

**PEEL GROUP**

**GENERAL REPRESENTATIONS ON THE  
TRAFFORD BOROUGH COUNCIL DRAFT CORE  
STRATEGY PREFERRED OPTIONS DOCUMENT**

**DOCUMENT 1**

**AUGUST 2008**

**TORLEY & SONS**

## CONTENTS

1. Introduction	1
2. General Representations	2

### Appendices:

Appendix 1 - Plan identifying Peel's proposals  
for an alternative Inner Area Boundary

Appendix 2 - Plan identifying additional key  
strategic site at junction 9 of M60

TA Ref: PEEM1016

LPA Ref:

Office Address: The Chancery  
58 Spring Gardens  
Manchester  
M2 1EW

Telephone 0161 831 1300

Date of Issue: 26 August 2008

All comments relate to the Core Strategy document and unless stated should be recorded as an objection.

## 1. Introduction

- 1.1 This document has been prepared on behalf of the Peel Group and comprises **general representations** on Trafford Borough Council's Draft Core Strategy Preferred Options Document (CSPOD) which was published for the purposes of public consultation on the 16<sup>th</sup> July 2008.
- 1.2 It is Document No.1 in a suite of 3 documents prepared on behalf of Peel Group in respect of the Draft CSPOD the others being:
  - Document 2 – Trafford Centre Rectangle Planning and Development Framework
  - Document 3 – Trafford Quays Concept Statement.
- 1.3 It is important to note that all the documents are interrelated and should be read together in order for Peel's representations to be properly understood.

## 2. General Representations

2.1 Our representations begin by addressing what we consider to be the four principal issues which arise from the draft CSPOD. These are:

- Anticipated date of plan adoption and subsequent 15 year time horizon.
- Definition of the Inner Area Boundary
- Spatial Options
- Definition of Key Strategic Sites

2.2 Thereafter, our representations follow the same order as the CSPOD

### Anticipated Date of Plan Adoption

2.3 Planning Policy Statement 12, paragraph 4.13, requires the time horizon of the Core Strategy to be 'at least 15 years from the date of adoption'.

2.4 Given that the Core Strategy in this particular case is, in our opinion, unlikely to be adopted before 2010, the document should cover the period to 2025.

102  
Para 1.5

2.5 Presently, paragraphs 1.5 and 3.3 of the Draft CSPOD refer to an end date of 2023 and 2024 which by implication assumes adoption in 2008/09. The Local Development Scheme assumes adoption at the end of 2009 but that is predicated upon a submission to the Secretary of State in September this year which is plainly not going to happen.

103  
Para 3.3

### Inner Area Boundary

2.6 The proposed Inner Area Boundary as defined in Figure 2 of the Draft CSPOD excludes the Trafford Centre Rectangle

104  
Fig 2

2.7 Paragraph 2.20 of the Draft CSPOD confirms that this definition was agreed in collaboration with the neighbouring authorities of Manchester and Salford.

2.8 Peel object to the proposed Inner Area boundary definition on the basis that it has not been, and is not currently, the subject of public consultation. Further, Trafford Borough Council have not advanced any evidence to justify why the selected boundary is considered to be the most appropriate, nor have they explained why other alternatives have been discounted. As is detailed within paragraph 4.36 of

PP12 core strategies are, amongst other things, required to be the most appropriate strategy when considered against "reasonable alternatives".

- 2.9 We believe that a more logical Inner Area Boundary would be that shown on the plan contained at Appendix 1 and which includes the Trafford Centre Rectangle. Our reasoning is set out below.
- 2.10 The Northern Way Growth Strategy explains that the City Regions are to be the powerhouses of accelerated economic growth. Reference is also made in the Northern Way documents and the Regional Housing Strategy to the housing offer in the Manchester City Region holding back economic growth. Consequently a step change in the quantity and quality of housing provision in the region is recommended. An important point to note at the outset is that City Regions are of a significantly greater scale than cities.
- 2.11 Emerging RSS has placed City Regions rather than cities at the heart of spatial planning for the North West. In respect of the Manchester City Region, Policy MCR2 requires that the defined Regional Centre is to be the main focus for economic growth. The Regional Centre of the Manchester City Region comprises Manchester City Centre and Central Park to the East, the Higher Education Precinct and Central Manchester Hospitals to the South and Salford Quays, Salford University, Trafford Wharfside and Pomona Docks to the West.
- 2.12 Policy MCR 2 also confirms that residential development is to be focussed in the surrounding Inner Areas to meet both locally generated and "aspirational" needs and to secure a **significant** increase in their populations. It goes on to note that the Inner Areas have enormous potential for new housing and economic development which, if left untapped, will limit the ability of the Regional Centre to secure investment and generate economic growth in the City Region.
- 2.13 Emerging RSS (paragraph 10.6) states that the Inner Areas surrounding the Regional Centre comprise North Manchester, East Manchester and Central Manchester Regeneration Areas, **Trafford Park, North Trafford** and Central Salford. The extent of these areas is consistent with the City Region concept. The decision to elevate this definition into the supporting text from a footnote was taken by the Secretary of State to provide clarity.
- 2.14 Whilst detailed boundary definitions are for LDF documents, it is highly significant that emerging RSS confirms that the whole of Trafford Park should form part of the Inner Area. The Draft CSPOD clearly recognises that the Trafford Centre Rectangle forms part of Trafford Park. Furthermore, North Trafford is also part of

the definition and it is beyond argument that the Trafford Centre Rectangle is in North Trafford.

