

Trafford's Core Strategy: Publication Document Representation Form – September 2010

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strategic.planning@trafford.gov.uk

This form has two parts –


Part A – Personal Details (You need only submit one copy of Part A)

Part B – Your representation(s) (**Please submit a separate Part B for each representation you wish to make**)

Before completing this representation form please refer to the attached guidance notes.

PART A

Please use the representation form to make a representation on the Core Strategy: Publication Document.			
1. Personal Details		2. Agents Details (If applicable)	
Name:	Gareth Dickenson	Name:	Ian McDonald
Organisation (if applicable):	Royal London Asset Management	Organisation (if applicable):	Strategic Planning Advice Ltd
Address:	55 Gracechurch Street London	Address:	93-99 Upper Richmond Road London
Postcode:	EC3V 0RL	Postcode:	SW15 2TG
Tel:	020 7506 6500	Tel:	020 8785 5644
Fax:		Fax:	
Email:	gareth.dickinson@rlam.co.uk	Email:	mcdonald@spa-ltd.co.uk
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 representation forms enclosed in the box below:			
Total number of representation forms enclosed:			5

 **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.** An electronic version of the representation form 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 **Monday 1st November 2010.**

**Strategic Planning and Developments
Trafford Council
First Floor
Sale Waterside
Sale
M33 7ZF**

The form can also be **faxed** to: 0161 912 3128.

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.

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PART B – Please use a separate sheet for each representation

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: Strategic Planning Advice Ltd

3. To which part of the DPD does this representation relate?

Paragraph Number

Chapter 2

Policy Number

The Profile

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

X

4. (2) Sound*

Yes

No

X

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

X

(2) Effective

(3) Consistent with national Policy

X

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Chap 2, The Profile - Defective evidence base, leading to Failure to consider alternative strategies

RLAM contend that the Core Strategy is unsound on the following ground:

- It is not founded on a robust and credible evidence base in that the Profile neglects important factors affecting the future development of the Borough, which has led to a failure to consider alternative strategies. It is not coherent with the Core Strategy being prepared by Manchester City Council (PPS12, paras 4.17 and 4.45)

Evidence not Robust or Credible: Cross Boundary Issues

The context for this first ground is:

- Guidance in PPS12 (para 4.17) that local authorities' areas cannot be planned in isolation
- Also in PPS12 at para 4.45 that the evidence should "be coherent with the core strategies prepared by

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powers in relation to economic development, when it comes into being in April 2011.

However in spite of this commitment, the Core Strategy fails to consider important cross-boundary issues and is not coherent with the emerging Core Strategy of the neighbouring City of Manchester.

On the basis of the (now revoked) designations of the Regional Centre and the Inner Areas (paras 2.10-2.13), the Council in its Vision for 2026 (para 3.4) sets out its focus on the north east part of the Borough:

“The focus for economic and housing growth will be within the urban area, primarily in the north east of the Borough and the principal town centre (Altrincham).”

The five strategic locations identified as areas for change are either (four of them) in the north of the Borough or in a remote mid-western location (Carrington). Apart from the reference to Altrincham (above), the plan sees a limited role for the southern part of the Borough:

“Within the southern part of the City Region, economic development will be focused in the towns and on brown-field land to meet local needs and regeneration priorities.” (para 2.14)

With regards to Altrincham the Council's own Study “The Trafford Other Main Town Centre Uses Study” (2009) concluded that due to a low number of suitable and available sites in town centre locations, it may be necessary to consider further sites situated in other appropriate locations as defined in PPS4 Policy EC5.1e.” (Core Strategy, para 8.26) Furthermore the town centre is in very poor health: in September 2010 it was recorded that Altrincham has the highest proportion of vacant retail space of any centre in the UK. It is not an attractive destination for demanding office occupiers.

In brief the Core Strategy does not anticipate economic activity of any strategic scale taking place within the southern part of the Borough. However adjacent to the southern part of the Borough there are three issues of major importance that should be taken into account in the Trafford Core Strategy:

1. Manchester Airport, which lies immediately east of the Trafford Borough boundary, and economic development related to the Airport
2. Wythenshawe, which has important regeneration needs and the western part of which, Newall Green, lies immediately adjacent to Trafford's boundary and to Davenport Green.
3. The major economic importance of the skilled labour pool that is concentrated in the south of the conurbation and in adjacent areas to the south of the Greater Manchester boundary.

The Airport and its Master Plan

The Core Strategy fails, in its economic development policies, to take any account of the development plans of the Airport or of the opportunities offered by the Airport for Trafford communities, in spite of the fact that:

1. The Airport lies immediately adjacent to the boundary of Trafford Borough
2. It is the single most important factor in the future economic growth of the City Region and the region as it is the principal hub for international (i.e. export) communications
3. It employs some 18,000 people directly on the site, of whom about 10% are estimated to be resident in Trafford (Airport figures), making the Airport one of the largest employers of Trafford residents
4. It is a major factor in the fact that the south of the conurbation is a very highly valued location for business in Greater Manchester.

Furthermore representations have been made to the Council by the Airport to consider the possibility of locating within Trafford business activities related to the Airport, for example logistics.

Manchester Airport has produced a Master Plan (Manchester Airport Master Plan to 2030, November 2007) which is not a statutory plan but which the Government (Future of Air Transport, White Paper, 2003) expects local authorities to take into account in the preparation of local plans and in planning decisions.

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The Master Plan for the Airport (“Manchester Airport Master Plan to 2030, November 2007”) sets out its objectives as including:

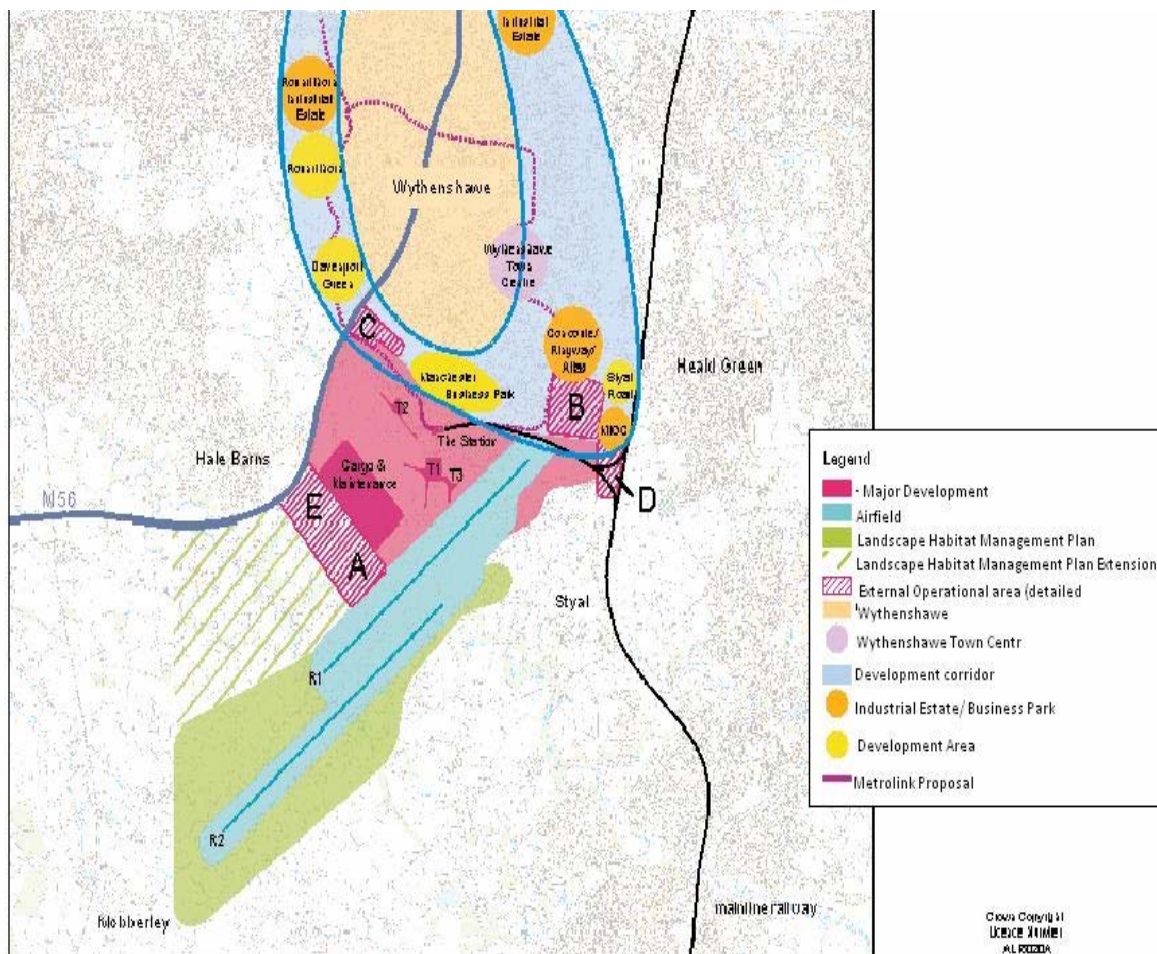
1. Inform the plans and strategies of others, especially regional economic, transport and spatial strategies.
2. Provide information on the likely physical development of the Airport site and the land required for that development.
3. Provide the basis for discussion with our customers, neighbours, partners and all those with an interest in our activities.
4. Provide a framework for managing the positive and negative effects of the Airport's growth and spreading the economic benefits.

