

**Our Ref:** 2014-052-001a

**Your Ref:** Land Allocations DPD Consultation

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

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**F.** 0870  
**E.** info@  
**W.** njlcoi

17<sup>th</sup> March 2014

Dear Sir/Madam,

**Re: Land Allocations Consultation February – March 2014.**

I am writing to you on behalf of my client, UK Land and Property, as part of the ongoing Trafford Land Allocations Consultation. UK Land and Property are promoting a site located to the south of Bank Hall Lane, Hale, which they consider would be appropriate for a limited amount of future residential development. Please find attached a plan highlighting the nature and extent of the site along with the requisite completed forms.

The site amounts to 3.96 hectares and is bound by residential properties to the north, east and west, with greenfield land to the south. The Land Allocations Consultation Draft and accompanying Draft Policies Map propose to allocate the site as Existing Green Infrastructure, covered by Policy GI1. Part of the site to the south is also allocated as Green Belt land under Policy GB1, and it is within the context of these two draft policies that we frame our representations.

We are of the considered view that residential development of the site could provide an opportunity for significant enhancements of the Green Belt area to the south west and the Bollin Valley. This would both provide better-quality green infrastructure, which would enhance and preserve the character of the local area, and would also diminish the impacts of losing an area of greenfield/Green Belt land to development.

The site is surrounded by residential development at three of its boundaries, and in this sense, relates well to the existing built form. Development of the site would also form a strong defensible boundary to the edge of the settlement of Hale. Furthermore, the site can be accessed directly from Bank Hall Lane.

**Draft Policy GI 1 – Green Infrastructure**

Draft Policy GI 1 relates to green infrastructure, specifying that *'when considering development proposals within these areas, the Council will give consideration to the anticipated level of adverse*

*impact on the multi-functionality of the green infrastructure, existing or proposed public access or access for maintenance purposes.'*

Although we do agree with the principle of this policy and the protection afforded to existing green infrastructure within Trafford, we consider that a caveat should be included within the policy specifying that any adverse impacts brought about by a development can be offset elsewhere. This will enable appropriate sites to come forward for residential development that will provide significant enhancements to green infrastructure elsewhere within the borough.

### **Draft Policy GB1 – The Green Belt**

This draft policy relates to the protection of Green Belt land, stating that *'the Council will continue to protect the Green Belt in line with Core Strategy Policy R4.'*

Policy R4 of the adopted Core Strategy sets out the Council's position with regard to the release of Green Belt land which is broadly in line with national policy guidance.

Although no formal Green Belt review has been announced by Trafford MBC at this stage, we consider that the site south of Bank Hall Lane does not meet the five purposes of the Green Belt set out within the National Planning Policy Framework (NPPF) and as such, it should not be included in the Green Belt within the final Land Allocations DPD and Policy Map. This is made all the more relevant by the fact that part of the site is not within the green belt, and alterations proposed would be minimal in nature.

The five purposes of the Green Belt are:

- *To check the unrestricted sprawl of large built-up areas*
  - The site is located at the urban fringes of Hale and its development would in no way lead to unrestricted sprawl. As stated above, the site would form a strong defensible boundary to the locality, serving to square off the developed area.
- *To prevent neighbouring towns merging into one another*
  - The site is a significant distance from any other neighbouring town and hence this is not a concern.
- *To assist in safeguarding the countryside from encroachment;*
  - The site is surrounded by development at three of its boundaries and in this regard, its release from Green Belt protection for residential development would relate well to the existing built form. As noted above, the development would also result in the significant enhancement of countryside to the south of the site which should be taken into consideration.
- *To preserve the setting and special character of historic towns*
  - This is not relevant to the site.
- *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land*
  - The release of the site would in no way serve to discourage the recycling of urban land.



Taking the above into account, the site should be excluded from the Green Belt boundary within the Land Allocations DPD and Policy Map to allow its release for residential development.

**Conclusion**

We are of the view that the site located to the south of Bank Hall Lane should be released from Green Belt protection so that it can be developed for a limited amount of housing. As demonstrated, this would be in keeping with the character of the surrounding area and would not prejudice the wider Green Belt to the south of Hale. The release of the site could also serve to greatly improve the Green Belt zone and the Bollin Valley located to the south of the site.

With regard to the Land Allocations DPD, we propose that the two draft policies GI 1 and GB 1 are amended as described above.

We trust that this letter alongside the enclosed information is acceptable, but should you require further details please do not hesitate to contact me on the above details.

Yours faithfully,

**Justine Entezari**  
**Planning Consultant**  
**For and on behalf of NJL Consulting LLP**

*Enc: Site Location Plan and Completed Forms*

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

Office Use Only	
Date	
Ref	
Ack	

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

<b>Total number of comment sheets enclosed:</b>	2
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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](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 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?			
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	81
SA Report		Paragraph number	
SA Appendices		Policy number	GI 1
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
				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>Please see enclosed letter.</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.

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

Office Use Only	
Date	
Ref	
Ack	

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## 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	93
SA Report		Paragraph number	
SA Appendices		Policy number	GB 1
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)			

Do you support, oppose or have general comments about this specific part of the document?					
<b>Support</b>		<b>Object</b>		<b>General Comment</b>	X

**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 see enclosed letter.

**Name:** Justine Entezari

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.

# Bankhall Lane - Site Location Plan

