

Gregory Gray Associates

CHARTERED TOWN PLANNING CONSULTANTS

Victoria House, 18-22 Albert Street, Fleet, Hampshire, GU513RJ

Tel: 01252 624004 Fax: 01252 626431

E-Mail: info@ggassociates.co.uk

Yvonne Parker,
Strategic Planning and Development,
Trafford Metropolitan Borough Council,
1st Floor Waterside House
Sale Waterside,
Sale
M33 7ZF

1st September 2011

Dear Yvonne,

Core Strategy Consultation considering the National Planning Policy Framework (NPPF)

We write on behalf of our client, The Garden Centre Group, in response to the draft National Planning Policy Framework (NPPF) that was published on 25 July 2011 and the Planning Inspector's note 7, dated 9 August 2011. This note summarises how the substantive policy changes within the NPPF affect the soundness of the Trafford Core Strategy.

This letter follows our previous representations made on behalf of The Garden Centre Group to Trafford Metropolitan Council on 3 May 2011 and 25 October 2010 on the Core Strategy Publication Document. Representations were also made on 11 August 2010 for the Strategic Housing Land Availability Assessment (SHLAA):

The representations relate to two Wyevale Garden Centre sites known as Altrincham Wyevale, located off Green Lane (1.6 hectares) and Wyevale World of Pets and Leisure (WOPAL) (3 hectares), located off Wood Lane / Thorley Lane. Both sites are located in the Green Belt between Altrincham and Timperley. Site Location Plans are enclosed with this letter.

The key areas of the draft NPPF we feel need to be addressed within the Core Strategy are the following:

1. Presumption in favour of sustainable development
2. Housing and Viability of Development
3. Green Belt Position

Presumption in favour of sustainable development

Director: G.W.R. Gray MSc. Dip.TP MRTPI ACl.Arb Secretary: C.J. Gray
Associate Director: M.G. Cole BA(Hons.) Dip.TP MRTPI
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A key principle of the NPPF is for planning to pro-actively drive and support development. Paragraph 19 states *'Decision-takers at every level should assume that the default answer to development proposals is "yes", except where this would compromise the key sustainable development principles set out in this Framework'*.

The draft NPPF seeks to achieve sustainable development. It therefore requires local plans to aim to achieve the objective of sustainable development. It states *'To this end, they should be consistent with the objectives, principles and policies set out in this Framework, including the presumption in favour of sustainable development. This means that plans should be prepared on the basis that objectively assessed development needs should be met, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'*

Paragraph 24 goes on to state *'Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework'*. Paragraph 48 seeks Local Plans to be *'positively prepared'*.

The Development Management chapter states in paragraph 53 *'the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent development.'* Paragraph 54 adds to this stating that to enable each local authority to proactively fulfil their planning role and to actively promote sustainable development local authorities need to:

- *approach development management decisions positively - looking for solutions rather than problems so that applications can be approved wherever it is practical to do so*
- *attach significant weight to the benefits of economic and housing growth*
- *influence development proposals to achieve quality outcomes; and*
- *enable the delivery of sustainable development proposals.*

To accord with the Government's policy objectives set out within the draft NPPF, the Trafford Core Strategy needs to take a proactive and flexible stance in assessing development proposals that encourage economic growth and ensure the default answer to development is yes except where proposals would compromise the key sustainable development principles set out within the Framework.

The strong presumption in favour of sustainable development and employment / housing growth laid out in emerging national planning guidance is a key principle of the Trafford Core Strategy. My client therefore continues to support the sustainable development principles laid out in the Trafford Core Strategy and supported in earlier representations.

As well as promoting sustainable development the planning guidance changes laid out in the draft NPPF indicates that the Trafford Core Strategy should now reflect changes in society and future changes in development by implementing strategies that are flexible and which reflect current and future market conditions. As a consequence my client considers that the Core Strategy could place greater emphasis on the opportunities presented by previously developed sites in the Green Belt and outside the Regional Centre and Principal Urban Areas of Trafford in assisting the delivery of sustainable development.