Trafford's Core Strategy reflects none of these.

The Master Plan takes an integrated approach to the development of the Airport:

- it considers the future operational needs to accommodate the growth in traffic set out in the Future of Air Transport White Paper 2003;
- it sets out an environmental strategy to minimise the negative impacts of the Airport;
- it identifies the opportunities for economic development to exploit the locational advantages offered by the Airport;
- it sets out proposals for developing further the means of accessing the Airport by means other than the private car and
- it identifies the potential for the Airport and related economic development to assist in addressing the regeneration needs of the adjacent and very large Wythenshawe communities.

Manchester Airport Strategic Master Plan



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The Master Plan identifies an arc of development extending from Roundthorn Industrial Estate in the west, via Wythenshawe Hospital and Davenport Green to the Airport and beyond to the east. This arc wraps round Wythenshawe and is designed to maximise the opportunities for Wythenshawe residents, amongst others, to benefit from access to the employment opportunities in the Airport and in related sites. Figure 4, Airport Site and Development Corridor, in the Master Plan expressly identifies Davenport Green as a development area (see Plan below).

The Core Strategy contains no references to the Airport Master Plan.

Wythenshawe

The concept of linking development opportunities related to the Airport to the regeneration needs of the Wythenshawe communities is also developed in the Wythenshawe Strategic Regeneration Framework (WSRF), produced by Manchester City Council in December 2004. Manchester City Council's (MCC) Draft Core Strategy (Pre-Publication Draft, September 2010, para 3.14) endorses the Wythenshawe Strategic Regeneration Framework, in particular the development corridors (one East and one West), the relevant one for present purposes being the West Wythenshawe Development Corridor (WSRF, para 6.5), which corresponds to the western part of the arc identified in the Airport Master Plan. It is described as "incorporating the new retail/services centre proposal at Baguley, Roundthorn Industrial Estate, Wythenshawe Hospital and any future development at Davenport Green."

The spatial framework set out in Chapter 6 and illustrated in Figures 1-7 (see in particular the Strategic Master Plan, Figure 3, below) is an excellent example of an integrated approach to planning and development: integration of issues across LA boundaries (Manchester, Trafford and Stockport) and integration between the key topics of residential communities, employment, movement, green space, property market factors (the south Manchester effect), economic linkages and service centres.

