

Your Ref: 1158/107
Our Ref: L&P/TCS/HIL

Thursday, 3rd February 2011

Ms Yvonne Parker
The Programme Officer
c/o Trafford Council
First Floor
Waterside House
Sale Waterside
Sale
M33 7ZF

Dear Ms Parker

TRAFFORD CORE STRATEGY EXAMINATION
UNIQUE REFERENCE NO: 1158/107
MAIN MATTER 5: THE GREEN BELT AND OTHER PROTECTED LAND

Please find attached 4 copies of Further Written Representation in relation to Representation No. 107 made on behalf of Homestar Investments Limited.

Please do not hesitate to contact me if you require any further information.

Yours sincerely



David Thompson
Development Planning Manager

Att.

Trafford Core Strategy Examination

**Further Written Representations by Peel Holdings
(Land and Property) Limited on behalf of Homestar
Investments Limited**

Reference No: 1158/107

Main Matter 5: The Green Belt and Other Protected Open Land
– Policy R4 and Appendix 2

February 2011

1. Introduction and Summary

1.1. This is a Further Written Representation to the Trafford Core Strategy Examination in Public by Peel Holdings (Land and Property) Limited (hereafter 'Peel') on behalf of Homestar Investments Limited (hereafter 'Homestar').

1.2. This representation is in relation to Main Matter 5: The Green Belt and Other Protected Land (Policy R4 and Appendix 2) in the Inspector's Main Matters, Issues and Questions Report.

1.3. Peel and MPSL Planning & Design Limited have previously made submissions on behalf of Homestar. These can be seen in the Core Strategy: Public Examination Documents List in 10.4.9 (Core Strategy Further Consultation), 10.6.2 (Core Strategy Further Consultation on Vision, Strategic Objectives and Delivery Strategy), 10.7.2 (Core Strategy Publication Consultation) and 10.8.1 (Land Allocations).

1.4. The submissions made have related to the strategic policy approach in the Core Strategy (hereafter 'CS') and have promoted a specific site. The site is located at Land off St. Martins Road/Church and Hawthorn Lane, Ashton Upon Mersey, Trafford (hereafter the 'Site'). The following Figures provide further information relating to the site:

- Figure 1: The Site in the context of the Sale 'Place'
- Figure 2: Green Belt around north and west Sale
- Figure 3: Key photographs

1.5. In addition to the aforementioned representations made in response to consultation at various stages of the Core Strategy DPD, representations were also made by Homestar in June 2009 to the Strategic Housing Land Availability Assessment (SHLAA) consultation. These representations included a completed 'site suggestion form' setting out the characteristics of the Site

in relation to accessibility, suitability, viability and sustainability. These representations confirmed that the Site is 6.42 hectares and capable of delivering in excess of 230 units.

- 1.6. These further representations contend that the CS as drafted is unsound because it does not provide sufficient flexibility of land supply, specifically with regard to land around Sale and Ashton Upon Mersey, which would result in insufficient levels of housing being delivered to meet local market and affordable needs. Land is available, viable and suitable for consideration west and north of Church Lane, Ashton Upon Mersey. This land is within the Green Belt but exceptional circumstances exist to justify a local boundary review in this locality. The Inspector is invited to make the CS sound by allowing for this land to be released through the CS and wider LDF process.

2. **Main Representation**

Soundness

- 2.1. Homestar believes that the Trafford Core Strategy is **unsound**. This is because Policy R4 – ‘Green Belt and Other Protected Open Land’ (Publication Document Examination List (PDEL) 6.1.2. Core Strategy p.136) does not allow for a review of Green Belt boundaries in South Trafford.
- 2.2. PPS12 (page 20) states that *“To be “sound” a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY. “Justified” means that the document must be: founded on a robust and credible evidence base; and the most appropriate strategy when considered against the reasonable alternatives; “Effective” means that the document must be deliverable, flexible and able to be monitored.”*
- 2.3. It is Homestar’s view that the CS is unsound due to a combination of the following:
- The CS is *not sufficiently flexible* with regard to land supply;
 - As a result, the CS *cannot deliver* the amount of local and affordable housing needed in South Trafford and specifically, the Sale ‘Place’;

- The CS therefore does *not provide the most appropriate strategy*;
- There is an *alternative*, more flexible option, involving the release of a *limited amount of Green Belt land*, which would be sound.

