this programme. In addition one of the actions within the Strategy is to undertake a Private Sector Stock Condition survey that will identify issues regarding energy efficiency within the Private Sector so that the Council can target those families or individuals in the greatest need.

The Council along with other authorities in GM have a shortage of social and affordable accommodation. Although the priority is to increase this provision, the development of this type of tenure is unfortunately not keeping up with demand. The Council needs to look to the PRS to provide greater choice for the residents of the borough that may choice to live in this tenure.

The HOST service will be reviewed as a consequence of the Homelessness Reduction Act; we would like this review to be extended to cover the whole range of help it offers to Trafford residents

HOST has been reviewed in line with the Homelessness Reduction Act. The number of staff is increasing to support the changes and the new duties imposed by the Act. It is the Council's intention to review HOST further to look at widening the housing advice service and providing greater outreach services to hospitals, prisons and courts to assist those with housing issues.

We agree that new housing development should be ideally concentrated in locations that support urban regeneration and minimize environmental impacts with transport factors taken into account.

Page 9 – Place Plan consultations sound good in practice, but our communities have already been weakened and how these can be recreated is the issue. The need to actively involve Group's and communities in any changes is importance within this process.

We support the idea of housing propositions

Yes we agree the provision of new affordable homes is critical but this should not encroach upon greenbelt land, include sufficient numbers of affordable homes and be mindful of infrastructure issues.

As previously stated we are not opposed to the growth in the proportion of private rented good quality homes, however we are sceptical of the prospects of significantly raising this volume in Trafford, and therefore think that the increased provision of affordable social housing should be the main focus.

The Council acknowledges communities are key to the development of the Place Plans and Housing Propositions. This has been made clearer within the Strategy document.

Planning is far too slow and complex at the moment, and the council needs to work much more proactively to change this and to ensure that there are no delays in house building. There is no clear indication here of how they are going to work "proactively with developers to remove barriers to housing" in order to meet their target of "accelerated housing growth", page 12.

We support the idea of intermediate products.

Good to consult older people on their choices, rather than imposing solutions on them, but how widespread would the consultation be? In principle, eg the housing sharing options sound good but how to challenge traditional ideas of what a home is, and the desire to preserve the family home, page 15.

We support innovative ways of providing new housing.

A Trafford Housing Fund sounds good – we urgently need to find additional ways of funding housing, page 18.

We support any initiative that tackles long term empty properties.

We imagine there are some figures somewhere on its effect on those renting privately, an increase in evictions for those in rent arrears, and an unwillingness of private landlords to accept clients on UC, though it seems that social housing is able to manage and deal with the delayed payments. A national review of the planning system is underway via the recent NPPF (National Planning Policy Framework) consultation. The Government also intends to introduce a Housing Delivery Test that will try to speed up delivery through the creation of site specific action plans to tackle those sites that have stalled or not been brought forward.

The Council will develop a stand-alone Housing Strategy for Older People which will include some extensive consultation with residents over 55 across the borough. Trafford wants to ensure that appropriate housing options that are fit for purpose, are developed across the borough.

The Council welcomes the Labour Group's view on tackling long term empty properties and a Strategy to address this will be developed.

HOST work closely with the Council's Exchequer Services and any clients will have been brought to the attention of the HOST team who will make contact to offer advice and assistance to address their housing issue in relation to affordability or alternative housing.