Wythenshawe's Strategic Masterplan

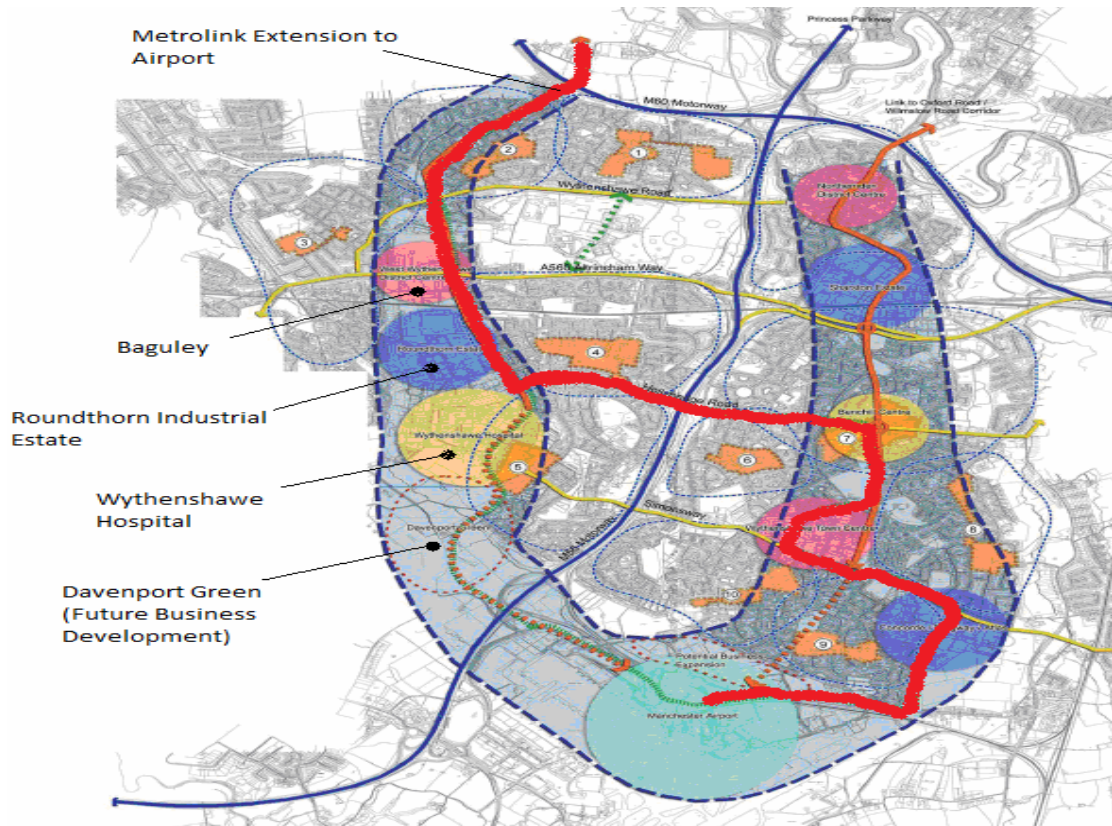


figure 3. strategic masterplan



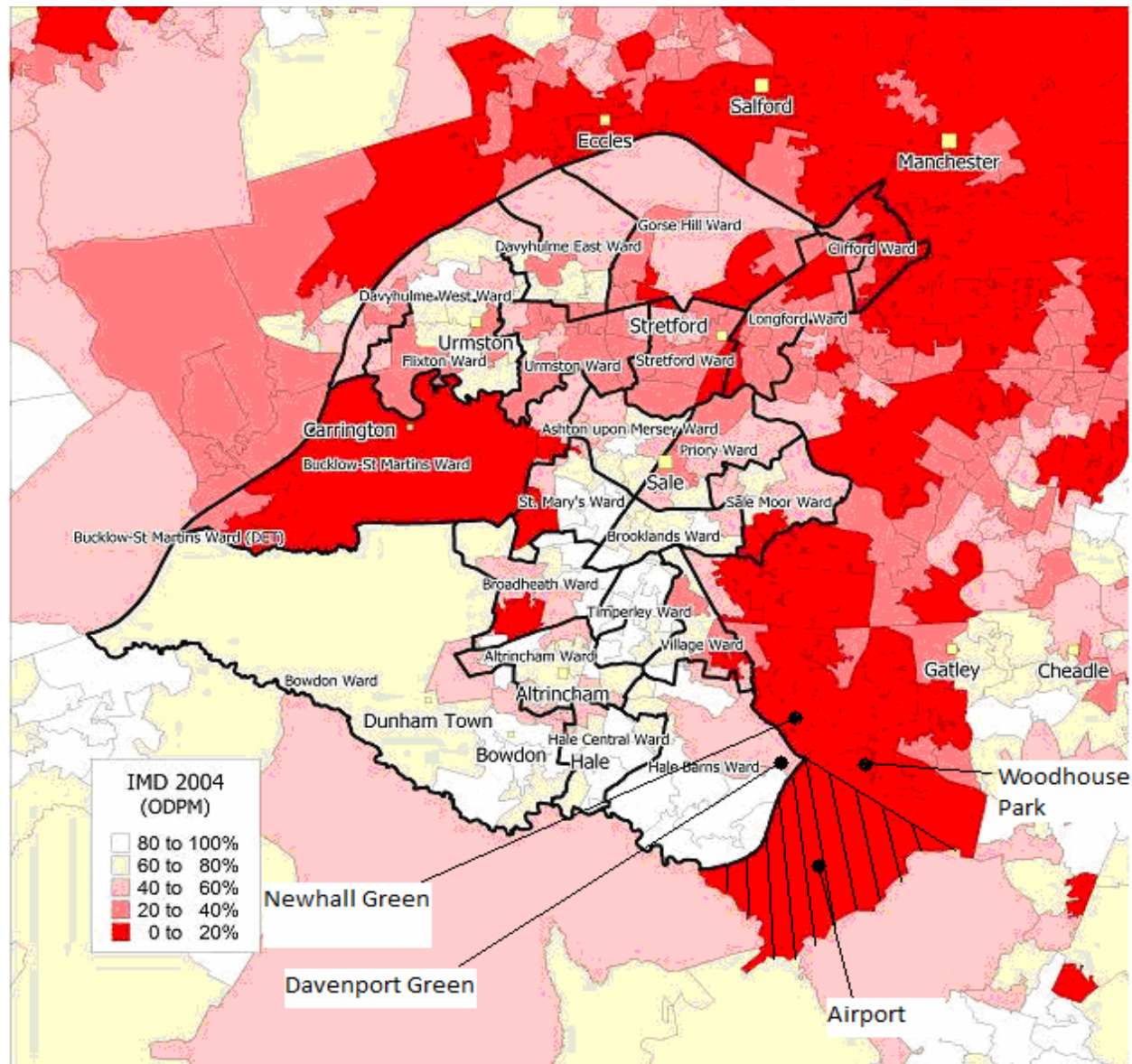
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The scale and extent of deprivation in Trafford and in adjacent areas of Manchester can be seen in the attached diagram from Trafford Council's Economic Development Plan, 2005. It can be seen that Davenport Green is very well located to provide employment accessible to major areas of deprivation in Manchester and smaller but still intense areas in Trafford

Index of Multiple Deprivation, TBC Wards and Adjacent Areas



The extension of Metrolink to the Airport is seen as fundamental to the Framework in the medium term (10-15 years, para. 6.22) and the link shown in the Strategic Master Plan is now committed. However the Master Plan also shows the need for a public transport service along the spine of the western corridor, which might be the Western Loop of the Metrolink extension to the Airport (now no longer programmed) The Framework suggests that bus routes provide improved accessibility in the interim, mirroring Metrolink routes as far as possible.

One of four opportunities identified in the Framework is “capturing the South Manchester effect by extending the strong employment and property markets to Wythenshawe”. It is noteworthy that the “effect” is twofold: employment, in that the area has access to a wide range of skills in the south Manchester and adjacent Cheshire areas, and property, in that it is an area in which commercial occupiers wish to locate, and investors and developers are consequently willing to invest and develop. One of the objectives of the Framework is to “make Wythenshawe the location of choice for investors and employers.....to meet the needs of inward and indigenous employers, particularly those linked to Manchester Airport” (Summary, Objectives, bullet 4).

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Within this corridor the MCC Draft Core Strategy identifies both Airport City and University Hospital South Manchester (Wythenshawe Hospital) as Strategic Employment Locations (Policies EL4 and EL5) and in both cases there is a requirement that they contribute to the regeneration of Wythenshawe. The Draft Core Strategy sees the Economic Development Corridors as providing spatial integration of the opportunities for economic development in Wythenshawe.

The clear message is that Davenport Green is an outstanding location at which to marry opportunity and need.

There is no mention of Wythenshawe in the Trafford Core Strategy, nor of the development corridor or arc of development.

Skilled Labour Pool

The Core Strategy makes no reference to the major economic importance of the skilled labour pool that is concentrated in the south of the conurbation and in adjacent areas to the south of the Greater Manchester boundary. Skilled labour is highly important to the competitiveness of export and knowledge-led companies; it is probably the single most important factor, as is shown by research by Savills (Savills' 2004 "Office Futures" for British Council for Offices). South Manchester (Stockport and Trafford and the adjacent areas of Cheshire are highly accessible to locations around the Airport and their resident populations contain high proportions of people in higher managerial and professional occupations, for example 29% in Stockport, 31% in Trafford and 37% in Macclesfield, compared to 24% overall in Greater Manchester and 26% overall in the UK. (as shown in the Table below).

People in Employment, Total, and Managers, Senior Officials and Professional Occupations in Greater Manchester, parts of Cheshire and Comparator Areas, Nos and % (2001)

	All People aged 16-74 in employment	Managers, senior officials and professional occupations	%
Bolton	114,415	27460	24
Bury	83,847	22639	27
Manchester	142,449	35612	25
Oldham	92,775	19483	21
Rochdale	86,867	18242	21
Salford	89,920	18883	21
Stockport	136,059	39457	29
Tameside	96,254	18288	19
Trafford	99,146	30735	31
Wigan	135,615	27123	20
Greater Manchester	1,077,347	258563	24
Crewe and Nantwich	91,286	22822	25
Macclesfield	73,039	27024	37
Warrington	91,286	24647	27
North West	2,900,020	696005	24
England	22,441,498	5834789	26
UK	26,575,679	6909677	26

