

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

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

Name:	Alan Hubbard	Agent (if applicable):	N/A
Organisation (if applicable):	National Trust	Organisation (if applicable):	
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Please use the consultation comment form to make a representation on the Trafford Local Plan: Land Allocations – Consultation Draft, the Sustainability Appraisal or other related evidence base. You should consider what it is you wish to comment on and let us know whether you support or oppose this particular element of the document. Please explain your reasons and suggest any improvements.

Please use a separate comment form for each specific policy, paragraph, figure or table you wish to comment on and attach it to this contact details sheet.

A separate site submission form is available to submit new sites which have not previously been assessed. This form is available on the Council's website via the Strategic Planning webpages, or directly from the team at the address below.

You only need to fill out one copy of your contact details if you are submitting all your comments at the same time, but please indicate the total number of comment sheets enclosed in the box below:

Total number of comment sheets enclosed:	7
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 **The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way.** Responses can be submitted via the electronic version of the comment form which can be found on the Council's web site at: www.trafford.gov.uk . **This form is in 'Word' format and you can type in your response and return it as an e-mail attachment to strategic.planning@trafford.gov.uk.**

Alternatively, completed comment forms can be returned by post to the address below by no later than **17th March 2014**.

**Strategic Planning
Trafford Council
Trafford Town Hall
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.

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Comment Sheet

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	X	Page number	26
SA Report		Paragraph number	
SA Appendices		Policy number	CAR1
SA Options Report		Site reference	
SA Flood Risk Sequential Test		Table/Figure reference	
SA Scoping Report		Other (including omissions and suggestions for proposed amendments)	
Topic Paper (please specify)			
HRA Scoping report			
SHLAA (2013)			
Conservation Area Appraisal (please specify)			
Other document, (please specify)			

Do you support, oppose or have general comments about this specific part of the document?					
Support		Object	X	General Comment	
<p>Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.</p> <p>Whilst in principle National Trust does not object to the development of land at Carrington, and in many respects in the manner set out in the proposed Policy and supporting text, it does have several concerns as follows:</p> <ul style="list-style-type: none"> The Draft Policies Map does not clearly define the extent of the Carrington Strategic Location – the black line boundary is very difficult to establish on the plan base and readily confused with other proposed designations. For example, whilst it would appear from the text that it is not intended that any land currently designated as Green Belt would be included within CAR1 it is not possible to conclude this from the available plan. There is concern that the transport corridor proposal to serve this area crosses a significant area of Green Belt land and it is inappropriate development. An alternative alignment further to the north could equally satisfactorily serve the development area with a much lesser impact upon the Green Belt and would clearly be preferable having regard to Green Belt purposes as set out in the NPPF. The extent of CAR1 also appears to include a number of important nature conservation assets – whilst there is a general reference in the last bullet point at 6.8 to safeguarding intrinsic features of nature conservation interest or value it is not considered that this is sufficient. Rather there should be a clear commitment to the safeguarding and enhancement of the designated sites – again relocation of the transport corridor would enable the integrity of all the sites shown on the Draft Policies Map to be 					

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maintained. The identification of a large part of this area, and adjacent land, for a major green infrastructure opportunity is welcomed but would be compromised by the transport corridor.

- CAR1 is also in part sensitively located in respect of a range of heritage assets, not least within the wider visual setting of assets of the highest individual and also cumulative value at Dunham Massey. Apart from the Grade I assets at Dunham Massey itself there are also designated and non –designated heritage asset both in Dunham Town and on the wider Dunham Estate that would potentially be impacted upon. One key feature is the view north from Dunham Massey House to the obelisk and its rural backdrop beyond. Impacts upon heritage features were a matter of considerable discussion at the time of the UDP Review and the proposal for a freight depot at Carrington. National Trust remains concerned about the potential adverse impact of ill-considered development on the setting of heritage assets within the overall Dunham Estate and requests that specific reference is made to the need to ensure that new development does not adversely impact upon such heritage assets.

Please continue on a separate sheet if required

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What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	X	Page number	32
SA Report		Paragraph number	7.22
SA Appendices		Policy number	HO2
SA Options Report		Table/Figure reference	
SA Flood Risk Sequential Test		Other (including omissions and suggestions for proposed amendments)	
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?				
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<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>Clarification is sought regarding the previous stated intention (in the Adopted Core Strategy) to prepare a SPD which “will set out specific criteria in relation to new residential development, conversion of buildings and house extensions in the Green Belt.” – para 24.8. There is no reference to this in the context of Policy HO2.</p> <p>This is an important consideration for National Trust in the context of its earlier submissions on the Land Allocations DPD, the existing important vernacular buildings on its estate that are redundant and the likelihood of others coming forward in due course as the overall Dunham Estate Plan is finalised and implemented. In this context there are likely to be several opportunities to appropriately conserve existing buildings through finding suitable new uses for them – for example, as at Village Farm in Dunham Woodhouses.</p> <p>Suitable clarification should be provided in the Policy.</p>				
Name: Alan Hubbard (National Trust)				

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Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	X	Page number	44
SA Report		Paragraph number	
SA Appendices		Policy number	TR3.4
SA Options Report		Table/Figure reference	
SA Flood Risk Sequential Test		Other (including omissions and suggestions for proposed amendments)	
SA Scoping Report			
Topic Paper (please specify)			
HRA Scoping Report			
SHLAA (2013)			
Conservation Area Appraisal (please specify)			
Other document, (please specify)			

