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By Post and Email

6 Jun 2014

EPP ref: 14-135-Rep004

Paul Forshaw
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Dear Mr Wansborough

**Re: Representations to Trafford Local Plan Land Allocations Consultation Draft –
Britannia Road Industrial Estate, Britannia Road, Sale**

We have been instructed by our client, Forward Construction and Developments Ltd (hereafter referred to as "FCDL") to submit representations to the Trafford Local Plan Land Allocations Consultation Draft in respect of the Britannia Road Industrial Estate, Britannia Road, Sale. These representations request that the site's allocation is changed from an employment allocation to a housing allocation.

Background

Site location and description

The Britannia Road Industrial Estate (hereafter referred to as "the site") is located approximately 0.2 miles to the north east of Sale town centre, on the eastern of the Rochdale Canal. It is located at the northern end of Britannia Road, which connects to the B5166 School Road at its southern extent, close to Sale Metrolink Station.

The area surrounding the site comprises a mix of residential and commercial uses. To the north are commercial uses within the Dane Road Industrial Estate. There is no access to these commercial sites from Britannia Road, with access instead from Dane Road to the north. Immediately to the south of the



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Registered office: as above

site are residential uses along Britannia Road. The residential properties immediately to the south are mainly semi-detached properties. Further along Britannia Road to the south are a number of residential apartment buildings. Residential properties are also located to the east and west of the site on the opposite side of the Sale to Manchester Metrolink line and the Rochdale Canal, respectively.

The site itself comprises a number of small commercial units on the western side of Britannia Road. These units mainly contain light industrial uses, include car repairs, small-scale components manufacturing and a hydroponic business. On the eastern side of the road are a number of small secure yards. The units on the site are all let on short term tenancies outside of the Landlord and Tenant Act.

The site is accessed from Britannia Road to the south. Britannia Road terminates within the site and there is footbridge link from the northern part of the site across the Metrolink line to Oldfield Road.

The site covers an area of approximately 0.85 hectares. A plan showing the location of the site is enclosed for your information.

Proposed allocation in the Land Allocations Consultation Draft

The Land Allocations Consultation Draft proposes to allocate the site as part of a wider "Other Sites / Employment Area" which also covers the Dane Road Industrial Estate to the north.

FCDL considers that the Britannia Road Industrial Estate is no longer suitable for continued employment use. In particular, the site's location at the end of a road which contains predominantly residential properties causes conflicts with the residential uses as a result of industrial and commercial traffic travelling directly past the residential uses on Britannia Road on a regular basis. This creates noise and vibrations which affect residential amenity. Furthermore, as a result of the age of the commercial units and the site's location, which offers poor access to the motorway and strategic road network, the site is struggling to compete with other employment locations in Trafford, particularly the employment locations to the north of Trafford (Trafford Park, etc).

As a result of the above, FCDL considers that the site is no longer an attractive or suitable location for employment uses. It therefore considers that the site should not be allocated as an Employment Area in the Land Allocations Development Plan Document and alternative uses should be explored. In particular, it is considered that the site would be a suitable location for residential uses and it is requested that it is allocated for housing in the Land Allocations Development Plan Document. A justification for this is given below.

Representations to the Land Allocations Consultation Draft

As stated above, it is requested that the site is allocated for housing in the Land Allocation Development Plan Document. We set out below why it is considered that the site is suitable for residential development and why it is no longer suitable or attractive for employment use and provide details as to why the loss of the site as an employment allocation will not negatively impact on the overall supply of employment land within Trafford.

Suitability for employment uses and impact of loss on overall employment land supply

Suitability for employment use

Policy EM3 of the adopted Trafford Core Strategy indicates that non-employment uses would be permitted in employment areas where the employment area is no longer suitable or attractive for continued employment use, and where it can be demonstrated that after the loss of the site for employment use there would still be an adequate supply of employment land within Trafford. The justification to Policy EM3 indicates that an adequate supply is defined as a supply of available / committed floorspace sufficient to allow the take-up of floorspace to continue at a rate reflecting recent take-up or which, at the time of the application, it is anticipated that market conditions could bear. Whilst the justification to Policy EM3 only refers to office floorspace, we presume that the same tests would apply to non-office employment.

As referred to above, FCDL considers that the site is no longer suitable or attractive for employment use. In terms of its suitability for employment uses; the site is located at the end of a road which is

predominantly occupied by residential properties. These include a mixture of semi-detached residential dwellings and apartment buildings. The only way that the site can be accessed is by Britannia Road. As a result, commercial traffic – which given the nature of some of the existing uses of the site can be frequent throughout the day and can include large vehicles – has to travel past the residential properties to access the site. The frequency of traffic associated with the industrial estate and the noise and vibrations caused by such traffic, particularly larger vehicles, can result in disturbance and a loss of amenity for the residents of the existing properties. Furthermore, the sort of traffic using Britannia Road to access the site is not the type that would be expected to use a predominantly residential road with such frequency. As well as causing disturbance and a loss of amenity, it could also pose a danger and accident risk; for example with children from the residential dwellings playing in the street.