Census 2001

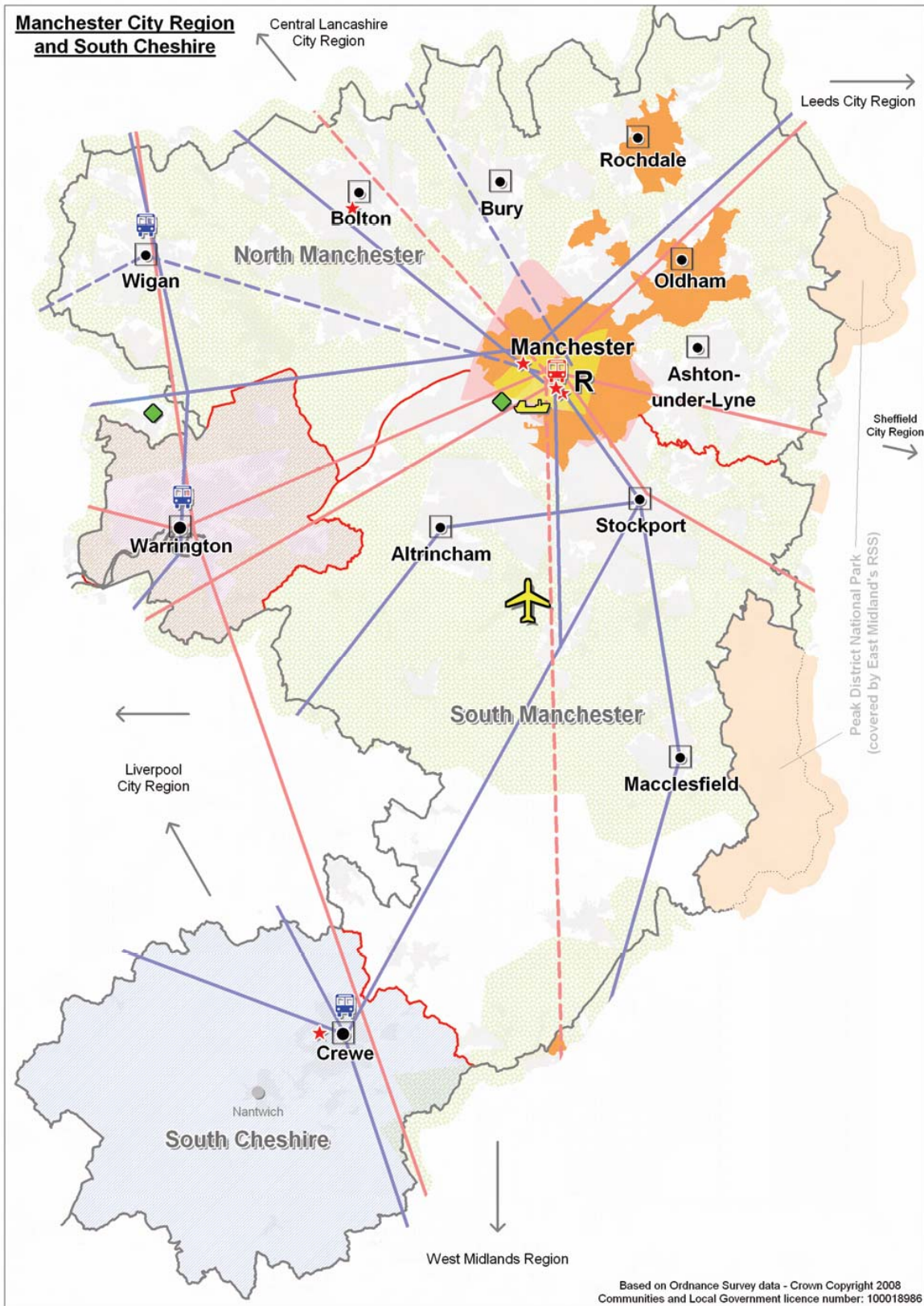
The importance of this labour pool is recognised in the evidence base of the RSS (not in the revoked policies) which includes a map of the Manchester City Region, which includes, because of its economic relationship, South Cheshire (see below). At para 2.20 RSS recognises that the Manchester sub-region is the largest in economic output terms in the region and that it offers the greatest potential for boosting economic performance in both the NW and the North, having world

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class assets in the City Centre and the Airport. It is interesting to note that the Airport (about 2 kms from Davenport Green) lies at the centre of the Manchester City Region as shown in the Key

Diagram below, a clear recognition of the importance of the adjacent Cheshire areas to the economic success of the City Region.



The Core Strategy makes no reference to the pool of skills in the south of the conurbation and Cheshire, nor of its implications for economic development and travel to work.

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Draft Core Strategy

Against this background it is important to note that the vision, the strategic objectives and the place objectives in the Draft Core Strategy mention Manchester Airport only cursorily, in spite of the fact that the need for additional employment and the need to support international business both figure largely in the objectives of the Core Strategy. Manchester Airport is a major employer (18,600 directly employed on the site), a very important factor for the competitiveness of firms operating in international markets and a major public transport interchange in its own right. The Key Diagram in the Draft Core Strategy shows Manchester Airport as a facility but there is no reference to the factors that make the Airport significant for Trafford.

The text at para 13.8 acknowledges the Airport as a major asset but the Policy W1.10 is very restrictive in relation to employment development associated with the Airport. Transport policy makes reference to improving choices of sustainable access to the Airport. The only references to possible development related to the Airport are in the text with no appropriate policies:

“18.11 All proposals for the development of any industrial, commercial, warehousing and storage uses associated with Manchester Airport will be subject to very careful assessment in consultation with Manchester Airport Plc and other appropriate agencies to determine the appropriateness of the proposal.”

“26.4The provision of upper midmarket hotel provision and associated conference centre facilities would fulfil a qualitative need and serve a distinct geographical market identified in Trafford for hotel activity in proximity to Altrincham, Sale and Manchester Airport.”

Whilst these are helpful expressions of intent, they are negated by Policy W1.10 and by the absence of any provision for employment development at Davenport Green.

The Place Objectives for Altrincham, the adjacent area of Trafford, make no reference to the Airport; neither do the Place Objectives for Sale where (at Sale West) there is a significant concentration of deprivation and need for additional employment; nor is there any reference to the Airport in the Place Objectives for Trafford Park, for which the Airport's roles as an international cargo facility and a gateway for the national and international movement of staff involved in import and export business are very important.

Unsoundness

In spite of all these major factors that affect the actual and potential quality of life and development of Trafford, the Council has not considered a strategy that would put a major economic development site in the southern part of the Borough, which, RLAM contend, would have been a very reasonable alternative strategy for the Council to have considered. The evidence for the Core Strategy is defective in serious measure and this has led to the omission of a reasonable alternative strategy, which undermines the soundness of the Core Strategy. That alternative might have been rejected by the Council with robust and credible evidence, but there was neither an alternative nor any evidence with which to consider it.

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PART B – Please use a separate sheet for each representation

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: Strategic Planning Advice Ltd

3. To which part of the DPD does this representation relate?

Paragraph Number Policy Number

Chapters 3, 4
& 5

4. Do you consider the DPD is:

4. (1) Legally Compliant Yes No

4. (2) Sound* Yes No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(2) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

PPS12 makes it clear that "The vision should be in general conformity with the RSS and it should closely relate to any Sustainable Community Strategy for the area. RLAM is not concerned with the RSS, although we note that the Council relies in policy terms on designations such as the Regional Centre and the Inner Areas that are no longer valid as they were creatures of the revoked RSS. However, the SCS creates a significantly different vision for the Borough from the Core Strategy:

"Trafford is thriving, diverse, prosperous, and culturally vibrant. A Borough at the heart of the Manchester City Region celebrated as the enterprise capital of the North West and home to internationally renowned sporting and cultural attractions."

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“Trafford businesses will be provided with all the tools and support to be able to continually and successfully compete for skills and investment on an international basis.”
(Trafford 2021, a Blueprint, Trafford Partnership)

This compares with the Vision and Objectives of the Core Strategy. The vision for the Core Strategy states:

“By 2026 Trafford will have vibrant and inclusive, prosperous and well designed sustainable communities, served by an integrated transport network offering a choice of modes of travel.

The historic, natural and built environment, including the Green Belt, will be preserved, protected and enhanced.

The focus for economic and housing growth will be within the urban area, primarily in the north east of the Borough and in the principal town centre, Altrincham. The following 5 Strategic Locations are identified as areas for change:

- Pomona Island (SL1)
- Etc”
-

The vision is elaborated under the heading “To achieve this Vision” with explanatory phrases. The one relating to economic development reads:

“Trafford Park Core will be maintained and strengthened as a key place to work to support both the Local and City Region economies.”

