



Your ref:  
Our ref: RPW/BT/PI1270

14 May 2014

Strategic Planning and Developments  
Trafford Town Hall  
Talbot Road,  
Stretford,  
MANCHESTER,  
M32 0TH

Dear Sir/Madam

**TRAFFORD LOCAL PLAN: LAND ALLOCATIONS CONSULTATION DRAFT**

We write on behalf of our client Landcare Manchester Limited who owns a substantial proportion of the land shown edged blue on the attached plan.

We have previously submitted representations on 14<sup>th</sup> September 2012 (copy attached) at the call for sites stage. At this time, we were unable to disclose our clients as they were in the process of acquiring the Greater Manchester Waste Disposal Authorities Portfolio which comprised 18 sites which included the attached site at Stretford.

Our Clients site as shown on the draft Proposals Map is covered either in whole or part by a number of designations as follows:

- Existing Green Infrastructure – GI1;
- Green Infrastructure Opportunity Areas – GI2;
- Green Belt – GB1;
- Natural Environment Asset – NE1;
- Landscape Character – NE2; and
- Parks Hierarchy and other Open Spaces – OS9 and SP9.

Our client has aspirations for the development of this site for some form of commercial development in the future given its key strategic location within the Greater Manchester conurbation. For example, opportunities may exist in the future for the site to benefit from landfill mining where recyclable materials such as metal as well as methane gas would be removed from former landfill and the land would then be refilled with harmless materials and cleaned up to enable it to be brought back into beneficial use. It is in the private ownership of Landcare Manchester Limited and continues to create methane and leachate which is managed via spiromatic venting, an extraction engine and recirculation. The site has no statutory rights of way across it and although it has been used by local people on an informal basis for many years, increased usage by residents in its current condition should not be encouraged.

Landcare Manchester Limited considers that the site has significant potential to make a major contribution to the future economic and social growth of Trafford and Greater Manchester for a range of business and commercial activities. Our client considers that

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Planning and Environmental Advisers

**Partners:**  
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Fiona Woodford  
Julie Halman

**Associates:**  
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**HOW Planning LLP**  
Registered Office: 40 Peter Street, Manchester M2 5GP  
Registered in England and Wales Registered Number: OC318465  
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Any reference to Partner means a member of HOW Planning LLP

whilst the site has been identified as part of the Green Infrastructure of the area as well as an Opportunity Area, these are similar aspirations from the previous UDP, albeit under new policy designations, which have not been realised i.e. Mersey Valley and Community Forest.

Landcare Manchester Limited strongly objects to the designation of the site under GI2 as it is unlikely that it can be delivered. It is also unnecessary given the sites existing and continued designation as Green Belt.

In summary, Landcare Manchester Limited objects to several descriptions in the emerging Local Plan which are deemed to be unnecessary and undeliverable. The site has a number of existing designations already in place, such as Green Belt, which provide policy protection for the site pending either a planning application capable of demonstrating very special circumstances, or a review of the Green Belt against the areas future social and economic needs.

We trust the above information is self-explanatory, although please do not hesitate to contact the undersigned if any points require clarification.

Yours faithfully

**RICHARD WOODFORD**  
**PARTNER**  
**Direct Line: 0161 831 5888**  
**Email: [richard.woodford@howplanning.com](mailto:richard.woodford@howplanning.com)**



Your ref:  
Our ref: MR/RW/RT

14<sup>th</sup> September 2012

Strategic Planning & Developments  
Waterside House  
Sale  
M33 7ZF

**By post and email ([strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk))**

Dear Sir / Madam

**REPRESENTATIONS TO THE TRAFFORD LOCAL PLAN LAND ALLOCATIONS CALL FOR SITES: LAND WEST OF CHESTER ROAD, STRETFORD**

I am writing on behalf of clients of HOW Planning LLP (HOW). I am instructed to promote the land shown edged in blue on the enclosed plan to Trafford Borough Council in response to the Council's consultation on the forthcoming Land Allocations Development Plan Document (DPD).

