



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

17 March 2014

By email only
strategic.planning@trafford.gov.uk
let.005.RF.AD.04810119/0081

Dear Sir/Madam

**TRAFFORD LOCAL PLAN: LAND ALLOCATIONS
REPRESENTATIONS ON BEHALF OF NATIONAL GRID**

We have enclosed a series of comment forms pursuant to the implications of the consultation draft Plan on National Grid's land interests within and around Partington.

Details of, and the justification for the comments made are set out below in respect of each site. Plans of the respective sites are also enclosed for ease of reference.

Land off Common Lane, Partington

Background

The 27ha site is subject to an extant planning permission for in the order of 1,000,000sqft of B Class floorspace (LPA Ref: H/OUT/71194). It is estimated that development of this scale could generate between 1,400 and 1,700 jobs directly on the site, with indirect economic benefits extending beyond general construction jobs and to wider support for local facilities and services.

In this respect, the site has scope to make a significant contribution to the requirement for new employment land within the Carrington Strategic Location, so long as the draft plan does not impose additional burdens on the site.

Proposals Map - Policy CAR1 – Carrington Strategic Location (**Support**)

National Grid support extension of the Carrington Strategic Location allocation to include the site. It is able to make a significant contribution to meeting the stated development objectives of the allocation within a relatively short timescale.

The site is currently being marketed for the permitted range of B Class uses, and benefits from being fully remediated.

However, support for the allocation including the site is subject to resolution of

the concerns expressed regarding paragraph 6.4 (see below). If this is not resolved then the preference would be for the site to be excluded from the allocation, in order to safeguard delivery of investment and regeneration in the area.

Policy CAR1 – Carrington Strategic Location - Paragraph 6.4 (Object)

Paragraph 6.4 states the following:

“Supplementary planning documentation will be prepared prior to planning permission being submitted and development taking place in this location. This documentation will provide guidance on a number of matters, including which parts of the site are appropriate for specific uses”. [Indigo Planning emphasis]

The rationale for this approach is understood, and broadly supported in respect of the main body of the site which is largely controlled by a single body. However, there is a risk of such supplementary planning documentation taking a prolonged period of time to prepare and adopt.

In this case, paragraph 6.4 could prevent development coming forward that complies with the overall objectives of the allocation, and does not frustrate or undermine delivery of development across the wider site. This is clearly contrary to the policy approach of the Core Strategy and the NPPF, both of which seek to deliver economic growth and regeneration in the shortest possible timeframe.

In the case of Common Lane, which already has planning permission for redevelopment, there is no justification for suggesting that development should be withheld until adoption of the supplementary planning document.

Even if planning permission had not been secured, its location on the southern edge of the allocation, clearly separated from the main body of the site by the existence of the safeguarded vehicle route along the alignment of Common Lane, makes it clear that the site could be developed without prejudice to delivery of the wider allocation. It is recommended that paragraph 6.4 is amended to simply state that:

“Supplementary planning documentation will be prepared to ~~prior to planning permission being submitted and development taking place in this location~~. This ~~documentation will~~ provide guidance on a number of matters, including which parts of the sites are appropriate for specific uses”.

The only practical alternative to this approach would be to define a specific area to which the prohibition of applications/delivery applies until the supplementary planning document is adopted (i.e. the area of the site controlled by the single land owner).

The justification to Policy CAR1 does suggest that a more pragmatic approach will be adopted along the lines suggested above. Paragraph 6.16 states that:

“The council will work with landowners to develop effective ways of bringing forward sustainable development in the location, including the preparation of supplementary planning documentation. Until such time as this work is completed, the council will use the policies in this section of the plan, together with other relevant local plan policies to determine whether or not development proposals should be considered premature and therefore refused. The supplementary planning documentation will help resolve complex issues within the Carrington area, and ensure delivery of the Core Strategy place objectives for Carrington”.

Whilst this paragraph affords some comfort (although references to ‘prematurity’ are concerning), the wording of paragraph 6.4 within the policy is unequivocal in its meaning and interpretation. Without the recommended changes being made, there is a real risk that developments supported by the Core Strategy and the Land Allocations document (in principle) could be frustrated to the detriment of the local economy, and the regeneration objectives for the Partington area outlined above.

Former LNG Storage Site, Heath Farm Lane, Partington

Background

The Heath Farm Lane site extends to approximately 16ha, and has now been cleared of its former industrial structures. The hazardous substances consent has also been revoked to the benefit of development on the subject site, and the wider area.