In relation to employment and the economy, the Vision is translated into Strategic Objective 3 (SO3):

“Meet Employment Need – Establish the right conditions to sustain employment sites for new and diverse investment to enable Trafford to remain competitive and contribute to the growth of the economy of the sub-region and to attract and retain employment opportunities.”

Further evidence of the economic aims of the Core Strategy is provided in the Place Objectives for Trafford Park which is seen by the Council as the principal location for strategic economic development in the Borough: TPO1 refers to supporting the growth of the City Region and TPO8 to ensuring that future development of the Trafford Park area reflects its significant role in meeting regional centre needs. The reference to the regional centre is inappropriate, given that RSS, the source of the concept and the related policies has been revoked. Significantly this objective for Trafford Park does not contain any reference to a regional economic contribution of the key strategic location for economic development in the Borough.

Comparison of the vision and the economic objective of the Core Strategy with the vision of the SCS shows that the SCS goes further than the Core Strategy in two key dimensions: it introduces the concept of Trafford as the enterprise capital and puts Trafford's economic role onto a regional plane, not just a sub-regional or City Regional plane. This higher ambition is confirmed in the view that Trafford businesses will compete for investment and skills on an international basis. The ambition of SO3 is however limited to “contribute(ing) to the growth of the economy of the sub-region.”

Given the outstanding locational advantages of the Borough, which we set out below, we suggest that the vision of the Core Strategy (fourth bullet of the “To achieve this Vision” section) be amended to read as follows:

“Strategic sites and locations within the Borough will be identified and promoted as key places to work to support the Local, City Region and Regional economies.”

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PART B – Please use a separate sheet for each representation

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Name or Organisation: Strategic Planning Advice Ltd

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

Chapter 8 & 18

SL1-5, W1

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

X, see RLAM's evidence relating to the Council's Sustainability Appraisal

4. (2) Sound*

Yes

No

X

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

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(3) Justified

X

(2) Effective

X

(3) Consistent with national Policy

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RLAM contend that Chap 8, para 8.2, identification of five Strategic Locations and Policies SL 1-5 are

1. Not justified; the choices made in the plan are not backed by the facts
2. Not effective in that Core Strategy is not deliverable

We contend in this section that the choice made in the Plan (not to identify Davenport Green as a Strategic Site or Location for employment) was not backed by the facts.

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We make this case under three headings:

- The Council is not proposing any strategic sites, not because there is no need, but because the possible sites were found to be too ill-prepared
- There are no sites or locations with a regionally or nationally competitive offer for B1 a and b, suitable for the Council's selected target sectors or other potential inward investors
- The Council has provided no evidence to justify the reversal of the Council's position on Davenport Green in 1996 and 2006.

No Strategic Sites

The Council in the Core Strategy: Further Consultation on the Preferred Option (June 2009) had proposed 13 Strategic Locations and 5 Strategic Sites. However the consultation responses, especially those from the Government Office for the North West, included a continuing theme of casting doubt as to whether "there is sufficient information to justify a site's inclusion and whether there is sufficient certainty that a site will be delivered as proposed" (Trafford Core Strategy: Technical Note on Strategic Locations and Sites Selection, Sections 3 and 4, March 2010). Given that Strategic Sites are (PPS12, para 4.6) central to the achievement of the strategy, it is remarkable that the Core Strategy was so dramatically altered as to reduce the 18 Sites and Locations to five Locations at a late stage in a process that is designed to be front loaded, without there being any implications for other aspects of the CS.

We question whether there is any merit in including Strategic Locations in a Core Strategy. They are not identified in Government Guidance, which only refers to strategic sites, as appropriate concepts to include in Core Strategies. (Inspectors have referred to locations in informal advice to other authorities.) Their identification in the Core Strategy is of no practical planning benefit in that they are not allocated for development; they have to be brought forward for development in a subsequent Development Plan Document, whereas Strategic Sites are allocations and can be brought forward through an SPD or Master Plan, that is without the need for another Development Plan Document. PPS12 was expressly amended to enable strategic sites to be brought forward more rapidly. The force of this point is endorsed by our examination below of the locations identified by the Council; their inclusion in the Core Strategy does not progress their implementation in that all those destined for significant employment use remain subject to major delivery constraints.

Apparently on the grounds that the Council does not have sufficient information about their delivery, the Core Strategy now contains no land allocations (for any use or purpose) that are central to the achievement of the Core Strategy. Having set out an objective to contribute to the growth of the sub-regional economy, the Core Strategy then fails to identify any sites that are central to the achievement of that objective. The reason for this omission is not that there is now any less importance attached to achieving this objective, only that the Council has not been able to provide sufficient evidence on the deliverability of the sites that might be suitable for strategic economic development. The allocation of land to achieve one of the key elements of the Core Strategy vision ("to support both the Local and City Region economies.") has been relegated to second (Strategic Location) or lower (policy provision) tier importance..

Given the wording of the Vision and Objectives, it is highly inappropriate that there should be no sites for economic development that are central to the strategy. A significant consequence of the Core Strategy being reliant on Locations is that all of them require Development Plan Documents to take them forward, which implies a real delay on any action being taken. PPS12 was expressly amended to enable Strategic Sites to be brought forward more rapidly.

The Council has provided no evidence that there is no longer a need for Strategic Sites for economic development, but it has dropped them from the current draft Core Strategy. The reason for dropping them is that the Council did not know enough about them and their deliverability. This undermines confidence in the effectiveness of the Core Strategy.

Lack of Competitive Sites for B1 (a) and (b) Use

There are no sites with a regionally or nationally competitive offer for B1 a and b, meaning that the strategy of the Core Strategy is incapable of delivering an important part of the Vision and Objectives and that the land identified for significant employment development, especially for B1 a and b uses, fails the test of soundness in that the policies are not effective in two respects:

- a. There are major constraints on the deliverability of the Strategic Locations.
- b. Even if they are delivered they will not meet the intentions of the Core Strategy as set out in the Vision and

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Objectives in relation to key targets.

Underlying the Draft Core Strategy are two important pieces of evidence: the Employment Land Study and the Sustainability Appraisal. Both are defective in our view. We address the first now and the second is considered in JAM Consult's Appendix 17..

The Employment Land Study failed to consider the quality of sites and their ability to compete with regional and national or international alternatives. In arriving at our views about the Strategic Locations identified by the Council and at our proposals for Davenport Green, we have examined competing developments at a number of sites in the UK and the rest of Europe, including Amsterdam, Dusseldorf, Barcelona, Madrid, Munich, Zurich, Copenhagen and Milan (all airport related developments) and Green Park, Reading and Chiswick Park, London (not airport related). Knight Frank have also examined potentially competing locations (Appendix 15). We have found no evidence that the Council has considered either the requirements of mobile investors or the nature of the development offer made by locations that compete for such investment.

We review briefly each of five Locations from the perspectives of deliverability and effectiveness in achieving the Vision and Objectives.

Pomona (Policy SL1) is identified as having potential for 10 hectares of employment development and Policy W1 indicates that it is one of the key locations for B1 offices. The constraints on development include:

- a. The Strategic Flood Risk Assessment, which shows that the site is unsuitable for residential and some leisure development yet it has planning permission (expiring in May 2012) for 546 residential units and it is said (para 8.26) that it will serve to enhance Trafford's image as a tourist destination (implying large numbers of people being attracted onto the land).
- b. Unspecified and uncoded improvements to highways and public transport.
- c. The viability of the site must be questionable as (para 8.21) it has been vacant for over 20 years following remediation; even after remediation and during a period of very buoyant economic conditions the site has not been developed. Concern over the viability of the site is aroused in the Phasing and Milestones section on Pomona in Trafford Core Strategy, Background Note on the 5 Proposed Strategic Locations, March 2010, (the Background Note) para 2.21, where reference is made to seeking funding from HCA.

