

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

17 March 2014

Dear Sir/Madam

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

Following the formal consultation with regards to the Trafford Local Plan Land Allocations Consultation Draft, Spawforths have been instructed by our Client, Langtree Group PLC, to make comments on this document on their behalf. Langtree Group is a commercial property development and investment business specialising in office space, industrial property and sustainable regeneration.

Langtree Group PLC welcomes the opportunity to comment on the consultation as a landowner of one of the Strategic Locations within Trafford - Carrington Strategic Location. Langtree purchased the site at the end of November 2013 from Shell as a strategic acquisition to facilitate development.

General Comments

Carrington is a key Strategic Location within the south of the Borough. The location offers the opportunity to reduce the isolation of both Carrington and Partington by creating a substantial new mixed use sustainable community.

Carrington is a strategic opportunity not only for Trafford Borough but also for the Greater Manchester Authorities. In a Written Submission from the Association of Greater Manchester Authorities to the Communities and Local Government Committee (June 2011), it was stated that Carrington is a “*top priority for investment in Greater Manchester and also a major potential generator of resources and economic growth in the longer term...Carrington, in the south of the borough of Trafford, represents such a strategic priority and is recognised as a one of the few major brownfield opportunities to drive economic growth at scale within the Greater Manchester Combined Authority area*”.

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Langtree support the general tenets of the adopted Trafford Local Plan: Core Strategy (2012) and Land Allocations Consultation Draft to deliver economic growth and regeneration through the allocation sites for housing, employment and other development; and detailing the infrastructure requirements for major sites. Langtree also support the focus of economic and housing growth through the identification of the five Strategic Locations as areas for change, but as is detailed below are concerned to ensure that this policy approach can be delivered.

With specific regards to Carrington, Langtree support the vision to reduce the isolation of both Carrington and Partington by creating a substantial new mixed use sustainable community along with employment, educational, health and recreational facilities with improved linkages. Langtree are looking forward to delivering an ambitious regeneration proposal for Carrington and consider that their landholding (1600 acres comprising of the Carrington Estate and Carrington Business Park) located between Partington and Sale West (which are identified as Priority Regeneration Areas) represents a unique opportunity for both Trafford and Greater Manchester.

Upon the acquisition of the site at the end of 2013, Langtree commenced a master planning / visioning process. Langtree have instructed consultants who are at present collating baseline information and will then explore the options to maximise the regeneration opportunity. The immediate work includes undertaking a number of baseline assessments which includes the assessment of COMAH zones within the site, ecological assessments, ground conditions reports and surveys, flood risk assessments, transportation studies, topographical surveys, a social infrastructure audit, services infrastructure audit, needs assessments, planning policy assessment, ownership / lease reports, assessing funding opportunities, undertaking a sustainability audit and a stakeholder audit. This work is due for completion in April / May 2014. From April to July 2014 an Options Assessment will be undertaken following the completion of the baseline reports. This will assess a number of options for the development of the site. Following on from this, the preferred option will be tested by the preparation of a Masterplan Framework.

The Langtree Vision for the site seeks to deliver:-

- The regeneration of the Carrington Strategic Location;
- The retention of existing key employers within the site;
- New strategic employment land opportunities to meet a full range of work based requirements;
- An enhanced critical mass as a catalyst for the renaissance of Carrington village;
- Creation of new residential communities to meet both aspirational and affordable housing requirements;

- Delivery of critical infrastructure to enhance connectivity and linkage both between the communities of Partington, Carrington and Sale; and also for the employment occupiers to link back to the strategic road network;
- Creation of a Spine of Sport to support the existing sporting assets in the locality;
- A series of linked communities with an enhanced service base and green infrastructure.

Langtree are committed to working with the Council and the key stakeholders / decision makers involved in Carrington as part of a Strategic Engagement process to fully understand all interested parties views and aspirations to move forward to realise the regeneration vision. Langtree have the experience, track record and resources to strategically engage with the relevant bodies to take forward the delivery of the Carrington Strategic Location in partnership with Trafford Council. Langtree want to maximise the assets and the regeneration opportunity and deliver a new strategic employment destination as well as sustainable mixed use communities.

Langtree recognise that the Trafford Local Plan Land Allocations Consultation Draft must conform to the Trafford Local Plan: Core Strategy. However, as detailed above, it is too early in the master planning process for Langtree to draw definitive conclusions on the most appropriate masterplan solution for the site. As such, these representations therefore seek to ensure that the Trafford Local Plan Land Allocations Consultation Draft is as flexible as it can be within the terms of Core Strategy compliance.

