APPENDIX B – Responses to the draft Regulation 18 version of the AAP and its supporting reports

1: Online Survey Responses

Question	Response	Summary of supplementary comments	Changes Proposed in Response	Response
Does the document identify the right opportunities and challenges within the AAP area?	Yes – 6 No – 3 Neutral – 0	The creation of new public realm is welcomed The provision of a new primary school seems inconsistent with the remainder of the vision which is focussed more towards cultural facilities, offices and public venues The challenges of climate change are not satisfactorily addressed The impacts of new development on traffic flows should be the main consideration The AAP area should be extended to include Stretford Mall which should be a regeneration priority	None.	The Council's Education Department have confirmed that additional primary school provision in the area is needed. The sustainability and climate change policies of the AAP have been strengthened. The AAP is supported by a comprehensive highways assessment. The Council will be advancing a separate AAP for Stretford which will

				incorporate the Stretford Mall site.
Do you agree with the proposed vision for the AAP area?	Yes – 5 No – 2 Neutral – 2	New tall buildings in this area, up to 20 storeys, would look out of place The existing leisure centre site would be a better alternative for a new primary school Existing, unattractive office blocks would need to be refurbished in order to further enhance the area	The upper height limits indicated in association with Policy CQ1 have been revised.	The indicated building heights in the AAP have been updated, resulting in the reduction of upper height limits where required to ensure appropriate development. The AAP is supported by a Townscape and Visual Impact Assessment and Heritage Assessment. The Council's planning policies already support the refurbishment and enhancement of existing building stock.
Do you agree with the strategic objectives and opportunities of the AAP?	Yes – 5 No - 0 Neutral - 4	The document should be more definitive in what it intends to deliver, rather than vague statements	None	The AAP does contain a clear set of objectives. It also clearly highlights the main opportunities for improving the area. The policies of

				the AAP build upon the objectives and are clear and precise in the need to deliver transformational change in the Civic Quarter.
Do you agree with the urban strategies that have been identified?	Yes – 5 No – 3 Neutral -1	The area can accommodate tall buildings given its proximity to Manchester city centre and MediaCityUK. However, some of the precedent imagery of existing high rise developments were not encouraging The omission of Stretford Mall from the AAP area is a concern Further opportunities for new green spaces and planting should be incorporated	None	The policies of the AAP and the Council's other planning policies will ensure appropriately designed development. The AAP contains proposals for a substantial quantum of green space and environmental enhancements.
Do you support draft Policy CQ1: Civic Quarter Regeneration?	Yes – 5 No - 0 Neutral - 4	[No additional comments provided]	N/A	N/A
Do you support draft Policy CQ2: Housing?	Yes - 5 No - 1 Neutral - 3	Priority should be given for existing residents to relocate to the new homes It is a concern that the area may not be able to cope with such a dramatic increase in population	The AAP is supported by detailed viability evidence which has informed an infrastructure and planning obligations	The Council supports the provision of a range of new residential accommodation including accessible family housing.

		The new housing may only be attainable for high earners	policy to ensure that the Civic Quarter is supported with new/enhanced infrastructure as required.	
Do you support draft Policy CQ4: Sustainability and Climate Change?	Yes - 5 No - 2 Neutral - 2	Much more could be done to support this objective, including more car-free areas, electric car infrastructure, and areas for residents to grow food Proposed enhancement to public transport and the provision of improved cycling and walking facilities is positive	The policy has been updated to reference EV charging infrastructure amongst other changes.	Support for public transport enhancements and improved walking and cycling facilities is acknowledged.
Do you support draft Policy CQ5: Conservation and Heritage?	Yes - 7 No - 0 Neutral - 2	All existing heritage assets should be brought back into proper use The proposals are respectful of the area's heritage	The AAP policies make explicit reference to the safeguarding and enhancement of existing heritage assets.	
Do you support draft Policy CQ6: High Quality Urban Design?	Yes - 5 No - 2 Neutral - 2	Poor decisions made in the last 20 years should not be repeated The illustrations in the document do not indicate high quality design Sufficient space should be allocated for recycling bins within new developments Trafford should take an innovative approach to design which would make it visually	The illustrations and precedent imagery in the document have been reviewed and updated where deemed necessary.	The AAP provides a policy framework for high quality design. The detailed guidance for the Neighbourhood Areas and additional design guidance provides a clear set of expectations for

