



TOWN AND COUNTRY PLANNING ACT 1990

**Appeal by: Redrow Homes Ltd
Site Address: Land to east and west of Warburton Lane,
Trafford, Greater Manchester
WA13 9TT**

**LPA reference: 98031/OUT/19
PINS reference: APP/Q4245/W/19/3243720**

**PROOF OF EVIDENCE OF MS. SARAH TODD
ON BEHALF OF THE LOCAL PLANNING AUTHORITY
REGARDING STRATEGIC PLANNING MATTERS**

My name is Sarah Todd and I am a Principal Transport Policy Officer within the Strategic Planning and Growth Service of Trafford Council. I have approximately 7 years' experience in the field of town and country planning. I have previously worked at two other UK Local Planning Authorities. During the course of my professional career I have been involved in the preparation of various Local Plan documents and supporting evidence base documents.

I hold a Bachelor of Arts honours degree in Geography from the University of Liverpool together with a Masters of Civic Design in Town and Regional Planning from the same university. I am a member of the Royal Town Planning Institute.

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1. Introduction

- 1.1. The appeal site is located within Warburton Parish, immediately to the south of Partington at Warburton Lane. The development proposal is for up to 400 dwellings on greenfield land to the east and west of Warburton Lane. No affordable housing is proposed as part of the development
- 1.2. Two reasons for refusal are directly relevant to the Strategic Planning position, the generally unsuitable location of the site and the sites current designation as safeguarded land and the lack of provision for a southern link road as part of the development. In addition the strategic planning concerns are reflected in other reasons for refusal including the sites current poor location for public transport and the failure of the application to deliver an integrated and accessible site.
- 1.3. The current Trafford Development Plan consists of the Core Strategy (2012) and the saved policies of the UDP (2006). The Core Strategy provides the strategic framework, whilst the saved policies of the UDP are generally detailed policies. The Core Strategy was adopted in 2012 and provides the overall spatial strategy for the borough up to 2026.
- 1.4. The intention, following the adoption of the Core Strategy in 2012, was to progress to the adoption of a Land Allocations Plan which would provide more detailed allocation policies. However, as work on the emerging Greater Manchester Spatial Framework (GMSF) progressed; the decision was taken to not progress the Land Allocations Plan. The GMSF is a joint DPD being prepared by the 10 Greater Manchester authorities and although it can only be afforded limited weight as an emerging development plan document, it indicates the future pattern of sustainable development.
- 1.5. The GMSF has been subject to a series of public consultations and the final Reg 19 Draft GMSF will be published for consultation in Autumn 2020. It is anticipated that the formal consultation will be underway before the appeal inquiry closes.

- 1.6. Trafford is also preparing a new Local Plan which will sit underneath the strategic GMSF policies. The Local Plan Issues Paper was published for consultation in Summer 2018 and the Reg 18 Draft Local Plan is scheduled for consultation in January 2021.
- 1.7. The Trafford Development Plan position is therefore in a period of change as new policy documents are being progressed. However the draft documents provide a clear indication of Trafford's commitment to delivering significant growth and in meeting the housing and employment needs of Trafford in the context of the wider Greater Manchester area.
- 1.8. Trafford's current housing target is the Local Housing Need (LHN) figure based on the standard method set out in the NPPF (2019). The LHN figure is 1,369 homes per annum. The Council cannot demonstrate a five year housing land supply and Trafford currently has a 2.4 year housing land supply against this target. The LHN supersedes the previous Core Strategy requirement for 578 homes per annum.
- 1.9. The latest Housing Delivery Test result for Trafford was published in February 2020 and identified that the Borough met 58% of its housing requirement based on a total requirement for 3,142 dwellings and net delivery of 1,815. Against the context of increasing annual targets within the HDT, this result is a substantial improvement over the 47% delivery achieved in the 2018 HDT. Annual delivery between 2016/17 to 2018/19 improved from 323 dwellings per year to 970 dwellings per year.
- 1.10. As such, Trafford Council is conscious of the imperative to support new housing delivery and has taken a positive and proactive approach to enhancing delivery and has seen substantial improvements in housing delivery in recent years. This approach has included the approval of a number of large schemes within the Carrington and Partington area. The Appellant has indicated that it will be presenting evidence on the quality of the supply. In that context, Rebecca Coley provides a separate proof explaining that there is ample land supply but

that the problem Trafford faces is of developers failing to bring forward allocated and available sites for development beyond the outline permission stage because of unrealistic expectations as to land value, who pays for infrastructure and s.106 obligations. Through this inquiry, the correct approach to such matters and viability will be tested.