Furthermore, the uses of the commercial buildings and secure yards on the site can also cause a loss of amenity for the residents of residential dwellings on Britannia Road, particularly those located close to the site. Activities with the commercial buildings can be noisy and some can result in the discharge of emissions and odours. There is also the poor visual amenity of these uses, particularly the secure yards which are often used for open storage. The existing operations and uses on the site significantly detract from the character and visual appearance of Britannia Road and result in a much reduced outlook for the residents of the nearby residential properties on Britannia Road.

As a result of the above, it is not considered that the site is suitable for continued employment use. In addition, it is also considered that there is a reduced level of demand for the employment use of the site. The site's location at the end of what is effectively a fairly narrow residential street can be off-putting for certain commercial operators and potential tenants of the industrial estate, particularly those who need to transport goods on a regular basis. Its location adjacent to residential properties also makes it unsuitable for some employment operators and can be off-putting for others due to concerns over restrictions that could be placed on commercial operations in this location (i.e. restrictions on opening hours, etc) in attempts to avoid impacts on the amenity of adjacent residential properties. Such restrictions are not generally imposed in the larger employment areas, such as Trafford Park.

Its location away from the motorway and strategic road network also adds to its undesirability and it struggles to compete with other employment locations within Trafford where access to the motorway network is much easier, such as Trafford Park. The age and specification of the buildings on the site also add to its undesirability, with many commercial operators preferring modern units elsewhere in Trafford.

The undesirability of the site for commercial uses is reflected in the fact that tenants on the site can only be secured on short term leases. It is also reflected in the January 2014 Land Allocations Topic Paper TP12 on employment land. Option 2 of the 3 proposed options for employment land considered decreasing the number of employment allocations in Trafford and re-allocating certain sites in order to “*maximise residential opportunities on employment sites in certain locations*” (paragraph 108.3). 8 areas were considered for de-allocation under this option. The Britannia Road Industrial Area was one such site that was considered for de-allocation. The Topic Paper indicates that the area to the west of Britannia Road could be released and reallocated for residential development. It is considered however, that if western part of the industrial estate is released and reallocated for residential development, the eastern side of Britannia Road within FDCL's ownership (the area currently containing secure yards) would also need to be released in order to ensure adequate amenity and outlook for any subsequent housing development.

In light of the above, it is not considered that the site is suitable or attractive for employment use. It is therefore considered that it should not be allocated for employment use in the Land Allocations Development Plan Document and should be allocated for housing instead to reflect the predominant character and land use of the remainder of Britannia Road.

Impact on supply of employment land

As stated above, Core Strategy Policy EM3 indicates that existing employment sites will only be released where it can be demonstrated that it would not result in a shortfall in employment land supply, and in particular, a drop in available employment land below average take-up rates.

Trafford's latest employment land position is summarised in Topic Paper TP12 at paragraph 103.3. It shows that, as of January 2014, there was a supply of available employment land amounting to 264 hectares

(652 acres). There is also an additional supply of 50 hectares (124 acres) of employment land that is not currently available, but is to be retained as a potential additional source of supply to meet future needs. There is therefore an overall employment land supply in Trafford of some 314 hectares (776 acres).

As stated above, Core Strategy Policy EM3 indicates that the alternative use of employment land will only be allowed where it would ensure that sufficient land still remains over the plan period to ensure that current average take-up rates can be met. Whilst average take-up rates are not known, the April 2013 Employment Land Study Update indicates that development rates for employment land in Trafford have averaged at 15 hectare per year (paragraph 5.13). We therefore use this 15 hectares figure as an indication of likely need going forward.

The Local Plan covers a period of 15 years (i.e. up to 2026 from the adoption of the Core Strategy in 2011). If this average development rate was to continue, there would be a requirement for 225 hectares of employment land over the plan period. There is therefore more than sufficient available employment land supply to meet this need, with the available employment land supply totalling 264 hectares. If this 15 ha development rate was to continue and all of the available employment land was to be allocated for such use, there would be a surplus supply of 39 ha, and therefore an available supply amounting to approximately 17.6 years (i.e. sufficient supply to cover the period up to 2028 (from 2011)). If the overall employment land was to be allocated (i.e. including the 50 ha additional supply), this would represent a surplus supply of 89 hectares and would provide sufficient supply for a period just short of 21 years (i.e. up to 2032 (from 2011)).

Whilst the Employment Land Survey shows that average development rates are 15 hectares a year, the Core Strategy plans for a lower target than this. Core Strategy Policy W1 sets a requirement for 190 hectares of employment land over the 15 year plan period. This equates to approximately 13 hectares per annum. Based on this annual requirement the 264 hectares available supply would provide a surplus of 74 hectares, or a supply of approximately 20 years. The overall supply of 314 hectares would provide a surplus of 124 hectares, or a supply equivalent to approximately 24 years.