SL1.1 states that a new mixed use commercial district will be created to complement the offers of the city centre and Salford Quays/Mediacity:uk and the justification refers to Trafford's northern gateway, the site's location relative to the regional centre and the Salford Quays/Irwell Corridor Strategic Regional Site as evidence of the commercial realism of the proposals. We comment on these points as follows:

- a. Given that the site is at least 2kms from the city centre we take it that complementary means cheaper, secondary offices, which will not be competing for regionally or nationally mobile investment.
- b. It is unclear what it means to complement Salford Quays/Mediacity:uk given that Pomona is physically unrelated to either and that Phase 1 of Mediacity:uk includes 950,000 sq.ft. of office and studio space; Phase 1 accounts for only one fifth of the land available in Salford for Mediacity:uk; it unclear what else remains for Pomona to provide in a complementary role.
- c. Trafford's northern gateway, the regional centre and the Salford Quays/Irwell Corridor Strategic Regional Site are not recognisable property market locations and so give no rationale for the future development and use of Pomona.
- d. Part of the justification at para 8.23 relies on "assist(ing) with the regeneration of this part of the Regional Centre"; para 8.24 likewise relies on reference to the Regional Centre, a term which was created for policy purposes in the now revoked RSS. The term does not help in identifying the role for the land.

We conclude that Pomona is not likely to provide the quality of location or premises that will be demanded by firms with locational choices in the target sectors and other export sectors. It will not contribute to the achievement of key elements of the Vision and Objectives, particularly relating to prosperity and growth of the sub-regional economy.

Trafford Wharfside (SL2) is shown as having the potential for 10 hectares of mainly B1 offices and light industrial development, leisure (including hotels) and residential (900 units) development, an opportunity to create "a major mixed use area of regional and international significance" where the focus will be on opportunities for new economic (particularly digital and media) industries.

Constraints that need to be addressed to enable development of the site include:

- a. Provision of a new high frequency public transport system by 2016, which seems inconceivable given that the Metrolink extension to Trafford Park is "subject to private sector funding" according to the Metrolink

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website.

- b. Other major developments requirements expected to be funded by the private sector/s.106 include a primary school, a secondary school, a processional route, two pedestrian links across the Ship Canal, affordable housing and other highways and utilities works
- c. Land assembly; the location is in multiple ownership.
- d. Apart from during the lifetime of the Trafford Park Development Corporation, there have never been satisfactory mechanisms for delivering major infrastructure works or for assembling development sites; the Core Strategy contains no indication of how these longstanding issues will be resolved.

Major infrastructure proposals are included in the 1996 and 2006 UDP for Trafford Park and there has been little progress in changing the character and potential of the area, particularly in relation to the target sectors.

In relation to the product that could be delivered at Trafford Wharfside SL2.2 identifies the employment uses as being in the Mediacity:uk area; however none of Phase 1 is in Trafford, and there is no mention of Trafford on the website for Mediacity:uk in relation to future phases for which 200 acres is identified in Salford. There seems very little prospect that Wharfside will attract significant "digital and media" industries in the face of huge competition from Mediacity:uk, the City Centre and the Sharp Project in East Manchester. The claims to international significance appear to be based on the presence of Manchester United FC rather than business activity. For the foreseeable future it is more likely that Mediacity:uk will be a very effective competitor for the targeted digital and media industries, at the expense of Trafford Wharfside (and Pomona).

We conclude that Trafford Wharfside is not likely to provide the quality of location or premises that will be demanded by firms with locational choices in the target sectors and other export sectors. It will not contribute to the achievement of key elements of the Vision and Objectives, particularly relating to prosperity and growth of the sub-regional economy.

Lancashire County Cricket Club (LCCC) Quarter (SL3) contains no significant employment development proposals so can be discounted in the present analysis.

Trafford Centre Rectangle (SL4) is identified as a Strategic Location but Policy W1 does not indicate it as a focus for B1 office development. Nevertheless SL4.2 refers to 15 has of land for employment providing high quality B1 commercial development and including a landmark office building at the former Kratos site. Constraints to be addressed to enable the development of the location include:

- Provision of a new high frequency public transport system by 2016, (same comment as for Trafford Wharfside)
- Significant but uncoded additions to highway and motorway capacity
- A number of other infrastructure items (SL4.5) which are even less well defined than in Trafford Core Strategy: Further Consultation on the Vision, Strategic Objectives, and Delivery Strategy, March 2010 but which did then including a new secondary school at £10m plus land costs (at the expense of the developer).
- A lack of appropriate measures to address infrastructure and land assembly issues (as Wharfside).

However our main concern relates to the ability of Trafford Park (as a whole and adjacent sites of similar character such as Pomona) to deliver sites for employment development of sufficient quality to achieve the vision and objectives of the Core Strategy. In the justification for the Policy (SL4) it is stated that the "location has the potential to provide a range of employment opportunities to meet the economic regeneration and development needs of the Borough and to contribute towards the economic prosperity of the City Region" (para 8.3). However in the Background Note on the 5 Proposed Locations at para 5.15, Key Issues (from Evidence Base) there is reported from the Trafford Other Town Centre Uses Study a number of concerns about Trafford Park as a viable location for office development:

1. "Whilst Trafford Park has not historically been considered a key office location, it has seen increased office development in recent years.
2. One of the Park's major issues relates to the availability of suitable sites.
3. In relation to the 63,000 sq.m. of floorspace across some 19.3 hectares of land that will contribute a proportion of Trafford's office requirements, the report concludes that:
 - a. The committed office developments may not necessarily be suitable for Trafford's growth sectors
 - b. Not all of the 19.29 has of land identified is proposed for office use: a number of sites are proposed for mixed use development incorporating both office and other uses.

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c. Not all of the office development commitments will come forward for development.”

Given that the Council see Trafford Park as the major focus for strategic employment development (Draft Core Strategy, March 2010, para 2.9), these quotes from the evidence base give no confidence that Trafford Park (or therefore the Borough) will be able to provide office accommodation of sufficient quality to be competitive and attractive for investors and occupiers that are able to choose between a range of locations within and beyond the City Region, that is, contribute to sub-regional growth.

Carrington (SL5) is identified as a Strategic Location but Policy W1.7 indicates that it is primarily suitable for large scale employment development, particularly for general industrial, storage and distribution uses with office development which is ancillary. The Council does not see it as an office location and the intended uses would be incompatible with a high quality office development. There are major infrastructure, contamination and nature conservation issues to be addressed, but we do not dwell on those because it is not an office location.

Overall our view is that the Council may have fallen into the practice identified by the Planning Inspectorate in their advice on Development Plan Documents:

“In some instances the weakness derives from a failure to identify sufficient and/or appropriate land for development. Sometimes this appears to derive from a reluctance to accept that unpopular decisions about allocating land, possibly green field land, for development have to be made. Simply claiming that development needs will be met within the urban areas and that the position will be reviewed if necessary in the future is not likely to be acceptable unless there is a evidence that the “urban areas only” approach is likely to be realistic.” (PINS, Examining Development Plan Documents, Learning from Experience, Sept 2009, para 21)

This criticism echoes the comment reported in Technical Note on Strategic Locations and Sites Selection, which forms part of the previous Core Strategy consultation:

“One recurring comment questioned whether the change proposed in some Locations was significant enough to justify it being identified especially. For example, it was considered that the strategy proposed for the Trafford Park Core area of continuing to focus employment development here was really just ‘business as usual’ and didn’t constitute significant enough change to justify identifying it as a Location.” (para 4.2)

Our view, having reviewed the Council’s evidence and inspected the Locations, is that the Locations identified in Trafford Park and at Carrington represent a “business as usual” approach, with little “significant change” and a “failure to identify appropriate land”.