It represents a brownfield site sandwiched between the residential area of Partington and the greenbelt, and is immediately available for site remediation and development.

The site also has a clear relationship with those to the north and south of Broadway (referred to below). Any redevelopment of the Heath Farm Lane site would naturally include a requirement for some strategic landscaping and habitat creation, due to the scale of the site.

It is envisaged that a comprehensive approach to planned redevelopment of Heath Farm lane alongside the two Broadway sites could deliver qualitative enhancements to the open space and amenity value of the wider area. However, the present allocation of the Broadway sites for open space related purposes is prejudicial to the approach, hence the corresponding objection to these allocations below.

Proposals Map - Policy RE1 – Priority Regeneration Area (**Support**)

National Grid support inclusion of the site within the Partington Priority Regeneration Area, not least due to the clarification at paragraph 9.3 that *“...within these areas the council will support development proposals which deliver new homes, community facilities and transportation improvements where they meet regeneration objectives set out in the Core Strategy and Policy L3....”*.

This allocation sets a positive framework for delivery of development on the Heath Farm Lane site, particularly when read alongside Policy HO2 (release of other land for residential development) which supports redevelopment of sustainable brownfield sites for residential purposes.

Proposals Map - Policy CAR1 – Carrington Strategic Location (**Support**)

National Grid support extension of the Carrington Strategic Location allocation to include the site. As with Common Lane, it is able to make a significant contribution to meeting the stated development objectives of the allocation within a relatively short timescale.

However, support for the allocation including the site is subject to resolution of the concerns expressed regarding paragraph 6.4. If this is not resolved then the preference would be for the site to be excluded from the allocation, in order to safeguard delivery of investment and regeneration in the area.

Policy CAR1 – Carrington Strategic Location - Paragraph 6.4 (**Object**)

The objection to paragraph 6.4 outlined in respect of Common Lane is reiterated within the context of Heath Farm Lane. Heath Farm Lane can readily be developed in a manner that does not prejudice delivery of wider objectives for the allocation due to the degree of separation between the sites. Its integration with the wider area can be readily secured via standard development control criteria.

Land to the North and South of Broadway, Partington

Background

Representations were made to the council at ‘call for sites’ stage regarding the land north and south of Broadway. In both cases it was recommended that the sites be allocated for residential development (at least in part).

Whilst presently over grown, both sites are in fact part of the former gas works, and arguably both previously developed and subject to contamination.

The sites are subject to various landscape/open space designations which appear to be simply carried through from the UDP with no assessment undertaken as to the merit of doing so. In fact, as pointed out within the submissions to the call for sites consultation, the sites comprise little more than overgrown scrub with no formal amenity value.

Proposals Map - Policy RE1 – Priority Regeneration Area (**Support**)

National Grid support inclusion of the sites within the Partington Priority Regeneration Area, not least due to the clarification at paragraph 9.3 that *“...within these areas the council will support development proposals which deliver new homes, community facilities and transportation improvements where they meet regeneration objectives set out in the Core Strategy and Policy L3....”*.

This allocation sets a positive framework for delivery of development on the Broadway sites in conjunction with Heath Farm Lane, particularly when read alongside Policy HO2 (release of other land for residential development) which supports redevelopment of sustainable brownfield sites for residential purposes.

Proposals Map - Policy CAR1 – Carrington Strategic Location (**Support**)

National Grid support extension of the Carrington Strategic Location allocation to include the sites. In conjunction with Heath Farm Lane, they are able to make a significant contribution to meeting the stated development objectives of the allocation within a relatively short timescale.

However, support for the allocation including the site is subject to resolution of the concerns expressed regarding paragraph 6.4. If this is not resolved then the preference would be for the site to be excluded from the allocation, in order to safeguard delivery of investment and regeneration in the area, so long as the corresponding ‘open space’ designations were removed.

Policy CAR1 – Carrington Strategic Location - Paragraph 6.4 (**Object**)

The objection to paragraph 6.4 outlined in respect of Common Lane and Heath Farm Lane is reiterated within the context of the Broadway sites, where they are considered in a comprehensive manner with Heath Farm Lane.

Proposals Map - Policy GI1 – Green Infrastructure (**Object**)

The sites are washed over by the Green Infrastructure designation, albeit they do not appear to be listed within Appendix B, they have no multi-functionality, and there is no existing or proposed public access.

Paragraphs 23.2 and 23.3 of Policy GI1 state that:

“When considering development proposals within these areas, the council will give consideration to the anticipated level of adverse impact on the multi-functionality of the green infrastructure, existing or proposed public access or access for maintenance purposes.