- 2.15 The decision to include North Trafford and Trafford Park within the Inner Area was taken between the Interim and Submission Draft stages of Emerging RSS and conveys a clear requirement that the Inner Area definition should embrace Trafford Park and its role as both an existing, and future potential, strategic employment area which provides for large numbers of jobs for those living in the surrounding residential neighbourhoods. The Trafford Centre Rectangle is a critical component of Trafford Park with regard to current and future employment opportunities.
- 2.16 Following on from the above it is clear that, within Trafford, the definition of the Inner Area should focus on opportunity rather than on need alone. Accordingly, the boundary should be defined so as to maximise the opportunity for Trafford to contribute both to providing accommodation for modern businesses in all of the growth sectors and to achieving the step change that is required in the provision of high quality housing to support the economic growth in Trafford Park, the Regional Centre and the City Region..
- 2.17 The Trafford Centre Rectangle has formed an integral part of Trafford Park since the early 1900s and was, indeed, a strategic development site within the Trafford Park UDA; designated in the late 1980s for a period of 10 years. One of the main reasons why the Secretary of State granted planning permission for the Trafford Centre in 1993 was the contribution it would make to the regeneration of Trafford Park.
- 2.18 Trafford Park is one of the largest employment areas in the UK and has been a strategic employment area for decades – contributing c 75,000 jobs at its peak. Within the Park the Trafford Centre Rectangle supports a substantial number of jobs –in excess of 10,000 – which is approximately 20% of the total employment in Trafford Park<sup>1</sup>. The Rectangle is well placed to make a significant contribution to meeting future development needs both for new employment and housing. This opportunity consists of approximately 6 or more sites including Trafford Quays which could be brought forward for development in the period to 2025 including

---

<sup>1</sup> The Trafford Economic Development Plan 2005 estimates employment in the main industrial area of the Park to be c.40,000 jobs.

sites suitable for high quality housing and business accommodation (see Document 2).

- 2.19 Further, the Trafford Economic Development Plan sets out the commitment of TBC and its partners to make a significant contribution to the achievement of the economic growth of MCR and also notes the considerable potential of Trafford Park to play a role in this through the means of a new Vision and Strategy for its enhancement and repositioning as a strategic employment area in the 21<sup>st</sup> Century. In this context reference is made to the ARUP Employment Land Study, undertaken for the North West Regional Assembly to inform draft RSS, which notes the significance of the likely shift in demand away from manufacturing. This points to a major opportunity over the plan period for change and renewal in Trafford Park and in this regard it is noteworthy that the Council has recently commissioned a Masterplan for the area which will assist with the repositioning of Trafford Park.
- 2.20 Existing development in the Trafford Centre Rectangle has already contributed to significant improvements to the public transport accessibility of Trafford Park. The potential for a wider range of uses including residential on sites such as Trafford Quays to support further improved public transport is recognised in the Trafford Park Accessibility Study (2007) which was commissioned jointly by GMPTE, TBC and SCC (see Document 2 for further detail)<sup>2</sup>.
- 2.21 The importance of the contribution which the Trafford Centre Rectangle can make to the provision of new housing for the City Region has recently been confirmed by the fact that the Rectangle is specifically identified as one of the areas of Trafford where further development should be brought forward in the Government's "Partnerships for Growth" initiative. The New Growth Points (NGP) initiative was announced by the Government in 2006 when 29 local authorities and partnerships were named as NGPs, commencing a long term partnership for growth with the Government. The programme has recently been expanded and, in July 2008, the Government confirmed that a bid by AGMA had been approved. As part of this bid, Trafford is one of four local authorities in Manchester committed to increasing the supply of good quality new housing to ensure that Greater Manchester's contribution to the growth of the UK economy is not constrained. Importantly, in the Government's document "Second Round Growth Points", the Trafford Centre

---

<sup>2</sup> The Council should include the Trafford Park Accessibility Study in its evidence base

Rectangle is included as one of the identified areas where further development will be brought forward.

2.22 In conclusion, having regard to:-

- the scale of City Regions and the consequential implications for the extent of Regional Centres and Inner Areas;
- the fact that emerging RSS requires significant economic growth for the City Region, which must be supported by a supply of new good quality housing;
- the requirement of emerging RSS that economic growth be focussed in the Regional Centre, with the concern that residential development in the Inner Areas is crucial to support that economic growth and the consequential requirement for the Inner Areas to focus on the provision of opportunity as well as meeting need;
- the inclusion of both North Trafford and Trafford Park within the Inner Areas, within both of which descriptions the Trafford Centre Rectangle clearly lies;
- the contribution which the Rectangle has made and continues to make as part of Trafford Park in terms of regeneration, job creation and improved public transport accessibility;
- the particular opportunity presented by Trafford Park to contribute to the economic growth of the Manchester City Region, as envisaged by the Council's Economic Development Plan; and
- the opportunity for residential development in the Trafford Centre Rectangle as recognised by the Government's recent "Second Round Growth Points" document
- it is clear that, in order to provide "the most appropriate strategy", as required by PPS12, the Trafford Centre Rectangle should be located within the Inner Area boundary.

### **Spatial Options**

2.23 Whichever spatial option is chosen it is imperative that the increased housing requirements for 2008/9-2016/17 which derive from Trafford's New Growth Point status are factored into the Council's assessment of overall housing requirements



for the plan period (which we anticipate as being 2010-2025) and the Council's subsequent assessment of the most appropriate approach for meeting these requirements spatially.

- 2.24 To meet the increased housing requirement through 'plan, monitor and manage', as has been suggested in paragraphs 5.16 (on page 59) and 7.8 of the CSPOD would be in direct conflict with the advice contained in PPS12 (paragraph 4.26) which refers to growth point status as a "major change in circumstance" with the clear recognition that this will require a high level of public consultation on the strategic options.
- 2.25 We also wish to record that, not only does the Trafford Centre Rectangle have the potential to accommodate significant levels of growth and development during the plan period but it is also identified as a location for further development in the Government's 'Second Round Growth Points' document. As such all three spatial options, prepared before the Government's announcement, which indicate the Trafford Centre Rectangle as having only moderate levels of growth should be revised and amended accordingly.
- 2.26 Taking the above into account, **we wish to support Option 2** of the proposed Spatial Options, with some qualifications.
- 2.27 First, we consider the quantum of residential development (1000 units<sup>3</sup>) which the CSPOD Option 2 presently estimates as being capable of being accommodated at the Trafford Centre Rectangle under this option during the plan period to be unduly conservative.
- 2.28 As is detailed in Document 2 of our representations, we believe that 1275 dwellings can be accommodated on the Trafford Quays site alone in the plan period of 2010-2025 and, as such, it is particularly well placed to meet the enhanced housing requirements which New Growth Point Status brings for the period 2008/09-2016/17. It appears from Appendix 5 to the Sustainability Appraisal that, in capacity terms, this figure has been considered acceptable by the Council. In the circumstances, we ask that the contents of pages 39 and 75 be amended accordingly.

105  
P. 59  
5.16

106  
P. 73  
7.8

107  
Spatial option  
2  
support

108  
P. 39

109  
P. 75

---

<sup>3</sup> This figure is not consistent with that shown in the Draft Strategic Housing Land Availability Assessment and is plainly incorrect. We comment on this further in the representations on the SHLAA.