Housing

The draft NPPF seeks to significantly increase the delivery of new housing. As set out in paragraph 107 this means:

- *Increasing the supply of housing*
- *Delivering a wide choice of high quality homes that people want and need*
- *Widening opportunities for home ownership; and*
- *Creating sustainable, inclusive and mixed communities, including through the regeneration and renewal of areas of poor housing.*

To boost the supply of housing, paragraph 109 sets out, local planning authorities should:

- *identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. The supply should include an additional allowance of at least 20 per cent to ensure choice and competition in the market for land*
- *identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible 11-15*

The housing figures set out in the Trafford Core Strategy **Policy L1.2**, therefore need to fully reflect the requirement of the draft NPPF for an additional allowance of at least 20% on top of the requirement for Local Authorities to provide a five year rolling housing land supply.

Paragraph 39 seeks to ensure development is not threatened by viability. It states *'To enable a plan to be deliverable, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, local standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and on-site mitigation, provide acceptable returns to a willing land owner and willing developer to enable the development to be deliverable.'*

Policies L2.8-L2.12 of the Core Strategy split the Borough into three broad market locations, with three different categories of affordable housing for development. Policy **L2.12** confirms development in Altrincham and its surrounding area will be required to contribute 40% affordable housing on new development. The NPPF seeks to ensure development is not threatened by viability, therefore this policy should be amended to recognise the need to consider the impact of this policy on viability of development and to ensure acceptable returns to a willing developer.

Green Belt

The plan encourages a review of existing green belt boundaries. Paragraph 140 requires local planning authorities, when defining boundaries to *'not include land which it is unnecessary to keep permanently open'*.

Paragraph 144 states a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. However exceptions to this are: *'limited infilling or the partial or complete redevelopment of previously developed sites (excluding temporary buildings), whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.'*

Policy R4 of the Core Strategy confirms that the Green Belt will be protected from inappropriate development. The policy does not allow for the redevelopment of existing employment sites in the Green Belt. This therefore does not comply with the NPPF's exception for the partial or complete redevelopment of previously developed sites which would not have a greater impact on the openness of the Green Belt. To ensure the Core Strategy is sound, its policies should allow for appropriate development within the Green Belt to be supported in exceptional circumstances, for example where an improvement to the openness of the Green Belt would result.

This is relevant to the Garden Centre Groups two sites at Altrincham Wyevale and World of Pets and Leisure (WOPAL). Large scale previously developed sites in the Green Belt, such as the WOPAL and Altrincham Wyevale Garden Centres, could offer significant regeneration benefits to the local and wider community if redeveloped, by providing new housing and/or employment opportunities to serve the suburban and rural communities.

As well as assisting the wider growth aspirations, the redevelopment of large scale previously developed sites in the Green Belt could reduce the overall impact of development on the openness of the Green Belt, where the site footprint is reduced. Given the amount and form of development currently within the two brownfield sites this approach could also improve the quality and appearance of the surrounding landscape by removing unsightly and obsolete buildings.

The openness of the Green Belt could be enhanced through a more sensitively designed development that has less impact on the landscape. In this way development could assist in ensuring the continued protection of the undeveloped areas of greenfield land in the Green Belt.

With this in mind my client considers draft **Policy R4** should be re-drafted to better reflect the latest government guidance, that being to promote and enable sustainable development wherever possible. This approach could enable consideration of large scale previously developed sites in the Green Belt and their potential to deliver new homes and employment opportunities in a sustainable manner to serve the Trafford community, while still meeting the objectives of Green Belt policy.

Conclusion

A key overriding principle of the draft NPPF is the presumption in favour of sustainable development. The framework is pro-development and clearly requires local plans to follow this positive approach. The Core Strategy must therefore be more flexible and pro-active in its approach to where development should be encouraged.

In particular:

- Core Strategy **Policy L1.2** needs to fully reflect the requirement of the draft NPPF for an additional allowance of at least 20% on top of the requirement for Local Authorities to provide a five year rolling housing land supply.
- Core Strategy **Policy R4** should allow provision for the appropriate development of previously developed land within the Green Belt in exceptional circumstances, for example where there would be an improvement to the openness of the Green Belt, in accordance

with the draft NPPF. This would assist in ensuring the continued protection of the undeveloped areas of greenfield land in the Green Belt.