It is evident from the above that the loss of the site, which amounts to approximately 0.85 ha, and its allocation / development for non-employment uses, would not result in the available or total supply of employment land falling below either the average development rate requirements (15 ha per annum) or the requirements set in Core Strategy Policy W1 (13 ha per annum).

If the site was to be allocated / developed for non-employment uses it would reduce the available employment land supply to 263.2 ha. Based on this revised available supply, there would still be a surplus supply of 38.2 ha if average development rates (15 ha per annum) were to continue, and a surplus of 73.2 ha against Core Strategy Policy W1 requirements (13 ha per annum). These equate to supplies of approximately 17 years and 20 years respectively.

If the overall employment land supply was to be considered (i.e. including the 50 ha additional supply), this surplus would be even greater and there would be 313.6 ha of supply. This is equivalent to a surplus of 88.6 ha if past development rates are to continue (equivalent to a supply of 20 years) or a surplus of 123.6 ha against Policy W1 requirements (equivalent to 24 years supply).

The above therefore indicates that if the site was to be released from employment allocation and allocated for alternative uses (such as housing) there would still be more than sufficient available employment land supply to cover the local plan period. The loss of the site as an employment allocation would not therefore prevent the employment land targets in Core Strategy Policy W1 being met and would not result in a shortfall of employment land if past development rates continue.

It is considered that the above shows that the site is no longer suitable or attractive for employment use and its loss as an employment site would not prevent employment land targets in the Core Strategy from being met or result in a shortfall of employment land to meet needs. Paragraph 22 of the National Planning Policy Framework (hereafter referred to as the "Framework") states that planning policies should avoid the long term protection of employment sites where there is an indication that they may no longer be suitable or attractive for such use. As such, it is requested that the site is not allocated for employment uses in the Land Allocations Development Plan Document.

Instead, it is considered that the site is suitable for residential development and should be allocated for housing instead. The site's suitability for housing is set out below.

Suitability for residential development

Suitability

Policy L1 "Land for New Homes" of the adopted Trafford Core Strategy requires that 80% of new dwellings in Trafford are developed on previously developed (brownfield) land. Core Strategy Policy L2 "Meeting Housing Needs" sets out the locational criteria for new housing development. It requires that sites for new residential development meet the following requirements:

- (a) They are on a site of sufficient size to accommodate adequately the proposed use and all necessary ancillary facilities;
- (b) They are appropriately located in terms of access to existing community facilities; and
- (c) Residential development on the site would not be harmful to the character or amenity of the immediately surrounding area.

It is considered that housing development on the site would meet all of the above requirements. The site is currently developed and is considered to be of poor visual amenity. Residential development on the site would therefore utilise previously developed land and offer the opportunity to improve the visual amenity and quality of the immediately surrounding area, assisting to meet the previously developed land target set by Core Strategy Policy L1.

The site is of sufficient size to be able to accommodate a residential development of a range of types and sizes of dwelling as well as sufficient internal access roads, car parking spaces and amenity areas; meeting requirement (a) of Policy L2. We enclose a plan showing an indicative layout of residential development on the site. This plan shows how residential development could be accommodated on the site and the requirements of part (a) of Policy L2 could be met.

Residential development on the site would also meet the requirements of part (b) of Policy L2. Future residents of the site would have access to a range of community services and facilities in the immediately surrounding area and further afield by sustainable modes of transport. In particular, the following are located within walking and cycling distance of the site:

- Sale Town Centre (500 m) – residents of the site would have access to a range of services and facilities within the town centre. These include retail opportunities, employment opportunities, leisure and entertainment opportunities and other services and facilities;
- Schools – there are a number of schools located within walking distance of the site including, Springfield Primary School (650 m), Sale Grammar School (1 km); St Anne's Church of England Primary School (1 km) and St Joseph's Catholic Primary School (800 m). There are also a number of other schools in the wider area which are accessible by short public transport journeys, including Sale High School which is approximately 15 minutes journey from the site from the nearest bus stop to the site (see below) on Service No. 18 / 19;
- Health care facilities – such as Washway Road Medical centre (1 km) and dental practices on School Road (500 m) and Ashfield Road (650 m);
- Supermarkets – including a large Sainsbury's 650 m from the site; and
- Leisure, sport and recreation facilities and opportunities – Sale Leisure Centre is located approximately 650 m from the site and there are a number of areas of open space, some containing sports pitches within the surrounding area, including Worthington park, Dale Road Tennis Club, Priory Gardens, Brooklands Sports Club and Crossford Bridge Playing Fields.

The site also has excellent access to public transport services. Bus stops are located approximately 300 m from the site on School Road, offering regular services into Manchester. Further bus stops are also located within Sale Town Centre. Sale Metrolink Station and Dane Road Metrolink Station are also accessible from the site (within 500 m) offering regular tram services to Altrincham and Manchester.

