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Strategic Planning
Trafford Town Hall
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Ref: 30113

Dear Sir/Madam

Trafford Local Plan: Land Allocations – Consultation Draft

Site Representations on behalf of Air Products plc.

This representation is submitted on behalf of Air Products plc in response to the Trafford Local Plan: Land Allocations – Consultation Draft, which was released for consultation in February 2014. Specifically, our clients interests relate to their facility at Manchester Road, Carrington (Location Plan attached).

The Air Products Carrington facility is of strategic importance to the business and is a key provider of raw materials to other businesses in the UK. Air Products prides itself on its global safety record and this is reflected in the safe operation of the Carrington site since 1968. Notwithstanding that, the health and safety requirements of the air separation plant and the large scale storage of liquid oxygen and other gases on site are reflected in the consultation zones established by the HSE.

With respect to the HSE consultation zones for the Air Products facility, it is requested that any new allocations or policies contained within the Plan relating specifically to the Carrington Strategic Location (CSL) should not under any circumstance conflict with the HSE planning advice for developments near hazardous installations (PADHI).

Although PADHI guidance would not 'advise against' uses occupied by the general public, Air Products believe that only uses falling within use classes B2 and B8 would be compatible in the Manchester Road location between Partington and the Carrington Business Park. On that basis, Air Products would oppose new site allocations in the Manchester Road area for development types described under PADHI guidance: Development Types, "Table 2 Development Type: Developments for use by the general public." These uses are inherently incompatible with the existing industrial land uses. Accordingly, it is requested that the sections of the Allocations Plan relevant to the Carrington Strategic Location are prepared with this in mind.

Context

The Carrington site is a substantial production facility and amongst other things, also carries out Research and Development, engineering and European spare parts distribution functions. It currently employs (directly or indirectly) around 100 staff and is operational 24 hours a day throughout the year. The facility is a long standing employer in the Carrington area.

Air Products are considering a significant plant and equipment re-investment in the site to enhance production, energy, and environmental efficiency of the plant. In progressing this potential for investment, Air Products need to be confident that future land use policies contained within the Allocations Plan will not be in conflict with and constrain the future operations of the facility.

The Carrington Strategic Location

Air Products appreciate that Carrington is a major brownfield redevelopment opportunity of strategic importance for Trafford and indeed the City Region. Transportation, housing, employment, environmental sensitivity and associated community infrastructure are focal points of the site's regeneration. As a stakeholder, employer and owner of unique infrastructure, Air Products are keen to contribute to the evolution of the strategy for Carrington throughout the Allocations Plan preparation process and the preparation of any subsequent Supplementary Planning Document relating to the CSL.

The economic development/industrial potential of Carrington as a strategic location has unique infrastructure characteristics that often do not co-exist to the extent they do in this location, namely electrical, energy, natural gas, Combined Heat and Power sources, pipeline feedstocks, industrial gases, steam, as well as the ship canal and port, motorway links and a rail corridor (albeit historic).

The emerging strategy for the employment land at Carrington can be strengthened by establishing a clear framework within the Plan for long term economic development that will facilitate the delivery of the wider opportunities in a cohesive manner.

In order to achieve this, the Allocations Plan should fully account for the HSE consultation zones that exist at Carrington in order to help safeguard and sustain existing and potentially future industrial operations as well as other compatible employment uses.

Do Air Products consider the Plan to be 'sound'?

In general terms, Air Products believe that the Trafford Local Plan has been prepared in accordance with the requirements set out in paragraph 182 of the National Planning Policy Framework and on that basis consider it to be 'sound'. However, certain changes will be necessary to the wording of individual policies contained within the Plan in order that the existing employment uses in Carrington, such as Air Products, continue to be safeguarded and are allowed to thrive and grow in the future to provide sustainable employment.



This representation therefore centres on the wording and context of individual policies within the Plan rather than questioning the soundness of the plan preparation process in general.

Policy CAR1 - Carrington Strategic Location

When considering the context outlined above, it is important to ensure that any future development at Carrington will not restrict the operation of the existing Air Products facility as well as other business and industrial uses currently operating at Carrington. Air Products remain supportive of the strategy to deliver mixed-use sustainable development, but only when it is not detrimental to existing uses.

On that basis, Air Products object to the wording of sections of Policy CAR1 as it does little to protect the existing business and industrial uses operating there. Specifically, it is requested that the following changes are made.