2	Email Response – Graham Scott on behalf of Trafford Housing Trust	 We have been involved in the above throughout and are happy with where this has got to. Our overall views are as follows: Positive engagement with RPs partners has resulted in a strong and robust strategy approach. TMBC have listened to partners. Important rationale behind tackling affordability issue: unlocking family homes through the provision of better quality elderly accommodation; focus on affordable starter homes; greater choice of intermediate products; and emerging tenures. Refining PRS approach in terms of location and role of RPs. Seen as essential to quality delivery. Trafford housing fund welcomed - provide gap funding where viability is stalling development. Place Plan approach is positive – ensure that the right products are delivered in the right location and this is guided by a credible evidence base. Recognise the importance of continuing regeneration in social housing estates – Place Plans will further support this. Key to success will be to ensure that stakeholders work collaboratively to delivery positive change in neighbourhood 'places'. 	The Council welcomes Trafford Housing Trust's comments and thank them for their overall input and involvement throughout the creation of the Trafford Housing Strategy. The Council are pleased that THT welcome the development of the Trafford Housing Fund and the creation of Place Plans/Housing Propositions. The Place Plans/Housing Propositions with be developed in partnership with RPs, residents and developers through the SHP.
3	Email Response HOW Planning LLP – on behalf of Royal London Asset	Regrettably RLAM was not notified of the consultation and only became aware of it late last week when information was uploaded to the TMBC website. As a result, the time available to review the extensive information and provide detailed comments has been limited. This response is therefore high level, but RLAM would welcome further, more comprehensive engagement on the Strategy going forward, to ensure opportunities at Davenport Green to help deliver the Strategy can be fully considered.	Trafford Council welcomes the comments made on behalf of Royal London Asset Management. RLAMN were not notified directly, however a press release and publicity via the Council's Facebook and Twitter pages were enacted.

	Management	RLAM fully supports the seven priorities identified to achieve The Trafford Vision 2031, which are: 1. To accelerate housing growth. 2. To support inclusive growth. 3. To create neighbourhoods of choice through a better mix of homes and attractive, accessible environments. 4. To reduce inequalities across the borough. 5. To improve residents' health and wellbeing. 6. To increase the range of, and residents access to, opportunities. 7. To reduce homelessness Several of these priorities follow key themes identified in the last draft of the GMSF, to which RLAM submitted comprehensive representations. The representations sought to demonstrate the unique opportunity presented at Davenport Green to deliver development which could help achieve the aims and objectives of the GMSF. An Executive Summary of the representation is appended for your information. It is understood that following this consultation a detailed action plan will he worked up to set out actions that will be pursued to try and achieve the priorities identified above. RLAM is very keen to be involved in this process to explore how development at Davenport Green could help to deliver the priorities and would welcome engagement when appropriate.	The Council is pleased that RLAM supports the seven priorities as detailed within the Strategy. The emerging draft GMSF will be going out for further consultation in Summer 2018 and there will be an opportunity for further comments and concerns to be raised during this period.
4	Email Response Indigo – on behalf of Wyevale Garden Centres	We write on behalf of, Wyevale Garden Centres (herein Wyevale) in response to the Trafford Council Draft Housing Strategy consultation. We have completed the electronic questionnaire, but provide further detailed comments below on the following: 1. Support for the overall proposed housing need/target for Trafford; and	Trafford Council welcomes the comments made on behalf of Wyevale Garden Centres. The Council is pleased that Wyevale have responded directly to the on-line survey, which is detailed within a separate summary report.

2. Support for the need for housing in the Green Belt to meet the housing requirement including the release of Green Belt at Timperley Wedge which includes land within our client's ownership at land at World of Pets, Thorley Lane, Timperley.

Wyevale have been promoting the World of Pets site for housing and previously attended the council's Timperley Wedge Stakeholder meeting on 9 November 2017.

Overall housing need/target

The Housing Strategy will form part of the evidence base to the Council's emerging Local Plan: Land Allocations and also inform Trafford's contribution to the emerging Greater Manchester Spatial Framework (GMSF). Wyevale are supportive of the key focus of the strategy which is to accelerate housing and economic growth in Trafford by developing more homes.

Based on the Draft GMSF the housing target in Trafford up to 2034 will be 23,100 dwellings (1,155 dwellings per annum). The Strategy makes reference to fewer than 400 homes being built each year over the last nine years which is significantly less than what was planned for locally in the Core Strategy. Clearly, there is a shortfall in housing delivery that needs to be met and it is positive to see how the draft housing strategy aims to address this shortfall.

Paragraph 1.57 of the supporting Trafford Policy Review document (Appendix 2) highlights that whilst the housing delivery will be focused on brownfield land in existing urban centres, more "land is needed and the release of Green Belt land will be required."