Residents of the site would therefore also have access to facilities, services and employment opportunities in the wider area on sustainable modes of transport.

As a result of the above, it is considered that the site is within a highly sustainable location which would reduce reliance on private motor vehicles, reducing contributions towards climate change and also assisting in creating a healthy community (as required by section 8 of the Framework) by encouraging cycling and walking. Its sustainable location also offers the opportunity to assist in reducing instances of social inclusion within Trafford by providing housing in a location where those without access to private motor vehicles can still access the facilities and services that they may need on a daily basis.

Residential development on the site would therefore meet requirement (b) of Policy L2 and one of the Core Planning Principles set at paragraph 17 of the Framework which requires that patterns of growth are actively managed to *"make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable"*.

In addition, residential development on the site would support in maintaining and enhancing the vibrancy and vitality of Sale town centre. It would increase the population within its catchment, and in particular the number of people within walking distance of the town centre. As a result it would assist in increasing activity within, and use of the town centre. This is supported by Section 2 of the Framework, which requires the promotion of competitive town centre environments.

It is considered that residential development on the site would represent a continuation of the predominant land use along Britannia Road. As stated above, the majority of Britannia Road contains residential properties. Residential development on the site would therefore be a continuation of this land use and it is not considered that it would result in amenity issues with the existing residential properties. Indeed, as referred to above, it is considered that redevelopment of the site for residential use would remove an existing use which does result in amenity issues for the existing residential properties. Residential development on the site would therefore offer the opportunity to enhance the amenity and character of Britannia Road and would thereby comply with part (c) of Policy L2.

Furthermore, it is considered that the design of any residential development on the site could take account of the existing employment uses to the north in the Dane Road Industrial Estate and ensure that no amenity issues arise from the development of residential properties close to employment / commercial uses. This could include a buffer zone between the commercial uses and residential uses, the installation of acoustic fencing along the boundary of the site or the use of triple glazing and other measures within residential properties if necessary. Similarly, it is considered that similar measures could be installed to protect future residents from any amenity issues that could arise from the site's location adjacent to the Metrolink line, if necessary. However, it should be noted that this line is used by trams rather than heavy rail, and would not therefore result in the same level of noise or disturbance. There are other residential properties located alongside this line which do not experience amenity issues, and there is nothing to indicate that it would not be the same for any residential development on the site.

A housing allocation for the site would therefore ensure that housing development is provided in a location which meets the requirements of Core Strategy Policies L1 and L2, as well as the requirements of the Framework, including one of the core planning principles of providing development in sustainable locations.

Contribution towards meeting housing needs

As a result of the site's suitability for housing development, it provides an opportunity to assist in meeting housing needs across the plan period in a highly sustainable location, and will ensure that there is less reliance on windfall sites to meet housing requirements.

Trafford's latest housing position is set out in the Land Allocations Topic Paper TP6 "Housing" and the Strategic Housing Land Availability Assessment (SHLAA) 2013 Review.

Trafford's housing requirement is set out in Policy L1 of the adopted Core Strategy. This sets a requirement of 12,210 dwellings to be delivered across the 15 year plan period. Topic Paper TP6 indicates that 1,188 dwellings have already been provided (as of January 2014), reducing the target to 11,022 dwellings.

In accordance with the Framework, Trafford is required to demonstrate that it has a 5 year supply of deliverable housing land. This 5 year requirement would be 3,470 dwellings. The 2013 SHLAA indicates that there is a deliverable supply of 4,493 units, thereby providing sufficient deliverable housing land for approximately 6.5 years, meeting the requirements of the Framework.

In terms of the longer term housing requirements over the plan period (11,022 dwellings); Topic Paper TP6 sets out 4 options for meeting this requirement. The chosen option (Option 4) would see the highest number of housing allocations by allocating all sites identified in the SHLAA. It proposes to allocate 48 sites, providing a total of 7,980 dwellings. In addition to this, it states that an additional 1,776 dwellings can be provided on smaller sites identified in the SHLAA. This provides a total supply of 9,756 dwellings. The Topic Paper acknowledges that this is short of the housing requirement across the plan period. In order to reduce this shortfall it proposes that through the Land Allocations Development Plan Document an additional 300 units above what was originally envisaged on the Pomona Island site could be delivered to assist in meeting the shortfall. An allowance for the development of 500 dwellings on windfall sites will also be incorporated into the Land Allocations Development Plan Document to reduce this shortfall further.

The Topic Paper concludes that the above would be sufficient to meet housing requirements across the plan period. However, this would only provide for 10,556 dwellings. This is 466 dwellings short of the requirement of 11,022 dwellings. This shortfall could increase further over the plan period if anticipated sites do not come forward for development, or if anticipated delivery rates are lower than envisaged.