The DPD will cover the whole of Trafford and, together with the Core Strategy (adopted January 2012) will form part of the Local Plan. The Land Allocations DPD will *inter-alia* set out new site allocations for housing, employment and other purposes.

The Site is referred to as land to the west of Chester Road, Stretford. It is a 50 ha parcel of landfill / Greenfield land located roughly 400m from Stretford Town Centre. The vast majority of the Site is not located within a flood risk zone with only a small area in the far eastern corner subject to flood risk.

The Site is considered to be sustainably located on land between Junctions 7 and 8 of the M60 providing transportation links to both the Regional Centre and the principal town centre of Altrincham. The Manchester to Altrincham Metrolink line also runs north-south through Stretford with Stretford station less than 1km from the Site. The site has strong and defensible boundaries.

Notwithstanding the Sites allocations in the Core Strategy as Green Belt land (policy R4) and for Open Space, Sport and Recreation opportunities (policy R5); due to the size of the Site and its high degree of accessibility, we consider that additional uses on the Site – including employment (B1), warehousing (B8), hotel (C1), retail (A1), leisure (D2), residential (C3) as well as energy and waste – are appropriate.

The Trafford Core Strategy has a number of place objectives for Stretford. One of these is STO2 and this states that in Stretford, the Local Authority should "*maximize opportunities for the re-use or redevelopment of unused, under used or derelict land for mixed, housing and/or employment schemes*". The Site (being an old landfill Site) is considered to be of poor environmental and recreational quality and thus significantly

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under-utilised. In order to bring the Site up to a quality appropriate for leisure uses, significant remediation works would be necessary. However, such works would require an appropriate level of alternative development in order to cross-subsidise these works for viability purposes.

The development of the Site for a mix of uses (including retaining a proportion of the land for open space / recreational uses) would contribute to the three dimensions of sustainable development in the following ways:

**Economic role:** the development of a mix of uses on the Site would generate considerable economic benefits. The Core Strategy states that one of the key issues facing Stretford is the *"small pockets of inequalities that exist in the area"*. One of the place objectives for Stretford is therefore *"to improve access to work and reduce economic deprivation"* (STO17). The promotion of business uses on the Site would generate significant employment opportunities in this more deprived area. Similarly, the development of residential uses on the Site would generate employment through construction; the additional residents to the area would in turn generate additional expenditure and potential further indirect jobs.

**Social role:** the development of the Site for residential uses would enable the provision of a mix of homes helping to create a strong, vibrant and healthy community through the provision of a supply of homes that meets the needs of the local community. Core Strategy place objective STO1 states that in Stretford, the Local Authority should *"establish a better balance in housing types and tenure to meet people's needs in the area"*. Even if only half of the site were brought forward for residential uses, this could still generate in the region of 750 homes (at 30 dwellings per hectare). At a 60:40 split between market and affordable housing as per policy L2 of the Core Strategy, this could potentially generate in the region of 300 affordable homes (viability withstanding). The homes would be built to high standards to complement and enrich the environment and as stated above they would be accessible to local services. The provision of leisure facilities and open space on the Site would also contribute to the aspirations of health and wellbeing.

**Environmental role:** a significant proportion of the Site could be maintained as open space. Core Strategy place objective STO5 states that in Stretford, the Local Authority should aim to *"improve the appearance and quality of green and open space for recreational purposes"*. Development could lead to improved and more dynamic management and improvement of the land. The Site has the ability to be masterplanned in such a way as to complement the existing surrounds as well as improve its existing ecological / environmental value. Modern construction methods can also be adopted to ensure that waste is minimised. Similarly, due to the Site's close proximity to Stretford Town Centre and access to public transport, a Travel Plan can be created which focusses on reducing the need for travel by private vehicles. This therefore meets the requirements of the Stretford Core Strategy place objectives to *"ensure all new development is constructed in accordance with the latest environmental standards"* (STO19).

In conclusion, the promotion of the Site through the Land Allocations DPD is considered to be sustainable. Despite its current allocations in the Core Strategy, alternative uses are considered to be appropriate in bringing forward these allocations in a viable and substantial way. The Site is considered to be sustainably located to existing infrastructure and can contribute significantly to the economic, social and environmental future of Trafford.