Paragraph's 6.2-6.4 of the policy set the context for development in Carrington yet there is no mention of the need for new non-employment development to be accommodated without being detrimental to the existing employment uses already in operation and ensuring that their future operational needs are not compromised. It is requested that such a reference is inserted from the outset of the policy.

Paragraph 6.4 requires supplementary planning guidance to be prepared that will provide guidance on which parts of the site are appropriate for specific uses prior to any planning application being submitted or development taking place. Air Products are fully supportive of this approach; however it is suggested that the wording needs to be much stronger in order that it can be used as a sound basis for decision taking. Our suggestion for alternative wording is "No residential and developments for use by the general public shall take place within the Carrington Strategic Location until a Supplementary Planning Document is adopted by Trafford Council, supported by a robust and deliverable masterplan based upon all known constraints. This SPD will provide guidance on a number of matters, including which parts of the site are appropriate for specific uses."

Paragraph 6.5 'Residential Development' sets out guidance in relation to new residential development at Carrington. Air Products object to the wording of this section of the policy and request that the following changes are made:

The first bullet point refers to a minimum of 1,560 residential units to be delivered, with an indicative target of 80% to be accommodated on brownfield land. The brownfield land at Carrington is almost entirely centred around the existing business and industrial uses and so concentrating residential development in such close proximity could compromise existing businesses, including Air Products, limiting their ability to grow or expand as a result. This section of the policy should make it clear that a robust masterplanning exercise of the entire Carrington Strategic Location (CSL) should first be conducted with the involvement of all stakeholders to demonstrate that residential development can be justifiably be located within the CSL without impact upon existing businesses, taking into account all known constraints. It would be counterproductive and unrealistic to set a target of 80% from the outset if this is not realistically achievable.

This would help to ensure that the policy accords with paragraph 21 of the NPPF, which states that "*Local planning authorities should support existing business sectors, taking account of whether they are expanding*



or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.”

Air Products are not opposed to the allocation of residential development in the CSL, but any future residential development needs to be in areas that will not impact upon the future operations of existing businesses and have been robustly tested through a masterplanning exercise taking into account all known constraints.

Paragraph 6.6 ‘Employment Development’ does little to protect the existing employment uses on the site and instead looks to provide restrictions on new employment uses in favour of future residential development. Air Products strongly object to the wording of this section of the policy, in that the policy should seek to protect the future operation of existing employment uses within the CSL and they should remain unaffected following the introduction of new development in the area.

It is important to remember that the CSL is an existing employment area that has historically been an important area of employment for the borough providing a large number of jobs for local people for many years. The Air Products facility with its long standing employment use in the CSL should continue to have its current and future needs protected, as set out in paragraph 21 of NPPF.

As previously stated, there is no acknowledgement of the potential impact that residential development could have on existing employment uses and developments for use by the general public and the wording of this section of the policy needs to acknowledge this fact. Additional comments should be included to the effect that ‘new development should not be located where it would result in existing employment uses being unable to continue operating without restriction or reasonably expand their operations in the future.’ As mentioned earlier, a robust masterplanning exercise of the entire CSL from the outset should help to alleviate the concerns of existing business operators such as Air Products.

Not taking these necessary steps will be contrary to paragraph 18 of the NPPF, which states “*The Government is committed to securing economic growth in order to create jobs and prosperity*”. The policy as currently worded would create uncertainty for existing employers such as Air Products who need to make strategic decisions about future investment in their plants and this does not create a stable platform from which economic growth can be achieved.

Paragraph 20 of the NPPF states “*To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.*” Again, as worded the policy cannot be seen as planning positively for the existing employment operators in the CSL and should be amended accordingly.

Other policies contained in the Plan have been worded in a way that would protect existing employment areas and so the wording of Policy CAR1 is inconsistent in that respect. Paragraph 6.18, which is the justification text supporting Policy EM2 ‘Broadheath Employment Area’ states “*This Policy seeks to protect the industrial area from incursion from other, often higher value, land uses and to safeguard the integrity of the industrial area and further opportunities for new investment.*” The wording of this policy is consistent with



the aims of paragraphs 18 and 20 of the NPPF and so the wording of Policy CAR1 should be amended to take this into account.

Conclusion

Air Products remain keen to maintain a positive working relationship with Trafford Council throughout the plan preparation process but understandably have some concerns with elements of the Plan as currently worded, in particular Policy CAR1.

I trust these comments are useful and if you have any questions please do not hesitate to contact me. In the meantime I look forward to receiving your acknowledgement of receipt of this representation.

Yours faithfully

Justin Cove

Associate