2. The Appeal Site

- 2.1. The application site is located in Warburton Parish, directly to the south of Partington. Beyond the site to the west is the Manchester Ship Canal which forms the borough boundary between Trafford and Salford, the area to the south of the site is rural consisting of agricultural fields and the small village of Warburton. The nearest services and facilities to the site are in Partington which has a local centre. The appeal site currently has limited links to Partington and the links which are proposed are considered to be inadequate.
- 2.2. The appeal site is a greenfield site and is currently used as agricultural land. The southern boundary of the site forms the Green Belt boundary, as designated in 1984 by the Greater Manchester Green Belt Local Plan. The appeal site has never been in the Green Belt.
- 2.3. The site is currently designated in the Trafford Core Strategy (CD-E2) as Other Protected Open Land (or safeguarded land). Policy R4 states that 'Other Protected Open Land' (OPOL), including 'Land at Warburton (immediately to the south of Partington)' is protected from development. The policy sets out two main categories of permissible development: where it is required in connection with agriculture or forestry; or where it is proposed for agricultural diversification. The supporting text explains that areas of OPOL are excluded from the Green Belt and are not allocated for development but that they may be required to meet development needs post 2026.
- 2.4. The NPPF, paragraph 139 explains the role and purpose of safeguarded land, that it should be identified on land between the urban area and the Green Belt

in order to meet longer term development needs beyond the plan period. It also states that safeguarded land is not available for development at the present time and that planning permission for the permanent development of safeguarded land should only be granted following an update to a plan. This is precisely the role and purpose of 'other protected open land' as it is protected from development in the current plan period in order to meet future potential needs following a strategic plan review. Both the NPPF and the Development Plan are clear that the current designation of this site as safeguarded land means that it should only be released for development following an update to the Development Plan.

- 2.5. This policy is entirely clear and is not caveated in any way. Of course, this policy approach must be considered alongside the rest of the NPPF but if safeguarded land is promoted for development in advance of such review of the development plan, the decision making necessarily has to consider matters which would be integral in that review in particular matters such as sustainability of location, provision of infrastructure and consistency with the overall spatial strategy.
- 2.6. The OPOL land at Warburton Lane has never been identified for development and the Inspector appointed to examine the UDP (2006) (CD-E1) set out his serious reservations about the suitability of the safeguarded land for extensive development in addressing representation on Policy C8 – Protected Open Land (see Appendix 1). This related to what the Inspector considered to be fundamental issues with its location, how it could be sustainably integrated with the existing Partington community, and with other social and transport infrastructure. These issues remain the same in respect of the site today. If the site is brought forward without the required infrastructure and in a way that is not coordinated with the wider Carrington area in accordance with the spatial strategy, then it will form an unsustainable, isolated development, isolated from the infrastructure it needs and out on a limb.
- 2.7. The requirement for a plan review is crucial in demonstrating the potential of this site to deliver sustainable development. A plan review assesses the

development needs of the borough and identifies an appropriate spatial strategy, considering the infrastructure which is required and establishing a framework for the sustainable delivery of development. A plan review would allow for consideration of how this site could achieve sustainable development and how, if at all, it could be successfully integrated with the existing Partington community, other development in Carrington including under SL5 and with that anticipated under the GMSF for Carrington. The applicant has failed to demonstrate how these points have been taken into account and what measures have been identified to make the release of this site in advance of a plan review appropriate. The Core Strategy never envisaged this site coming forward in the plan period to 2026 and therefore gave no consideration to the infrastructure which would be required to support the site or what mitigations may be required or how it would sit with the wider development framework.

