

VIA EMAIL & POST: strategic.planning@trafford.gov.uk

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

23472/A5/LD
17th March 2014

Dear Sir/Madam,

**TRAFFORD METROPOLITAN BOROUGH COUNCIL: LAND ALLOCATIONS- CONSULTATION
DRAFT
REPRESENTATIONS ON BEHALF OF BDW TRADING LTD**

We write on behalf of our Client, BDW (Barratt David Wilson) Trading Ltd (hereafter referred to as "BDW") in response to the Council's Land Allocations Consultation Draft. As a national developer operating within Trafford, BDW has a number of direct interests in the Land Allocations document, particularly in relation to Green Belt, and are actively promoting residential development across Trafford such as at land at Hawthorn Lane, Ashton upon Mersey. We also seek to promote the Site at Hawthorn Lane for inclusion within the "Call for Sites".

Core Strategy, Land Allocations and NPPF

The Core Strategy was adopted in January 2012. This pre-dates the publication of the NPPF and subsequently, whilst it was prepared in accordance with the Planning and Compulsory Purchase Act 2004, paragraph 215 of the NPPF applies which states that:

"Due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework".

The Core Strategy sets out the housing requirements for the Borough. This sets a minimum indicative target of 12,000 new homes to be delivered between 2008 and 2026, which is reflective of the RSS target of 10,400 and 20% uplift until 2018 to reflect the Housing Growth Point Status carried forward.

BDW has concerns that the Core Strategy and subsequent Site Allocations document is not based on **"full objectively assessed needs for market and affordable housing"** (NPPF, paragraph 47) and because there are no proposals by Trafford Metropolitan Borough Council ("TMBC") to review this in light of this NPPF requirement. Additionally, there are concerns that this proposed level of housing does not **"boost significantly the supply of housing"** (NPPF, paragraph 47) and evidence of delivery in the Borough since the adoption of the Core Strategy suggests that it is failing to deliver in key areas, such as housing growth.

The decision not to review the Core Strategy should be viewed in the context of the Greater Manchester Combined Authority position on growth- housing and employment land requirements,

which stated in their January 2014 Committee Report that:

“Those districts with adopted Core Strategies- Bolton, Stockport, Oldham, Manchester and Trafford- will be hoping that their plans will give them resilience from challenge and would want to avoid any sort of short term review. However, safety cannot be assured, and the challenges facing other districts could have consequences for them, especially if it can be demonstrated that a reliance on out-dated RS housing requirements means that their plans look increasingly out of date”. [Paragraph 2.5]

Additionally the report considers that:

“the outcomes of this work, will potentially raise questions on how, when and where GM develops and any analysis of land supply will require consideration of Green Belt and other protected open land, as well as opportunities to maximise Greater Manchester’s Green Infrastructure assets. The work intended here is not a review of GM green belt, but will inform the districts of whether this is an issue and whether they need to undertake release through their own local plan processes, and at what stage such an outcome might need to be considered”. [Paragraph 5.2]

As the Council has based their housing figures on the RS housing requirements, there is real concern from BDW that these figures could be quickly demonstrated to be out of date, especially based on the recent increased projections within the Greater Manchester area.

This approach is supported by the recent published Planning Practice Guidance (“PPG”) (March 2014), which states that:

To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of adoption (PPG, Paragraph 008 of Local Plans)

It is therefore BDW’s firm consideration that the level of housing set within the Core Strategy does not, and will continue to fail to boost significantly the supply of housing, nor is it based on full objectively assessed needs for market and affordable housing. Furthermore, the strategy for the delivery of housing in the Borough contained within the Core Strategy is failing to deliver and if carried through to the Land Allocations document will fail to be effective.

It is also BDW’s position that, at the outset, the Core Strategy needs to be reviewed in order to revise both the amount of new housing to be delivered across the Borough and the strategy for delivering that housing growth in light of the emerging Greater Manchester Combined Authority approach and the PPG. Subsequently, the approach to land release within the Land Allocations documents needs to be revised in respect of the quantum and type of land being considered for housing development, particularly to allow for the release of Green Belt land that no longer performs a Green Belt function and represents an appropriate option for sustainable development.