- 2.29 We similarly believe that the level of housing proposed for the Pomona-Wharfside area is unduly conservative bearing in mind its size and location within the Regional Centre.
- 2.30 The Draft CSPOD allocates, under Spatial Option 2, 1500 dwellings to Pomona-Wharfside during the plan period (page 75) with the implication being, having regard to the information provided at Page 39, that 750 dwellings will be provided at Wharfside and 750 at Pomona.
- 2.31 We consider that Pomona in particular has the potential to accommodate a higher number of dwellings during the plan period and note that, within the Draft SHLAA, it is estimated that Pomona will contribute 1300 dwellings in the plan period with a significant number to follow after the end of the plan period. Like the Trafford Centre Rectangle Pomona is specifically identified as a site where further development will be brought forward in the Government's "Second Round Growth Point" document.
- 2.32 In the circumstances, we request that the 'allocation' for Pomona-Wharfside be uplifted to 2000 dwellings and contents of pages 39, 41 and 75 be amended accordingly.

110  
P 41

### Key Strategic Sites

- 2.33 For the reasons given above we support the identification of **Trafford Park** and the **Trafford Centre Rectangle** as Key Strategic Sites in all three options. We are similarly supportive of the manner in which they are described. The Trafford Centre Rectangle should include the 'triangle' of land adjacent to Junction 9 of the M60 as shown at Appendix 2.
- 2.34 We support the identification of **Wharfside and Pomona as Key Strategic Sites** in all three options. However we consider that the description of the forms of development which would be considered acceptable should be clarified. Particular recognition should be given to the fact that the number and type of businesses which would fall under the umbrella of 'digital and media industries' is potentially very wide and goes beyond the basic interpretation of television, publishing and IT. Furthermore, whilst these uses should be the focus care needs to be taken in the final version of the Core Strategy not to preclude any other kind of employment use given the location of the sites in the Regional Centre and the requirements of Policy MCR2 in emerging RSS.

111  
P. 63  
Site D  
Support

112  
P 64  
Site E

113  
P. 62  
Site B

114  
P. 60  
Site A

**Figure 3: Places in Trafford**

- 2.35 The recognition within Figure 3 and the text within Page 13 that the Trafford Centre Rectangle forms part of Trafford Park is supported. As is detailed within our responses at paragraph 2.17 et seq, the Trafford Centre Rectangle has formed part of Trafford Park since the early 1900's and remains an important part of the Park.

115  
Fig 3  
P. 12  
Support

**Page 13 – Trafford Park Spatial Profile**

- 2.36 We question the accuracy of the job generation / wage injection figures attributable to Trafford Park.
- 2.37 It is reported that the Trafford Park area employs in the region of 8,000 people. This is clearly incorrect.
- 2.38 As set out in paragraph 2.18 above, the businesses within Trafford Park (excluding the Trafford Centre Rectangle) employ in the region of 40,000 people. Employment in the Trafford Centre Rectangle is in the region of 10,000 persons. The total employment figure for Trafford Park is therefore c. 50,000 or greater.
- 2.39 It is similarly reported that businesses in Trafford Park inject between £45 and £55 million in wages into the regional economy. This figure is also incorrect.
- 2.40 In fact, the Trafford Centre and its associated development alone injects this figure in wages into the regional economy. <sup>4</sup>The wage injection of Trafford Park (of which the Trafford Centre forms part) is obviously considerably higher.

116  
P. 13

**Page 13 – Trafford Park Key Issues – work**

- 2.41 Under the sub-heading of 'Work' it is considered that the current status of the Trafford Centre Rectangle as a place to 'work' and its potential to accommodate further employment generating developments should be recognised, in the same way that it is in Section 6 and through its identification as a Key Strategic Site.
- 2.42 Under the same sub heading, it is considered that the forms of development which would be considered acceptable should be clarified. Particular recognition should

---

<sup>4</sup> This information is also included in the Trafford Economic Development Plan 2005.

be given to the fact that the number and type of businesses falling under the umbrella term of 'digital and media industries' is potentially very wide and goes beyond the basic interpretation of television, publishing and IT.

***Page 16 – Urmston - Key Issues – Live***

- 2.43 The need to 'manage the congestion associated with the Trafford Centre' is identified as a key issue. Presumably, given the Urmston context, this relates to Junctions 9 and 10 of the M60, which provide access to the Urmston area.
- 2.44 We object to this being identified as an issue requiring resolution since the Trafford Centre does not create regular traffic congestion<sup>5</sup>. The only significant congestion directly caused by the Centre is at the small number of peak trading times within the year.
- 2.45 There are regular reduced speeds on the M60, particularly in the PM peak period in a clockwise direction, which affect the ability to join the motorway at these times and, as a result, the operation of the junctions serving Urmston. This reduced level of service is caused by the tailback from the M60/M 62/M602 merges to the north and not the Trafford Centre. It would be very misleading to state or imply otherwise.
- 2.46 Peel therefore requests the removal of the specific reference to the Trafford Centre in the Urmston context.

117  
P.16

***Page 16 – Urmston - Key Issues - Learn***

- 2.47 We support the recognition which the CSPOD gives to the need to ensure that Urmston residents are able to access jobs in Trafford Park and at the Trafford Centre.
- 2.48 We consider that similar recognition should be given to other areas of the borough such as Old Trafford and Stretford.

118  
P14

119  
P15

---

<sup>5</sup> As we are advised by Peel's Retained Highway Consultants.

**Page 23 – Carrington – Key Issues – Live**

- 2.49 Under this sub-heading, it is stated that the potential of the creation of an Eco Town at Carrington is being investigated.
- 2.50 On the 30<sup>th</sup> April 2008 Central Government announced a shortlist of 15 Eco Towns for consultation and Carrington was not included.
- 2.51 In the circumstances the aforementioned reference is outdated and should be deleted, as should other references to the Eco-Town (eg. paragraph 5.17 on page 59).

