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6 March 2014

Our ref: HSP/DPA/MC0002

Your ref:

Dear Sir or Madam,

Trafford Local Plan: Land Allocations Development Plan Document (Consultation Draft)

CSM (United Kingdom) Limited, Elsinore Road / Skerton Road, Old Trafford, M16 0WF

The following representations have been submitted on behalf of our client, CSM (United Kingdom) Limited ("CSM"), in response to the Trafford Local Plan Land Allocations Development Plan Document Consultation Draft ("LADPD") published in January 2014, and its associated Sustainability Appraisal and evidence base documents. These representations are submitted subsequent to earlier representations made to the Council in September 2012 and which have been incorporated into the LADPD.

These current representations aim to provide the Council with an up-to-date position in respect of CSM's site and its future potential for residential development as well as setting out an analysis of the site's position under Policy HO1 of the LADPD as currently drafted.

The following sections are set out below:

- CSM Site Update
- Assessment of the Draft Land Allocation
- Deliverability
- Summary

CSM Site Update

The representations submitted on behalf of CSM in September 2012 stated that the current economic climate had influenced the company to review its UK-based operations and to consider consolidation measures where appropriate. As the economy continues to show signs of improvement, CSM remains in a position dictated by the wider industry and therefore intends to pursue the consolidation of some sites in the future; however, the timing associated with this review process and indeed any action remains undefined.

By way of background evidence to the current market issues influencing CSM's review process, the following points highlight some important current industry trends:

- The Skerton Road site serves the UK bread industry, which has been in decline for several years (the document attached at **Appendix A** was prepared by recognised market information organisations and demonstrates this decline)
- The market is very competitive and margins are constantly under pressure.
- The Skerton Road site is heavily dependent on bread ingredients and is therefore becoming less economically viable as time passes.

To be clear, no plans are currently in place to close the site or relocate operations; however, it is feasible to assume that given current levels of profitability, the rate of margin erosion and the overall declining market, prospects for relocating operations may become a much more realistic proposition in the near future.

The site is located within the established Old Trafford Regeneration Area as identified by the saved Policy H10 of the Trafford Unitary Development Plan (2006) and carried through by adopted Policy L3.3 of the Trafford Core Strategy (2012). The primary objective within this defined area is to boost the supply of housing by 1,000 dwellings as well as incorporating new shops, services and employment opportunities where appropriate.

Since the submission of our initial representations in September 2012, the site is considered to remain suitable for residential development with no change in characteristics or circumstances that would indicate otherwise. The site is 2.5 hectares in area and has potential to deliver in the region of 285 units including a mix of houses and apartments, as was submitted to the Council in September 2012 by way of an indicative scheme layout.

It is not intended to reiterate all of the site's benefits within these current representations but the following points summarise the most significant points towards allocating the site for residential development:

- Brownfield land within the settlement boundaries;
- Accessible via a variety of public transport modes as well as the highway network;
- Close to services and amenities;
- Suitable for the provision of a mix of housing types and sizes to contribute to regeneration objectives; and
- Suitable for the provision of some retail or other small scale commercial uses to the benefit of the local community.

In addition to the site specific benefits identified above, the recent acquisition of Grove House has highlighted a growing interest in the surrounding area for residential development. Planning permission was granted by Trafford Council in May 2013 to convert Grove House from offices to 63 residential apartments. The introduction of high density residential development into the area clearly demonstrates the Council's commitment to residential-led regeneration in Old Trafford, which does not actively encourage the retention or continued use of existing employment uses on a long term basis.

CSM has been approached by the land owner/developer of Grove House to discuss the current status of the Skerton Road site following publication of the LADPD including the proposed residential allocation. It is clear that the redevelopment of the Skerton Road site would bring significant wider benefits for the area, not least the saleability of Grove House apartments and improved amenity value within the locality, which would attract new residents into the area.

The following section considers the Council's draft land allocation for the Skerton Road site as identified within the Consultation Draft document.

Assessment of the Draft Land Allocation

The Consultation Draft Land Allocation DPD includes the proposed allocation of the Skerton Road site for residential development, to be delivered during years 11-15 of the Plan period. The LADPD also sets a target development density of 50 dwellings per hectare (dph), yielding a total of 125 units across the site, with the inclusion of 5% affordable housing provision and public open space.