As defined by Policy R3 of the Core Strategy, development should protect and enhance the quality and / or the multi-functionality of Trafford’s green infrastructure”.



As outlined above, the Broadway sites do not have any of the positive characteristics associated with the green infrastructure designation and, arguably, an application to sensitively redevelop the sites would not contravene the policy.

However, more fundamentally, it is National Grid's view that the sites should not be subject to this allocation in the first place as there is no evidence to justify imposing the constraint on its redevelopment.

Through reference to the sustainability appraisal accompanying the consultation draft Land Allocations document, it is evident that the allocation is simply a legacy of previous UDP designation. We have consistently argued that these designations themselves were erroneous given the lack of detailed appraisal or assessment of their value.

This is clearly the case now. We are not aware of any detailed assessment of the merits of the sites as having some positive green space function. The update on green and open spaces need undertaken by Trafford Council in June 2009 confirmed that the Bucklow St Martin's Ward "...is very sufficient in green space", and the more recent Trafford green space strategy does not afford the site any particular designation (e.g. semi-natural green space, amenity green space, etc.).

If there was ever any evidence to support the specific allocation of the site for green space purposes, this is now clearly outdated and not fit for purpose. Removal of the designation and consideration of the Broadway sites in a comprehensive manner with the adjoining Heath Farm Lane site would enable a more positive response to meeting development, green space and amenity needs for the local area.

Proposals Map – Policy OS1 – Parks and Open Spaces (Object)

National Grid object to this designation of the site on the same basis as outlined in respect of the G11 allocation above.

Yours faithfully

Richard Frudd

Enc: As noted
cc: Mr C Connolly – National Grid
Mr B Gaunt – National Grid
Mr T O'Keefe – DTZ
Mr D Nesbitt – DTZ
Mr B Birtwistle – Birtwistle Property Consultants

**Trafford Local Plan: Land Allocations Consultation Draft
Comment Form – February to March 2014**

Office Use Only	
Date	
Ref	
Ack	

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strategic.planning@trafford.gov.uk

Name:		Agent (if applicable):	Richard Frudd
Organisation (if applicable):	National Grid	Organisation (if applicable):	Indigo Planning Ltd
Address:		Address:	Toronto Square Toronto Street Leeds
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Tel:		Tel:	0113 380 0270
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Please use the consultation comment form to make a representation on the Trafford Local Plan: Land Allocations – Consultation Draft, the Sustainability Appraisal or other related evidence base. You should consider what it is you wish to comment on and let us know whether you support or oppose this particular element of the document. Please explain your reasons and suggest any improvements.

Please use a separate comment form for each specific policy, paragraph, figure or table you wish to comment on and attach it to this contact details sheet.

A separate site submission form is available to submit new sites which have not previously been assessed. This form is available on the Council's website via the Strategic Planning webpages, or directly from the team at the address below.

You only need to fill out one copy of your contact details if you are submitting all your comments at the same time, but please indicate the total number of comment sheets enclosed in the box below:

Total number of comment sheets enclosed:	10
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 **The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way.** Responses can be submitted via the electronic version of the comment form which can be found on the Council's web site at: www.trafford.gov.uk. **This form is in 'Word' format and you can type in your response and return it as an e-mail attachment to strategic.planning@trafford.gov.uk.**

Alternatively, completed comment forms can be returned by post to the address below by no later than **17th March 2014**.

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Data Protection Notice:

Please note that all comments will be held by the Council on the database for the duration of the Local Development Framework (LDF) and will be available for public inspection under the Freedom of Information Act 2000.

Trafford Local Plan: Land Allocations Consultation Draft

Comment Form – February 2014



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SA Report		Paragraph number	
SA Appendices		Policy number	CAR1
SA Options Report		Site reference	Common Lane, Partington
SA Flood Risk Sequential Test		Table/Figure reference	
SA Scoping Report		Other (including omissions and suggestions for proposed amendments)	
Topic Paper (please specify)			
HRA Scoping report			
SHLAA (2013)			
Conservation Area Appraisal (please specify)			
Other document, (please specify)			

Do you support, oppose or have general comments about this specific part of the document?				
Support	X	Object		General Comment
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Please continue on a separate sheet if required

Thank you for taking the time to fill in our Land Allocations Plan comments form; your comments are very much appreciated.

Trafford Local Plan: Land Allocations Consultation Draft

Comment Form – February 2014



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SA Appendices		Policy number	CAR1
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