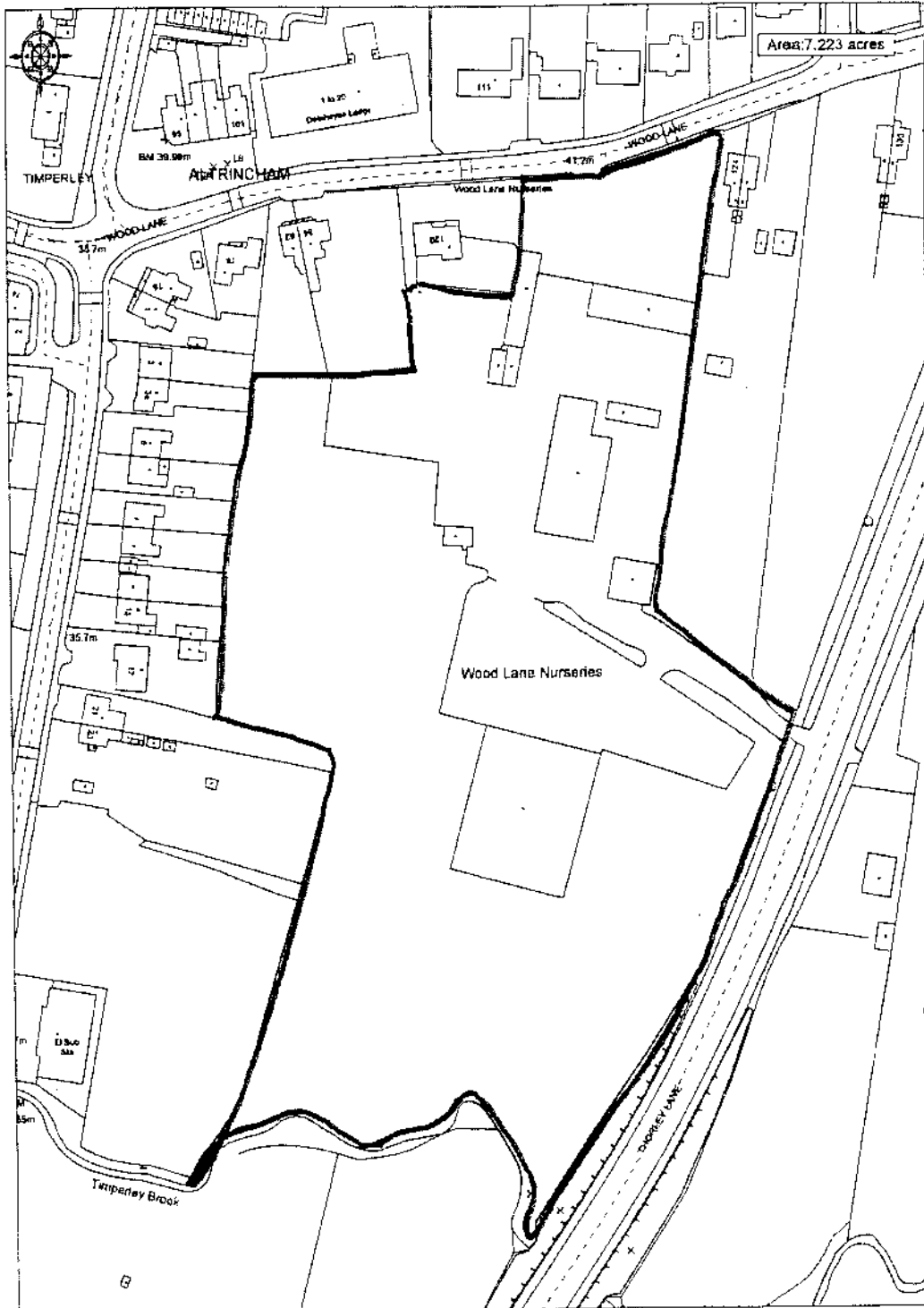
I would be grateful of these comments being taken into consideration in finalising the Trafford Core Strategy. Should you wish to discuss any of these matters in more detail, please do not hesitate to contact me.