3. Carrington / Partington

3.1. Carrington and Partington are located in the west of Trafford, close to the appeal site. Partington was originally a small rural settlement that was transformed when a large number of council houses were built. To the north of Partington is Carrington, an area that has traditionally been dominated by a long established petrochemicals works. This has since declined and more recently a business park and off-airport car parking have developed. The Carrington area also has a small residential community.

3.2. The Core Strategy (CD-E2) identifies each area as a distinct place and the key issues / priorities for these areas include:

Partington

- Securing a revitalised shopping centre;
- Widening the housing offer to tackle population decline and achieve sustainable growth;
- Reducing the area's physical isolation through the delivery of improved transport links to the Regional Centre, Altrincham and Trafford Park.

Carrington

- Securing the regeneration of a substantial area of brown-field land;
- Reducing the area's physical isolation through the delivery of improved transport links;
- Delivering sustainable transport links to the Regional Centre, key town centres and employment locations from Carrington / Partington.

3.3. Development in this area is expected to contribute to meeting these objectives; it must support the existing Carrington and Partington communities and address the issues outlined above. A key priority for this area is to reduce the isolation of the existing communities and provide significantly improved sustainable transport modes as well as improved highway links particularly in relation to the A6144. The regeneration of this area has been a long standing Council objective and it is necessary that any development is integrated with and has a regenerative benefit on the existing communities at Partington and Carrington.

4. The Core Strategy's overall Spatial Strategy

4.1. The Core Strategy (CD-E2) provides the overall spatial strategy for Trafford and seeks to establish a balance between growth, regeneration and environmental protection and improvement.

4.2. A key theme of the Core Strategy's Strategic Objectives is to deliver development in the most sustainable locations and to ensure that where a location is less sustainable, it is made more accessible through improved transport links, particularly in relation to public transport. The Strategic Objectives seek to regenerate the physical, economic and social fabric of the most disadvantaged communities. Accordingly any development proposal would need to be located in an area which is or can be sustainably accessed and can also contribute to urban regeneration.

- 4.3. The Core Strategy identifies five areas for significant strategic change, the 'Strategic Locations'. These areas are integral to delivering the vision and objectives of the Core Strategy. Carrington is a strategic location (Core Strategy policy SL5) within the south of the Borough. Development in this Strategic Location offers the opportunity to reduce the isolation of both Carrington and Partington by creating a substantial new mixed use sustainable community on large tracts of former industrial brownfield land. The location offers the potential for a new major mixed-use development supported by "substantial improvements to both public transport and road infrastructure".
- 4.4. The Core Strategy establishes the development potential of this land within SL5.2, which states:

The Council considers that this Location can deliver:

- *1,560 residential units comprising, predominantly, accommodation suitable for families;*
 - *75 hectares of land for employment activities;*
 - *New road infrastructure to serve the development area to relieve congestion on the existing A6144;*
 - *Significant improvements to public transport infrastructure by improving access to Partington, the Regional Centre and Altrincham with links to the Metrolink system;*
 - *Community facilities including convenience retail, school provision, health and recreational facilities of a scale appropriate to support the needs of the new community; and*
 - *High quality green infrastructure within the new community and connects with the surrounding open countryside and protects and enhances the existing sites of environmental importance.*
- 4.5. The extent and boundary of SL5 has not been formalised within the adopted development plan but the broad location is identified through the Core Strategy. This indicates that the SL5 area is located well to the north and east of the appeal site and focused on the brownfield land at the former Shell, Carrington

site. The extent of the SL5 site is considered to be broadly aligned with the boundary established by UDP Policy E7: Main Industrial Areas as indicated on the composite policies map. The land at Warburton Lane is outside of the Policy SL5 area.