CSM is satisfied with the proposed allocation of land for residential development and reiterates its support for the reallocation of land from Use Class B employment land (as currently identified on the saved Trafford UDP Proposals Map) to Use Class C3 residential land.

Furthermore, the proposed density of 50 dph is considered to be broadly acceptable; however, it is considered necessary to consider a flexible approach to site density in response to housing market demand. The indicative development scheme submitted with our original representations on behalf of CSM (September 2012) indicated that the site could comfortably deliver in the region of 285 dwellings including a mix of houses and apartments, including the provision of sufficient public open space.

Depending on when the site becomes available for residential development, a shift in the housing market may have been realised. It is considered that an appropriately worded mechanism is incorporated into Policy HO1 to allow higher densities of development, stating something along the lines of:

"Where market demand clearly demonstrates a need for a higher density of residential development than identified within Appendix C, the Council will assess the suitability of individual allocated development sites to meet this demand."

CSM is satisfied that the proposed requirement for affordable housing at 5% of total dwellings to be provided is appropriate for this location and considering the current industrial use of the site. Should unexpected costs arise during clearance of the site (e.g. remediation works) or indeed if meeting the affordable housing provision (and other planning obligations) is prohibited by market trends at the time of delivery, an assessment of financial viability may be prepared under adopted Core Strategy Policy L8.10 and in accordance with the National Planning Policy Framework (paragraph 173).

Briefly, in respect of the LADPD Sustainability Appraisal, it is considered noteworthy that the Council's own assessment of the site for residential development is broadly very positive. A couple of minor comments are identified in respect of noise pollution from the nearby Tramlink to the north and also in respect of potential pressure being placed on school places following development. In both instances, it is considered that such issues can be overcome or adequately addressed during the preparation of a development proposal and through negotiations with the Council following the submission of a planning application.

Overall, CSM is satisfied that the Council has prepared a realistic land allocation in relation to the site's location and current land use and, importantly, its expectations for delivery. Furthermore, the Council's Sustainability Appraisal is broadly supportive of the use of the Skerton Road site for residential development highlighting a number of sustainability criteria being positively satisfied.

Deliverability

As highlighted above, and as submitted within our initial representations of September 2012, the timing for CSM vacating the site is not yet known. However, the UK bread industry-wide evidence identified above indicates that pressure continues to apply to the Skerton Road site even in the wake of generally improving economic conditions.

With this in mind it is considered appropriate to consider the timing for delivery, as the site is currently identified within the draft LADPD as being developable within the final five years of the Plan period to 2027.

The table below provides a summary of the proposed housing allocations identified within Trafford's Inner Area (i.e. those areas identified for regeneration and strategic housing development) during the plan period. It is understood that all of these sites currently lie outside of the planning application process and are therefore subject to detailed proposals coming forward.

Site Name	Years 0-5	Years 6-10	Years 11-15	Total Units
Trafford Quays, Trafford Park	250	250	550	1050
Globe Trading Estate, 88-118 Chorlton Road	107	0	0	107
Former Bakemark UK, Skerton Road	0	0	125	125
Former Trafford Press, Chester Road	116	0	0	116
Land Off Bold Street	170	0	0	170
Land Bounded by Northumberland Road, East Union Street and Blackley Street	31	0	0	31
Land at Chester Road, Cornbrook Road Park and Virgil Street	0	0	305	305
Land at Avondale Road	0	0	35	35
Land at 39 Talbot Road	38	0	0	38
Old Trafford County Cricket Club Strategic Location	60	300	40	400
Land at Warwick Road South, Old Trafford	24	0	0	24
Land at Talbot Road, Stretford	50	100	0	150
Former Trafford College site, Stretford	63	0	0	63
Totals	909	650	1055	2,614

Data sourced from Draft LADPD Appendix C – Housing Delivery Site Information

The table identifies that there is a slight weighting towards a greater provision of housing being identified within the first and final five year periods, with approximately 300 fewer dwellings being identified for development within years 6-10 (excluding windfall sites). The identified Inner Areas are considered to be in great need of new and regenerated housing stock and therefore it is considered that early housing delivery within the plan period should be sought where possible.