		distinctive from other boroughs		developers. This will be complemented by the Councl's emerging Design Guide.
Do you support draft Policy CQ7: Public Realm Principles?	Yes - 5 No - 1 Neutral - 3	The provision of a new civic square for public events is supported All pedestrian routes should be made safe with lighting and surveillance The creation of small neighbourhood parks is welcomed	None	Support noted.
Do you support draft Policy CQ8: Well-being Route: Talbot Road?	Yes - 6 No - 1 Neutral - 2	The downgrading of a major highway is not supported since it would cause knock-on effects on surroundings streets	None	The downgrading proposals have been fully tested and subject to detailed highways modelling and discussion with Transport for Greater Manchester. The AAP seeks to reduce car use and increase the use of sustainable transport modes.
Do you support draft Policy CQ9: Processional Route?	Yes - 5 No - 1 Neutral - 3	Gateways and signposting at Old Trafford Metrolink stop to make it more welcoming for visitors is important Whether this would deliver the benefits that are stated is questioned since such major	None	The AAP envisages significant environmental and public realm upgrades in the vicinity of the Old

		events are so limited Blocking off major routeways is not supported since it would create highways problems on surrounding streets		Trafford Metrolink stop and wider Processional Route. The AAP does not promote the blocking off of major routeways.
Do you support draft Policy CQ10: Movement and Car Parking?	Yes - 3 No - 1 Neutral - 5	The proposals will place further demands on the Metrolink yet there is already a lack of capacity at peak times More disabled parking should be provided, and more parking for electric vehicles Some of the sites where new housing is proposed should be reallocated for more car parking	None	The AAP provides a policy basis for accessible parking in all new development in addition to EV charging points. The transport evidence base does not support the conclusion that more generalised vehicular car parking is required in the area.
Do you support the need for an Infrastructure and Obligations policy?	Yes - 4 No - 1 Neutral - 4	The area is already well-connected with the Metrolink and A56 bus corridor More local bus routes should be provided	None	Public transport upgrades are supported
Do you support the draft policies for the Central Neighbourhood?	Yes - 5 No - 0 Neutral - 4	The proposed new primary school should be provided elsewhere The green roofs proposed for this area are supported	None	The AAP does not seek to fix the precise location of new primary school provision.

		A new footpath should be provided which would link Ayres Road and Great Stone Road, provided between the Metrolink line and the cricket club boundary It is hoped that the objectives of the AAP for all neighbourhood areas would be delivered before 2037		The AAP supports enhanced pedestrian and cycle connectivity including better links between the surrounding area and Old Trafford Metrolink stop.
Do you support the draft policies for the Southern Neighbourhood?	Yes - 4 No - 0 Neutral - 5	The existing leisure centre should not closed until the replacement leisure centre is provided	None.	This is an operational issue that will be addressed outside of the AAP.
Do you support the draft policies for the Western Neighbourhood?	Yes – 4 No - 0 Neutral - 5	The entrance to the botanical gardens should be retained	None.	The AAP contains policies which seek to conserve and enhance heritage assets, in line with the National Planning Policy Framework.
Do you support the draft policies for the Northern Neighbourhood?	Yes – 5 No - 0 Neutral - 4	[No additional comments provided]	N/A	N/A
Do you support the draft policies for the Eastern Neighbourhood?	Yes – 5 No - 0 Neutral - 4	[No additional comments provided]	N/A	N/A
Do you have any comments regarding		[No comments provided]	N/A	N/A

the Integrated Assessment and its Scoping Report?				
Do you have any comments regarding the AAP evidence base?		[No comments provided]	N/A	N/A

Note: No question was asked regarding draft Policy CQ3: Mixed Use Communities

2. Local Resident Individual Responses

Theme	**Feedback Received**	**Changes Proposed in Response**	**Response**
Housing	Care should be taken to ensure that the new housing would be affordable to buy for local people and young families to enable them to stay in the area Buy to let should not be encouraged The housing offer should be as diverse as possible, to include social housing and the highest possible proportion of affordable homes It is disappointing that the amount of student housing has decreased since to encourage such a population would be beneficial to the local economy	None	Policy CQ11 sets out the Council's affordable housing requirements for the area. The AAP supports a diverse range of housing types and tenures. The AAP supports an element of student accommodation as part of the overall mix.