- 4.6. The Strategic Location policies set out the approximate level of development that will be delivered and the essential requirements (e.g. infrastructure) to ensure that the development can be delivered in a sustainable way. The current strategy for development in Carrington and Partington is focused on the reuse and reclamation of land. There are a range of development opportunities in Partington and a significant area of vacant brownfield land in Carrington. The policies also detail the phasing of development and a list of key infrastructure projects.
- 4.7. The Core Strategy identified the SL5 area as a major development site. However (as set out in SL5.2) this must be delivered alongside new road infrastructure to relieve the A6144, as well as delivering improvements to public transport infrastructure. The closure of the Carrington Shell refinery and the release of a large area of brownfield land provides a strong planning rationale for the principle of development in this area under the Core Strategy policy, but it is very clear that development in this location is fully contingent on major infrastructure and public transport improvements. The Core Strategy does not seek to make any further allocations to the south or west as there is a very strong spatial logic in ensuring the main SL5 area is progressed first. Further, as even SL5 is dependent on infrastructure improvements and better connectivity, any other development further to the west/south is also inevitably subject to these constraints/requirements.
- 4.8. Policy SL5 is supported by an 'Implementation Plan' (see Core Strategy, para 8.66), which contains a schedule of infrastructure requirements to support the Strategic Location. Each infrastructure project has been classified in terms of its priority, with Priority 1 being required to support existing development through to Priority 4 which requires further investigation and is a requirement for later stages of the Core Strategy.

4.9. Improvements to the Flixton Road / Manchester Road junction are identified as 'Priority 1', the Carrington Link Road (or Carrington Relief Road) and wider improvements to the local highway network and public transport provision are identified as Priority 2. The priority status of these schemes demonstrates that they are considered to be integral to the sustainable delivery of even just the development proposed in SL5.

4.10. Thus the Carrington Relief Road (CRR) is integral to the successful delivery of the SL5 area, delivering increased capacity and helping to relieve congestion on the existing A6144. The CRR is also integral to the delivery of the wider GMSF development proposals. The Council has taken a proactive approach to delivering the CRR, securing Growth Deal 3 funding and a Housing Infrastructure Fund Grant, which cover approximately half of the anticipated costs. To meet the funding shortfall work is currently underway and an update will be provided to the Planning Committee shortly as to how the funding shortfall for the CRR will be met under existing policy by developer contributions from sites in the SL5 area, as well as any other development site in the wider area which requires the CRR. Delivering the CRR is integral to unlocking development schemes in the SL5 area and bringing development forward.

4.11. The infrastructure requirements identified in the SL5 policy area are to support the anticipated level of development in the policy. Obviously, the appeal site is outside of this area on land which was not proposed for development in the Core Strategy and which therefore was not considered in the infrastructure requirements associated with SL5. The infrastructure provisions for the appeal site therefore need to be mindful of the SL5 requirements, but also that this site may require additional infrastructure over and above this linked to plan review such as the southern spine road (see Section 5 'GMSF').

4.12. The following major residential led planning applications have come forward within the area covered by SL5 to date:

Site	Development proposed	Planning status
Carrington Village (99245/OUT/19)	597 units 62,000 sqm employment floorspace	Approved
Heath Farm Lane (94949/HYB/18)	600 units	Minded to grant, subject to S106

4.13. Each of these proposals is within the SL5 area and will bring forward brownfield land for development and integrate with existing communities at Carrington and Partington.

4.14. The rate of delivery has been challenging at this strategic location as development has been subject to significant infrastructure constraints and limited flexibility on the part of landowners to adjust expectations regarding appropriate land values. This is addressed in the evidence of Rebecca Coley. Until recently schemes in this area were falling short in the provision of affordable housing and claimed to be reliant upon public funding for the delivery of strategic infrastructure. This relative freeze in the planning process is, in Trafford's view, attributable to unrealistic expectations of land value from development and is now being proactively addressed

4.15. A total of 1,197 residential properties now have permission or are minded to grant within the SL5 policy area. However the infrastructure required has not yet been delivered, specifically the Carrington Relief Road. The Heath Farm Lane planning application in the SL5 area is partly reliant on the Relief Road, or equivalent highways schemes coming forward. The employment application at Voltage Park also requires improvements to highways infrastructure. In addition, there are a series of applications in the wider area, not within SL5, which are contributing to the pressure on the existing transport infrastructure:

Site	Development proposed	Planning status
Lock Lane, Partington (86160/OUT/15)	550 units	Approved
Land north of Oak Road (97897/FUL/19)	75 units	Approved