Furthermore we believe this deficiency derives from a more fundamental fault of the Core Strategy: that it starts with a set of assumptions which have not been tested in spite of many years’ experience of promoting development for employment. For example in the Vision Trafford Park is described as “a key place to work to support both the local and City Region economies” and SO3 refers to Trafford remaining competitive. There is no scrutiny of whether this has been achieved in the past, how conditions might be changing and what different measures may be required as a response.

The Council’s Economic Development Plan 2005 sets out a number of historic measures of the economic performance of the Borough. There is however no evidence of enquiry into how the Borough will maintain its competitiveness in a changing global climate in the future, how different external factors will impinge on the economic performance of the Borough e.g. the City Centre and the Airport, or how competitiveness will be reconciled with the demands of climate change e.g. reducing the need to travel. The Council, when considering the City Region programme (Report to Members 17th March 2010) identified the labour supply in the Borough as a special factor in Trafford’s contribution to the Sub

Region, but there is no evidence that this has been taken into account, its spatial distribution (which relates closely to housing markets) and the implications it might have for the spatial distribution of employment. Equally there is no evidence relating to the housing and labour supply beyond the Borough boundary and how that might impact on future travel to work patterns, carbon emissions and the distribution of employment land. No real alternatives have been tested in arriving at the Preferred Option.

A further overriding point relating to all the locations identified by the Council is the requirement for Strategic Locations (Draft Core Strategy, para 8.4) that they should be “supported by information of what is being provided, when it will be provided, who will provide it, how it will be delivered. This information has been outlined, with general costs and funding sources identified, and will be agreed in principle by all delivery partners”. However the infrastructure requirements for the five identified locations are only expressed in terms of the priority attaching to their status, the priorities being explained in para 8.14 of the Draft Core Strategy: apart from Priority 1 (committed

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and needed now) the priorities (2-4) are all stated simply as needed or desirable. This falls far short of the requirement in para 8.4.

Furthermore a total of 67 infrastructure projects are listed as being needed for the five Strategic Locations: only five (four in Carrington) of these are described as Priority 1/committed and the costs of these six are unknown except in two cases. It is unclear how a scheme can be committed but with unknown costs. It is clear that the proposals for the five Strategic Locations are very uncertain; whilst they are described as important for the delivery of the Core Strategy, there is no evidence that the identified locations pass the second test set out by the Council for Strategic Locations: that they will be "supported by information of what is being provided, when it will be provided, who will provide it, how it will be delivered."

As a result RLAM conclude that the Core Strategy is unsound on the grounds that the delivery strategy, specifically the designation of Strategic Locations, is extremely unlikely to deliver the objectives and vision of the Core Strategy in relation to the growth of sub regional economy (PPS12, para 4.4).

Lack of Evidence to Justify Reversal of the Council's Position on Davenport Green in 1996 and 2006

Justification in 1996 UDP & Inspector's Report

The context for the Council's current policy stance is provided by the Council's advocacy of Davenport Green in two previous UDP's.

In May 1996 Trafford BC (TBC) adopted their Unitary Development Plan (UDP 1996) which provided (Policy E13) for a strategic high amenity employment site on 36.4 has of land within a 135.6 ha estate at Davenport Green. The justification referred to the need for a truly exceptional site, the lack of comparable sites, the need to compete on national and European scales for mobile investment and the revitalising effect on the sub-regional economy, complementing the development of existing sites in urban areas. The direct and indirect regenerative impacts of the proposal for Greater Manchester were acknowledged. Part of the justification was that "a key feature of a competitive site is ready availability, including in planning terms." The policy was subject to a number of conditions, including one related to the nature of the permitted occupiers. The occupier conditions were considerably tightened when the Council granted consent in 2001 and renewed it in 2003.

The policies providing for Davenport Green as a strategic high amenity site in the 1996 UDP were subject to detailed scrutiny at the UDP Inquiry and were subsequently approved by the Inspector. The Council confirmed the proposal (Part 2 Proposals E13 and E14) in the same terms in the UDP which they adopted in 2006 (UDP 2006). The proposal has thus been confirmed by TBC relatively recently.

Further context is provided by the records of RLAM's solicitor, which show the following telephone conversation:

Gary Pickering , Deputy Chief Executive (then and now) in June 2008 in telephone conversation with Oliver Goodwin, planning lawyer to developer / owners APSL (MUSE / RLAM) advised;

" - it's a political decision, the Conservatives resolved 5 years ago, made it clear, they wanted it [Davenport Green] dropped. The Tories demanded it. The NWDA said it [Davenport Green] could have been kept. No chance at all with the Tories, and the Liberals support. Mike Horner [Director of MUSE] has been made well aware [of the political decision] I met him at a social function a couple of months ago. It was an electoral promise ".

This indicates that in about 2003 the Conservative Party in Trafford took a political decision to put Davenport Green into the Green Belt. The decision pre-dated the start of the preparation of the current

Core Strategy for Trafford.

The Council, having taken a prior political decision to put the Davenport Green development site into the Green Belt, have devised a number of reasons for their decision:

1. No new evidence has been provided to support the continued exclusion of Davenport Green from the Green Belt (CS, para 24.12)
2. The Sustainability Appraisal related to the June 2009 Preferred Option Consultation Document suggested that development at Davenport Green would not be as sustainable as other locations for employment activity such as Trafford Park and the main town centres (CS, para 24.13)
3. In spite of planning permission being granted , there does not appear to be any realistic prospect of the

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development going ahead (CS, para 2.14)

4. The North West Development Agency (NWD) removed Davenport Green from their list of strategic sites (CS, para 24.15).

We address these points in the following paragraphs.

No New Evidence

It is the Council that is proposing the change from the policy that they had previously promoted in two UDP's and they have produced no evidence that the circumstances that justified the designation of Davenport Green as an employment site in 1996 and 2006 have changed sufficiently to justify their changed approach and policy.

In Appendix 16 we summarise the multiple occasions on which RLAM have made representations to the Council relating to the Core Strategy and Davenport Green. Much new evidence was submitted and the Council's approach to many aspects of the Core Strategy was criticised, with suggestions for change. It is not true that RLAM have not submitted new evidence.

However RLAM understand that Core Strategies must be up to date and reflect current and, as far as possible, future (flexibility) conditions. Indeed PPS4 (para EC1.3) urges local planning authorities to review employment allocations, particularly those for restricted or single uses:

At the local level, the evidence base should:

- assess the existing and future supply of land available for economic development, ensuring that existing site allocations for economic development are reassessed against the policies in this PPS, particularly if they are for single or restricted uses.

With the change of ownership of the site making RLAM sole owner, the role and servicing of the site have been completely reviewed with the result that the proposals have taken a very different form, without abandoning the critical economic challenge that the scheme should deliver economic investment, activity and jobs that might not otherwise locate in Greater Manchester (net additionality), in summary:

- The economic need for type of development proposed at Davenport Green has been reviewed; if anything the need is considerably greater.
- The development concept has been revised to match the requirements of mobile investors and to match the offer from competing locations
- Supporting uses have been introduced to improve the sustainability performance of the scheme, enabling more business interaction on the site and reducing the need for staff to travel off site for services
- The size of the built scheme has been reduced whilst retaining the same total job creation
- The occupier conditions B1(a and b) use have been abandoned in order to improve the marketability of the scheme
- The public transport offer has been improved
- The rural park will be retained in a role or roles that will meet the Council's ambitions for green infrastructure, as well as providing opportunities for improving the sustainability of the proposals e.g. through the introduction of sustainable urban drainage
- The proposals will include strong support for the regeneration of Wythenshawe, enabling local people in that deprived community to share in the benefits of the scheme
- Emerging proposals for a development corridor between Baguley district centre and the airport (including Davenport Green) create major opportunities for sustainable waste handling, public transport, low carbon energy production and CHP and air quality management; Davenport Green is a critical link in this corridor and in unlocking these opportunities; RLAM is willing to develop the opportunities as soon as other sites, such as Roundthorn Industrial Estate and Airport City, are brought forward.