Langtree note that the Trafford Local Plan: Core Strategy was prepared during 2009 – 2011, that the Examination was held during 2011 and the Core Strategy was adopted in January 2012. The National Planning Policy Framework (NPPF) was published on 27 March 2012 and hence the adopted Core Strategy does not comply with the final NPPF. This is clear from the Core Strategy Inspector's Report which makes many references to now superseded PPGs and PPSs. Specifically, the adopted Core Strategy promotes a sequential approach for the location of development with brownfield land given the highest priority. Whilst the NPPF encourages the re-use of previously developed land, it does not however prioritise such re-use. The NPPF is focussed upon delivery to achieve a step change in the economic and housing fortunes of the Country.

Paragraph 47 of the NPPF requires LPAs to *“identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase*

the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;”

It is clear to Langtree that the proposed housing and employment development within Trafford is heavily reliant on the delivery of the Strategic Locations and the delivery rates for these sites are detailed in the Core Strategy. The Core Strategy sets ambitious delivery rates when the potentially complex nature of some of the Strategic Locations is considered. The Strategic Locations are all brownfield sites which are inherently more complex, costly and difficult to deliver. Both Greater Manchester and Trafford have Growth Point status to deliver an additional 20% target of housing however we note that within the SHLAA 2013 Update (January 2014) there has been under delivery of more than 20% since 2007/8. We are concerned therefore whether the current strategy of reliance upon brownfield land is constraining delivery and precluding the regeneration objectives of the Core Strategy and also precluding the ability to demonstrate a deliverable 5 year housing land supply. We consider that any constraints related to delivery, need to be a key focus within the Trafford Local Plan Land Allocations Consultation Draft due to the heavy reliance on brownfield Strategic Locations which are presently not delivering the housing development as detailed in the Core Strategy.

Paragraph 49 of the NPPF confirms that planning applications for housing “*should be considered in the context of the presumption in favour of sustainable development*” if “*the local planning authority cannot demonstrate a five-year supply of deliverable housing sites*”. As such, if a LPA cannot demonstrate a five year supply of housing, its policies will be considered to be “*out of date*” and the presumption in favour of sustainable development will override the Plan and therefore the acceptability of planning applications will be assessed using these NPPF criteria. We want to ensure that the Trafford policy context takes account of the NPPF advice (which was published after the Core Strategy was adopted) and that any local policy constraints to delivery are addressed and resolved as the emerging Trafford Plans are moved forward.

Given the above, Langtree are of the view that the Council should undertake a Partial or Full Review of the Core Strategy alongside the Trafford Local Plan Land Allocations Consultation Draft, to ensure that the NPPF guidance is embodied into the Trafford policy framework and that any policy constraints to under delivery of housing and employment (and delivery of the Strategic Locations and priority Regeneration Areas) are addressed by alternative policy mechanisms to ensure that the stated growth ambitions can be realised.

We recognise that the Council are already committed to the Land Allocations process and may not wish to delay this to review the Core Strategy. If this is the case, then Langtree consider that the Trafford Local Plan Land Allocations Consultation Draft strategy should include a trigger mechanism for a Partial or Full Review of the Core Strategy if delivery rates do not meet both housing and employment targets and the stated regeneration objectives are not met. Langtree therefore recommend that an additional policy is included within the Land Allocations document which sets out such a trigger mechanism. This would be in accord with paragraph 153 of the NPPF which states “*Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances*”. This will also allow the Core Strategy to be brought into compliance with the NPPF. The Council should set out a timescale for such a Partial / Full review of the Core Strategy within their Development Scheme (LDS). Such a review may also need to be informed by the emerging Greater Manchester Spatial Framework which amongst other issues is considering the housing requirements of all ten Greater Manchester authorities. As an absolute minimum the Council should provide a firm commitment within the Trafford Local Plan Land Allocations Consultation Draft and an updated LDS that a Full or Partial Review of the Core Strategy will commence immediately upon adoption of the Allocations plan (presuming it is to be found sound).

Langtree support the overall vision for Trafford (i.e. the focus for economic and housing growth within or on the edge of urban areas; identification of five Strategic Locations as areas for change; and the main focus for regeneration being in the Priority Regeneration Areas of Old Trafford, Partington and Sale West). Langtree also support the ambitious housing and employment delivery levels. Langtree are therefore keen to ensure that the Trafford planning framework (Trafford Local Plan: Core Strategy and Trafford Local Plan Land Allocations Consultation Draft) are facilitators of this development and regeneration rather than being constraints to it. Langtree consider that with the appropriate planning framework, their strategic landholding is a once in a lifetime opportunity to deliver true and long lasting regeneration within the western area of Trafford.