Strategic Locations and the Delivery of Housing

BDW does not consider that the Council’s proposed delivery of a minimum of 12,000 new homes within the plan period to be appropriate particularly based on the increasing population, and the emerging conjoined approach of the Greater Manchester Authorities.

In terms of the strategy for housing land release, there is clearly a substantial over-reliance on the five identified Strategic Locations (SL1- Pomona Island; SL2- Wharfside; SL3- Lancashire Cricket Club; SL4- Trafford Centre Rectangle and SL5- Carrington) estimated to deliver 4,710 units over the plan period. There is a real concern that these units will not be delivered within the required timeframe, resulting in an increasing level of unmet need for which there is no mechanism currently in place to address, such as through a review of Green Belt boundaries.

This misguided over-reliance on strategic locations is particularly evident when regard is had to the fact that of the 1,420 units identified in the Core Strategy to come forward on strategic locations between 2011/12 and 2015/16, none have so far been delivered despite the recovering economic climate. This has already resulted in a three year delay [on these sites], which is only likely to be increase further, as only one site (POM1) has planning permission albeit for a lower number of dwellings than the Core Strategy identifies (App Ref: H/58948 – 546 units). This permission, however, appears to have expired and has not been implemented (as detailed in the 2013 SHLAA). The table shown in Appendix A demonstrates the current position in relation to the Core Strategy strategic locations and delays being experienced.

Based on this subsequent substantial delay in delivery on the Borough's most important housing sites, it is unlikely that even if two developers were on site building at a rate of 60 dwellings per annum, they would achieve the required 1,420 units in the remaining two year period (up to 2015/16). These delays will only worsen if, in the first instance, planning applications come forward in outline form, and again if there is no developer on board and any further remediation works are required. Further sites are therefore required to compensate for the failure of the strategic locations to deliver at the rate envisaged by the Core Strategy, to help TMBC meet its housing needs.

Additional Strategic Locations

The Land Allocations Document now appears to propose additional units to Strategic Locations "POM1" and "TCR1", which will result in an additional 1,800 units overall (300 units and 1,500 units respectively). Justification has been provided for POM1, which states that it:

"Represents an increased rate at which the land will be released in this Strategic Location for residential development, against that originally anticipated in the Core Strategy". (Paragraph 2.11)

TMBC has, however, failed to provide any sound justification in the Land Allocations document as to why "Strategic Location TRC1 – Trafford Centre Rectangle Strategic Location", has been included. It inaccurately states that:

"Trafford Core Strategy Policy SL4 identifies the Trafford Centre Rectangle as a Strategic Location, which is to deliver a substantial new mixed use sustainable community, with 1,500 new homes". (Paragraph 5.10)

The Core Strategy does not support this, but rather it states that:

"A major mixed use development will be delivered in this location, providing a new residential neighbourhood, together with commercial, leisure and community facilities". The Council considers that this location can deliver: 1,050 residential units comprising predominately accommodation suitable for families on the land known as "Trafford Quays", commercial office space and community facilities". (Core Strategy Policy SL4-SL4.1 and SL4.2)

The requirement identified in CS Policy SL4 for 1,050 dwellings is proposed to be met through TCR2 "Trafford Quays". Additionally, whilst there is a caveat in the Core Strategy policy which states that the minimum targets for each Strategic Location may be exceeded in the plan period, these additional units are only to be brought forward if market and other considerations are favourable.

Further clarification is required from the Council on this matter to account for the additional 1,500 units not previously included in the Core Strategy.

It is therefore our firm consideration that the Land Allocations DPD should not proceed as it is not based on up-to-date fully objectively assessed housing needs, and its methodology should be revised in light of the emerging Greater Manchester position and following a revision to the Core Strategy.

Policy Specific Comments

Policy HO1- Land release for new residential development

Policy HO1 sets out a number of sites which will be released for residential development over the Plan period. BDW is supportive of residential development which protects and enhances the distinctiveness and character of the area, and the densities applied to housing sites and new apartments. BDW does however consider that the policy should be flexible with a mechanism in place to allow for the release of Greenfield and Green Belt land, particularly when there is a proven record of the Strategic Locations failing to deliver. Without such a mechanism it is unclear how the Local Plan can possibly meet the housing needs of the Borough.