In light of this, it is considered that further housing allocations should be identified in order to reduce the shortfall and to provide flexibility if some sites do not come forward for development or development rates are lower than expected. In particular, this would reduce reliance on windfall sites, the delivery of which can be difficult to predict and unreliable. The Topic Paper identifies that delivery rates over the first 3 years of the plan period have been lower than expected, with a shortfall in provision over this period of 1,112 dwellings. Allocating additional housing sites would provide flexibility in housing land provision if lower delivery rates continue.

As demonstrated above, the site would provide a highly sustainable location for housing development to assist in meeting needs across the plan period and reduce the reliance on windfall sites. It is therefore requested that it is allocated for housing in the Land Allocations Development Plan Document.

Affordable housing

Development on the site would also offer the opportunity to provide a proportion of affordable housing in line with Core Strategy Policy L2.

It is noted that Topic Paper TP6 shows that there has been a shortfall of approximately 682 affordable dwellings in the early years of the plan period. Allocating additional housing sites in the Land Allocations Development Plan Document would allow for a higher rate of affordable housing provision going forward as development sites would provide a percentage of affordable housing in accordance with Core Strategy Policy L2. The allocation of further housing sites would also provide flexibility if some anticipated sites do not come forward for development within the plan period.

Given the site's sustainable location, it is considered that it would be an ideal place for affordable housing. FCDL has contacted Trafford Housing Trust, which has indicated that it would be interested in managing and developing affordable housing in this location.

The allocation of the site for housing would therefore provide the opportunity for affordable housing to be provided in a sustainable location as part of any housing development on the site, in line with the requirements of Core Strategy Policy L2, which requires that 20% of dwellings in this location are set aside as affordable.

Availability

As referred to above, the site is currently tenanted on short term leases outside of the Landlord and Tenant Act. They are therefore able to be terminated at short notice. The site could therefore be made available for development at short notice, and would be available within the plan period.

As referred to above, Trafford Housing Trust has shown interest in developing affordable housing in this area. Private house builders and developers have also expressed keen interest in developing market housing on the site. There is therefore keen developer interest in the site, and as a result it is considered that the site would be developable within the plan period.

Other constraints

It is also considered that there are no other constraints to residential development on the site. The site does not contain any listed buildings, nor is it considered to form part of the setting of any listed buildings. It is not in a conservation area, nor does it form part of any environmental designation. There are also no known Tree Preservation Orders on the site.

Summary

As a result of the above, it is considered that the site would meet the policy requirements within the adopted Core Strategy in relation to the development of new housing, as well as the requirements of the Framework. It is located in a highly sustainable location, offering access to a range of services and facilities by sustainable modes of transport, and residential development could be accommodated on the site without resulting in amenity issues for existing or future residents.

Its allocation for housing would therefore assist in meeting the small shortfall in housing provision across the plan period and would provide added flexibility to allow for market and affordable housing requirements to be met if other sites do not come forward for development during the plan period or if delivery rates slow below the rate anticipated. In particular, the site's allocation for housing would reduce the reliance on unpredictable windfall sites to meet housing needs.

Conclusion

The Britannia Road Industrial Estate is no longer considered suitable or attractive for employment use. Given its location at the end of a road which predominantly contains residential properties, it is considered that its continued employment use would result in amenity issues for the occupiers of the residential properties. Such amenity problems could include noise and vibration from commercial vehicles and commercial / industrial activities on the site, potentially odours from industrial operations and a poor visual outlook.

The potential for conflicts with the residential uses surrounding the site is one reason why the site is not attractive for modern employment use, with potential occupiers put off due to the potential for operations on the site to be restricted in order to avoid such conflicts (e.g. restrictions on operating hours in order to preserve residential amenity). The site's location also contributes to its unattractiveness for modern employment use. It has poor access to the motorway and strategic road network and cannot compete in this respect to the larger industrial and commercial areas to the north of Trafford (Trafford Park, etc).

As a result of the above, it is considered that it is not suitable for an employment allocation. Given that the site represents a previously developed site, in a highly sustainable location with access to a range of community facilities and services, it is considered that it should instead be allocated for housing. Residential development on the site would provide housing in a location where all prospective residents would have access to services and facilities, including employment opportunities, by sustainable modes of transport. Its allocation for housing would therefore assist in meeting the small shortfall in housing provision across the plan period and would provide flexibility in housing provision, reducing reliance on windfall sites.

Provision of housing in this location would also assist in supporting the vibrancy of Sale town centre by increasing the number of people living within its catchment, and in particular within walking distance.

Its allocation for housing rather than employment development would not have an impact on the overall supply of employment land in Trafford and would still ensure that more than sufficient employment land is available to meet needs throughout and beyond the plan period.

In light of the above, development of housing on the site would meet the requirements of Core Strategy Policies L1, L2 and W1, as well as meeting the requirements of the Framework

The site could be made available for residential development at short notice and there has been keen developer interest in the site. It would therefore be available and developable within the plan period.

FDCL therefore requests that the site's proposed allocation in the Land Allocations Consultation Draft is changed from an employment allocation to a housing allocation.