Timing for the vacation and disposal of the Skerton Road site is not currently known as has been identified above and in line with representations submitted in September 2012. However, bearing in mind the continued economic pressures experienced within the UK bread industry, it is considered

to be appropriate and realistic to reassign the timing for the release of Skerton Road forward from years 11-15 into years 6-10.

It is requested that the identified supply of 125 units is reassigned for delivery within years 6-10 of the plan period (2017-2021).

Not only would an earlier allocation provide CSM with a reassurance that the principle of housing is acceptable within a realistic time frame, but it would also help the Council to deliver a more-consistent supply of housing throughout the plan period, without risking any net reduction in supply during the latter part of the plan period. As a worst-case scenario, if the site was not made available for housing development within years 6-10, a formal review of the Council's housing land supply, either by way of Annual Monitoring Reports or a full reassessment of housing land allocations, could return the allocation to its current status within the final five years of the plan period without significantly harming the Council's monitoring process or delivery objectives.

If the Council considered that the proposed reassignment of all 125 units into years 6-10 was not appropriate in the context of its wider objectives, it is requested that the potential supply is split between the latter five year periods as follows:

- Years 6-10 = 75 units
- Years 11-15 = 50 units

This phased approach would still provide CSM or a developer with the flexibility to begin delivering housing earlier than currently proposed by the LADPD.

Summary

In order to summarise, the following key points are made:

- It remains likely that CSM will vacate the Skerton Road site at some point during the Local Plan period to 2027, in response to continuing economic pressures within the UK bread industry.
- Whilst vacation of the site is likely, specific timing is not yet known and no immediate plans exist to vacate the site or to relocate any of the current no-site operations.
- When compared against the representations submitted to Trafford Council in September 2012, it is considered that there is an increased likelihood in the site being vacated and that this may happen at an earlier point within the plan period than year 10 (2021 / 2022).
- It is suggested that Policy HO1 is amended to allow some flexibility for housing allocations to provide higher density developments in response to market conditions at the time the land comes forward for delivery.
- The current identified supply of deliverable housing land (years 1-5 of the plan period) and the supply of developable land (years 6-16) within Trafford's 'Inner Area' (as set out at Appendix C of the LADPD) is considered to be slightly unbalanced with less housing identified for release within years 6-10.

- In light of the current evidence, it is considered appropriate to reassign the proposed supply of 125 units at Skerton Road to be delivered within years 6-10 of the plan period.
- Should the Council not consider this approach to be consistent with its wider policy objectives, it is proposed that the supply be split between the latter five year periods, with a greater emphasis on years 6-10 (i.e. 75 units delivered in years 6-10 and 50 units delivered in years 11-15).

I trust that the above representations are clear. Should you require any further information or clarification on any of the points raised, please do not hesitate to contact either Harry Spawton or Dominic Page of this office.

I look forward to receiving an update on subsequent rounds of consultation following compilations of response to the current draft Land Allocations DPD.