4.16. Improvements to the highway and public transport infrastructure that serve the area will, in the longer term, improve the sustainability of the general area as a focus for development, achieving consistency with the NPPF’s overarching aim for sustainable development by “identifying and coordinating the provision of infrastructure” (NPPF para 8a). Paragraph 103 of the NPPF states that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes” (NPPF, February 2019)

4.17. The realisation of Policy SL5, including the delivery of the Carrington Relief Road, are of central importance to unlocking the potential for sustainable development within the Strategic Location. The development of the SL5 area, with the required infrastructure, is essential for creating the right conditions for successful development beyond it. The land within SL5 is largely brownfield land and forms a logical extension to the existing communities at Carrington and Partington as well as to existing employment uses. To bring forward other areas to the south and west which are identified in the GMSF New Carrington development site in advance of SL5, would lead to an illogical form of development which is not well connected and integrated with existing residential and employment areas. The wider GMSF development must come forward as part of a development plan review, not ad-hoc development parcels which give limited regard to the wider site. To do so would lead to piecemeal development which would not deliver the required infrastructure or contribute to the wider whole or the strategic growth of the wider area and which would result

in a disjointed development pattern which will not deliver a successful new community at New Carrington.

4.18. Core Strategy Policy L3 “Regeneration and reducing inequalities” identified Partington as a Priority Regeneration Area (PRA). PRAs are locations where the Council will support appropriate development that will reduce inequalities, secure regeneration benefits, and create sustainable communities. The policy seeks to bring forward development within the Partington PRA and provide improved social, transport and green infrastructure. Development proposals should contribute to the regeneration of Partington, providing an improved local centre, enhanced public transport links and connecting the community to surrounding towns and employment locations.

4.19. The appeal site is not considered to be within the Partington PRA area, although the area is incorrectly shown to be within this area on the Proposals Map due to a graphical error (see evidence of Ms Brown). As the site is covered by Policy R4 and is safeguarded land it would not be able to contribute to delivering the aims of Policy L3 for Partington. Given the L3 objectives for Partington, if the site were to come forward in the Core Strategy plan period, then the scheme should consider how it could contribute to the ongoing need to secure regeneration benefits for Partington. The appeal proposal pays little regard to integrating the site with Partington and providing connections over the Red Brook, which prevents the site from making any meaningful contribution to the regeneration objectives outlined in L3.

5. The Greater Manchester Spatial Framework

5.1. Trafford Council is one of the ten districts preparing the Greater Manchester Spatial Framework (GMSF) (CD-F1). The plan sets out how Greater Manchester (GM) should develop up until 2037 and identifies sites for housing, offices and industry and warehousing, whilst also protecting environmental assets across GM.

- 5.2. The GMSF identifies sufficient land to meet the housing and employment needs for Greater Manchester, but also proposes to redistribute this across the GM authorities. The GMSF Spatial Strategy proposes to focus growth in the northern districts whilst sustaining the southern districts (Trafford and Stockport). In accordance with the overall spatial strategy, this meant that in the Draft GMSF 2019 Trafford's housing requirement was 19,280 units in the GMSF plan period to 2037, whilst the total LHN figure for Trafford in 2019 was 25,365 units.
- 5.3. The GMSF has been subject to a series of consultations at various points through its development, with the last consultation on a Regulation 18 draft plan in January 2019. The GMSF will be published for Regulation 19 consultation in Autumn 2020. The Association of Greater Manchester Authorities Executive Board considered the timetable for the Plan at its meeting on 9th September and agreed that the Regulation 19 Plan would be considered for approval by that Board on 12th October. Approvals from the ten individual Metropolitan Districts will then follow during the remainder of October with formal consultation currently programmed for 8 weeks from 9th November.
- 5.4. The GMSF is an ambitious plan which seeks to meet the employment and housing needs across Greater Manchester. The Draft GMSF 2019 proposed a total of 200,980 new dwellings in the plan period to 2037, with a total of 19,280 dwellings in Trafford. Approximately 2.9 million sq m of office space and 5.4 million sq m of industry and warehousing floorspace were proposed across GM. These figures are from the Draft GMSF 2019 and will be updated in the GMSF 2020.
- 5.5. Most of the development needs across GM can be met within the existing urban area. However some additional employment and residential land outside of the existing urban area is required to meet the needs of GM. The Draft GMSF 2019 identified a number of strategic sites which will be needed to deliver the housing and employment land requirement, most of which will involve some Green Belt release. New Carrington is one of the proposed strategic sites and is one of the largest proposed allocations in the GMSF. It

includes the land in SL5, significant areas of land at Sale West, as well as land to the south of the SL5 area and around Partington, at its southern and western most extremity including the appeal site.