We trust the above is clear and satisfactory; however if you have any queries or require further information, please do not hesitate to contact either Paul Forshaw or Alison Freeman at the above office. Otherwise, we would be grateful if you could acknowledge receipt of these representations and confirm they have been "duly made".

Yours sincerely
Emery Planning


Paul Forshaw BA (Hons), Mplan, MRTPI
Consultant

Enc Site location plan
 Indicative housing layout plan
 Completed representations form

Cc Mr J Shepherd – FDCL

**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

Name:	Mr Jamie Shepherd	Agent (if applicable):	Paul Forshaw
Organisation (if applicable):	Forward Development and Construction Ltd	Organisation (if applicable):	Emery Planning
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Fax:		Fax:	01625 511 457
Email:		Email:	paulforshaw@emeryplanning.com

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:

Total number of comment sheets enclosed:	1
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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 . **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.**

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



PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:

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 and 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	
SA Options Report		Site reference	EM3.9
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	X	General Comment
<p>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.</p> <p>We request that the proposed allocation of the site is changed from an employment allocation to a housing allocation. Please see the enclosed letter for further details.</p> <p>Please note that it was agreed with Matthew Wansborough that we could have an extension until 6th June 2014 to submit these representations.</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 2014**



PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:

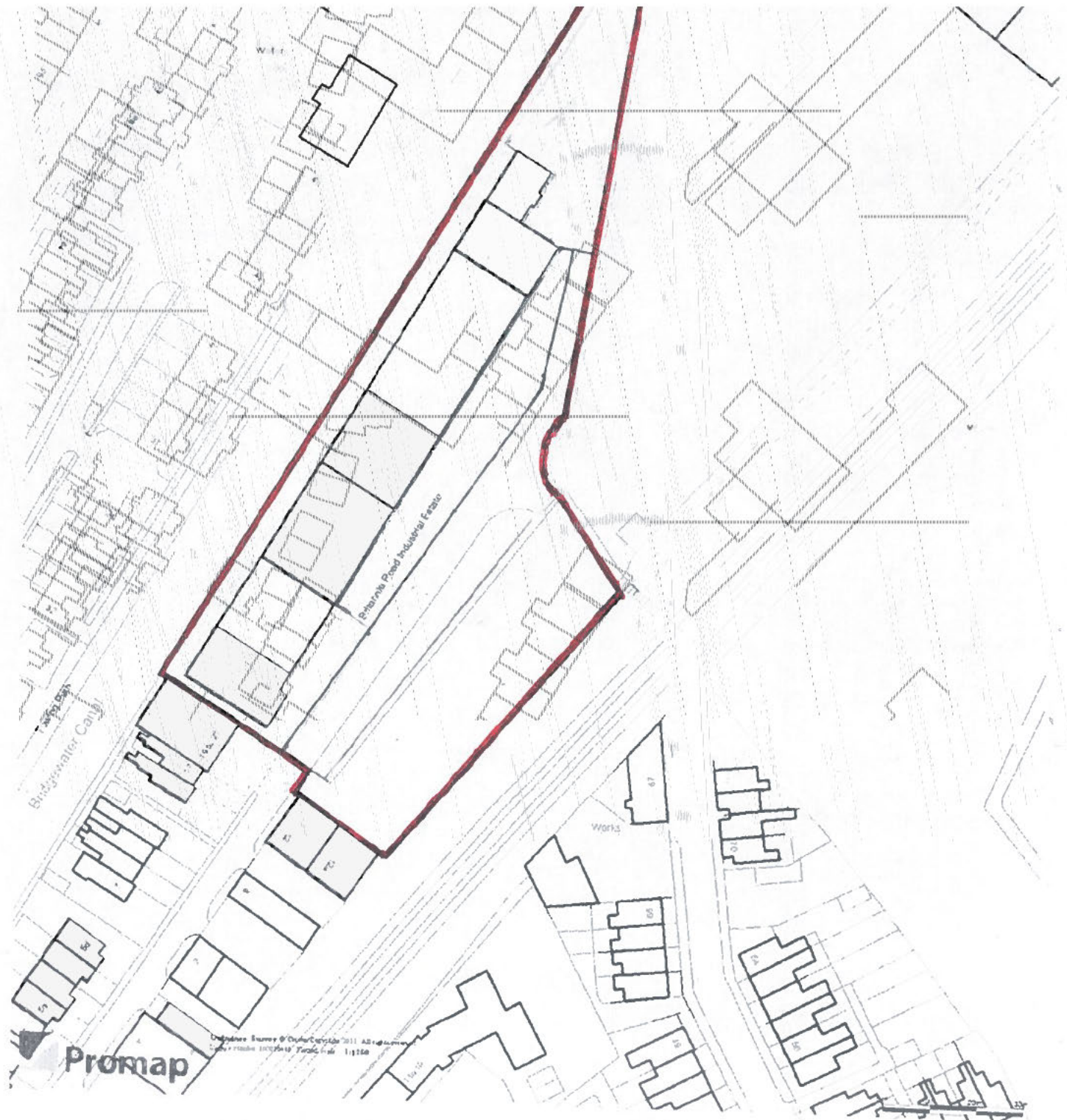
strategic.planning@trafford.gov.uk

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

Please return this form by 17th 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.