Yours faithfully

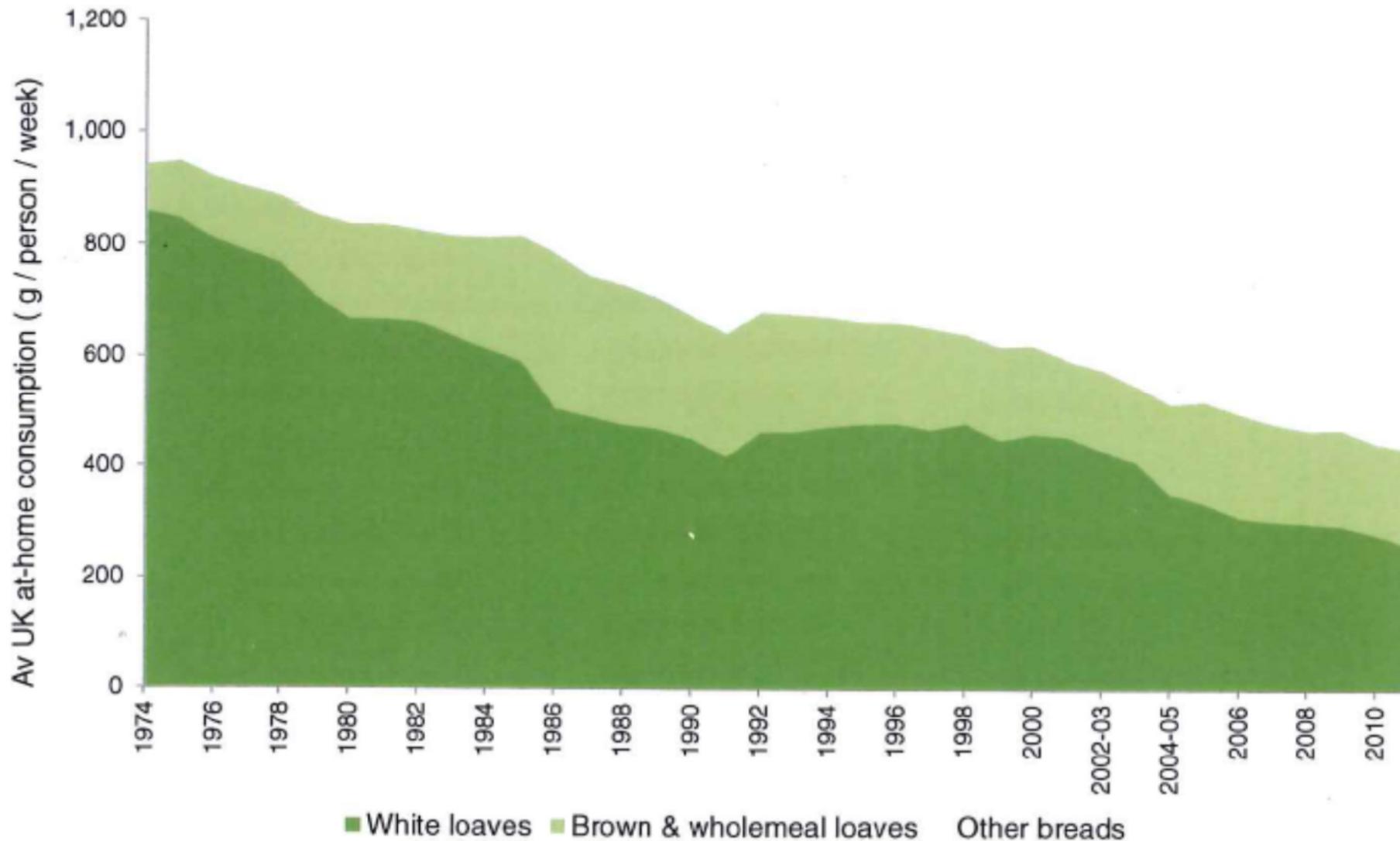
Gerald Eve LLP

cc Tony Mann – CSM (United Kingdom) Limited

APPENDIX A

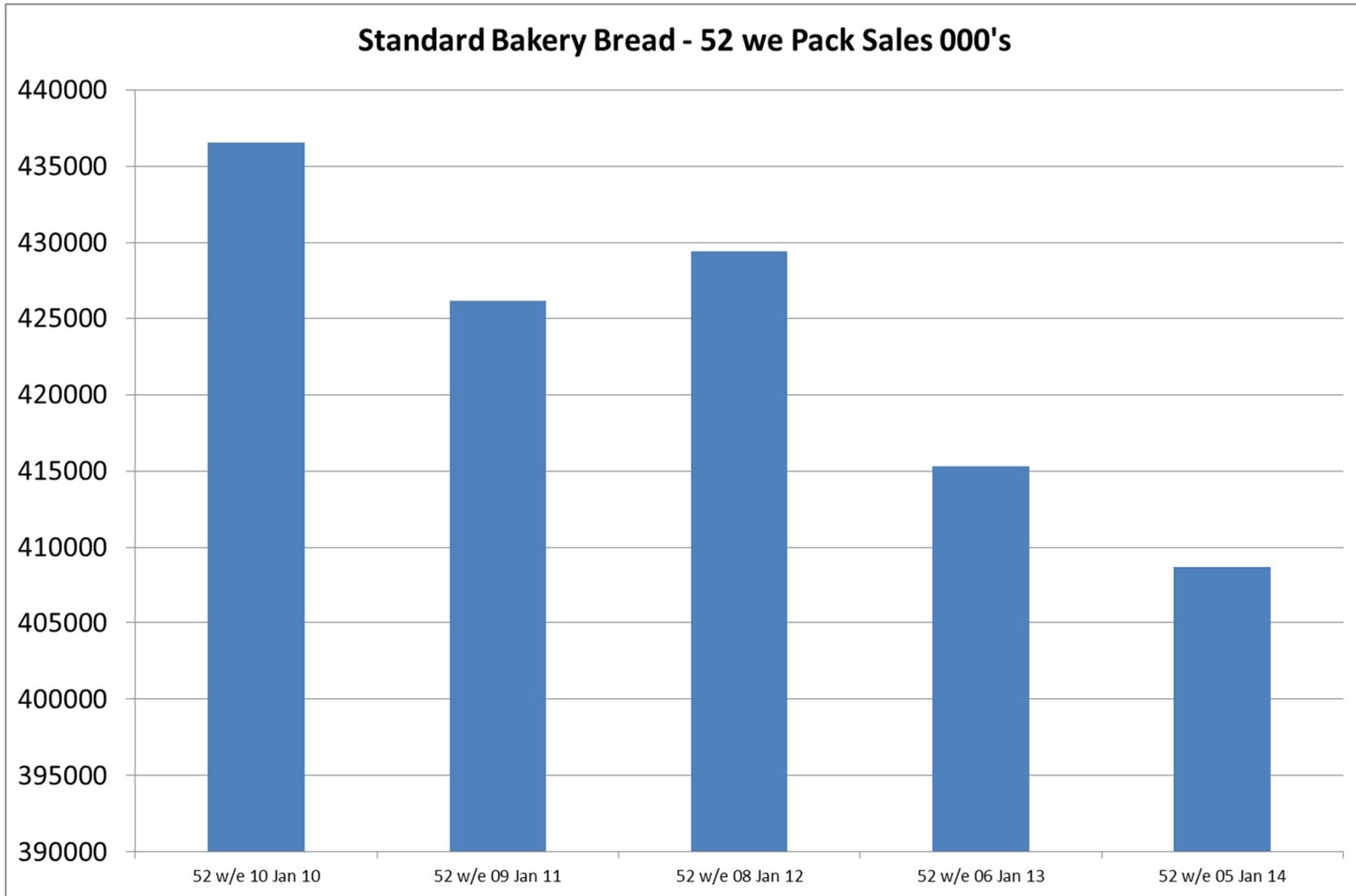
UK Bread Industry Data

Consumption of bread



Source: *Family Food 2011*, DEFRA, December 2012 (latest edition)



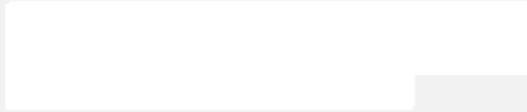


A new form post has been received.



Posted on: 06/03/2014 12:21:20

Posted from:



Form Post

Your Name:	-
Organisation if applicable:	CSM (United Kingdom) Limited
Address:	Skerton Road, , Old Trafford, , M16 0WF,
Phone:	0161 830 7097
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Document:	Trafford Local Plan: Land Allocations - Consultation Draft,SA Report,SA Appendices
Indicate Conservation Area Topic PaperOther Document:	-
Page Number:	-
Paragraph number:	-
Policy number:	HO1

Site reference:	Former Bakemark UK Skerton Road
TableFigure reference:	-
Other including omissions and suggestions for proposed amendments:	Please refer to attached letter dated 6 March 2014
Do you support oppose or have general comments about this specific part of the document:	Support
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:	Please refer to attached letter dated 6 March 2014
What gender are you:	-
What is your age:	-
what do you do in Trafford tick those that apply:	-
Do you consider yourself to have a disability or impairment as defined in the Disability and Discrimination Act 1995:	-
White:	
Mixed:	
Asian or Asian British:	
Black or Black British:	
Chinese:	
Sexual OrientationHow would you describe your sexual orientation:	-
Religion BeliefWhat is your religious belief:	-