120  
P. 23

**Figure 4 Strategic Objectives**

- 2.52 Strategic Objective SO6 includes reference to the Manchester Ship Canal in an Objective which is aimed at improving sporting and leisure assets with a view to involving people more in physical and cultural activities and creating attractive public open spaces. Reference in this Objective to the Manchester Ship Canal should be deleted as it is a commercial working canal and not a leisure/sporting asset.
- 2.53 Strategic Objective S07 should be amended to make specific reference to the need to improve public transport accessibility to and within Trafford Park
- 2.54 There is, we believe, a need for a further Strategic Objective specifically relating to the Trafford Centre Rectangle (potentially numbered as S03A or S04). This may be worded as follows:

121  
Strat. Obj. SO6  
P. 25

122  
Strat. Obj ref S07  
P. 26

123  
Strat obj ref  
"new"

*"Maximise the potential of the Trafford Centre Rectangle to accommodate additional development which is complementary to the existing range of facilities within this area with a particular focus upon high quality residential accommodation which will contribute to the creation of a sustainable community."*

**Paragraph 4.1 (Table of Place Visions and Objectives)**

- 2.55 The 'Vision' for Trafford Park should be broadened to include making reference to improving the mix of uses at each end of the Park (Wharfside /Trafford Centre Rectangle).
- 2.56 The amended text might be as follows:

124  
P. 28  
TPV

*"To sustain Trafford Park as a regionally significant focus of economic activity with an improved mix of uses at Wharfside and within the Trafford Centre Rectangle serving and supporting the business and employment needs of Trafford and the Wider City Region economy and its residents"*

- 2.57 The text within **TP02** understates the importance of the place objective. Reference should be made to 'promoting and supporting' significant mixed business and residential development and not just creating the right conditions.

125  
P.28  
TP02

- 2.58 Although Peel supports the reference in **TPO3** to maximising the economic and residential potential of Trafford Park, this is essentially a repetition of Objective TPO2. We suggest combining TPO2 and TPO3 into one Objective which reads:-

126  
P.28  
TPO3

*"Maximise the economic and residential potential of Trafford Park by promoting and supporting significant mixed business and residential development at Wharfside and the Trafford Centre Rectangle and by maintaining the function of the core as a business location".*

- 2.59 The reference in **TPO4** to 'digital and media industries at mediacity.uk' should be clarified as we suggest at paragraph 2.34 and 2.42 of this document.

127  
P.28  
TPO4

- 2.60 Objectives **OTO2** and **OTO3** should be combined in a similar way to TPO2 and TPO3 as follows:-

128  
P.28  
OTO2

*"Maximise the economic and residential potential of Old Trafford by promoting and supporting significant new business and residential led regeneration schemes to create sustainable communities close to the Regional Centre".*

128  
P.28  
OTO3

- 2.61 The area objectives for Stretford, Urmston, Sale and Altrincham all include reference to restricting private market housing in accordance with RSS policy MCR3 but allowing housing that supports local needs and regeneration strategies etc (i.e. **STO3** and **STO8**). It is unnecessary to say both. Accordingly we request that, in each case, the objective which seeks to restrict private market housing should be removed and greater reliance placed on the provisions of Policy MCR3. For example, objectives **STO3** and **STO8** would be deleted and replaced by a single objective which reads as follows:

130  
P.29  
STO3

*"To allow new housing in sustainable locations that supports local regeneration strategies and to meet identified local needs in accordance with Policy MCR 3 of dRSS"*

130  
P.29  
STO8

132  
P.29  
URO3

133  
P.29  
URO5

134  
P.29  
SA03

135  
P.29  
SA04

136  
P.30  
ALO2

137  
P.30  
ALO4

## Core Policies

### Paragraph 7.5

- 2.62 The text within this paragraph reports the housing requirement for the period 2003-2021 as being 618 dwellings per annum (including clearance replacement). This equates to a requirement for a total of 11,124 dwellings.
- 2.63 In line with our representations at paragraph 2.22, we believe that the figures should be amended to take account of the increased housing requirements for the period 2008/09-2016/17 which derive from Trafford's New Growth Point Status. Adopting this approach increases annual requirement in the period 2008/9-2016/17 to 734 dwellings and the total requirement over the period 2003-2021 to 12,052 dwellings.
- 2.64 This in turn equates, to a 15 year requirement from date of plan adoption (2010-2025) of 9,966.

138  
P. 72  
Para 7.5

### Figure 5

- 2.65 The figures in figure 5 relating to the number of units are taken from the Draft Strategic Housing Land Availability Assessment and will need to be reviewed in light of comments made on the Draft SHLAA.

138  
P. 73  
Fig 5

### Core Policies and Development Management Policies

- 2.66 It is noted that the Core Policy Direction and Development Management Policies merely provide the 'headlines' for a series of proposed policies to be developed in the future.
- 2.67 It is difficult to provide comments and assess the soundness of what is proposed without seeing greater detail and there should be a further round of consultation when the proposed wording of the policies has been worked up.
- 2.68 Our comments on the policy directions as they currently stand are as follows:

140  
Para 7.3  
Page 72

### Core Policy Direction L1

- 2.69 The Policy should meet the RSS requirements as augmented by the requirements of New Growth Point status.

140  
Policy L1  
P. 76

2.70 The Trafford Centre Rectangle should be included within the list of locations where the Council wishes to focus future housing development (second bullet point). This is for the reasons given elsewhere in the representations and to ensure consistency with other elements of the Core Strategy.

2.71 It is considered that the fourth bullet point replicates advice contained in national and regional planning policy and is therefore unnecessary.

**Core Policy Direction L2**

2.72 It is considered that the fifth bullet point contained within this policy understates the objectives of adopted and emerging RSS and the Regional Economic Strategy.

142  
L2  
P.78

2.73 We consider that it should be reworded as follows:

- Encourage the provision of suitable accommodation and provide the right environment to enable key growth sectors to flourish in the borough.

**Core Policy Direction L3**

2.74 The Trafford Centre Rectangle (not just Trafford Quays) should be included in the list of areas where mixed use development will be promoted. This is for the reasons given elsewhere and to ensure consistency with other areas of the Core Strategy.

143  
L3  
P.79

**Paragraph 7.24**

2.75 The Trafford Centre Rectangle should be included within the list of the Borough's most accessible locations. This is because of its current accessibility by non car modes (it includes the bus station for example) and because of the potential to increase its accessibility and linkages to neighbouring areas through the scale of mixed use development which is being promoted in other areas of the Core Strategy.