Other Uses	A new leisure centre for the area is much needed The site of the new leisure centre should be the police headquarters site, not the B&Q site The leisure centre should retain its focus as a facility for the local community The development should be supported by new places to eat, drink and shop A private gym is much needed in the Old Trafford area More doctors, dentists and schools would be essential to support the new population If White City Retail Park is to be lost then its retail function could be transferred to Stretford town centre	None	The Council supports enhanced leisure facilities in the area. The AAP policies encourage a range of uses to ensure mixed and sustainable communities. Policy CQ11 seeks to address infrastructure requirements.
Traffic and Movement	The closure of Talbot Road would direct even more traffic onto the A56 Talbot Road should be closed to traffic completely More multi-storey car parks should be built New car parking should be spread across the area and not just concentrated in the south Resident-only parking should be introduced to prevent match day parking around the Metrolink stops	None.	The traffic impacts resulting from the downgrading of Talbot Road have been fully tested and do not result in acceptable impacts on the local or wider highway network. Any proposals for additional car parking will be assessed

	The parking requirements of existing residents should be prioritised More cycle infrastructure should be incorporated including lockers and sheltered parking facilities The proposed pedestrian route around the cricket ground should include provision for cyclists The proposed pedestrian crossing over Great Stone Road is supported but this should also accommodate cyclists The crossing of the Metrolink line at Old Trafford should be remodelled The proposed multi-storey car park on the former B&Q site should be re-sited to the current leisure centre site and accessed from the A56 Chester Road The recent opening of the Trafford Park Metrolink line should take most football supporters away from the Altrincham line, and thus there is no requirement for a processional route The loss of White City Retail Park would take away existing essential shopping opportunities for residents; an improved bus service to alternative provision in Stretford would be needed Major investment is essential if Trafford Bar Metrolink stop is to function as an interchange Pedestrian permeability and connectivity within the AAP area		within the context of the AAP's objectives including design objectives. The AAP as a whole seeks to give greater priority to cyclists. As detailed proposals are advanced, all opportunities to enhance cycle provision will be taken. The Processional Route has been a longstanding objective for the Council. It will service visitors to both Lancashire Cricket Club and Manchester United in addition to radically enhancing the local environment.

	looks promising but care should be taken to ensure that these routes continue beyond the boundary The exhibition walk needs substantial anchor developments at either end if it is to successfully operate as intended		
Urban Design	The housing densities should be reduced Zones for tall buildings should be confined to the A56 and away from existing residential areas which could be put in shadow. The tall buildings proposed for the northern and eastern neighbourhoods would dwarf existing historic buildings. Tall buildings can cause wind gusts and extremes of heat, and such impacts should be further investigated The overall design bears no relationship to the historic street pattern of the area More built development and hard-surfacing across the area is likely to increase the risk of flooding	Policy CQ1 has been updated and the upper height limits across the AAP area have also been revised in response to feedback.	The area is capable of accommodating a range of housing typologies with varying design approaches, which is encouraged. Housing density will be considered on a case by case basis in line with the AAP policies and those of the wider Development Plan. The AAP contains a requirement for sustainable drainage techniques which should reduce the risk of flooding.
Public Realm, Green Infrastructure and the Natural Environment	More green spaces are needed than the plans presently allow for There is an opportunity to further improve the greenspace at the Quadrant	None.	Detailed design considerations will be addressed at the planning application stage.

	All existing mature trees across the AAP area should be retained New tree planting should include fruit trees and not non-native ornamental trees Running and cycling facilities within the local parks should be improved instead of providing a new linear running track along Talbot Road The use of rain gardens needs careful consideration; the soils may be inappropriate and there are maintenance and infrastructure implications		The Council's policies already seek to protect trees and secure enhancement where losses are incurred. The Council supports wider improvements to local parks in addition to the downgrading of Talbot Road.
Specific Draft Policies	Policy CQ2: Housing • The Council should adopt a strict approach in securing the maximum proportion of affordable housing • The implications of an additional 4,000 homes within the area on the local transport system should be properly assessed • Areas of car-free housing should be introduced Policy CQ3: Mixed Use Communities • Prospective museums within the AAP area should not solely be sports related Policy CQ4: Sustainability and Climate Change • More emphasis should be placed on tackling air pollution along the A56 corridor Policy CQ6: High Quality Urban Design • Solar photovoltaic panels should be placed in the most	None.	See policy CQ11 which sets out the affordable housing requirement. The transport impacts of the AAP have been fully assessed. The AAP does not seek to place restrictions on design or the approach to ensuring the delivery of sustainable development which is in line with the NPPF.

	effective locations and not necessarily hidden from view • The material used in new buildings should not be restricted to brick Policy CQ7: Public Realm Principles • Better connections need to be made between the new public realm and areas beyond the AAP boundary where residents live who would want to use them • The new green spaces are minimal compared to the scale of development proposed for the area • The legacy of the Botanical Gardens justifies something bolder than what the AAP proposes Policy CQ8: Well-being Route: Talbot Road • This should not just be a feature of the AAP area only but should foster links and connections beyond the boundary Policy CQ9: Processional Route • The need for this is questioned since new development proposed for this area is limited and it would not result in a significant increase in footfall • The new stand and museum at Lancashire County Cricket Club would block the southern end and would compromise the route Policy CQ10: Movement and Car Parking • It needs to be demonstrated that the visions for the AAP would not have significant traffic implications beyond the AAP area • The capacity of the area's public transport would need		The proposals for the Processional Route and Talbot Road are comprehensive and seek to deliver a much improved environment. Connections into and out of the area to link the surrounding residential communities are illustrated in the AAP and will be encouraged.