- 5.6. In the draft GMSF 2019 policy 'GM Allocation 45: New Carrington' sets out the development requirements for the site. The Draft GMSF 2019 identified the site for a minimum of 6,100 homes and approximately 500,000 sqm employment floorspace. Draft Policy GM45 is clear that development should come forward as part of a wider masterplanned scheme which over time would deliver the necessary wide ranging infrastructure, including the Carrington Relief Road, as well as other highway and public transport schemes.
- 5.7. New Carrington is also specifically identified in the overarching GMSF strategy, highlighting the integral importance of the allocation to the plan. Draft GMSF policy GM-Strat 11 "New Carrington" establishes that the location "enables the redevelopment of the extensive former Shell Carrington industrial estate" and looks to support the regeneration and integration of neighbouring Partington and Sale West. The policy also highlights the need for major investment in public transport and highways infrastructure to address current issues and to ensure that residents and workers in the area can travel sustainably.
- 5.8. The New Carrington site offers one of few opportunities in GM to deliver a new settlement of a significant size and to make a considerable contribution to meeting Trafford and Greater Manchester's employment and housing needs. The proposal for a large amount of employment development and local facilities, as well as a diverse range of housing, will enable New Carrington to function as a sustainable neighbourhood, rather than as an isolated community. The success of the New Carrington community will be dependent on the delivery of significant new infrastructure, which all parts of the New Carrington development will need to contribute to in a coordinated way. A strategy for a coordinated approach to infrastructure delivery will be a key requirement of the GMSF New Carrington policy.

5.9. A high level Masterplan has been prepared for the New Carrington site which will be published as a supporting document to the GMSF 2020. The Masterplan will support the proposed allocation in the GMSF 2020 and has informed the revised GM45 site allocation policy, as well as helping to ensure a joined up approach to development. Trafford Council commissioned the Masterplan, but it had input from the key landowners, including Redrow in the early stages of the Masterplan's development. The masterplan draws upon evidence base documents which have been prepared for the GMSF and determines an appropriate development quantum and high level phasing for the New Carrington site. The Draft GMSF 2019 policy requires the preparation of a detailed Masterplan / SPD to support the allocation and it is envisaged that the high level Masterplan will form the basis of this further work.

5.10. Draft policy GM45 also sets out the high level policy requirements which will overcome the infrastructure barriers that currently prevent the appeal site from coming forward. The development parcels within the New Carrington site will need to contribute to and have regard to the infrastructure which is required for the wider site. There is a significant risk that if sites, such as the land at Warburton Lane, come forward in an uncoordinated way then they could threaten the wider integration of the sites into the New Carrington site, or preclude the delivery of a key infrastructure route. For example the early high level masterplan (see Appendix 2) has identified a requirement for a southern link road running through the eastern land parcel of the appeal site. Whilst noting that this evidence is high level, the route of the southern link road through the site is the logical location for access to the development parcels to the east, and in achieving the successful integration of development.

5.11. The application makes no allowance for the development to accommodate infrastructure of this significance. The absence of provision for this link could mean that the development of this site would prejudice the delivery of wider strategic infrastructure needed to support the New Carrington site.

5.12. Thus, in summary, a co-ordinated, phased approach is one of the overarching principles of the proposed strategic allocations within the emerging GMSF.

This will be considered as part of the high level Masterplan and a more detailed phasing and infrastructure schedule will be developed as part of further work. The appeal site within the context of this wider strategic allocation can play a role in supporting the creation of a new, sustainable community but in isolation has the potential to undermine delivery of wider sustainable development.