2.4. These points are explored in more detail below in considering whether there is a case for ‘exceptional circumstances’ as required by national planning guidance when considering the potential alteration of detailed Green Belt boundaries through Development Plans.

2.5. In Trafford, exceptional circumstances exist so as to justify a revision to Policy R4. The revision to the Policy would be to allow a limited amount of housing development within the Green Belt within the Ashton Upon Mersey area of the Sale ‘Place’.

Exceptional Circumstances

2.6. The ‘exceptional circumstances’ set out below are, in combination, clearly capable of meeting the test, as set out in PPG2 and as established in guidance produced by the Planning Inspectorate ‘Local Development Frameworks Examining Development Plan Documents: Learning from Experience’ (PDEL 2.4.1) and through a number of CS examinations.

No.1 - The Need for Additional Land in South Trafford

2.7. Housing delivery in current market conditions remains uncertain and it is important that the CS does not create a policy framework which reduces the Council’s ability to respond to changing market conditions and potential on-going difficulties in the delivery of housing. Specifically, the CS should avoid policies that reduce the Council’s ability to respond flexibly to changing and/or unexpected circumstances, particularly in relation to the delivery of local needs, affordable and/or specialist needs housing. This approach is supported in ‘Local Development Frameworks Examining Development Plan Documents: Learning from Experience’ (PDEL 2.4.1).

- 2.8. Homestar contends that not including a mechanism for additional land release within the CS is premature, given housing land supply and market conditions. It also restricts the potential scope of the preparation of the Land Allocations DPD and limits its outcome. It may also have consequential impacts upon the delivery of affordable housing.
- 2.9. Homestar notes that Policy L1 'Land for New Homes' (PDEL 6.2.1 Core Strategy p.62) and Table 1 (PDEL p.66) identifies that the Council will seek to deliver 4,350 residential units in the 'Other South City Region Sites' between 2008 and 2026. New Growth Point status would increase this target by 20% to 2018.
- 2.10. It is noted that the 'Other South City Region Sites' exclude units anticipated to be delivered via 'Strategic Locations', 'Other Inner Area Sites' and 'Regeneration / Town Centre Schemes'. The volume of housing to be delivered within the 'Other South City Region Sites' is significant – accounting for 41.8% of the Borough wide target. In that context, the delivery of sufficient housing within the Sale 'Place' is fundamental to meeting the needs of South Trafford and the wider southern part of the City Region.
- 2.11. It is essential to the successful and effectively delivery of the CS that sufficient housing land is identified to accommodate the level of delivery within the 'Other South City Region Sites' and that account is taken (and flexibility included within the CS) to allow for potential difficulties in delivery and uncertain market conditions.
- 2.12. To achieve the objectives of the draft CS, a specific emphasis should be given to sites that are deliverable and developable and can meet local housing needs.
- 2.13. Setting policies in place which seek to deliver the volumes of housing needed over a 16 year period to meet need housing needs and deliver

sustainable growth can require the making of difficult decisions. Allowing some additional greenfield development, to meet future need, could be regarded as being a difficult decision.

- 2.14. Whilst first priority should be given to delivery within the identified ‘Strategic Locations’ and ‘Regeneration Schemes’, making such decisions is necessary and crucial to the delivery of the CS.
- 2.15. Homestar considers that the release of a limited amount of greenfield (including Green Belt) land for local and affordable/specialised needs in South Trafford would have no undermining impact on the Strategic Locations or Regeneration Schemes.
- 2.16. In light of the above general factors relating to the scale and nature of housing need and the requirement for flexibility to take account of land supply and market conditions, it is concluded that the general circumstances exist to determine that the CS should be flexible enough to permit the limited release of additional land in South Trafford.

No.2: The need for additional land in Sale ‘Place’

- 2.17. The CS states that the greater need for affordable housing falls within the Southern [housing] sub-market (PDEL Core Strategy 6.2.1 para. 11.10). The Southern area of Trafford includes a number of sub-areas, all of which are expected to contribute to delivering local housing needs. This includes Sale ‘Place’, which includes Ashton Upon Mersey, which is a ‘moderate’ market area as defined by the Council’s Viability Study. It has significant affordable housing needs. Sale is identified as providing over one quarter of the housing in South Trafford over the CS period, and to be a significant contributor of affordable housing. It is therefore vital to consider whether enough land has been provided to meet these aims.