In summary, Wyevale are supportive of the key aims of the Housing Strategy and target for Trafford and need to release land from the Green Belt for housing.

The emerging draft GMSF will be going out for further consultation in Summer 2018 and there will be an opportunity for further comments and concerns to be raised during this period. The details regarding Greenbelt release will follow once the final GMSF has been approved.

Proposed Timperley Wedge Site

Three strategic development sites in Trafford are identified in the Strategy (which are proposed within the GMSF) that will together contribute to 15,000 of the required dwellings. Of note paragraph 1.46 of the Trafford Policy Review document highlights that:

"these sites have been selected to maximise sustainability, with an emphasis on releasing a relatively small number of large sites rather than the widespread incremental development of smaller sites. Adopting this development approach allows for the creation of new neighbourhoods, prevents piecemeal development and provides the critical mass to ensure that new development is supported by adequate infrastructure."

Wyevale are supportive of the proposed allocation of Timperley Wedge for housing including the World of Pets site. Timperley Wedge is within the Airport City Gateway, and as referenced in The Housing Market in Trafford Report (September 2017) it's development will maximise the benefits of the Airport.

Whilst the site is currently located in the Green Belt, it is partially brownfield and is bordered by residential development to the north and west. It therefore represents a natural infill and will only result in a limited extension into the Green Belt.

The site is bordered by Wood Lane to the north, Thorley Lane to the east, residential dwellings to the north west and south, and existing trees to the west and south. Additionally, Timperley Brook runs along the southern boundary. The site is therefore extremely well contained and is not viewed as forming part of the wider Green Belt and represents a logical extension to the adjoining built settlement of Timperley.

The site is also within in a sustainable location for residential development on the southern edge of Timperley, adjoining an established residential area. It is well served by public transport

The emerging draft GMSF will be going out for further consultation in Summer 2018 and there will be an opportunity for further comments and concerns to be raised during this period. The details regarding Greenbelt release will follow once the final GMSF has been approved.

		with regular bus services on Wood Lane to Altrincham Town Centre and the surrounding area. The site is also located within walking distance of nearby primary and secondary schools, and existing local services and facilities as well as employment. Housing on the site will also provide a mix of housing, including starter and family homes as well as affordable housing to help address the needs of existing residents and the requirements for more housing across the area in accordance with the aims and objectives of the Housing Strategy. In summary, the site does not contribute to any of the five purposes of the Green Belt, being visually and functionally removed from the existing Green Belt. The site is well screened by existing trees, and as such its development for housing and release from the Green Belt will not impact on openness of the wider Green Belt. A review of the Green Belt in this location based on a new defensible boundary using physical features that are readily recognised and considered permanent (i.e. an established thick tree belt, established residential development and the road network) will limit the impact on the remaining Green Belt. Conclusion In summary, Wyevale support the need for more housing in Trafford and allocation of land at Timperley Wedge in the forthcoming Local Plan (including the Wyevale site) for housing	The emerging draft GMSF will be going out for further consultation in Summer 2018 and there will be an opportunity for further comments and concerns to be raised during this period. The details regarding Greenbelt release will follow once the final GMSF has been approved.
		to help meet the Council's housing requirements.	
5	Email Response Indigo – on behalf of Redrow Homes Ltd	On behalf of our client, Redrow Homes Ltd, this representation is submitted in response to the consultation on Trafford's Draft Housing Strategy 2018-2023. It is our understanding that the Housing Strategy has been developed to identify key housing priorities for the borough and key interventions required to meet current and future housing need.	Trafford Council welcomes the comments made on behalf of Redrow Homes Ltd.

The comments below are structured to follow that of the draft Strategy.

Introduction

We support the Strategy's overall ambition to plan for accelerated housing development in the borough and support inclusive economic growth.

The strategy is developed so that "those people who choose to live in Trafford, now and in the future, can afford to do so, have choice about where they live and the tenure they choose to live in". The strategy for achieving this is structured around seven priorities. We particularly support the priorities to accelerate housing growth, support inclusive economic growth and create a better mix of homes (page 1). These priorities are in line with the National Planning Policy Framework (NPPF) paragraph 47 and (draft revised NPPF paragraph 60) to boost significantly the supply of housing and to proactively drive and support sustainable economic development to deliver the homes that the country needs (paragraph 17).