	to be increased in order to cater for expected demands		
Specific Neighbourhood Policies	Central Area: • The proposed public park is in the wrong location and should be behind the original entrance portico at White City Gate • The erection of a 20 storey building adjacent to the portico would be harmful to its setting Southern Area: • The area between the proposed new leisure centre and the cricket club is a further opportunity which is currently left blank Western Area: • The AAP makes no provision for improved pedestrian crossings at the junction of Chester Road and Great Stone Road where residents of Gorse Hill would seek to access the Civic Quarter • The Tesco store should also be relocated in order to boost the offer at Stretford town centre Northern Area: • This area has potential for a major landmark development such as a regional museum or art gallery which could anchor one end of the well-being route Eastern Area: • There is potential for the sunken Trafford Bar Metrolink station to be built over to provide further development sites	None.	The AAP provides a framework for future planning applications and investment by the Council and other key stakeholders. The precise location and scale of new buildings, green spaces etc will be considered carefully at the planning application stage. Proposals will need to demonstrate compliance with the AAP generally and the parameter plans thus ensuring high quality appropriate development which will integrate with the wider masterplan. The AAP does not preclude other development opportunities coming forward in the area but does set out a

			framework for positive change.
Miscellaneous	The focus should be on properly cleaning and maintaining the area which does not presently occur This should be used as an opportunity to invest in the area's internet connectivity and infrastructure Local community projects should be identified that could be supported through subsequent Community Infrastructure Levy payments Contributions to realising the AAP vision should be secured from Manchester United Football Club and Lancashire County Cricket Club since both would benefit The AAP area should be extended to include land at the junction of Elsinore Road and Skerton Road The evidence underpinning the AAP is inaccurate and incomplete, including the Transport Assessment (TA) The AAP fails to conform with existing adopted planning policy, including Core Strategy Policy SL3, Strategic Objective SO2 and Place Objectives for Old Trafford The AAP is inward-looking and pays little regard to the opportunities to integrate with the wider area and achieve more widespread regeneration The lack of identity that the area suffers from would not be addressed through improved wayfinding; it is as a	The AAP policies have been reviewed and updated in line with the IA report.	The cleaning of public streets etc is beyond the remit of the AAP. Future utilities provision has been assessed by the Council and is built into the requirements of policy CQ11. The AAP has been assessed against the Council's existing planning policies and is judged to be complementary to them. A primary objective of the AAP is to ensure that the regeneration of the area is outward and looking and is fully accessible. The AAP has been subject to comprehensive

	consequence of the area's isolation and fragmented nature which the AAP does not attempt to tackle Residents of the area have not been meaningfully involved in the document's preparation The significance of the individual neighbourhood areas is not well-articulated in the AAP Some of the assessment criteria within the IA Report are not supported by the AAP itself, for example regarding promoting equality of opportunity and reducing levels of deprivation		consultation with the public and key stakeholders.

3. Consultee Individual Responses

Theme	Feedback Received	Changes Proposed in Response	Response
Transport and Movement	The conclusions of the TA that the AAP area is highly accessible by sustainable modes of transport are accepted The development of a robust Travel Plan is necessary in order to maximise the obvious potential of the area in meeting transport demands by sustainable modes The further analysis that the TA commits to in order to obtain a clearer indication of the potential traffic impacts of the development of the AAP area should be shared as soon as possible, and with this considering the wider impacts on the Strategic Road Network The AAP should make more explicit reference to Transport for	None.	The transport report has been updated and is provided as publicly accessible information. It has been subject to separate engagement with Transport for Greater Manchester. Prior to any future physical interventions in the area (such as