- 2.18. The SHLAA 2010 has found that there are 202 dwellings ‘in the planning process’ within Sale (i.e. supply counted as deliverable with planning permission). A further 1,143 dwellings are ‘outside the planning process’, of which 125 are in the 15+ year category, equating to 1,018 over the Core Strategy’s 15 year period.
- 2.19. The dwellings to be delivered in Sale over the CS period that are currently ‘outside the process’ are mainly located on a large number of small sites. Only three sites contain over 100 units. Only five sites contain more than 50 units. Around half of Sale’s supply ‘outside the process’ is expected to be delivered on sites yielding less than 50 units. This is reflective of a wider reliance on small sites across Trafford, with one-third of sites in the overall SHLAA being less than 0.8 hectares. This reliance on smaller sites poses a significant risk of under-delivery.
- 2.20. The nature of the land supply in Sale is also characterised by some greenfield land. The largest of any site ‘outside the planning process’ in Sale shows a yield of 215 units on a greenfield site which is heavily treed, and which is the subject of a range of environmental designations – site ref. 1723 Land at Firsway Sale. It is understood that this site has been removed from the Green Belt since the first adopted UDP in 1996. If the Firsway site is excluded from the figures, the number of dwellings outside the planning process over the CS period reduces from 1,018 to 803.
- 2.21. There are two other greenfield sites ‘outside the planning process’ within the SHLAA in Sale within the next 15 years. These are:
- 1545: Buck Lane, 5 units in <5 years
 - 1727: New Hall Close, 17 units in 10-15 years
- 2.22. In addition to Firsway and these two smaller sites, ref. 1725 Moss Lane is identified in the SHLAA for 52 units in the 15+ year period. This site is not shown on the SHLAA map.

- 2.23. It is clear from the inclusion of these sites, in particular the Firsway site, that the Council envisages needing to release some greenfield land in order to meet local housing needs in Sale. We comment on the comparative merits of the identified greenfield sites further below.
- 2.24. It is however apparent that the composition of the supply for Sale is over-reliant on a large number of small brownfield sites. Owing to their small scale brownfield nature and the 'moderate' market operating in the area, these sites will in general be more of a challenge to deliver than larger greenfield sites. The viability of such sites is heavily dependent on market conditions. Such sites, even if viable to develop (and also available), are also less likely to be able to deliver affordable housing, both because they would fall below minimum size thresholds and because viability is likely to be more marginal.
- 2.25. It is therefore considered that the reliance on small brownfield sites may well not deliver sufficient local and affordable or specialist housing in Sale. The likelihood of this being the case is strong, sufficient to merit a more flexible approach to land supply. The inclusion of an additional area of land capable of delivering in excess of 230 units without harm to the purposes of the Green Belt (as explained below) would appear to provide a more balanced and flexible approach over the lifetime of the CS.

No 3: The Green Belt around Sale and Ashton Upon Mersey

- 2.26. The Green Belt to the north of Sale separates Urmston from Ashton Upon Mersey, both of which lie within Trafford. It is a linear corridor around 1.2 km wide, which encompasses the open land around the River Mersey. The M60 and Carrington Spur dual carriageway road both pass through the open land and, along with the River, act as physical barriers to movement.

- 2.27. To the west of Sale a similar width of Green Belt, comprises parts of the flat Carrington mossland uninterrupted by any major linear infrastructure, and provides an open gap between Sale and Carrington.
- 2.28. The Carrington Spur dual carriageway follows the Mersey river corridor. It leaves the M60 to the north of Ashton Upon Mersey and crosses the river before sweeping sharply south to follow the edge of the urban area. As it nears the urban edge it creates a distinctive visual and physical separation between the urban area and the wider extents of open land around the river and defines the boundary of the Site.
- 2.29. Figure 2 shows in more detail the Green Belt to the north and west of Sale. The river and dual carriageway road form firm physical boundaries close to the urban edge on the north side of Ashton Upon Mersey. Open land of varying widths is enclosed between the urban edge and these features. All of the land abutting the urban edge, with the exception of the Site is actively used for recreational purposes, as playing fields, riding school and a golf course. The Site is defined by the firm boundaries of the urban edge, dual carriageway road, and golf course; and in addition has a substantial tree belt alongside the road in the western field which creates a very strong visual boundary separating it from the wider area (see photograph 1 on Figure 3). When considering minor Green Belt boundary changes there is no better alternative to the Site on the northern boundary of Ashton Upon Mersey.
- 2.30. To the west of Ashton Upon Mersey the Green Belt boundary is tightly drawn to the urban edge and at the northern corner public parkland with play facilities abuts the urban edge, enclosed to the west by a woodland belt. The woodland continues all along the urban edge as one moves south, and extends onto the Firsway site. Although this site is not currently in the Green Belt, it nevertheless forms a very firm visual boundary between the urban area and the Green Belt, which would potentially be lost were this