Langtree wish to build as much flexibility into the Trafford Local Plan Land Allocations Consultation Draft as the Core Strategy allows and also facilitate a mechanism for a Core Strategy review. In this context, Langtree have the following comments on specific policies/issues:

Commence a Core Strategy Review now or include a New Policy within the Land Allocations Draft which requires a Core Strategy Review

As detailed above, a new policy should be included in the Trafford Local Plan Land Allocations detailing the triggers for a Partial or Full Core Strategy review to address alternative policy directions to increase:

- a) housing delivery
- b) employment delivery
- c) improvement of the Priority Regeneration Areas of Old Trafford, Partington and Sale West (measured by improvement of Deprivation Indices)

“Other protected land” Policies

Paragraph 6.14 (Policy CAR1) confirms that “other protected land” is included within the boundary of the Carrington Strategic site for future development needs however this policy seeks to protect this “safeguarded land” during the plan period. These policy references are confusing and clarity should be given on the potential for their release during the plan period. This should either be done through amendments to the Land Allocations policy (GB2.2) or as part of the Core Strategy review. Alternative policy mechanisms should be considered in relation to the delivery of regeneration and new housing and employment at Trafford. This could include relaxation of the policy to deliver residential development primarily on brownfield land to allow other greenfield land to come forward to cross fund the bringing forward of brownfield development. It could also include flexibility over the timing of release of safeguarded land which could support this approach, as could the potential for environmental exchange. Such policy approaches should be explored to enhance delivery of regeneration, housing and employment within Trafford.

Extent of Boundary of Carrington Strategic Location

A precise boundary for the Carrington Strategic Location should be omitted. A more flexible approach would be to leave the area of the Strategic Location open at this stage until the Langtree Masterplan Framework is completed. This may include integration of the Partington and West Sale Priority Regeneration Areas (see below).

Area Action Plan or Supplementary Planning Document

The draft Land Allocations policy refers to the need for a SPD to guide development within the Carrington Strategic Location. Whilst this may be the most appropriate policy route, the potential for an Area Action Plan at this stage should not be lost especially as it is set out in the Core Strategy. Langtree Group PLC request that any such document is prepared by the developer or landowner (paragraph 6.16).

Alignment of Link Road through site

The A6144 Carrington Spur – A6144 Manchester Road link-road extension is shown as a precise safeguarded route alignment. The alignment of the proposed safeguarded route through the Carrington Strategic Location should not be shown on the Policies Map, and hence should be described in words rather than prescribed on a plan. Whilst the justification for strategic road improvements is understood, no detailed traffic modelling has been completed and a precise route has not been tested and hence it is requested that some flexibility over the route is provided through appropriate wording within the policy. This will help to enable the deliverability and viability of the link and the wider regeneration to be maximised by allowing the exact route to be determined as the masterplan for the site is developed.

Level of Detail

The detail of Policy CAR1 should be reserved until the masterplanning process is completed. We support many of the key principles set out within the policy but the level of detail is too prescriptive at this stage and should be deleted. The policy as drafted contains a considerable level of detail in relation to residential amenity, scale of development, town centre uses etc which are considered to be too prescriptive in advance of the Masterplan Framework. Many of the issues are covered within other elements of national policy or elsewhere within Trafford policy statements. We consider that these requirements would be better addressed in an Area Action Plan or Supplementary Planning Document to inform a planning application.

Policy GT1: Gypsy, Roma and Travellers Community

The site identified for the provision of 17 pitches for Gypsy and Traveller accommodation is located within the boundaries of the Carrington Strategic Location. It is noted that further work is to be completed in 2014 which will inform the level of provision of this accommodation. Since the evidence has not been fully established we consider that it is too early to confirm the need and hence a criteria based policy should be used at this stage to allow a site to be identified subsequently. Langtree Group request the deletion of this allocation from the current draft Land Allocations document.

Priority Regeneration Areas

Priority Regeneration Areas RE1.2 Partington and RE1.3 Sale West are identified within the Core Strategy and the Land Allocations document but Carrington is not recognised as a Priority Regeneration Area. Carrington is recognised as a Strategic Location but the extent of this is to be determined through the masterplan process and there will undoubtedly be overlap between the Priority Regeneration Areas and the Strategic Location. There is very little detail in respect of the Partington and Sale West Priority Regeneration Areas within the draft Land Allocations document. Consideration should be given to a

more joined up approach to facilitate interaction between the three areas to deliver a holistic regeneration solution for the comprehensive area.

Highway Network – Policy TR3.4

The A6144 Manchester Road – A57 Cadishead Way (Salford) Manchester Ship Canal bridge is stated as servicing the employment proposals set out in policy SL5 of the Core Strategy (i.e. Carrington). The detailed justification and impact of this has yet to be established as has the preferred location if such a bridge link is required. The location of the bridge link is shown on the proposals map but it does not align with the suggested A6144 extension. As with the A6144 Carrington Spur – A6144 Manchester Road link-road extension, we consider that it would be better not to show this on a plan but instead to deal with it in appropriate wording within the policy.

Public Transport Network – Policy TR2.6

The former Broadheath-Irlam railway line is included as a protected corridor. The proposals map does not appear to show the limits of this safeguarded corridor.

We would request that you consider these comments and trust that they will be given due regard in this process. Please do not hesitate to contact us to discuss any matters arising from this representation.

Yours sincerely

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