

**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](mailto:strategic.planning@trafford.gov.uk)

Name:	Paul Daly	Agent (if applicable):	
Organisation (if applicable):	Sport England	Organisation (if applicable):	
Address:	SportPark, 3 Oakwood Drive, Loughborough, Leicestershire,	Address:	
Postcode:	LE11 3QF	Postcode:	
Tel:	020 7273 1777	Tel:	
Fax:		Fax:	
Email:	planning.northwest@sportengland .org	Email:	

**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:

<b>Total number of comment sheets enclosed:</b>	2
---	---

 **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](http://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](mailto: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 to March 2014**

# Trafford Local Plan: Land Allocations Consultation Draft

## Comment Form – February 2014



**PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**

[strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

### 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?			
Please indicate the document <b>and</b> the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	X	Page number	
SA Report		Paragraph number	
SA Appendices		Policy number	H01
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?					
<b>Support</b>	X	<b>Object</b>	X	<b>General Comment</b>	

**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.**

At this stage, it is not possible to indicate support or objection to policy H01, as there are elements of it that we consider positive and elements that we have concerns about.

Specifically, the key concern is that some of the housing sites appear to include playing fields and / or other sports facilities. For example, site 'H01 Former Orton Brook School Site Oak Road, Partington' would appear to be a disused playing field. It is difficult to identify all the individual sites that fall into this category based on the draft policies map and text, eg a site is identified as 'Former Trafford College site, Stretford' but it is unclear which site this is on the map, or what sports facilities (if any) it contains.

Development of such sites for housing would result in the permanent loss of playing field land and / or other sports facilities. In the case of disused sites, Sport England regards them as potential resources for sport that could be brought back into use unless there has been a lawful development that would prevent this. Lack of current use does not indicate that they are surplus to need.

At this stage, no evidence has been provided that such development would represent any of the specific circumstances set out in paragraph 74 of the National Planning Policy Framework (or in the case of playing fields Sport England's playing field policy) in which development of playing field land / other land used for sport can occur. Sport England would therefore oppose in principle the inclusion of such sites as allocations in the plan.

## Trafford Local Plan: Land Allocations Consultation Draft Comment Form – February 2014



**PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**

[strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

However, it is recognised that policy H01 is explicit that proposals that come forward for housing would have to be considered against all relevant national planning policies and those in the Trafford Local Plan. This presumably includes protection offered by NPPF paragraph 74 and policies which protect sport and recreation sites in the Local Plan. This explicit reference is supported in so far as it would presumably protect any playing field / sites with sports facilities unless replacement provision was provided or they were demonstrated as surplus to current / future need.

It would be useful if a supporting document / appendix could be provided which listed the constraints of proposed allocations. This could prevent speculative / uninformed applications which might otherwise come forward.

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.

# Trafford Local Plan: Land Allocations Consultation Draft Comment Form – February 2014



**PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**

[strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

Were facilities for inspection satisfactory?			
--	--	--	--

Any other comments?

---

---

**7. Any further comments/suggestions**

---

---

---

**Thank you for completing this form, your feedback is very much appreciated.**

Please return this form by 17<sup>th</sup> March 2014 to:

**Strategic Planning  
Trafford Council  
Trafford Town Hall  
Talbot Road  
Stretford  
M32 0TH**

*Please note that all comments will be held by the Council on a 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 to March 2014

Office Use Only	
Date	
Ref	
Ack	

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**  
[strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

## Additional 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 full contact details if you are submitting all your comments at the same time, but please put your name on each additional sheet and indicate the total number of comment sheets being submitted on the contact details form.

What are you commenting on?			
Please indicate the document <b>and</b> the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	X	Page number	
SA Report		Paragraph number	
SA Appendices		Policy number	SP1 – SP5
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)			

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

Do you support, oppose or have general comments about this specific part of the document?					
Support		Object		General Comment	X
<p><b>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.</b></p> <p>Policies SP1 to SP5 are broadly supported in so far as they seek to protect, enhance and provide sports facilities.</p> <p>However, I would like to caution reference to local standards for sport and recreation. There are numerous problems with standards, but these will not be presented here as it is recognised that the adopted core strategy contains local standards. Instead it will simply be flagged up that reference to standards might impact on the policy effectiveness at some future date when the evidence base is updated.</p> <p>In contrast to PPG17, the National Planning Policy Framework does not require local standards to be calculated for sport and recreation. Instead, paragraph 73 requires planning policies to be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. It also states that “The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area”.</p> <p>Sport England published a revised methodology for undertaking Playing Pitch Strategies in October 2013. In contrast to the previous methodology, the revised methodology does not include the calculation of local standards. There is now a more site specific focus, and whilst there is aggregation into geographical areas there are no local standards.</p> <p>Sport England is also currently producing guidance that will be referenced by the national planning practice guidance supporting the National Planning Policy Framework. Specifically it will provide guidance on undertaking assessments on needs and opportunities relating to sport and recreation facilities (ie NPPF paragraph 73). The draft guidance does not propose the calculation of standards. Instead it seeks to provide an understanding of the surpluses and deficiencies across an area and identify specific needs, ie needs that can be addressed by a specific action or actions at the level of an individual site.</p>					
<p><b>Name: Paul Daly (Sport England)</b></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.