

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

17 March 2014
Our ref: GCS/EP/C-0174899

Dear Sir / Madam

Trafford Local Plan: Land Allocations - Consultation Draft January 2014

On behalf of our client intu Properties Plc. (hereafter referred to as 'intu') we wish to provide comments on the Trafford Local Plan Land Allocations Consultation Draft, published in January 2014, in relation to intu Trafford Centre and its role within the Trafford Borough.

The Trafford Centre Rectangle Strategic Location

The intu Trafford Centre is located within the area designated as 'The Trafford Centre Rectangle' under Draft Policy TCR1 of the Local Allocations Plan, in which the area is recognised as a 'key strategic part of Trafford'.

Draft Policy TCR1 states that the Council will grant planning permission for '*the development of a mix of residential, employment, retail, leisure and community facilities*' at the Trafford Rectangle Strategic Location '*in accordance with Core Strategy Policy SL4*' and '*where it is consistent with other policies within the Local Plan and national planning policy*' to '*support and enhance the delivery of major mixed-use sustainable development*'.

intu are supportive of Draft Policy TCR1 including continuing to promote intu Trafford Centre as a location for high quality, sustainable development, recognising the significant role the Centre plays within both the Trafford Borough and the North West region as a visitor destination. As part of this, intu are wholly supportive of the Trafford Park Metrolink Extension, which will further enhance the accessibility of intu Trafford Centre within Greater Manchester, and the safeguarding of land for this purpose.

Whilst Draft Policy TCR1 notes that further mixed use sustainable development, including a mix of residential, employment, retail, leisure and community facilities will be supported by the Council, the Draft Policy does not fully recognise the role intu Trafford Centre plays as an established, high quality and innovative retail and leisure location within the Trafford Borough, which attracts more than 30 million

visitors to the Borough and the North West region each year.

It is suggested that further detail be included within Draft Policy TCR1 to note the important role that Intu Trafford Centre plays in this respect within Trafford and state clearly that *'the current role and status of Intu Trafford Centre will be supported and the development of additional retail and leisure uses within the Trafford Centre Rectangle Strategy Location will be supported where consistent with the Local Plan and national planning policy.'* This would be in accordance with the National Planning Policy Framework which recommends that Local Planning Authorities be positive and constructive towards economic development and recommends that there be 'a presumption in favour of sustainable development'.

Intu are committed to continuing to invest in the Trafford Borough, as evidenced in their ongoing investment in facilities at Intu Trafford Centre, including the delivery of the SEALIFE Centre at Barton Square, a popular new tourist attraction for the region which opened during 2013, and the forthcoming improvements to the retail offer at Barton Square. This continued investment at Intu Trafford Centre is clearly in accordance with the objectives of the Trafford Core Strategy, whose focus is the delivery of significant growth and development to secure the sustainable regeneration of the Borough over the Plan period.

It should also be recognised that Intu Trafford Centre is an important local employer, with over 8,000 people employed at the Centre, and that the continued future investment in the improvement of the Centre has the ability to continue to create a number of employment opportunities that will benefit the Trafford Borough. This is in keeping with the clear expectations of Local Planning Authorities, set out by the Government, to grant development consents which prioritise growth and jobs, as detailed in the Plan for Growth and the National Planning Policy Framework.

Retail Warehouse Parks

Draft Policy OR1 'Retail Warehouse Parks' recognises the role of the three existing retail warehouse parks within Trafford, White City Retail Park, Altrincham Retail Park and Trafford Retail Park, in providing for bulky goods retailing facilities that cannot be accommodated within existing town centres within the Borough.

The stated objective of this Policy is to ensure that this role is maintained, that the retail warehouse parks can continue to complement the offer of the Borough's town centres, and that the Council will *'promote new development that consolidates the existing function of the Retail Warehouse Parks as a specialist location for the sale of bulky comparison goods in accordance with Core Strategy Policy W2.14'*.

The second part of the Policy (para. 20.4) identifies that planning permission will be granted for non-bulky comparison and convenience retail and other town centre uses where the following criteria are met:

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- Will not prejudice the primary function of the Retail Warehouse Parks as facilities for the retail of bulky comparison goods;
 - Cannot be accommodated on a sequentially-preferable site;
 - Will not result in a significant adverse impact on any defined town centre within the catchment area of the proposal; and
 - Is in accordance with other policies within the Trafford Local Plan, and national guidance, as appropriate.

It is clear from the first part of Draft Policy OR1 that the intention is to safeguard the existing Retail Warehouse Parks for bulky-goods retailing, which is wholly in accordance with Core Strategy Policy W2.14 which states that *'Further development within the retail warehouse parks should be limited to the sale of bulky comparison goods only.'*

However, this objective is diluted by the second part of Draft Policy OCR1 which outlines that non-bulky comparison and convenience goods floorspace will be deemed acceptable subject to the criteria set out above, which is not consistent with Core Strategy Policy W2.14. It is therefore suggested that this part of the Policy is amended to be in line with the Core Strategy Policy W2.14.

Public Transport Network

Draft Policy TR2 sets out the Council's commitment to *'to secure improvements to the frequency and reliability of the public transport network'* and *'support further development of a high quality integrated public transport network offering a choice of modes of travel to all sectors of the local community and visitors to the Borough.'*

Policy TR2.1 specifically relates to the Metrolink. It is stated that the improvement and extension of the Metrolink will be encouraged and promoted by the Council. It is noted that the proposed enhancements to the Metrolink within the Trafford Borough are identified on the Policies Map, and include new Metrolink stops on the Trafford Park extension at Wharfside, Imperial War Museum, Village, Parkway Circle, EventCity and intu Trafford Centre.

intu are wholly supportive of this Policy, including the proposed Metrolink Trafford Park extension and the safeguarding of land to allow the development of Metrolink stops in due course.

We trust you will take the above comments into account in the preparation of the next stage of the Trafford Local Plan: Land Allocations. We would also request that we have the opportunity to contribute to further Local Plan consultations and attend any Examinations of the Local Plan in due course.

If you have any queries or require any further information with regard to these comments, please do not hesitate to contact us. In the meantime, we would be grateful if you could confirm receipt of this submission.

Yours sincerely

Graham Stock
Deloitte LLP