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<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>It is noted that the extent of the commitment in the Core Strategy is “<i>New road infrastructure to serve the development area to relieve congestion on the existing A6144</i>”. Para 8.73 of the Core Strategy states that “<i>The alignment of the link road to serve the development area and ease congestion along the A6144 will be determined by the Carrington Area Action Plan</i>”. As that plan has not come forward to date it is important to consider the potential routing as part of the Land Allocations DPD – in this regard attention is drawn to the Trust’s response to Policy CAR1, in particular:</p> <ul style="list-style-type: none"> • There is concern that the transport corridor proposal to serve this area crosses a significant area of Green Belt land and it is inappropriate development. An alternative alignment further to the north could equally satisfactorily serve the development area with a much lesser impact upon the Green Belt and would clearly be preferable having regard to Green Belt purposes as set out in the NPPF. • The extent of CAR1 also appears to include a number of important nature conservation assets – whilst there is a general reference in the last bullet point at 6.8 to safeguarding intrinsic features of nature conservation interest or value it is not considered that this is sufficient. Rather there should be a clear commitment to the safeguarding and enhancement of the designated sites – again relocation of the transport corridor would enable the integrity of all the sites shown on the Draft Policies Map to be maintained. The identification of a large part of this area, and adjacent land, for a major green infrastructure opportunity is welcomed but would be compromised by the transport corridor. 				
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Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	X	Page number	53
SA Report		Paragraph number	13.21
SA Appendices		Policy number	EM2.1
SA Options Report		Table/Figure reference	
SA Flood Risk Sequential Test		Other (including omissions and suggestions for proposed amendments)	
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
	X			

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.

National Trust is pleased to re-confirm that the land at Dairyhouse Lane is held by it as 'investment land' and that it is appropriate in principle for employment use. The caveats regarding its location close to the Green Belt and opposite residential properties are noted and agreed.

Overall Policy EM2.1 and the related text at paragraph 13.21 are welcomed and supported.

Name: Alan Hubbard (National Trust)

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Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	X	Page number	75 (and Appendix B, page 100)
SA Report		Paragraph number	
SA Appendices		Policy number	HE2
SA Options Report		Table/Figure reference	
SA Flood Risk Sequential Test		Other (including omissions and suggestions for proposed amendments)	
SA Scoping Report			
Topic Paper (please specify)			
HRA Scoping Report			
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<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>It is noted that this Policy is directly related to Policy R1 in the adopted Core Strategy; however, the wording is less informative than – and arguably inconsistent with that – in the Core Strategy. Specifically Policy R1.2 makes clear reference to the importance of the settings of heritage assets but these are not identified in the wording of proposed Policy HE2.</p> <p>It is requested that Policy HE2 is amended to read: “Trafford’s Historic Parks and Gardens are identified in Appendix B and allocated on the Policies Map, the Council will preserve, protect and enhance these heritage assets, including their wider settings. “The Council will continue to preserve, protect and enhance all types of heritage assets listed in Policy R1 of the Trafford Core Strategy, including their wider settings.”</p> <p><u>Appendix B</u> This reads as if Trafford’s only heritage assets are its Registered Historic Parks and Gardens...a more relevant title for this Appendix, and its tie back to Policy H2.2 would be “HE2 Registered Historic Parks and Gardens”. (NB there are other parks and gardens in Trafford that whilst not formally Registered are of historic interest and arguably therefore are locally important as ‘non-designated heritage assets’.)</p>				
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Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	X	Page number	76 (and Appendix B, page 100)
SA Report		Paragraph number	
SA Appendices		Policy number	HE3
SA Options Report		Table/Figure reference	
SA Flood Risk Sequential Test		Other (including omissions and suggestions for proposed amendments)	
SA Scoping Report			
Topic Paper (please specify)			
HRA Scoping Report			
SHLAA (2013)			
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<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>It is considered that the title of this Policy lacks clarity and that the relevant text could be interpreted as meaning that Watch Hill is the Council's only archaeological resource, which of course is far from the truth albeit that it is the only Scheduled Monument.</p> <p>As the Policy only relates to the location of the Scheduled Monument its title should reflect this, e.g.:</p> <p>"HE3 – Watch Hill Scheduled Monument"</p> <p>Similarly in respect of Appendix B, as written this suggests that Watch Hill is the only archaeological asset in Trafford – the reference here to Watch Hill should also be next to text reading "HE3 – Watch Hill Scheduled Monument" (or "HE3 – Scheduled Monument").</p>				
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Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	X	Page number	93
SA Report		Paragraph number	
SA Appendices		Policy number	GB2.1
SA Options Report		Table/Figure reference	
SA Flood Risk Sequential Test		Other (including omissions and suggestions for proposed amendments)	
SA Scoping Report			
Topic Paper (please specify)			
HRA Scoping Report			
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<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>The proposed position in respect of land south of Partington is noted. As previously indicated National Trust holds investment land in this area (around Broad Oak Farm) that can be made available for residential development.</p> <p>The wording proposed in the Land Allocations DPD is not consistent with the Core Strategy – specifically it refers to land not being released until there has been a strategic review of the Green Belt. In contrast the adopted Core Strategy is clear that such land will be protected from development for now <u>to enable it to make a contribution to meeting future needs</u>. It then goes on to particularly state that <i>“This will reduce the need for the Council to consider alterations to the Green Belt boundary to accommodate the future allocation of land for development in the Borough”</i>. The intention set out in the Land Allocations document, and specifically the reference to there being no permanent development of such sites until after a strategic review of Green Belt land, is inconsistent with the Core Strategy and objected to by National Trust.</p> <p>The case for a strategic review of the Green Belt in Trafford, or indeed more widely, has not been made and is not necessary whilst there is reserve land available, such as that to the south of Partington, to meet future, longer term, development needs.</p>					
Name: Alan Hubbard (National Trust)					

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