Policy HO2- Release of Other Land for residential development

The presumption in favour of sustainable development is set out in the NPPF, and this approach is supported by BDW. In terms of Local Plans, it sets out the presumption in favour of sustainable development and that:

Local Plans should meet objectively assessed needs, with sufficient flexibility [our emphasis] to adapt to rapid change unless; any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole” (NPPF, Paragraph 14)

Furthermore, development which is sustainable should be approved **“without delay”** (NPPF, paragraph 15). Overall, Policy HO2 in its current form is overly restrictive and does not align with the NPPF and the model policy by the Planning Inspectorate which sets out the presumption in favour of sustainable development.

Policy GB1 – Green Belt

Policy GB1 seeks to supplement Core Strategy Policy R4 and the need to protect Green Belt Land.

Whilst BDW understand the need to protect Green Belt land to comply with the NPPF, we object to the lack of consideration by TMBC to the release of Green Belt land which does not meet the five purposes of the Green Belt (NPPF, paragraph 80).

Failing a full Green Belt review, which BDW consider to be entirely necessary in light of the clear failure of the Core Strategy to deliver, it is BDW’s consideration that minor amendments to the boundary be proposed through the Land Allocations document to include additional sites in sustainable locations, adjacent to existing residential properties and local facilities, which are otherwise unconstrained. This approach will help to facilitate the growth which will be required, both in the short term and long term, to address the failure of the Strategic Locations to deliver, until such time that a full review of the Core Strategy’s housing policies is undertaken.

A localised release of Green Belt sites is essential to help TMBC meet the full objectively assessed needs for market and affordable housing in line with the NPPF requirements, which the Core Strategy and subsequent draft Land Allocations document does not achieve, and to:

“Take account of the need to promote sustainable patterns of development” (NPPF, paragraph 84).

Land at Hawthorn Lane, Ashton upon Mersey

BDW considers that their Site at Hawthorn Lane, Ashton upon Mersey (Appendix B- Site Location Plan) ("the Site") is highly sustainable and suitable for residential development. The Site itself comprises a triangular shaped site bounded by existing residential land use to the south, contained by the A6144 Carrington Spur Road to the north and west, and St Martin's Church and Ashton upon Mersey Golf Club to the east, which clearly benefits from strong defensible boundaries. Access to the Site is obtained via Hawthorn Lane.

It is considered that the land edged in red within the enclosed plan is capable of development of up to 100 units. The land to the north of this Site edged in blue is also available for future development.

The Site does not serve any of the five purposes of Green Belt listed under paragraph 80 of the NPPF and, as a result, BDW propose that it is released from the Green Belt to help meet the Borough's housing needs in a sustainable manner.

The Site has been promoted since 2008 on behalf of Homestar Developments, in the Land Allocations "Issues and Options" Stage (Ref: ladpd73) and again within the SHLAA (2009-2011) and was considered to be capable of accommodating and delivering 230 units. The Site (Ref: LA83- St Martin's Road, Ashton upon Mersey) was discounted on the basis that it is:

"Open land designated for Green Belt and Protection of Landscape Character Areas".

The Site was also promoted within the Core Strategy in 2011 as land off St Martin's Road/Church and Hawthorn Lane, Ashton upon Mersey, when representations sought the removal of the Site from the Green Belt. It was however considered by the Inspector at that time that:

"Policy L1 soundly demonstrates that the Core Strategy is sufficient and flexible in the provision of housing land without the need to release land from the Green Belt".

For the reasons stated above the Core Strategy Inspector, or Council's evidence on delivery, has been proven to be misguided.