	Greater Manchester's 2040 Strategy The AAP should set out the area's role in the Bee Network; Talbot Road, Warwick Road and Brian Statham Way are all designated Bee Ways More significant restrictions to general traffic on Talbot Road should be considered, for example bus gates or other physical measures Additional measures to further support pedestrian and cycle movement should be incorporated Careful consideration needs to be given to the implications for buses and journey times; some bus routes may need to be diverted There are ambitions for a tram/train tunnel under central Manchester, potentially in the Old Trafford/Trafford Bar area. The AAP should be progressed in the knowledge of this The substandard junction of the White City Gyratory should be redesigned as part of these proposals		the proposed Talbot Road works) there will be an opportunity for further consultation on the draft proposals. The area's role in the Bee Network is fully acknowledged.
Urban Design	The importance of applying aerodrome safeguarding criteria is highlighted when noting the height of development proposed for the AAP area and also the potential incorporation of renewable technologies The Public Health England document 'Active Design' should be referred to within the AAP as a source to assess the improvements to the physical environment	None	All planning applications for taller buildings will be considered in line with aerodrome safeguarding criteria. A range of best

			practice guidance including national publications have informed the production of the AAP.
Public Realm, Green Infrastructure and the Natural Environment	The plans to be reviewed as part of the IA Draft Scoping Report should include all those relating to the natural environment (for example, biodiversity plans and relevant landscape strategies) The IA Draft Scoping Report should specifically refer to the conservation and enhancement of a green infrastructure network The 'Next Steps' section of the IA Draft Scoping Report should allow for some bespoke indicators to be selected in order that the impacts of the AAP's implementation on the natural environment can be monitored It will be important to consider the ease and cost of the long-term maintenance of the proposed new public realm The AAP should emphasise the important of including sustainable drainage systems in new developments and of applying the surface water hierarchy as set out in national policy The AAP should elaborate on the linkage between public realm, landscaping and exemplary sustainable surface water management	The IA report has been updated to take into account all necessary requirements.	The costs to deliver the new public realm have been fully assessed and are taken into account in the proposed AAP policies. The AAP contains specific sustainability policies including reference to sustainable drainage.

	A collaborative approach to sustainable drainage across the AAP area is encouraged in order to plan for sufficient capacity at the outset and to avoid a piecemeal approach		
Specific Draft Policies	Policy CQ3: Mixed Use Communities, as with draft Policy CQ2, should contain a commitment that all new development will be required to demonstrate sound sustainability principles Policy CQ4: Sustainability and Climate Change should encourage the use of soft (or green) methods of incorporating sustainable drainage solutions, rather than typical hard engineering Policy CQ4 should be amended to require developers to demonstrate a measurable environmental net gain Policy CQ4 should reflect the objectives of the Greater Manchester Joint Waste Development Plan in promoting the movement of waste up the waste hierarchy The objectives of Policy CQ6: High Quality Urban Design and Policy CQ7: Public Realm Principles should be extended to ensure that development proposals incorporate design features which encourage sport and physical activity	Policy CQ4 has been updated.	The AAP is founded on the requirement for sustainable development which is confirmed in the vision and objectives. The theme of sustainability also features in the relevant policies and in any event is a requirement of national planning policy.
Miscellaneous	The APP promotes the redevelopment of brownfield land which has been the subject of past industrial activity; care should be taken to ensure no pollution to controlled waters	None.	This is already dealt with in the Council's wider planning policies dealing with environmental protection and

			through existing legislation.

4. Stakeholder Individual Responses

Site	Feedback Received	Changes Proposed in Response	Response
Police Headquarters (Northern Area)	Market research and financial appraisals undertaken on behalf of the Greater Manchester Combined Authority support a residential-led development of the police headquarters site This could include 900 new homes, areas of open space, small-scale commercial and office space, and refurbishment of the adjacent building The AAP's proposed office/workspace use of the site is not considered to be viable or suitable It would seem more appropriate to focus new office accommodation within the Civic Quarter around existing office uses in the Talbot Road and Town Hall areas	None.	The Council supports the redevelopment of the site. The AAP retains a reference to the need to deliver an element of employment generating activity to ensure mixed and sustainable communities.
Tyre Depot, Talbot Road (Eastern Area)	The opportunity to introduce higher density residential development across the site is welcomed The need to provide adequate separate distances to the railway line is recognised Appraisal work undertaken to date supports 10 storeys of PRS (private rented sector) accommodation (50 units) Affordable provision would be subject to further viability work	None.	Support for residential use noted.

Vanguard Site, Talbot Road (Eastern Area)	There is an outstanding application for a residential apartment scheme (156 units) Any redevelopment of this site has to consider the sub-surface railway tunnel which bisects the site, and the need for separation distances to the railway line These physical constraints impose viability and deliverability challenges The policy objective for affordable housing is recognised The viability of the site is currently being reviewed to establish an optimum scheme A greater proportion of affordable housing could be offered as part of a 20 storey development (310 units) The AAP's indicative height limits for development in this neighbourhood are not supported Flexibility should be incorporated within the AAP to allow the appropriateness of scale and height to be assessed on a site by site basis The Townscape and Visual Impact Assessment (TVIA) should have been instructed to inform the masterplan and not applied retrospectively The AAP should more clearly distinguish between designated and non-designated heritage assets	None.	Comments noted. The AAP does allow for each site to be assessed on its individual merits however the AAP parameter plans adopt an evidence based approach to ensuring a comprehensive approach is adopted across the area thereby securing appropriate development. The TVIA provides a robust baseline upon which the AAP is based. The Council attaches importance to the conservation and enhancement of all designated and non-designated heritage assets.