Yours sincerely

**MATTHEW ROBINSON**  
**GRADUATE PLANNER**  
**Direct Line: 0161 831 5884**  
**Email: [matthew.robinson@howplanning.com](mailto:matthew.robinson@howplanning.com)**

# Trafford Local Plan: Land Allocations Consultation Draft

## Comment Form – February 2014



**PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**

[strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

### 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 <b>and</b> the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	✓	Page number	
SA Report		Paragraph number	
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)	<i>Site should be allocated for development</i>
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		Object	✓	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 style="text-align: center;"><i>See letter</i></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 to March 2014**

Office Use Only	
Date	
Ref	
Ack	

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[strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

Name:		Agent (if applicable):	
Organisation (if applicable):		Organisation (if applicable):	
Address:		Address:	
Postcode:		Postcode:	
Tel:		Tel:	
Fax:		Fax:	
Email:		Email:	

**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:

<b>Total number of comment sheets enclosed:</b>	
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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](http://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](mailto: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  
Talbot Road  
Stretford  
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 to March 2014**

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**Additional 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 full contact details if you are submitting all your comments at the same time, but please put your name on each additional sheet and indicate the total number of comment sheets being submitted on the contact details form.

What are you commenting on?			
Please indicate the document <b>and</b> the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	✓	Page number	82
SA Report		Paragraph number	
SA Appendices		Policy number	9I2
SA Options Report		Table/Figure reference	
SA Flood Risk Sequential Test		Other (including omissions and suggestions for proposed amendments)	See letter
SA Scoping Report			
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		Object		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 style="text-align: center;"><i>See letter</i></p>				
<p>Name: <i>HOW PLANNING</i></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.



Submit by Email

Print Form

Please note that this form will be sent as an xml data file.

# Trafford Local Plan: Land Allocations "Call for Sites"

TRAFFORD  
COUNCIL

## Site information

Site address 1: Land to the west of Chester Road

Site address 2: Stretford

Postcode (if known)

Ward (if known) Stretford Ward

Has the land been previously developed?

Site size (if known) Approx: 50ha

Yes  No  Don't know

**Please specify units of measurement**

Existing use: Open Space / Recreational Land (Greenfield)

Preferred use: Mixed-use (residential, employment, warehousing, leisure, open space, retail and hotel)

Alternative use: Mixed-use (residential, employment, warehousing, leisure, open space, retail and hotel)

## Contact details

### Landowner

Name: See below

Organisation:

Site address 1:

Site address 2:

Postcode:

Ward (if known)

Telephone:

Nature of interest (please select)

Email:

Freehold

Leasehold

### Other interest

Name: Richard Woodford

Organisation: HOW Planning LLP

Site address 1: 40 Peter Street

Site address 2: Manchester

Postcode: M2 5GP

Ward (if known)

Telephone: 0161 835 1333

Nature of interest (please select)

Email: richard.woodford@howplanning.  
ccm

Local resident

Agent

Other  
organisation

Site Issues

Sustainability

e.g. what kind of economic, social or environmental impacts could this site have?

Good     Bad     Don't know

Details:

Please refer to the Cover Letter dated the 14th September 2012.

Deliverability

e.g. are there any constraints on development?

Good     Bad     Don't know

Details:

Limited constraints: Please refer to the Cover Letter dated the 14th September 2012.