Five purposes of the Green Belt

The NPPF requires Green Belt to serve one or more of the five purposes set out in paragraph 80 of the Framework. The Site does not perform any of these functions based on the following:

- 1) It is not serving the purpose of restricting sprawl of a large built up area as it is located adjacent to existing residential land uses, Carrington Spur Dual Carriageway and Ashton upon Mersey Golf Course. Defensible boundaries, particularly the Carrington Spur Dual Carriageway, would remain to restrict expansion of the settlement.
- 2) The release of the Site from the Green Belt would not result in the merger of Sale with Urmston and Ashton upon Mersey.
- 3) The presence of the Carrington Spur Dual Carriageway to the north and west and the extensive tree boundary along the carriageway, and the existing residential area to the south creates a strong visual boundary and provides a permanent physical feature that prevents harmful encroachment into the countryside.
- 4) The development of the Site would not harm the setting or special character of the historic area or Conservation Area. Existing and proposed landscaping will ensure separation from the Conservation Area.

- 5) Finally, whilst there are a number of strategic locations allocated, there has been a failure of TMBC to deliver the required level of growth, evidenced by the application of a 20% buffer as an "under-performer". Housing has failed to be delivered on the Strategic Locations in the past three years, and the likelihood of a need to increase housing in the Greater Manchester Area is great. Consequently, urban regeneration cannot be achieved alone through the recycling of brownfield land. The Site therefore does not perform the function of assisting in urban regeneration.

The failure of the site to serve any of the five purposes of the Green Belt means that its release for housing development is suitable. Overall, BDW objects to the continuation of Policy GB1 and further Green Belt land release is required to meet both the present and future needs of Trafford in sustainable sites, such as BDW's site in Ashton-upon-Mersey.

We also seek the inclusion of this Site within TMBC's "Call for Sites" for the reasons set out above.

Conclusions

BDW supports the continued growth and development of Trafford and the need to provide housing across the Local Plan period and beyond. However, they have a number of concerns with the document in its current form.

The Core Strategy is not delivering the numbers of units required to meet the objectives set out within the document. There is a particular over-reliance on Strategic Locations which have so far failed to deliver any development in the past three years. It is therefore BDW's firm consideration that a wider release of land is required, to ensure that Trafford's housing requirements are based on full, objectively assessed needs in terms of market and affordable housing in line with the NPPF.

To do this, a full review of the housing policy and Core Strategy is required ahead of any proposed Land Allocations document. This approach is supported by the consideration of the Greater Manchester Combined Authority, who considers there is a likely requirement to update Core Strategies which place an over-reliance on RS figures, such as Trafford, and there is a need to review the Core Strategy, and subsequently the approval of the Land Allocations document to housing land release.

To meet these needs, further mechanisms will therefore be required. These include the need for a Green Belt review or modification of the boundary to facilitate further housing, in locations such as BDW's site at Hawthorn Lane, Ashton upon Mersey, where the five purposes of the Green Belt are set out in paragraph 80 of the NPPF are not served.

On the basis of the above, BDW trust that full consideration will be given to these representations, and reserve the right to amend and update these representations, and to appear at any future Examination in Public to deliberate these issues further.

Yours sincerely,

LORRAINE DAVISON

Senior Planner

Encl.

Appendix A- Housing Supply Table

Appendix B- Location Plan

TRAFFORD METROPOLITAN BOROUGH COUNCIL

COMPARISON BETWEEN CORE STRATEGY AND LAND ALLOCATIONS DOCUMENTS

Core Ref:	Strategy	Land Allocations Ref:	2011/12 – 2015/16*	2016/17 – 2020/21	2021/22 – 2025/26	Total	No. of units proposed in Land Allocations Document	Change in number of units proposed Core Strategy -> Land Allocations	
SL1	Pomona Island	POM1	350	450	0	800	1,100 (plus an additional 400 homes beyond the plan period).	300	
SL2	Trafford Wharfside	WHA	400	300	200	900	900	0	
SL3	LCCC	LAN1	60	300	40	400	400	0	
SL4	Trafford Centre	TCR1	No details provided					1,500	1,500
		TCR2	250	250	550	1,050	1,050	0	
SL5	Carrington	CAR1	360	600	600	1,560	1,560	0	
Total			1,420	1,900	1,390	4,710	6,510	1,800	

*3 year delay already experienced.

