

2014



Redrow Homes NW

3rd March 2014



TRAFFORD LOCAL PLAN: LAND ALLOCATIONS CONSULTATION DRAFT

The written representation of Redrow Homes NW

General Objection

We generally support the underlying principles of the Land Allocations DPD which are informed by the Core Strategy. We do however, object to some of the background mechanisms behind the policies, these will be discussed in further detail in the additional comment sheets.

We have no objection to the strategic allocations that have been identified in chapters 2-5 of the Land Allocations DPD, or to the priority that is given to development in these locations. However, we do object to how the policy remains silent on any fall-back position should these sites not be deliverable. We would like the policies of the Land Allocations DPD to provide an ability for sites that are scheduled to come forward later in the plan period to come forward earlier if the strategic allocations fail to meet their planned delivery rates in order to maintain the level of provision planned throughout the Core Strategy.

These representations are made in respect of two sites – the land at the former Bayer UK site in Altrincham (currently draft allocated for 85 units in years 1-5) and site GB2.1 Land in Warburton (currently draft allocated as safeguarded land).

Chapter 7 Housing

Policy HO1, in accordance with Appendix B, states the phasing plan of all the sites allocated for residential development to help deliver planning policies L1 and L2 of the Trafford Core Strategy. We feel that the assumption in para 7.9 (50 units per annum will be delivered through office conversion) should not be counted as part of the borough's land supply as they are, in effect, windfall sites which must only be counted if the LPA can provide "compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply" (para 48 of the NPPF). This conversion target equates to 6% of the borough's plan period housing need and the council has not shown the "compelling evidence" in either the Land Allocations Consultation Draft or the Core Strategy DPD that this rate has previously been achieved, furthermore, neither document set out how this rate will be achieved in the future. We have strong reason to believe that this should not be counted towards the council's identified land supply.

We raise objection to the statement in policy HO2 that indicates a target of 80% residential development will be achieved on brownfield sites, we feel this could stunt housing provision. There are significant abnormal costs associated with brownfield sites that can make development unviable after Section 106 and CIL contributions are added to the cost of development. We would like to see mechanisms in place that allow for further greenfield development above the 20% target subject to the brownfield stock being unviable and failing to deliver the required amount of development in line with the phasing plans set out in Appendix C. This measure would prevent the rate of housing provision from slowing down as the greenfield sites could 'top up' any deficit created by reduced uptake of brownfield sites, allowing for the planned rate of development to take place in accordance with the timescales of the Allocations Plan and the Core Strategy.

Chapter 9 Regeneration areas

We are in support of Policy RE1.2, delivering investment in housing and employment is key to helping Partington grow into a more sustainable and safer community. We are pleased that the Partington Priority Regeneration Area includes the 'Land at Warburton Site' because this can help to deliver the executive family homes that can help rebalance the social mix of the town. We wish for the current allocation to remain, subject to a few changes (discussed in subsequent comment sheets that discuss Chapter 26 Green Belt). The site must continue to be part of the Priority Regeneration Area in the adopted Land Allocations DPD in order to compliment the brownfield regeneration in Partington by providing the potential for a different residential mix.

Chapter 26 Green Belt

We have particular objection to policy GB2 of the Land Allocations DPD because we would like to see the opportunity for safeguarded land to come forward during the Core Strategy Period if other allocations fail to deliver their forecast capacity during the Core Strategy or should the council fail to identify a deliverable five year housing land supply. This would only come about when the council has conducted a review of the housing permissions granted in the borough against the housing target as part of the Authority Monitoring Report process. This mechanism would help to keep an even rate of housing provision throughout the plan period.

GB2.1 Land at Warburton (immediately to the South of Partington)

We are delighted that the council have recognised the suitability of this site for housing development by safeguarding it for future development and identifying it as part of the Partington Priority Regeneration Area. Although we feel that these allocations somewhat contradict one another – its inclusion within the Partington PRA would suggest it can suitably deliver the regeneration objectives of this plan period, but the safeguarded land means that these benefits cannot be achieved until after the plan has expired.

This land has been safeguarded since the adoption of the Trafford UDP which was 18 years ago in 1996. Since then, the population and demography of Trafford has changed and we feel it would be appropriate to either allocate it for residential development to help stimulate the resurgence of Partington, or to caveat the draft allocation to permit a suitable planning application should there be an absence of a five year housing land supply.

Appendix C – Former Bayer UK Site, Altrincham

This site is draft allocated for the development of up 85 homes to come forward within the next five years, this is simply too dense a development to be viable on this site as the proposed balance between houses and apartments is weighted too heavily in favour of apartments. Currently, the demand for apartments is low and we feel that a scheme in line with the current allocation would result in a large number of empty flats. An allocation for c.35 homes (25 houses and 10 flats) would

maximise the use of the land and make development viable because a more appropriate balance of family houses and apartments would be provided on site.

We would welcome the opportunity to contribute on other Local Plan documents in future. If you require any further comment from Redrow Homes NW on this, or any other Local Plan consultation document, please do not hesitate to contact me.

Paul Murray
Assistant Planner
Redrow Homes NW

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

Office Use Only	
Date	
Ref	
Ack	

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

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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:	See e-mail attachment
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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.

Trafford Local Plan: Land Allocations Consultation Draft

Comment Form – February 2014



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Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on? See e-mail attachment			
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	Y	Page number	
SA Report		Paragraph number	
SA Appendices		Policy number	
SA Options Report		Site reference	
SA Flood Risk Sequential Test		Table/Figure reference	
SA Scoping Report		Other (including omissions and suggestions for proposed amendments)	
Topic Paper (please specify)			
HRA Scoping report			
SHLAA (2013)			
Conservation Area Appraisal (please specify)			
Other document, (please specify)			

Do you support, oppose or have general comments about this specific part of the document?				
Support		Object		General Comment
<p>Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.</p>				

Please continue on a separate sheet if required

Thank you for taking the time to fill in our Land Allocations Plan comments form; your comments are very much appreciated.