5.13. Development proposals within the GMSF New Carrington allocation will need to demonstrate how they will be effectively linked and integrated into the rest of the allocation, as well as to existing communities, so that their regenerative potential is maximised and existing and new communities are not separated. The Framework at paragraph 91 emphasises that “Planning policies and decisions should aim to achieve healthy, inclusive and safe places”.

5.14. In particular it stresses that development should “promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;” In other words development envisaged by the framework should not be isolated – inward looking estates ‘ship wrecked’ on the periphery of settlements – rather they should seek to connect well and integrate with existing localities and neighbourhoods.

5.15. These challenges will be included as key policy principles in the GMSF 2020 New Carrington allocation policy. This is particularly relevant to the appeal site considering its location on the edge of the proposed allocation area. The current application gives very limited regard to how the site could be linked to the Partington community to the north or the wider New Carrington development site, a requirement of the Draft GMSF 2019 and the NPPF’s requirement to deliver sustainable development. The applicant should have demonstrated what measures could be taken to deliver active travel linkages between the site and these should have been considered in the scheme design from the outset as a key principle of the development.

5.16. In terms of the next stages for the GMSF, the Regulation 19 Draft GMSF will be published for consultation in Autumn 2020. Upon completion of the publication stage late 2020 / early 2021, the plan will be submitted to the Secretary of State in June 2021 for Examination in Public and adoption in 2022.

5.17. Although GM45 can currently be accorded limited weight, it embodies and reflects the basic spatial reasons why this site is not suitable for standalone development now. It also demonstrates that the Council is committed to bringing forward a major new development at New Carrington, building on the existing SL5 strategic location and delivering appropriate development at the right time with the right infrastructure and with appropriate connections to other existing and new development.

6. Housing Land Supply

6.1. Trafford is currently unable to demonstrate a five year housing land supply against the Trafford LHN figure of 1,369 homes per annum (see paragraph 1.8). Although noting the current unfavourable housing land supply position it is not considered that this overcomes the locational and spatial problems of the site and the ability to deliver sustainable development. This is discussed further in the evidence of Ms Brown.

6.2. Trafford is taking a pro-active approach to addressing the housing land position and the Housing Delivery Test Action Plan sets out various measures to enhance housing delivery. This includes progressing Masterplans on significant sites which are within the existing urban area, such as for Stretford, Pomona and Wharfside, as well as the Civic Quarter Area Action Plan.

6.3. It is anticipated that the emerging GMSF will reduce Trafford's housing requirement from the current LHN figure. The draft GMSF 2019 proposed a spatial strategy which seeks to rebalance growth in Greater Manchester, focusing higher levels of growth in the northern districts as well as in the most sustainable locations in the regional centre. At a time when Green Belt review is contemplated, this approach follows that of NPPF paragraph 137 which

encourages greater use of brownfield land and cross-border collaboration. The southern districts (Trafford and Stockport) were set a housing target which is slightly lower than their LHN, but which still brings housing development forward and sustains the competitiveness of these areas. Under this strategy, and based upon current housing land supply data, Trafford will be able to demonstrate a five year housing land supply upon adoption of the GMSF.

- 6.4. The role of land at Warburton Lane towards enhancing housing delivery in Trafford, and Partington/Carrington in particular, should be considered in the context of a much wider development and regeneration package. The development sites within the SL5 area have demanded a significant amount of resource to reach a point suitable for delivery with a range of infrastructure contributions and triggers in place to manage what is a substantial scale of growth for the area. Additional housing development, at a location such as Warburton Lane, without forming a part of a new strategic approach to further growth in the area would simply undermine the strategy that has been established.

7. Appeal Site - Unsustainable Location for Housing

- 7.1. The land at Warburton Lane has never been in the Green Belt and has, since the UDP 1996, been identified as 'Other Protected Open Land' or Safeguarded Land. The land at Warburton Lane, which is the subject of this appeal, is part a wider area of safeguarded land located to the south of Partington. This is the starting point in considering the appeal site and it is my view that this site should not come forward under policy in advance of a development plan review.
- 7.2. The UDP (2006) Inspectors Report noted the difficulties of integrating the appeal site with Partington and set out concerns that the development of the site would form an unsustainable urban extension. It is considered that these concerns remain relevant to the appeal site today and the position has not changed with regard to the challenges associated with integrating the

development site with the existing Partington community when this site is considered in isolation.