Bridgewater Canal

Industrial Estate

Works

Promap

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1:1250

BLOCK	UNITS	1 BED (CIRCA 47M2)	2 BED (CIRCA 63M2)	PARKING REQUIREMENT	PARKING PROVISION
A	18	1		1 (100%)	
B	20	3	17	34 (200%)	
C	20	3	17	34	
D	12	4	8	16	
E	19	6	13	26	
F	19	6	13	26	
TOTALS	108	23	85	193	193

All dimensions to be checked on site.
 Figured dimensions to be read in preference to scaled.
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 All works based on these drawings must conform with current building regulations and LA approvals

preliminary

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1:1250 Proposed Site at Britannia Rd, Sale...

Date	Rev	Description	Init.
Revisions			

Job Title.
Proposed Residential Development at Britannia Rd, Sale...

Dwg Title.
PROPOSED SITE PLAN

Client.
FORWARD CONSTRUCTION AND DEVELOPMENTS LTD

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 Cheshire,
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1:500 proposed site at Britannia Rd, Sale...

Scale. 1:500 & 1250 @ A2	Date. Jan 2013	Drawn by. KJL	Checked by.
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Drawing No. **13/FCD/015/200 REV A**



Mr Matthew Wansborough
Senior Regeneration Officer
Strategic Planning
Trafford Town Hall
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Stretford, Manchester
M32 0TH

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18 July 2014

EPP ref: 14-135-L006

Alison Freeman
T: 01 625 442 788
alisonfreeman@emeryplanning.com

Sent by post & email – matthew.wansborough@trafford.gov.uk

Dear Matthew

Re: Representations to land allocations consultation - Britannia Road Industrial Estate,
Britannia Road, Sale

Further to your email to Paul Forshaw on Thursday 3rd July 2014 and our subsequent telephone discussion I write as promised with a response to the questions raised in your email.

My client purchased their site in two parcels; the first, the open land to the East was purchased in May 2006. The land and industrial buildings to the West was purchased in 2010. The open land when purchased had been a vacant plot formally attached to a concrete works and had been vacant for many years. On purchase our client cleared the land and offered it for rent for open storage. After 14 months they were successful in letting the land to a fencing contractor, however, this proved short lived as the company did not survive. The land then remained vacant for around 4 years but has more recently been subdivided into smaller plots and let as open storage. The nature of these businesses do not generate employment on site. As can be seen by the enclosed photographs, the goods stored range from scrap vehicles, building materials and construction plant.

The land and buildings to the West when purchased were vacant, but had formally been the Carlton Press Printing works. Carlton Press operated 24 hours a day, 7 days a week and employed a large number of people. After Carlton Press closed the then owner attempted to let the site, but was unsuccessful. When our client bought the site in 2010 the site had been vacant for a number of years. My clients, as with the land opposite, subdivided the industrial warehouse space into smaller units having been unable



Emery Planning Partnership Ltd
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to secure a letting for the whole premises. Attached is a site occupancy plan and with the exception of units 1 and 2 all leases you will note are short term, and outside the landlord and tenant act, and therefore the tenants have no security of tenure. As can be seen from the schedule of tenancies there have been significant void periods. Two of the tenants are involved in the vehicle accident repair industry and store large numbers of damaged vehicles both inside and outside the premises. Again all the businesses in the units do not provide significant employment opportunities, the use being mainly for storage.

As the original representation set out our clients maintain their land holding at the bottom of Britannia road is not suitable for employment uses, this in the main is due to the inadequate access arrangements, the road being a dead end culminating at the entrance of the site. Furthermore the nature of the businesses currently in occupation generate very high volumes of traffic, and create high levels of anti-social noise and disturbance which is particularly damaging to the residential amenity of the emerging residential nature of Britannia road and surrounding areas.

Britannia road has benefited recently from residential regeneration and it is envisaged that this highly residentially sustainable town centre location would benefit further by the relocation of the existing incongruous uses and becoming purely residential.

Attached are the following:-

1. Site Occupancy Plan.
2. Schedule of occupancy and Lettings.
3. Excel spreadsheet of lettings history.
4. Various photographs of the site and wider locality.

I hope the attached information is of assistance. If you require any further information, please do not hesitate to contact either me or Paul Forshaw at this office.

Kind regards.

Yours sincerely
Emery Planning

Alison Freeman BA (Hons), MRTPI
Director

Enc:

Copy to: Client

BRITANNIA ROAD

Land Plots to Southeast of Britannia Road – Purchased May 2006

Storage areas Only – No Staff/Employees

Plot 1 2500 sq.ft. – Vacant 14 months - then let under licence 01/09/2007 to A Gorman
Car Storage Space for Garage services based at 12a Britannia Rd.