site to be developed (see photographs 3 and 4 on Figure 3). In addition, the environmental value of this site is reflected in the environmental designations attached to it. From this standpoint alone, the Firsway site must be less suitable than the land at Ashton Upon Mersey for development. Further south, Sale merges into adjacent urban areas. There is therefore no better alternative to the Site to the west of Sale, although both sites are likely to be needed to meet housing need.

2.31. The urban area merges into other parts of the conurbation to the south and east, such that the only potentially additional areas for housing are again important urban green spaces. Those few opportunities which are potentially suitable for housing have already been identified by the Council through the SHLAA but are insufficient to meet local needs. Otherwise land is unsuitable because it serves an important open space function or it is located in other parts of the conurbation and is meeting local needs in those areas. From Homestar's analysis it is apparent that urban land is well constrained in other parts of South Trafford, although we have not undertaken any similar analysis of the degree to which limited additional land release may be justified in other 'Places'.

2.32. Therefore if additional housing is to be provided to meet local needs in Sale, it is appropriate for a limited amount of this to be within the Green Belt at the northern edge of Sale, provided land exists which can accommodate it through a local boundary review without undermining the purposes of the Green Belt. Homestar believes land at Ashton Upon Mersey to be a suitable candidate.

Land at Ashton Upon Mersey – Green Belt Considerations

2.33. The Site lies on the northern edge of the built up area of Ashton Upon Mersey, between properties along St Martin's Road and the A6144(M). Hawthorn Lane gives access to the western boundary of the Site and can provide vehicular access into the Site .

- 2.34. The development of this land would not cause any significant degree of harm to the Green Belt, given that the wider more important landscape setting to the north is protected by the A6144; hence the Site could form a more permanent urban boundary in the longer term.
- 2.35. In considering the implications of releasing the land at Ashton Upon Mersey (west and north of Church Lane) from the Green Belt, it is appropriate to consider the five purposes of including land within the Green Belt:
- *to check the unrestricted sprawl of large built-up areas;*
 - the area of land is sandwiched between the urban edge, the Carrington Spur road and Ashton golf course. It forms no part of the wider open area and owing to the characteristics of the Green Belt in this area, its removal would have no material impact on the efficacy of the Green Belt in preventing the sprawl of the metropolitan area;
 - *to prevent neighbouring towns from merging into one another;*
 - the area of land would not in itself lead to neighbouring towns merging into one another, and owing to the particular characteristics of the land and the Green Belt in this area would not create a precedent by which merging might occur in the future;
 - *to assist in safeguarding the countryside from encroachment;*
 - the area of land is located inbetween urban development and the Carrington Spur Road, and cannot be regarded as being in an area of countryside that has not already been encroached into. These factors make the land permanently 'urbanised' in nature. As a result there is no potential for safeguarding the countryside by the retention of this land within the Green Belt, and conversely no detrimental effect on safeguarding the countryside from encroachment by releasing the land for development;

- *to preserve the setting and special character of historic towns;*
 - the potential release of the land would have no impact of the setting and special character of an historic town;
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land;*
 - the priority for urban regeneration, through the Strategic Locations and Regeneration Schemes, would remain within the CS. The release of a limited amount of Green Belt land in this area would meet a local need for housing arising in the local area, but would in no way undermine the delivery of urban regeneration and would be expected instead to contribute towards it.

2.36. It is considered that the essential Green Belt purposes would still be met were this land not designated as Green Belt, and that the purposes of the Green Belt in this area are not undermined by the release of the land.

Land At Ashton Upon Mersey – Cultural Heritage Considerations

2.37. The Site location is shown on Figure 2. It lies to the west and north of the Ashton Upon Mersey Conservation Area but its development potential is not compromised by this relationship.

2.38. The Conservation Area lies on a slight rise in the landscape and has St Martin's Church at its heart. It abuts and lies partially within the defined urban boundary, and incorporates urban development within it. It abuts the golf course to the north and east. Land to its immediate north which lies within the Site is used for the handling/disposal of agricultural materials (see photograph 2 on Figure 3). Land to the west which lies within the Site abuts the graveyard of the church but there is little inter-visibility due to established trees. In these circumstances, careful layout and landscape treatments would readily ensure that there were no ill effects on the Conservation Area as result of development within the Site.