144  
Para 7.24  
P.79

**Development Management Policy Direction DM1**

2.76 The policy direction indicates the Council's intention to develop policy which will require new residential developments to achieve Sustainable Code for Homes Level 6 by 2014. This requirement is out of step and potentially more onerous than that which has been expressed at national and regional level Accordingly, we object and request that the target in the second bullet be amended to:

145  
DM1  
P.97



- As appropriate, seek to achieve Code for Sustainable Homes Level 6 by 2016

2.77 This would be consistent with the provisions of the consultation paper 'Building A Greener Future: Towards Zero Carbon Development' and with emerging RSS (Policy EM16).

#### ***Development Management Policy Direction DM5***

2.78 The first bullet point in this policy direction indicates that the Council will set a threshold to which affordable housing requirements will be applicable, of 15 dwellings or more.

2.79 The fourth bullet point goes on to indicate that the Council will establish a target contribution for affordable housing at 40% on all qualifying sites, reducing to a minimum of 30% in exceptional circumstances.

2.80 We would object to the incorporation of any threshold and target contributions within the Core Strategy unless they have been informed by an assessment of the economic viability including the impact on overall levels of housing delivery as is required by paragraph 29 to PPS3.

2.81 Our position on this particular issue is informed by the case of (1) Persimmon Homes (North East Ltd), (2) Barratt Homes Ltd, (3) Millhouse Developments Ltd v Blyth Valley Borough Council May 2008 (CO/7040/2007). In this particular case, Mr Justice Collins quashed a policy known as H4 in the Blyth Valley Core Strategy relating to affordable housing on the basis that it failed to comply with the requirements of paragraph 29 of PPS3. That decision has recently been upheld by the Court of Appeal.

2.82 We also reserve our position on whether it would be appropriate to delegate to an SPD matters such as defining exceptional circumstances or calculating a commuted sum until we see the wording of the detailed policy. Delegation to an SPD would also have to comply with PPS12.

#### ***Development Management Policy Direction DM6***

2.83 The third bullet point refers to developing policy to require developers of strategic sites to bring forward schemes to meet the needs of Trafford's Housing Market Assessment. In drafting the detail of the policy, the Council should bear in mind that some of the sites (e.g. Pomona, Wharfside and Trafford Centre Rectangle) will

146  
DM5  
P.101

147  
DM6  
P.102

be providing housing to meet the broader needs of the City Region. The detailed policy must reflect this.

***Development Management Policy Direction DM7***

2.84 The third bullet point refers to focusing development in existing centres and near to major public transport interchanges. The detailed policy should ensure that the definition of major public transport interchanges is drawn so as to include the Trafford Centre Bus Station, as this is one of the principal contributors to the public transport accessibility of Trafford Park and provides a key opportunity to help achieve the increased public transport accessibility of Trafford Park that is required elsewhere in the draft CSPOD.

148  
DM7  
P.103

2.85 We reserve our position on whether it would be appropriate to delegate matters to an SPD until we see the wording of the policy. Delegation to an SPD would have to comply with PPS12.

***Development Management Policy Direction DM8***

2.86 At this stage, we simply make the point that the policy must comply with Government policy at the time, particularly concerning contributions to the provision of community infrastructure and delegation to an SPD.

148  
DM8  
P.105

**Appendix 1 - Plan identifying Peel's proposals for an  
alternative Inner Area Boundary**



key

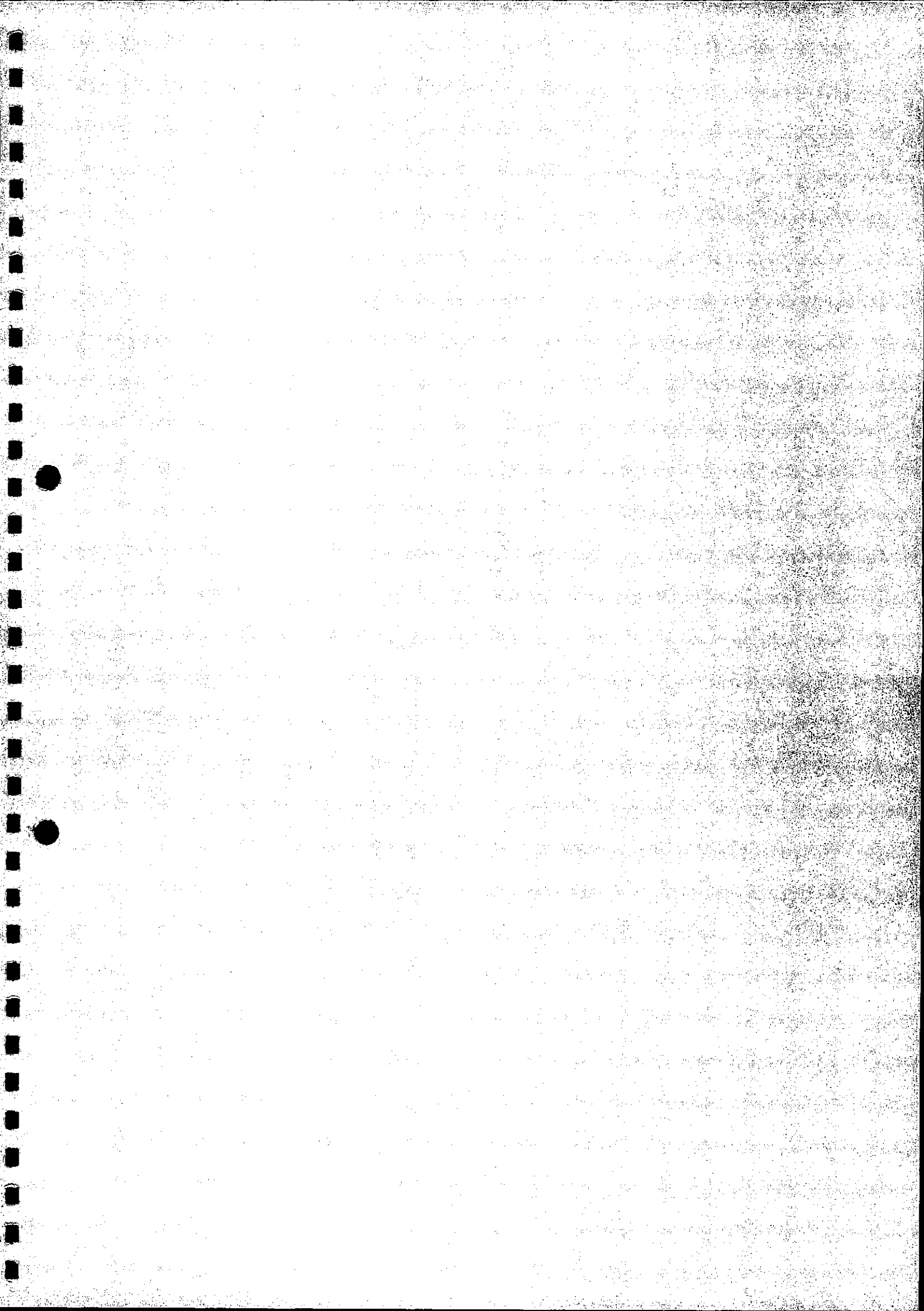
- Motorway Network
- Trafford MBC Boundary
- Regional Centre
- Peel Proposed Alternative Inner Area Boundary
- Trafford Park
- Trafford Rectangle
- Wharfedale
- Pomona-Ordsall