Policy and Strategic Context

This section (pages 2 to 5) should also include reference to the NPPF (and draft revised NPPF, currently the subject of public consultation) because this sets out the relevant national context on the delivery of new homes through the planning system, in particular paragraph 17 which sets out the core planning principles, and paragraph 50 which provides guidance on delivering a wide choice of quality homes.

Housing market challenges, opportunities and implications We support the acknowledgement that there are geographical differences within housing markets in Trafford, and that a clear distinction exists between the markets in the north and south of the borough. The north has a much higher proportion of disadvantaged communities, residents who are out of work, low

The Council is pleased that Redrow supports the vision and priorities, especially the 'accelerate housing growth' priority as detailed within the Strategy.

The emerging draft GMSF will be going out for further consultation in Summer 2018 and there will be an opportunity for further comments and concerns to be raised during this period.

Reference to NPPF has now been included within the Strategy, however the consultation is still ongoing and therefore we are unable to detail anything specific within this section.

The Council is pleased that Redrow acknowledges the geographical housing market differences across Trafford. The Council intends to undertake a Housing Need and Demand Assessment for Trafford that will provide the data and evidence of housing need including

household income and low value rented markets. The Strategy highlights that one of the key challenges "is to work to develop a more balanced housing market, including *through a better mix of housing and increasing local incomes*" (page 7).

Based on the current demographic and market trends (i.e. lower value homes in the north of the borough), we support the diversification of the housing market and the delivery a wider choice of high quality homes i.e. more market family homes in the north of the borough, which will widen opportunities for home ownership and the creation of inclusive and mixed communities. This will help to deliver a more balanced housing market, in line with Paragraph 50 of the NPPF.

Section 1: Creating great places to live

We support the acknowledgment that is it essential to get the right mix of different types of homes in neighbourhoods and to concentrate new housing development in locations that, inter alia, support urban regeneration; minimise environmental impacts, reduce the need to travel and are accessible (page 9).

1.1 Place Plans

We seek clarification on what status the proposed "Place Plans" (page 9) would hold in the context of the development plan for Trafford, given there already exists the ability for neighbourhoods to create Neighbourhood Development Plans to outline how local areas will be shaped. There is a risk that too many tiers of overlapping plans or vision documents for an area will lead to confusion rather than delivering the council's aspirations.

If Place Plans are to be progressed, however, we request that key stakeholders, such as land owners, developers and housebuilders, are invited to contribute to their preparation.

1.2 Rebalancing housing across the borough
The draft Strategy identifies that one of the key aims and

affordable provision for each of the distinctive housing market areas in the borough. This data will feed into the development of the Local Plan and Housing Propositions.

The Place Plans will be developed by the Vision 2031 team and will include an element of housing. The Strategy proposes that the Housing Propositions which will be developed by RPs, developers and residents will sit alongside these Place Plans. The Place Plans are in addition to the Core Strategy/Local Plan as they incorporate all service areas across the Council and the CCG.

challenges for Trafford is to develop a more balanced and diverse housing market through a better mix of housing. We support the creation of neighbourhoods that offer a good mix of homes and attractive, accessible environments, which is identified as a "key priority". This means developing significantly more homes of the right type, tenure, size and affordability in the right places.

1.2.1 Rebalancing housing through housing propositions
Subject to our comments above on the role of "Place Plans" in the context of the development plan, we support the proposal to develop "Housing Propositions" (page 10) to help provide greater clarity on the "type, size, tenure and affordability of new homes that are built and where" and in seeking to better balance the profile of housing at the local level. This will help enable the right type of housing to be built where it is most in need, and will facilitate a clearer understanding of housing needs and the needs for all types of housing in any given community. However, it will be important to ensure that any "Housing Propositions" are used to inform development proposals in the right way, and that it is acknowledged that when the council is determining future applications for development that these are just one of a number of material considerations taken into account.