- 7.3. The site is greenfield and it therefore would not contribute to meeting brownfield land objectives. One of the reasons for the New Carrington proposal in the GMSF is the ability to consider the proposed area as a whole and to use the Green Belt / greenfield areas to assist in bringing the brownfield land at Carrington forward. Allowing this site to come forward in advance of the wider Masterplan places an increased burden on the brownfield land at New Carrington, which may not be as able to viably contribute to infrastructure provision.
- 7.4. The current Trafford Development Plan, whilst identifying the SL5 Carrington area for significant growth, did not identify this site for housing in the Core Strategy plan period. This approach is based on sound planning reasons, that SL5 must come forward first to prioritise the redevelopment of brownfield land and make the most efficient use of land within the urban area. The approach in the Core Strategy remains in accordance with the NPPF's overarching principle to deliver sustainable development which the site, when considered in isolation, will not achieve.
- 7.5. The Draft GMSF 2019 proposes to include the safeguarded land at Warburton Lane within the New Carrington allocation, however draft policy GM45 is clear that this will require significant infrastructure to be delivered to support the allocation. The Masterplanning process for New Carrington is in its early stages and work is required to develop a detailed development and infrastructure phasing plan for the site. The early masterplanning work has indicated that the eastern land parcel of the appeal site may be required to deliver part of a southern link road through the site, providing a strategic link around the south and east Partington area. The appeal proposal makes no provision for this route and therefore risks the delivery of this infrastructure. The southern link road would also provide an important connection from the site to the wider area, delivering a more integrated site which is connected to surrounding

communities and helping to overcome the fundamental issues with this area as a detached, isolated urban extension.

- 7.6. The significant scale of the New Carrington site means that it will come forward over a significant period, with some development extending beyond the GMSF plan period to 2037. The New Carrington GMSF policy and detailed Masterplan will provide a framework to support the development of the site. Delivering a coordinated approach to the development and ensuring that each development parcel has regard to the wider scheme in terms of infrastructure contribution and integration with both existing and new development.
- 7.7. In regard to the appeal site the Draft GMSF 2020 policy will reflect the emerging evidence for this area which is likely to result in a reduced density and a need to ensure development mitigates its impact on the landscape and historic environment. The masterplan also suggests a development phasing schedule for the site, which takes into account infrastructure delivery, as well as the requirement for any site investigations works that may be required before a development parcel can come forward.
- 7.8. The emerging development plan shows how the site specific issues, infrastructure constraints and physical isolation of this site can be successfully overcome. In essence these issues can be addressed collectively and points such as integration and accessibility can be solved hand in hand. These are the matters which might be reasonably expected from any plan review, which reinforces the core NPPF advice about this particular site that its development should only precede following a new development plan. If development is to proceed sooner, perhaps because of the imperative of housing supply, then any application should at very least seek to replicate those matters which a plan review might address. Regrettably, in this case, the appeal application does none of those things but rather seeks to develop it in isolation and without regard to infrastructure of its relationship with its surroundings. As such it is clearly harmful, contrary to existing and emerging development plan policy and the objectives of the Framework.

7.9. Finally, the appeal proposal also does not offer an acceptable solution to public transport provision. Whilst offering a contribution towards public transport, this would not be effective on its own and when considering this site in isolation. This is set out in the evidence of John Morley and John Cookson, but it reinforces the point that this site cannot deliver sustainable development in isolation, it needs to be supported by the wider GMSF New Carrington proposals which will deliver improved public transport with the development quantum which can support it.

7.10. The Council's contention therefore is that the appellant's site would not overcome the challenges identified with this site in the UDP (2003) Inspectors Report around integrating the site with the existing community and delivering sustainable development. In fact, the proposed development at the appeal site could undermine the Council's achievement in delivering the infrastructure required to support the New Carrington development by failing to make provision for a southern link road through the site, or a contribution to the wider infrastructure requirements.