**Appendix 2 - Plan identifying additional key strategic site at  
junction 9 of M60**



junction 9 key strategic site

TURLEYASSOCIATES



COPY 3/1/08

PO/1045/—  
**TURLEY**

<b>STRATEGIC PLANNING AND DEVELOPMENTS</b>			
29 AUG 2008			
Rec			
Action by			
Ans			
Copied to:			

27 August 2008

Delivered by Post

Mr D Smith  
 Trafford Borough Council  
 Strategic Planning and Development  
 1st Floor, Waterside House  
 Sale Waterside  
 Sale, M33 7ZF

The Chancery  
 58 Spring Gardens  
 Manchester  
 M2 1EW

ACK 28/8

T: 0161 831 1300  
 F: 0161 831 1301

www.turleyassociates.co.uk

Our ref: MW/HSB/PEEM1016

E: mworchester@turleyassociates.co.uk

Dear Mr Smith

**COMMENTS ON TRAFFORD BOROUGH COUNCIL DRAFT CORE STRATEGY PREFERRED OPTIONS DOCUMENT ON BEHALF OF THE PEEL GROUP**

I set out below a number of additional representations to the Draft Core Strategy Preferred Options Document. These representations have been prepared by Turley Associates, on behalf of the Peel Group, today. They are additional to and should be read alongside the representations already submitted by Turley Associates on behalf of Peel in bound report format dated 26<sup>th</sup> August 2008.

**Key Strategic Sites**

We support the identification of Carrington and Partington Canalside (Sites H and I) as Key Strategic Sites. We are similarly supportive of the manner in which they are described.

We note that the following sites have not been identified as Key Strategic Sites:

- Broadheath (West) – Craven Road;
- Former Boat Yard, Edge Land, Stretford

We request that the Council gives due consideration to allocating these sites for the land uses previously put forward by Peel, in its Area Allocations Development Plan Document in due course.

**Paragraph 4.1 – Table of Place Visions and Objectives**

The text within CAO1 understates the importance of the place objective. Reference should be made to 'promoting and supporting' the development of a mix of new business activities.

150

151

152

153

CF 01

P. 1



I trust that these additional representations are of assistance and will be taken in account in the normal way.

Yours sincerely

**Mark Worcester**  
**Associate Director**

cc: D Thompson

Peel

PC - 1045 - 154  
TO  
160

**PEEL GROUP**

**TRAFFORD BOROUGH COUNCIL  
SUSTAINABILITY APPRAISAL OF THE DRAFT  
CORE STRATEGY PREFERRED OPTIONS  
DOCUMENT**

**REPRESENTATIONS**

**AUGUST 2008**

## CONTENTS

1. Introduction	1
2. Representations	2

TA Ref: PEEM1016

LPA Ref:

Office Address: The Chancery  
58 Spring Gardens  
Manchester  
M2 1EW

Telephone 0161 831 1300

Date of Issue: 26 August 2008

## 1. Introduction

1.1 This document has been prepared by Turley Associates on behalf of the Peel Group and comprises representations on the Sustainability Appraisal of the Draft Core Strategy Preferred Options (Draft CSPOD) which was published by Trafford Borough Council for the purposes of public consultation on the 16th July 2008.

1.2 As the Sustainability Appraisal informed preparation of the Draft CSPOD, it is important that representations contained within this document are read alongside our representations to the Draft CSPOD which comprise:

- Document 1 – General Representations
- Document 2 – Trafford Centre Rectangle Development Framework
- Document 3 – Trafford Quays Concept Statement

All references to SA doc.

## 2. Representations

2.1 We generally agree with the broad conclusions of the Sustainability Appraisal of each of the Options as summarised in the Draft CSPOD. Accordingly and in the limited time available, we have only considered the SA in relation to Option 2 which is the Option we support subject to important qualifications as set out in our representations on the Draft CSPOD. Our comments are as follows.

154

Support  
P 33, P 35  
P 37 diagram SA

2.2 On page 9, in Spatial Option 2, Social Objective S1, we disagree with the suggestion that it may be necessary to limit the number of smaller units in Pomona and Wharfside. These sites lie within the Regional Centre and have a social role to play which goes beyond just that of meeting needs in Trafford. We have already pointed out in our representations on the Draft CSPOD (Document 1) that the housing contribution of Pomona and Wharfside should be uplifted to 2000 in Option 2. The social impacts of this will be positive particularly when viewed in the context of the growth and investment required by policy of all kinds in the Regional Centre.

P 9 S1  
155

2.3 On page 18, in Spatial Option 2, Environment Objective E3, we disagree that the impacts of Option 2 on climate change and energy will be negative. Indeed, the text prior to the final sentence which reaches that conclusion all points to the impacts being neutral. This conclusion should be reviewed therefore.

P 18  
E3 156

2.4 On the same page, the conclusion on flooding (Environment Objective E4) has to be very provisional in the absence of the SFRA but, in any event, is deficient in that it seems to focus solely on flood plain issues and not flood risk from inadequate urban drainage systems. High concentration of development in small parts of the Borough could accentuate these risks so the more balanced approach in Option 2 is a positive in relation to this aspect of flooding.

P 18  
E4 157

2.5 On page 28, paragraph 4.5 refers to potentially more commuting with high levels of development around the Trafford Centre. This conclusion ignores the fact that the Trafford Centre Rectangle is itself a major employment area and is located within the biggest employment area in Trafford, namely Trafford Park which is also one of the largest employment areas in the City Region. The proposal to locate significant new housing in the Rectangle is likely to contribute to reducing the need to travel, including commuting.