Yours faithfully



Michael Cole

**Wyevale Property Review
World of Pets (Altrincham)**

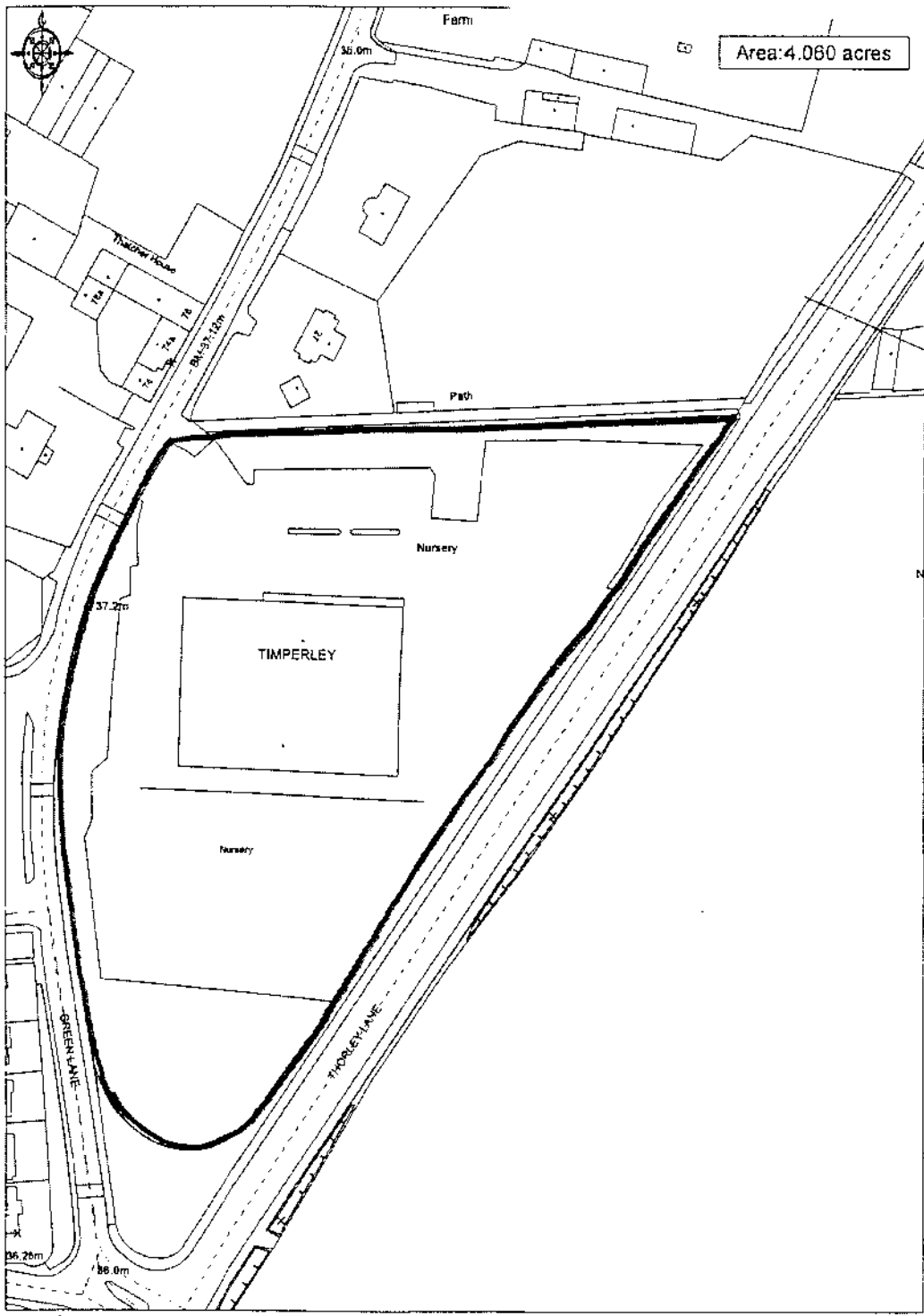



Ordnance Survey

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Wyevale Garden Centre Altrincham



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