Land at Ashton Upon Mersey – Accessibility Considerations

- 2.39. Figure 1 shows the Sale ‘Place’ in its context, with a 2 km catchment around the town centre depicting a land catchment within a core 30-40 minute walk/15-20 minute cycle.
- 2.40. Ashton Upon Mersey lies within the 2 km catchment. It enjoys good bus connections to the town centre and to Altrincham to the south, benefitting from ‘accessible’ status. It has a good provision of schools and local facilities, and is a highly sustainable location in the Sale ‘Place’ context, but is constrained by the tight Green Belt boundary.

3. Summary

- 3.1. In summary there is a clear need for the CS to incorporate flexibility within its provisions to enable sufficient land around Sale and Ashton Upon Mersey to come forward to meet local market and affordable needs. Opportunities for housing development within the existing urban area are limited and Homestar therefore believe that the release of a small amount of Green Belt land on the northern edge of Ashton Upon Mersey to be necessary and appropriate.
- 3.2. The Site is greenfield land located immediately adjacent to the urban boundary on the edge of a sustainable urban location, close to public transport routes, community facilities and retail/employment areas.
- 3.3. The A6144 to the north provides a logical barrier to development to the northern/western boundary, and indeed provides this role west of the Site.
- 3.4. The Site could be developed without undermining Green Belt purposes and may also enhance the setting of the adjacent Conservation Area.

- 3.5. Given that there is a clear need for additional housing land which cannot be met in the urban area the Site represents a sustainable location for a small urban extension.

4. Amendment to Core Strategy Sought:

- 4.1. To make the Core Strategy **sound**, the Inspector is therefore invited to either:

- Add a new section to Policy R4 of the Core Strategy as follows, after section R4.3:

“Land at Ashton Upon Mersey shall be released from the Green Belt for housing, to provide for local and affordable needs”

A plan showing the 6.42 hectare site area submitted by Homestar would then be included as an Appendix to the CS and / or the area be highlighted on the Key Diagram.

Or, if the Inspector considers it more appropriate for the Site to be allocated in a future DPD:

- Add a new section to Policy R4 after Section R4.3 as follows:

“Owing to the need to provide for local and affordable housing needs in Sale and Ashton Upon Mersey, land should be released from the Green Belt in this area through Development Plan Documents. The focus area for release will be land west and north of Church Lane, bounded to the west by the Carrington Spur.”

The area identified on the plan accompanying this report could then be identified on the Core Strategy key diagram by an asterisk.









- 4.2. The above change would conform with national guidance having met the 'exceptional circumstances' test of PPG2 and the Regional Spatial Strategy (Policy RGF4) which allows for localised detailed boundary changes provided there is no 'substantial strategic change' to the Green Belt.