P 28  
Para 4.5  
158

2.6 Appendix 5, on page 39, summarises changes made to the Options. The third bullet in Spatial Option 2 refers to changing the level of development in the Trafford Centre Rectangle from "significant" to moderate" including reducing the housing from 1200 to 1000. In our representations on the Draft CSPOD we have asked that this be reviewed in all three Options.

159

P 39  
Repeat of comment on CSPOD

reference to comments on Option 2

- 2.7 The reasons given for the changes in this Appendix, however, are to concentrate on brown field development and assist Partington.
- 2.8 As to the brown field point, this ignores the fact that the vast majority of the Rectangle comprises brownfield land. Although Trafford Quays is mainly not previously developed, even parts of that site are brownfield. Furthermore, the sustainability credentials of the Rectangle, including Trafford Quays should be considered as whole and we refer you in this connection to our representations on the Draft CSPOD and especially documents 2 and 3. The approach taken in this part of the SA is far too simplistic.
- 2.9 It is also entirely unclear how this change in the level of development in the Rectangle would assist Partington. Peel has major interests in Partington, as the Council knows, and is working with the Council to improve housing and services there. That commitment is not dependent on the level of development around the Trafford Centre. In any event, the fourth bullet of the SA indicates that the reduction in housing of 200 units which was made resulted in a reallocation to Old Trafford and Trafford Park – not Partington. This further undermines an already untenable conclusion.
- 2.10 As to the fifth bullet, we agree that the new sustainable community to be created at Trafford Quays will include convenient access to community facilities some of which will be on site. The precise nature and location of these will be the subject of further study.

P. 39.  
fifth bullet.  
S.  
(160)

SHLAA

PO/1045/—

TURLEY ASSOCIATES

27 August 2008

<b>STRATEGIC PLANNING AND DEVELOPMENTS</b>			
29 AUG 2008			
Rec			
Action by			
Ans			
Copied to:			

Delivered by Post

Mr D Smith  
 Trafford Borough Council  
 Strategic Planning and Development  
 1st Floor  
 Waterside House  
 Sale Waterside  
 Sale, M33 7ZF

The Chancery  
 58 Spring Gardens  
 Manchester  
 M2 1EW

ACK 28/8

T: 0161 831 1300  
 F: 0161 831 1301

www.turleyassociates.co.uk

Our ref: MW/HSB/PEEM1016

E: mworchester@turleyassociates.co.uk

Dear Mr Smith

**COMMENTS ON TRAFFORD BOROUGH COUNCIL DRAFT STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT ON BEHALF OF THE PEEL GROUP**

I set out below a number of additional representations to the Draft Strategic Housing Land Availability Assessment. These representations have been prepared by Turley Associates, on behalf of the Peel Group, today. They are additional to and should be read alongside the representations already submitted by Turley Associates on behalf of Peel in bound report format dated 26<sup>th</sup> August 2008.

The purpose of these representations is to comment on how the Draft SHLAA deals with specific sites put forward by the Peel Group in response to the Council's Call for Sites.

161

**Broadheath West, Sale**

This site (Craven Road) has recently been awarded outline planning permission, on appeal, for residential development. It should therefore be identified within the SHLAA in the category of 'sites within the planning process'.

We estimate that the site has capacity for in the region of 50 dwellings.

162

**Former Boat Yard, Edge Lane, Stretford**

We note that this is identified in the Draft SHLAA as having a potential development capacity of 44 units. Peel consider that the site and its environs have potential for more than 44 units and are currently investigating this in more detail and would welcome further discussions with the Council.

163

**Lock Lane, Partington**

LAR 6/1/11

We note that this is identified in the Draft SHLAA as having a potential development capacity of 550 units. Peel consider that the site and its environs have potential for more than 550 units and are currently investigating this in more detail and would welcome further discussions with the Council.

I trust that these additional representations are of assistance and will be taken into account in the normal way.

Yours sincerely

**Mark Worcester**  
**Associate Director**

cc: David Thompson

Peel



**PEEL GROUP**

**REPRESENTATIONS ON THE TRAFFORD  
BOROUGH COUNCIL DRAFT STRATEGIC  
HOUSING LAND AVAILABILITY ASSESSMENT**

**26 AUGUST 2008**

## CONTENTS

1. Introduction	1
2. Representations	2

TA Ref: PEEM1016  
Office Address: The Chancery  
58 Spring Gardens  
Manchester  
M2 1EW  
Telephone 0161 831 1300  
Date of Issue: 26 August 2008

# 1. Introduction

- 1.1 This document has been prepared on behalf of the Peel Group and comprises representations on the Draft Strategic Housing Land Availability Assessment which was published by Trafford Borough Council for the purposes of public consultation on the 16<sup>th</sup> July 2008.
- 1.2 It is stated that the Council's Strategic Housing Land Availability Assessment will form a key part of their Local Development Framework evidence base to support the delivery of sufficient land for housing across the Borough.
- 1.3 In view of this and view of the fact that the document is being consulted upon at the same time as the Council's Draft Core Strategy Preferred Options Document (CSPOD) and has informed the preparation of the CSPOD it is important that the representations contained within this document are read alongside our representations to the Draft CSPOD which comprise:
  - Document 1 – General Representations
  - Document 2 – Trafford Centre Rectangle Development Framework
  - Document 3 – Trafford Quays Concept Statement

## 2. Representations

### General Points

- P 9-10  
para 3.9  
object
- (164)
- 2.1 We note that the draft SHLAA excludes some employment sites until an Employment Land Review has been carried out. The Council should consult further once the draft SHLAA has been updated in light of such a Review before finalising the document.
- 2.2 We have requested the Council to provide, but have not yet received, copies of the Stage 5 proforma for various sites including LA90-96, LA84 and 63223/00, 01 and 01(b). We may wish to supplement these representations when we see these proformas.

### Methodology

- P 11  
para 3.1  
methodology  
object
- (165)
- 2.3 It is considered that in some instances the methodology employed by the Council in undertaking the assessment does not fully comply with the provisions of the DCLG Practice Guidance Document of July 2007 with the variation in approach not being fully justified. Specific examples are set out below but we suggest the Council reviews its Methodology prior to issuing a revised draft for further consultation.

