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Strategic Planning
Trafford Town Hall
Talbot Road
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M32 0TH

By Email – Strategic.planning@trafford.gov.uk

19885/A3/GG/ac

17th March 2014

Dear Sir,

**TRAFFORD LOCAL PLAN: LAND ALLOCATIONS – CONSULTATION DRAFT (JANUARY 2014)
REPRESENTATION ON BEHALF OF THE CROWN ESTATE**

We write on behalf of The Crown Estate, land owners of the Altrincham Retail Park, regarding the Trafford Local Plan: Land Allocations – Consultation Draft and specifically in relation to Policy OR1 – Retail Warehouse Parks at Section 20 – Out of Centre Retail.

Policy OR1 of the Draft Land Allocations identifies the three Retail Warehouse Parks in Trafford, of which Altrincham Retail Park is one. Paragraph 20.2 promotes new development that consolidates the existing functions of the Retail Warehouse Parks as a specialist location for the sale of bulky comparison goods in accordance with Core Strategy Policy W2.14. Paragraph 20.4 prescribes the circumstances where the Council will grant planning permission for non-bulky comparison and convenience retail and other main town centre uses within the defined Retail Warehouse Parks.

The Draft Land Allocations states that primary focus of Retail Warehouse Parks is for the sale of bulky comparison goods and we understand that the Council will seek to protect this role. We consider however that an element of the uses described by the Council as 'non-bulky comparison and other main town centre' make an important contribution towards the continued offer at the Altrincham Retail Park.

We consider that there should be a greater level of flexibility for development proposals at Altrincham Retail Park that acknowledges the existing composition of this Park (i.e. it is not all bulky goods and includes non-bulky goods retail Class A1 and Class A3 uses). There is also an extant planning permission for an additional 800 square meters of Class A1 and or Class A3 floorspace at Altrincham Retail Park (see Evidence Base below). These types of uses are complementary to and of a scale not to cause harm to other facilities. Looking forward through the Plan period, we consider that the Land Allocations document needs to ensure that the Policies provide sufficient flexibility to enable Altrincham Retail Park to continue to provide an important source of local employment and contribute towards economic growth.

Flexibility in Local Plans is supported in the National Planning Policy Framework (NPPF) at paragraph 14 which states that;

"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan



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making and decision taking. For plan-making this means that: local planning authorities should positively seek opportunities to meet the development needs of their area; Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid changes..." (Our emphasis)

Paragraph 21 of the NPPF identifies that investment in business should not be over-burdened by the combined requirements of planning policy expectations and that planning policies should recognise and seek to address potential barriers to investment and set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth.

The second sentence of the justification text to Policy OR1 at paragraph 20.5 is considered to be negatively worded and unnecessary. We suggest that this sentence is deleted.

Evidence Base

The Trafford Retail Study published in 2007 is now seven years old and its reliability as an 'up to date' evidence base document is questionable.

Topic Paper: TP 18 - Out of Centre Retail, which comprises one of the evidence base documents to the Draft Land Allocations document states that the April 2010 permission (H/71396) granted on appeal for the erection of four retail units (total 800 square meters) for purposes within Class A1 (Shops) and/or Class A3 (Restaurants and Cafes) has not yet been implemented, this is not correct. Planning Permission H/71396 dated April 2010 has been implemented and remains extant. The four units permitted under this permission are capable of being built out. The attached letter from Trafford Council dated 4th December 2012 confirms that planning permission H/71396 has been implemented.

Proposed Change

We consider that the policies controlling new development at Altrincham Retail Park should include a degree of flexibility and should not simply be restricted to non-bulky good uses. This will enable the Retail Park to adapt to the changing retail market and continue to provide an important source of local employment.

We recommend that paragraph 20.5 of the 'justification text' to the Draft Land Allocations document is amended as follows:

"The three identified Retail Warehouse Parks within Trafford are important facilities that meet the needs for the retailing or larger bulky goods. ~~However, in recent years there has been a steady erosion of the role of these facilities as bulky goods destinations with an increase in the amount of non-bulky comparison and convenience goods being sold, and the introduction of other facilities such as cafes.~~"

In the meantime if you require any clarification of this matter please do not hesitate to contact either Mark Sitch or myself.

Yours faithfully

GAVIN GALLAGHER

Associate

Cc: Michael Bell – The Crown Estate

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

Office Use Only	
Date	
Ref	
Ack	

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
strategic.planning@trafford.gov.uk

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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:	ONE
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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**.

**Strategic Planning
Trafford Council
Trafford Town Hall
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M32 0TH**

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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Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	<input checked="" type="checkbox"/>	Page number	74
SA Report		Paragraph number	10.5
SA Appendices		Policy number	
SA Options Report		Site reference	
SA Flood Risk Sequential Test		Table/Figure reference	
SA Scoping Report		Other (including omissions and suggestions for proposed amendments)	
Topic Paper (please specify)	<input checked="" type="checkbox"/>		TP18
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		Object	X	General Comment	
<p>Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.</p> <p>Please see the attached letter</p>					

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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