	The use of Council CPO powers in this area of the AAP would be beneficial (given the number of titles associated with the railway tunnel)		
Car park site, Talbot Road (Eastern Area)	The ambition for this site is the provision of high quality homes, either in isolation or as part of a wider development incorporating the adjacent Old Trafford Bowling Club (OTBC) site There are financial challenges facing the OTBC which this development could support Sensitive development would not prejudice the continued use and significance of the OTBC as a heritage asset It is disappointing that the site is not identified within the AAP as falling within an 'area to be redeveloped' The AAP only shows development within a small portion of the site A larger development plot is indicated which spans numerous landownership boundaries but this would not be deliverable This part of the AAP is shown as principally accommodating civic/education-type uses; it is considered that this should be extended to include residential uses The intention is for the OTBC site to remain privately accessed and not to include a public plaza, as the AAP shows	None.	Comments noted. Any detailed proposals for this site will be considered through the planning application / pre application process.

	The site could accommodate higher rise development than presently illustrated; a development of 10 storeys in this gateway location is considered appropriate		
Bingo Club site, Chester Road (Eastern Area)	The opportunity to introduce higher density residential development across the site is welcomed Appraisal work undertaken to date supports 10 storeys of PRS (private rented sector) accommodation (300 units) Access could be taken either from Chester Road or Talbot Road	None.	Comments and support noted.
White City Retail Park (Central Area)	The long term potential of White City Retail Park in realising the of the Civic Quarter is recognised, but these do not represent immediate opportunities due to leasehold obligations The opportunity to introduce higher density residential development on the eastern part of the site is welcomed The use of the site for car parking purposes requires further consideration Service access would need to be retained for residual retail uses	None.	Comments noted.
MKM House Site, Warwick Road (Central Area)	The site has planning permission for a 12 storey apartment building There are viability challenges with this scheme, and a revised proposal is being discussed with officers The identification of this site as being within an ‘area to be developed’ is supported	None.	The issues identified are matters for the development control process and not the AAP.

	The illustrative scheme for the site within the AAP bears no resemblance to the consented development (a lower-rise development is indicated)		
Charlton House, Warwick Road (Central Area)	The identification of this site as a 'negative impact building' and within an 'area to be developed' is supported The identification of the adjacent pub as a heritage asset is questioned The site can accommodate a higher rise development than the AAP illustrates The AAP fails to recognise the gateway potential of this site at the intersection of Chester Road and the new processional route	None.	The site has been assessed and identified appropriately within the AAP.
B&Q Site, Great Stone Road (Southern Area)	The proposed allocation of a leisure centre and multi-storey car park on this site is objected to There are other sites within the AAP area which should be earmarked for a leisure centre The Council has failed to deliver on previous commitments regarding a replacement leisure centre on alternative sites; the new leisure centre proposal will not be deliverable since it will rely on compulsory purchase powers of which there is no certainty The use of the site as a leisure centre and for parking would cause traffic congestion at nearby junctions, as confirmed in the TA The AAP should not be planning for car users	The former B&Q site is no longer proposed as a site for a new leisure centre. This is in response to changes in the Council's strategy which is to focus on the enhancement of existing facilities. The former B&Q site is now identified for residential use.	The AAP parameters for the former B&Q site are evidence based and designed to ensure that development compliments and respects the character of the local area.

	The former B&Q site should be allocated for residential development, consistent with the new outstanding planning application for 333 homes A residential development offers the best prospect of improving the street scene to Great Stone Road A residential scheme would support the overall vision for the AAP and would deliver a quick win to improve the housing land supply position The building height parameters are objected to; the site is capable of accommodating buildings taller than 6 storeys The TVIA does not assess alternative development heights or massing The AAP should set out a trajectory of sites to demonstrate how and when the proposed 4,000 homes in this location would be delivered All the design principles for residential development would be difficult to achieve whilst also providing the density of development envisaged		
2 Brindley Road	The AAP boundary should be extended to include this site The site provides a major redevelopment opportunity and could help meet housing needs in the area The area surrounding the site is in the midst of significant	None.	Comments noted. The redevelopment potential of the site is noted however this does not necessitate a change to the AAP

	change, and the area containing the site is the next logical step leading outwards from the city centre The site could accommodate development of up to 20 storeys		boundary.
Miscellaneous	Policy CQ3: Mixed Use Communities: • This policy encourages a mix of retail and other town centre uses within the AAP area but this should be extended to include 'experiential uses' in order to provide further footfall to support other commercial units • Positive engagement with food and drink operators seeking to locate in the area is encouraged in order to improve the nutritional value of what would be offered	None.	Policy CQ3 does not preclude the suggested use.