Site plans

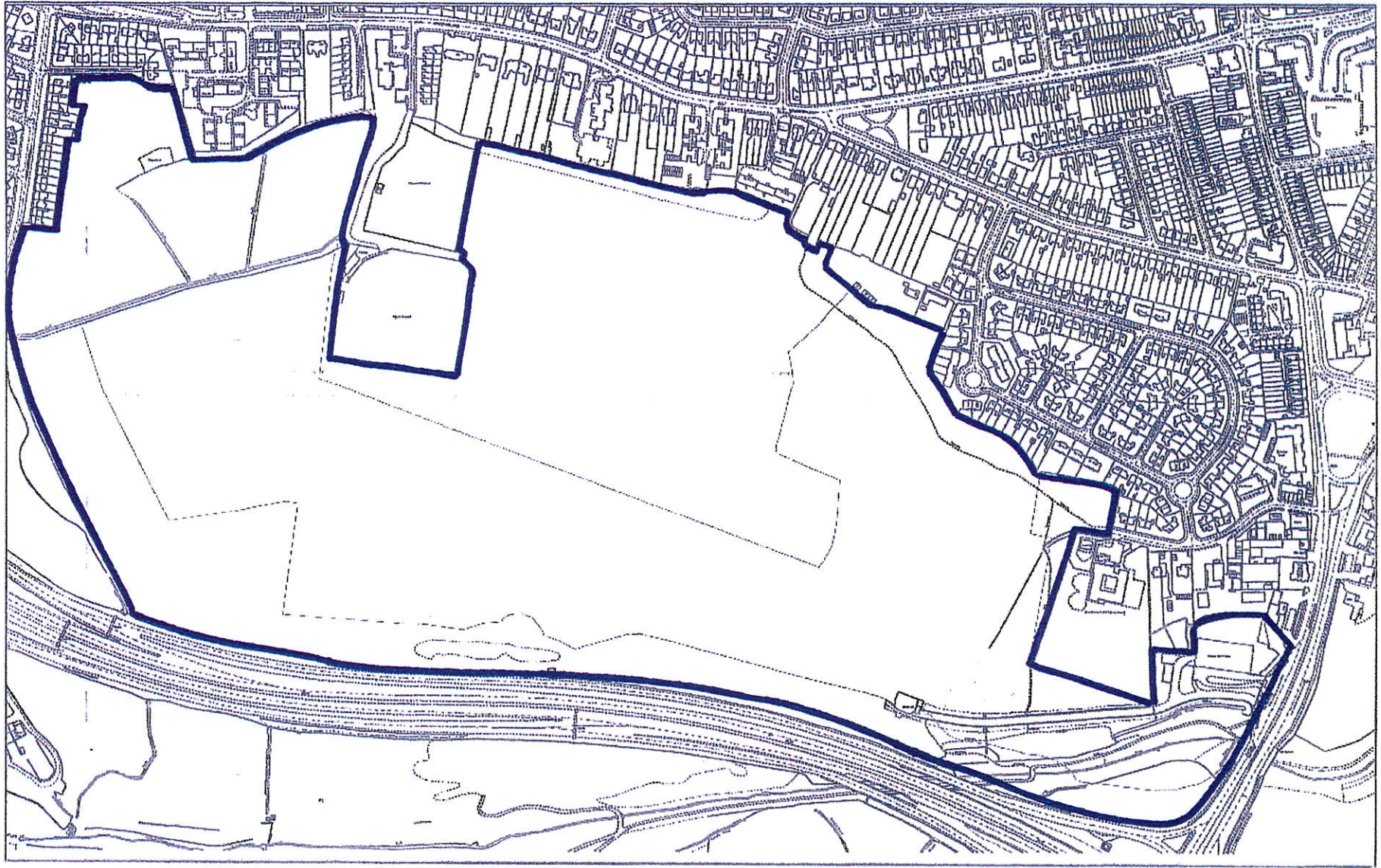
It is necessary to submit a plan on an OS map base, with the proposed site edged in blue - this is an essential requirement. You can submit either an image file or a pdf file along with this submission form by simply attaching it to your email once you click the **'Submit by email'** button at the top of this form.

Please submit your completed form(s) either electronically or by printing it out and sending it to Strategic Planning and Developments, Waterside house, Sale Waterside, Sale, Manchester, M33 7ZF by 5:00pm Friday 14th September 2012.

If you wish to be kept informed about progress on the Trafford Local Plan: Land Allocations, please indicate by clicking this box,  alternatively check the Council website [www.trafford.gov.uk](http://www.trafford.gov.uk) for updates.

Please note: All comments will be held by the Council on a database for the duration of the Local Plan and will be available for public inspection under the Freedom of Information Act 2000.

Land west of Chester Road, Stretford



Not to Scale