Plot 2 3400 sq.ft. – Vacant 4 yrs – then let under licence 19/04/2011 To Site Civils
Civil Engineering Materials & Equipment Storage

Plot 3 3400 sq.ft. – Vacant 4 yrs – then let under licence 06/04/2011 to TH Scaffolding
Scaffolding Materials Storage

Plot 4 3000sq.ft. – Vacant 6 yrs – then let under licence to Stuart Nealon
Storage area for computer recycling

Plot 5 4500sq.ft. – Vacant 6 yrs – then let under licence to O. Hertzog
Car breaking storage yard – have expanded outside of the fenced plot

All Tenants under 1 months notice

Industrial Units PURCHASE Completedc 25th March 2011

All leases are Outside the Landlord & Tenants Act

Units 1 & 2- 65yr Underlease to FCDL – Heavy Motor Gear Rewinders and Distributors
Approx 4 employees

Will be Relocated in Area

Unit 3 - 4400sq.ft. – Vacant 9 months – then 3 yr lease 20/12/2012 to P. Hickey
Car Accident Repairs – Parks up to 100 cars over the whole site
Approx 4 employees

Has now given notice that he wishes to reduce the workshop area by 50%

Unit 4 - 3300sq.ft – Vacant 21 mths – then 3 yr. lease 20/12/2012 to Bhudda Tree
Storage Depot for Distribution of Hydroponic Materials & Equipment
1 Part time Employee

Unit 5 2200sq.ft. – Vacant since purchase – FCDL liable for empty rates.

Unit 6 4400sq.ft – Vacant 16 mths – then 3 yr lease 26/07/2012 to Annatolia Foods
Importer & Distributor of Foodstuffs
Approx 2 employees

Unit 7 2200sq.ft. – Initially Vacant 4 mths let to Digital Revolution for 6 mths

Then vacant further 4.5 mths until 01/02/2012 3yr lease to MVC

Car Service & Repair Garage

Approx. 3 employees

Unit 7A 1536 sq.ft. – Vacant 20 mths – then 3 yr lease 01/01/2013 to Ask Design

Graphic Design Offices – The large area of hard standing/car parking associated with lease

– does not lend itself to separate use

Approx 4 employees



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Scale 1:11574



2014/07/17



08/10/11



2014/07/17



2014/07/17

BRITANNIA ROAD													
LAND TO EAST BRITANNIA ROAD													
May-06		Agreement for Sale			to	FCDL							
Nov-06		CB3		Office Scheme									
PLOT 1	2500 sq ft											Vacant 14mths	
01/09/2007		Licence		to 30/11/08		Gorman & Skenkis							
						Landscaping Materials & MOT Centre Car Storage							
PLOT 2	3400 sq.ft.											Vacant 4 yrs	
19/04/2011		Licence		to 18/04/2012		Site Civils			1 month notice				
						Civil and Building Material & Plant Storage							
PLOT 3	3400 sq.ft.											Vacant 4 yrs	
06/04/2011		Licence				Secure Access			1 month notice				
						Scaffolding Material storage							
PLOT 4	3000 sq.ft.											Vacant 6 yrs	
30/04/2013		Licence				Stuart Nealon			1 month notice				
						Computer Part Re-Cycling Storage							
PLOT 5	4500 sq.ft											Vacant 6 yrs	
31/05/2013		Licence				O Hertzog			1 month notice				
						ScrapCar Storage Site							
INDUSTRIAL UNITS		Agreement for Sale Dec 2010											
		Purchase Completed 25/03/2011		Registration Nov 2011									
All Leases Outside of Landlord & Tenants Act													
Unit 1 & 2		65 yr Underlease				Buttkreit							
						Heavy Motor gear Rewinders & Distributors							
Unit 3	4400 sq.ft												
20/12/2011		3yr Lease		20/12/2014		Paul Hickey						Vacant 9 mths	
						Car Accident Repairers - Park up to 100 cars							
Unit 4	3300 sq.ft.												
20/12/2012		3 yr Lease		20/12/2015		Brinicombe/Bhudda						Vacant 21 mths	
						Storage/Distribution Depot for Hydroponic Material & Equipment							
Unit 5	2200 sq.ft.												
						FCDL						Vacant Since Purchase	
Unit 6	4400 sq.ft.												
26/07/2012		3 yr Lease		26/12/2015		Annatolia Foods						Vacant 16 mths	
						Importers & Distributors of Foodstuffs							
Unit 7	2200 sq.ft.												
												Vacant 4 months from Purchase	
01/07/2011		6 mth Licence		31/01/2012		Digital Rev			not renewed				
												Vacant 4.	
18/06/2012		3 yr Lease	from 01/02/2012			MVC							
						Car Service & Repair garage							
Unit 7A													
01/01/2013		3yr Lease		01/01/2016		Ask Design						Vacant 20 mths	