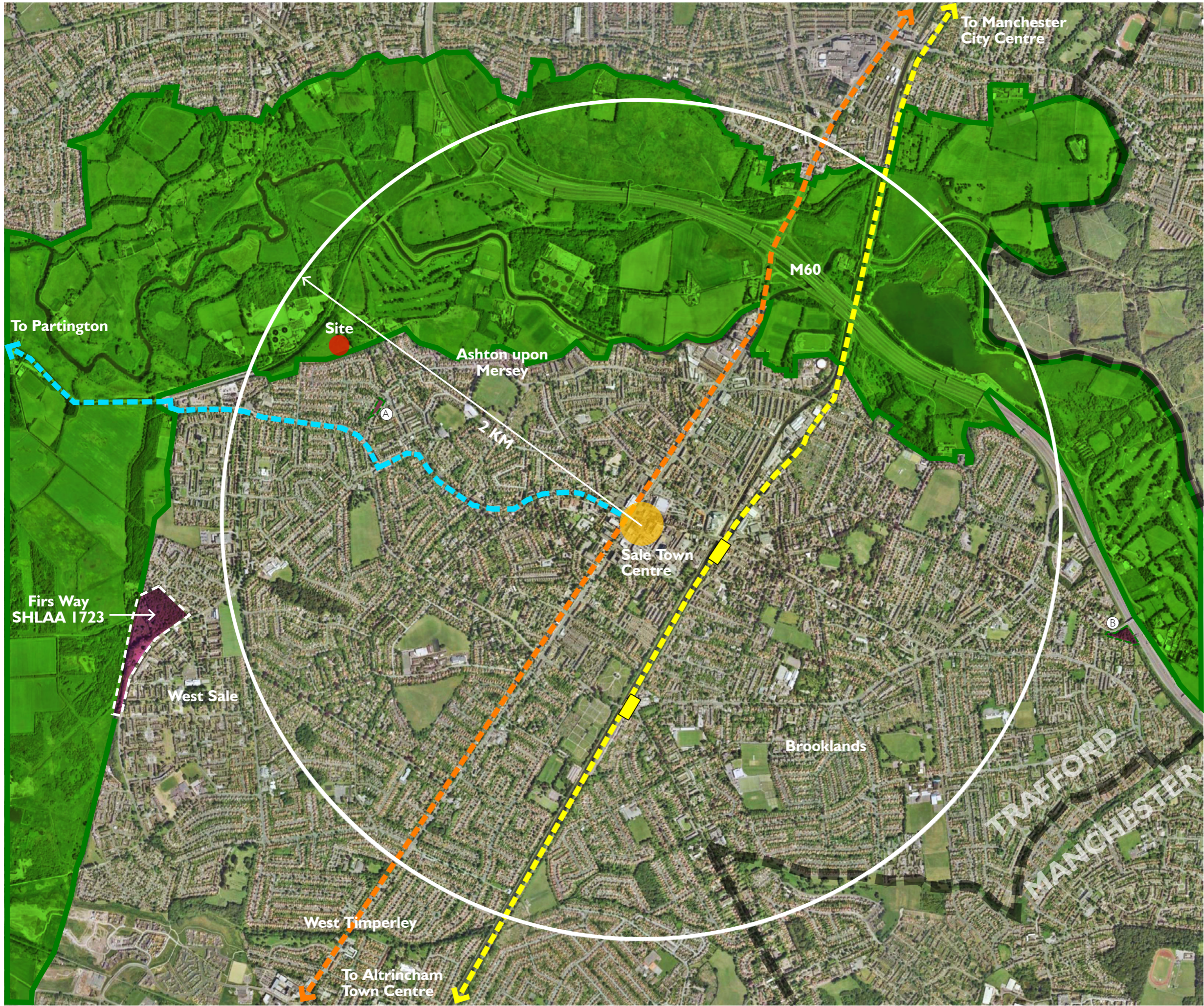
Peel (Land and Property) Limited

Peel Dome. The Trafford Centre. Manchester. M17 8PL

Tel: 0161 629 8357

Key ↑
North

-  Borough boundary
-  Bus corridor with combined service of 15 mins frequency
-  Quality bus corridor
-  Metro link and stations
-  Designated Green Belt
-  Land at Firs Way SHLAA site - 1723
Green Belt until 2001/2.
Designated:
Areas of Nature Conservation Value (ENV 9);
Wildlife Corridor (ENV 10);
Community Forest (ENV 15);
Protection of Landscape Character (ENV 17);
The Mersey Valley (M4).
-  SHLAA site - 1545
-  SHLAA site - 1727



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Land at Ashton upon Mersey

Figure 1

Scale: NTS

The site in the context of the Sale 'Place'



- Key**
- Site
 - Conservation area
 - Parks/playing fields/cricket club
 - Substantial woodland blocks close to urban boundary
 - Golf course
 - Riding school
 - Physical barriers to movement
 - Firs Way SHLAA site 1723



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Land at Ashton upon Mersey

Figure 2

Scale: NTS

Green Belt around north and west Sale



Photo 1 Left: View of the western part of the Land at Ashton upon Mersey Site looking west. The urban boundary lies on the left, and the tree belt on the far side of the picture defines the line of the Carrington Spurdual carriageway road. There is no physical or visual relationship between the site and the wider Green Belt beyond the road. The site is open with no intrinsic landscape merit.



Photo 2 Left: View of the land within the Site to the north of the Ashton upon Mersey Conservation Area. This land is used for the storage of agricultural materials.

Photos 3 and 4 Below: Two views of the SHLAA site 1723, Land at Firsway, currently identified with potential to provide 215 housing units. The land forms an attractive interface between the urban area and the Green Belt, and is designated for its nature conservation interest and environmental quality. From an environmental viewpoint it compares poorly with the land at Ashton upon Mersey as a suitable site for development.



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Land at Ashton upon Mersey

Figure 3

Key Photographs