APPENDIX C – Responses to the consultation on the methodology for the Viability Assessment

Stakeholder	Comments	Changes to Methodology Proposed in Response	Response
Victor (Old Trafford) Limited	Very impressed. Hopefully your method can be made part of future planning and CPO reforms. Quicker and realistically valued CPO agreements will greatly help to enable Masterplan Visions to become reality.	None	None requested.
Cushman & Wakefield	Request adding to the mailing list	None	None requested – separate action taken.
Peel L&P	**Overall Comments**		
	We understand that the proposed methodology for the Civic Quarter AAP viability assessment is based on the residual method, with the residual land value compared to the benchmark land value ('BLV') to assess site viability. We agree with this proposed methodology.	None	None requested.
	A number of the key viability assessment assumptions do not reflect the market realities of development and do not currently accord with the requirements of the PPG for Viability. In particular, there appears to be a form of 'circularity' in respect of the approach to BLV as briefly explained under the sub-heading below.	None.	TC's approach to methodology complies with the requirements of the NPPF (2018, revised 2019) and the PPG (2019).

	If the proposed assumptions are adopted, we believe that development will not come forward as landowners will have no incentive to release sites for development which will ultimately constrain land supply in the AAP area. Similarly, developers will not be sufficiently incentivised to take on the risk in delivering new build development in the AAP area, particularly when considering the short-medium term economic headwinds associated with the COVID-19 pandemic. Taken together, this will compromise delivery of the AAP vision and objectives.	None proposed	Sufficient land values to meet the aspirations of landowners whilst complying with development plan policies have been included. The assessment of land values follows the requirements as set out in the PPG (2019). Profit margin has been included at 17.5% the midpoint of the appropriate range set out in the PPG (2019). This profit margin is supported by planning appeal decisions and reflects the profit margin used in the GMSF Viability Study.
	There are numerous inputs where Trebbi have not set out their proposed assumptions and/or it is not clear what assumptions are being proposed. Therefore, stakeholders cannot fully comment on the appropriateness of the assumptions. For example, the sales values, build costs, EUV and landowner premium are not defined.	None proposed	The consultation event referred to the methodology used not specific assumptions. Stakeholders will have the opportunity to comment on assumptions at the EiP
	Where assumptions have been put forward, there is insufficient evidence to substantiate these assumptions and in many instances, no actual market evidence	None proposed	The consultation event referred to the methodology used not the supporting evidence base. Stakeholders will have the

	has been provided. The assumptions are therefore unsubstantiated and stakeholders cannot comment on the robustness of the evidence base at this early stage.		opportunity to comment on the evidence base at the EiP.
	Assumptions		
	The message appears to be that the BLV must assume 40% affordable housing as the policy compliant scheme and must not be higher than the policy compliant residual land value generated by the proposed development (assuming full CIL, commuted sums and affordable housing). On this basis, there would be no site-specific FVAs in the AAP area as all schemes would be deemed capable of supporting full policy requirements by default. This appears to be a form of circularity to secure full policy requirements. We are not aware of any guidance or precedent which supports this approach and it appears to be at odds with the PPGV, and thus 'unsound'.	None proposed	Planning policy requirements have been reflected in the BLV as required by paragraph 16 of the PPG (2019). TC have attempted to incorporate the highest amount of accuracy in their viability assessments engaging with developers and other stakeholders such as landowners, and infrastructure and affordable housing providers. Paragraph 2 of the PPG (2019) states that "the role for viability assessment is primarily at the plan making stage" and "policy requirements should be set at a level… without the need for further viability assessment at the decision taking stage".