We welcome the acknowledgement on page 11 that discussions with housebuilders will form a key role in future master planning exercises, but it is important that housebuilders, land owners and developers have the opportunity to be involved at the outset in the preparation of such Housing Propositions also.

Section 2: Delivering housing and economic growth
The Strategy highlights Trafford is "committed to accelerating housing and economic growth in Trafford. This means development significantly more homes of the right type, tenure, size and affordability in the right places" (page 11). We support this principle, as it is in accordance with the National Planning

It is a priority for the Council to develop a more balanced and diverse housing market across the borough. The Strategy identifies the need to create Housing Propositions which will look to rebalance the housing market and identify the type, size and tenure requirements needed for each area.

Housebuilders, developers, RPs and landowners will play a key role in delivering the actions contained within the Strategy.

Policy Framework (NPPF) paragraph 47 and (draft Revised NPPF paragraph 60) to "boost significantly the supply of housing".

The 2016 Draft Greater Manchester Strategic Framework (GMSF) indicates that of the 227,000 additional homes (net) to be delivered across Greater Manchester over the period 2015-2035, Trafford should accommodate 23,100 of these, which equates to an annual target of 1,155 dwellings. However, these figures are subject to change following finalisation of a new national methodology for determining local housing need (Planning for the right homes in the right places, DCLG 2017) and therefore the annual requirement for Trafford is likely to be higher, giving greater importance to the need to boost significantly the supply of new housing in the borough. This will be borne out through the next iteration of the GMSF and therefore any revisions will need to be factored into this strategy before it is finalised.

The main housing development sites in Trafford
We support the ambition to deliver family housing in Partington
(page 12). New family housing is identified to be provided within
the draft GMSF allocation (Draft Policy WG1 New Carrington).

This approach is supported by Paragraph 52 of the NPPF which highlights the "supply of new homes can be best achieved through planning for larger scale development, such as extensions to existing villages and towns".

We also support the commitment to increase the home building rate by taking a proactive approach to monitoring build rates, identifying stalled sites and working proactively with developers to remove barriers to housing development (page 12). The emerging draft GMSF will be going out for further consultation in Summer 2018 and there will be an opportunity for further comments and concerns to be raised during this period. The details regarding Greenbelt release will follow once the final GMSF has been approved.

2.2.1 People who need affordable homes

The Strategy aim to "increase the supply of affordable homes of the right size and type to meet the current shortfall and provide for future needs" is supported, however this must be done in the right locations, and any affordable housing requirement ought to be sufficiently flexible to take account of changing market conditions over time, as per Paragraph 50 of the NPPF. Whilst we support the intention that the relative proportions of affordable homes required to balance the housing market in different places will be assessed and planned for through the Housing Propositions (page 14), it should be made clear that affordable housing provision should be focused in the more affluent areas which have a current lack of affordable housing, and less affordable housing provision is required in new developments within or on the edge of the more deprived areas e.g. Partington / Carrington.

One of the Council's priorities is to increase affordable housing provision across the borough including affordable rented and shared ownership. The need for affordable housing will form part of the Housing Propositions and the evidence/data collected from the Housing Need and Demand Assessment will identify where affordable housing is needed across the borough. The Council will adopt a flexible approach and take into account market conditions when assessing affordable housing need.

2.2.2 Growing the private rented sector

The Strategy places emphasis on growing the private rented sector and increasing the proportion of quality homes available for private rent within the Borough. The Strategy should also place weight on promoting home ownership, rather than growing the private rental market, in order to align with the Trafford Vision 2031 which states that the council "will build a range of quality housing to attract people to Trafford and support residents to buy their own home". We support opportunities for home ownership and increased provision of family housing to meet the housing demand.

Trafford has a high proportion of home ownership – the highest in GM. The Council wants to rebalance this by increasing housing for rent through the private sector and build to rent schemes.

Summary

We trust that the above comments will be taken into consideration in the further preparation of the Trafford's Draft Housing Strategy. Should you wish to discuss this representation further please do not hesitate to contact us.