### Stage 6 – Estimating the Potential of Each Site

- P 15  
object
- (166)
- 2.4 The Council's conclusions regarding the deliverability and developability of the various sites identified has not been informed by detailed consultation with stakeholders such as landowners and developers contrary to advice contained within the DCLG guidance document. Paragraph 2.6 of the Draft SHLAA indicates that, to date, consultation has only gone as far as a limited 'call for sites exercise'.
- 2.5 In the circumstances, the Council's conclusions on the developability and deliverability of individual sites must be viewed with some caution.
- 2.6 We note that the Council intends to address this omission in approach prior to the final document being adopted but we consider that there should be further consultation on a final draft before the report is finalised and adopted.
- (167)

(170)

**Stage 8 – Reviewing the Assessment**

p14 18  
Para 3.39  
Table  
Object

2.7 Paragraph 3.39 of the Draft SHLAA reports that all large development sites were assumed to make a contribution to potential housing supply at annual rates of completion ranging from 60 to 80 dwellings per annum.

p18  
Para 3.40  
Table  
Object

2.8 We consider this approach to be too generic and that it has, we believe, resulted in an under-estimation of the contribution which certain sites can play in meeting the housing land requirements. It also contrasts with the approach taken with other (non large) sites where recorded developer aspirations for the sites were taken into account (see paragraph 3.40). For example, the Council has assumed that only 60 dwellings per annum can be completed on the Trafford Centre Rectangle site using this approach. In contrast our client believes a more realistic figure to be 100 dwellings per annum (i.e. an additional 40 dwellings per annum).

(171)

**Assessment Results**

2.9 As is noted above, we believe that the Council has under-estimated the capacity of some individual sites during the plan period.

p19  
Table 1

(172)

2.10 For example, the overall supply figures contained in Tables 1 and 4 assume 300 dwellings will be provided at site LA96 (Trafford Quays) in the years 5-10 with a further 300 dwellings in the years 10-15 and a further 1400 dwellings in the period 15 years+ .

Table 4  
p22  
Object

(173)

2.11 There are two key observations to raise in this regard:

- As is detailed in our response to the Draft CSPOD, the Trafford Quays site has the potential to accommodate a far higher number of dwellings than is estimated or being planned for during the plan period. We estimate the 1275 dwellings can be provided within the 15 year plan period and a further 1725 units thereafter.

(174)

- The estimate of residential development in the Trafford Centre Rectangle in the Draft SHLAA (600 units in plan period) is inconsistent with the provisions of the Draft CSPOD which identifies the Trafford Centre Rectangle as having the capacity to accommodate between 700 and 1000 dwellings in the 15 year plan period. Furthermore, it is apparent from the Sustainability Appraisal that, originally, Option 2 assumed 1200 dwellings at the Trafford Centre Rectangle (see Appendix 5).

(175)

2.12 Some sites appear to have been overlooked. For example, sites LA90-94 are sites within the Trafford Centre Rectangle which are stated to have been assessed (they appear in Appendix 4), are not stated as being discounted after the site survey stage (they are not listed in Appendix 6) yet do not appear in the supply (Appendix 7).

p66  
Appendix 4  
LA 90-94  
Table  
Object

123 274  
01/10/14

**The Amount of New Housing Required in Trafford**

168

- 2.13 It is considered that this section of the Draft SHLAA should be updated to reflect the increased housing requirements for the borough which derive from Trafford's New Growth Point Status (see the representations in Document 1).
- 2.14 It is clear that the number of dwellings which the Council anticipates being provided in the 15 year plan period (10,226) is only just above the Council's Housing Land Requirements (c.10,000 if NGP status is factored in) . Furthermore, given that a number of the sites which make up the anticipated supply have not been robustly tested for their deliverability / developability the Council's estimate of supply must be treated with some caution. The need for caution is very much reinforced when one considers that a large proportion of the sites are small scale (i.e. below 0.8 hectares) and, as a consequence, cannot be guaranteed to come forward.

169

**Conclusion**

LEADS TO  
REPRESENTATION  
1.1.16

- 2.15 Whilst the deliverability / developability of many of the sites identified is questionable at this stage, what is clear from the work which we have undertaken and submitted in representation to the Draft CSPOD, is that the Trafford Centre Rectangle and Trafford Quays in particular has the potential to make a far greater contribution to meeting housing land requirements than is currently being estimated.
- 2.16 Accordingly, we request that the estimates within the SHLAA be amended accordingly.

The Chancery  
58 Spring Gardens  
Manchester  
M2 1EW

T: 0161 831 1300  
F: 0161 831 1301

[www.turleyassociates.co.uk](http://www.turleyassociates.co.uk)

23 September 2008

**Delivered by Post**

Mr S Castle  
Chief Planning Officer  
Trafford Borough Council  
Sale Waterside  
Sale

Our ref: MW/HSB/PEEM2000

E: [mworcester@turleyassociates.co.uk](mailto:mworcester@turleyassociates.co.uk)

**FAO: Clare Taylor Russell**

Dear Mr Castle

**DRAFT CORE STRATEGY PREFERRED OPTIONS DPD**

As you are aware, we recently submitted representations on the above document on behalf of the Peel Group.

Further to our subsequent discussions, I set out below supplementary representations in respect of the Wharfside Key Strategic Site.

As you will be aware, the Peel Group supports the identification of Wharfside as a key strategic site in all three spatial options of the CSPOD but believe that the description of the forms of development which would be considered acceptable should be clarified. Our suggestions on how this might be achieved are set out in Paragraph 2.35 of Document 1 of our representations.

In addition to the observations already made, we believe that the Council should include within the Core Strategy a policy which indicates that the Council will promote a Local Development Order for the Media City Component of the Wharfside Key Strategic Site allocation. We believe that the promotion of an LDO will assist in attracting media related organisations to Wharfside and in so doing will make an important contribution towards the realisation of one of the key objectives of the emerging RSS; the attraction of such developments to the Regional Centre,

As you will be aware, the Planning and Compulsory Purchase Act 2004 (Section 61a) provides the necessary mechanism for this.

I would be grateful if the Council would give due consideration to these supplementary representations and update their records accordingly.

Please do let me know if you have any questions.

Yours sincerely

**Mark Worcester**  
**Associate Director**

cc:	Barry Jeeps	Stephenson Harwood
	Ed Burrows	Client
	Steve Wild	Client
	Ian Betts	Client