	The proposed assumption that “the value of the land irrespective of the buildings on the site will be less than the value of land should planning permission be granted for change of use” is flawed. We reinforce that sites will not come forward for development if this approach is adopted which will compromise delivery of the AAP objectives.	Statement that approach is flawed, no proposed changes	Paragraph 67 of the NPPF (2018, revised 2019) states that Councils should identify a sufficient supply of sites taking into account their “availability, suitability and likely economic viability”. The approach taken by TC looks to ensure schemes are economically viable and able to contribute towards planning contributions.
	We fundamentally disagree with the proposed ‘benchmarking’ approach to ‘standardise’ the abnormal costs. This is a flawed and an inherently contradictory approach; ‘abnormal’ costs cannot be ‘standardised’ as they are specific to each particular site. These costs should not be determined by benchmarking to another site.	None proposed.	A standardised approach to abnormal costs is used in plan making viability studies to account for their inclusion in the majority of site-specific assessments submitted by applicants.
	The proposed approach also contradicts Trebbi’s own comments in their recent viability review report in respect of Hall Lane, Partington (April 2020) where it is stated that: “No cost plan, site investigation report or commentary have been provided by the Applicant to support the abnormal costs. The Applicant is requested to provide this information as without it, it is impossible for us to comment on the appropriateness of	None proposed, the consultee appears to be suggesting detailed site investigation should have been undertaken and a cost plan produced for the entirety of the AAP area.	Paragraph 3 of the PPG (2019) states that the “assessing of viability of plans does not require individual testing of every site”, and goes on to say “plan makers can use site typologies to determine viability at the plan making stage”. TC have used a typology with regard to abnormal costs to enable an accurate assessment of viability at the plan making

	the abnormal costs, because they are site-specific and therefore it is not possible to benchmark against other schemes".		stage. The reference made is to a site-specific viability assessment where the applicant was attempting to not comply with the adopted development plan policies. TC fail to see the relevance of a site-specific viability case to the plan making process.
	The developer's profit of 17.5% of market housing GDV is not evidenced and may not provide an adequate return to compensate for the level of development risk, particularly in current market conditions.	None proposed.	The adopted profit margin represents the midpoint of the acceptable range for what may be considered a suitable return to developers in order to establish the viability of plan policies as set out in PPG (2019). This profit margin is supported by planning appeal decisions and GMSF Viability Assessment. The consultation event referred to the methodology used not the supporting evidence base. Stakeholders will have the opportunity to comment on the evidence base at EiP.

	If First Homes are proposed to be included as part of the assumed affordable housing mix, a developer's profit of 6% of affordable housing GDV is insufficient for this tenure of affordable housing as there is no reduction in sales risk through an assumed pre-sale to an RP. We request clarity on the affordable tenure assumptions in the next stage of the consultation.	None proposed	Proposed tenure of the affordable units has been adopted based on the Trafford Council Planning Obligations SPD (2014).
	Sales and marketing costs at 2% of GDV is insufficient on a 'for sale' basis. This assumption does not accord with that adopted in the vast majority of other market-facing FVAs we have seen prepared by suitably qualified practitioners.	None proposed.	There is not a uniform benchmark to sales and marketing fees. Fees are usually between 1.5% and 3.5% of GDV.
	The 30% discount to intermediate affordable tenures is too low, particularly in light of the recently announced changes to the shared ownership model which could adversely impact on the prices that RPs can afford to pay to acquire these properties going forwards from 2021. It is anticipated that shared ownership transfer values will be impaired as a consequence of the reduced minimum initial equity sale (10% instead of 25%) and the transfer of repair and maintenance liabilities to the RP.	None proposed.	There is no evidence that a 30% discount to open market value is not appropriate. From discussion with registered providers and Local Authorities, 30% was seen to reflect the likely transfer pricing for shared ownership properties.

Homes England	No comments but will continue to engage as appropriate.	None	None requested.
Highways England	Supportive of any necessary mitigation for the development proposals will be considered at the Plan-making stage, with phasing to be considered to determine the 'deliverable' (short-term) and 'developable' (5 years+) parcels of land early on. This will enable us to take a view of what necessary mitigation to the Strategic Road Network (SRN) may be required in both the short and long terms.	None	None requested.
	Highways England aim to work collaboratively with Planning Authorities to determine what the SRN impacts might be at an early stage, to enable the delivery of positive outcomes as quickly as possible. In order to facilitate that, Highways England recommend that once further analysis of the capacity need has been established, that this is shared with Highways England as early as can be. Highways England also recommended that, once completed, traffic models of the revised AAP area are share with them for comment.	None	Separate action taken - Highways information shared.
	It was also welcoming to hear that an equalisation methodology is being proposed for meeting the costs of	None	None requested.

	developing any necessary infrastructure, and Highways England are likely to be supportive of such methods being implemented in order to spread the costs across all impacted developers. It is important to ensure that any required infrastructure, especially where it may be lengthy or costly to construct, is considered at an early stage and that developers are made aware of their responsibilities as early as possible.		