Sustainability Appraisal

Also at para 24.13 the Council call in support of their decision on Davenport Green the Sustainability Appraisal they conducted in preparation for the June 2009 Preferred Option consultation. We have found serious flaws in this Appraisal and they are set out in Appendix 17. The Council suggests that the town centres and Trafford Park provide more sustainable locations for employment activity. However both of these locations are ruled out by the Council's own evidence for the type of high amenity B1 (a and b) development planned at Davenport Green:

- the Council's "Trafford Other Main Town Centre Uses" Study concluded in relation to land for office uses that:

"Due to a low number of suitable and available sites in town centre locations, even if the Altair planning

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permission is implemented, it may be necessary to consider further sites situated in regeneration areas of the Borough (in accordance with PPS4) where offices could form part of mixed-use developments, or are ancillary to other forms of economic development.” (para 9.2, confirmed at para 18.13 of Draft Core Strategy)

- Policy W1.5 says that “office uses will be focused in the Regional Centre (Pomona and Wharfside) and the town centres”, on which we comment:
 - There is an illogical circularity about the W1.5 reference to town centres given what has been concluded in the study quoted in the previous paragraph.
 - The Regional Centre no longer exists in policy terms, being a creature of Policy MCR2 of the RSS 2008; more substantially these two locations are very much secondary, being at closest (Pomona) some 2 kilometres from the city centre; they cannot be considered prime locations for mobile office occupier
- The Council has identified no other locations for significant or high quality office development.

No Realistic Prospect of the Development Going Ahead

In response to this view expressed by the Council (CS para 24.14), as we report in relation to the NWDA and Strategic Sites below, development of any strategic character has failed to take place on the majority of the 25 Strategic Sites identified by the Agency. There are probably three main reasons for this general lack of activity and investment on the sites:

1. There were too many sites to either make an impact on the external market or to be effectively prepared for development with the resources available
2. The Agency and other bodies failed to carry out their proposals to focus on bringing the sites forward for development and marketing.
3. The competitive position of the region and the city region have proved to be weaker than expected; even in buoyant economic conditions the strategic sites have not made a great impact.

The development prospects of Davenport Green could have been better if the above conditions had not prevailed; however the principal factor that militated against implementation of the scheme was the very restrictive conditions attached to occupancy of the premises. These applied to first and successive occupiers and would therefore hamper not only marketing to occupiers but also any security for which occupiers wanted to use their interest in the premises. The impact of these constraints is addressed fully by Knight Frank in the Report at Appendix 15. In retrospect they were a product of very optimistic conditions and a general consensus that Davenport Green was an internationally competitive site. As a consequence a major change that RLAM have made in order to address this defect is to abandon all the occupier conditions.

Delisting of Davenport Green as Strategic Site by NWDA

The Council further state, in support of their proposal to return the development site at Davenport Green to the Green Belt, at para 24.15 of the Publication Draft:

“Additionally, following NWDA's review of its strategic regional sites, Davenport Green has been removed from the list of designated sites. This reflects a refocusing of NWDA priorities taking account of the changing policy and market context, and consideration of the criteria for ERDF funding under the North West Operational Programme.”

The implication of this is that the NWDA independently decided to delete Davenport Green from the list of strategic sites. However the chronology of events indicates otherwise. The origin of the Council's decision to return Davenport Green to the Green Belt lies in a political commitment by the local Conservative Party in their manifesto for the 200? Election that they would restore Davenport Green to the Green Belt. This decision, recorded in Appendix X or reported to RLAM n xx/yy/zz by the Director of Technical Services, predates any planning process to evaluate the merits of Davenport Green in an open and even-handed fashion that is supported by evidence; whatever evaluation was undertaken had to come up with only one answer: Davenport Green would not be a strategic location or site for employment and it would be returned to the Green Belt. The chronology of how Davenport Green has been handled in planning terms at Appendix X makes the whole process clear.

The Planning Inspectorate specifically warn against retrospective justification of planning proposals in development plan documents (PINS, Examining Development Plan Documents, Learning from Experience, Sept 2009, para 33).

The removal of Davenport Green from the list of strategic sites by the NWDA was one of several post hoc rationalisations of the prior political decision. The review, reported in NWDA Strategic Regional Sites Review

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technical report Feb, 2009, went through three stages:

1. At the first stage (December 2007), it was recommended that Davenport Green be retained subject to further investigation.
2. The second stage (March 2008) was an informal review by officers at 4NW against policies in Draft RSS; the deletion of Davenport Green was not considered.
3. The third stage (October 2008) recommended deletion, because “no development taken place on site since designation”. The Agency consulted on its proposals from 16/12/08 to 27/03/09.

However in advance of the third stage the Council had already published its Core Strategy Preferred Options in July 2008, in which the Council states: “none of the 3 Spatial Options include the proposals for development at Davenport Green”

Even earlier than this the Council in July 2007 had published its Issues and Options paper in which it gave “Future prospects for the development of the strategic employment site at Davenport Green” as one of the issues to be considered.

It seems highly unlikely that the NWDA made its recommendation to delete Davenport Green from the list of strategic sites independently of the views of Trafford BC. The reason given by the NWDA for the deletion (no development) does not relate to the points quoted by the Council in para 24.15. And indeed it is curious that Davenport Green is picked out for lack of progress, given that the NWDA 2009 Technical Report was able to report little progress on any of the 25 regional sites, except Chester Business Park which pre-dated the designation of strategic sites by the NWDA.

In fact Davenport Green stands up well against the tests quoted in para 24.15:

- Changing policy, which in the NWDA report referred to the Stern (the seriousness of the climate change threat) and Eddington (the importance of transport to UK economic success) Reports: Davenport Green is highly accessible to labour markets of very diverse skills to the north and south of the site and the proposals included and still do include measures to provide a range of transport options in order to reduce car dependency; on the Eddington point it is next door to Manchester Airport, the M56 and the public transport facilities at the Airport; it therefore seeks to make the most of the labour market and the key local, regional and national accessibility of South Manchester.
- Market context, which in the NWDA Report referred to the need to build on the regeneration success and economic uplift in the regional cores, without neglecting other places. However more recent evidence puts this account into a different light: in Manchester the regeneration of the regional core has been impressive but it has not been achieved by a major influx of new economic activity to the (sub-)region and MIER is advocating that planning policy now needs to provide business development in the areas where the demand is, in the south of the conurbation. Davenport Green is located and planned to capture the uniquely valuable assets of south Manchester in order to generate net additional investment and jobs for the sub-region.
- ERDF Funding criteria under the NW Operational Programme, which NWDA report as meaning a focus on high value and knowledge driven activity and sustainable locations. Davenport Green will satisfy both of these conditions more effectively than other sites in Greater Manchester. Only high value activities will come to a prestige location such as Davenport Green and the site in the wider context of the arc of development presents exceptional opportunities for sustainable development that equally are difficult to replicate elsewhere in the conurbation.

Whilst one can only speculate as to what NWDA might have done in the absence of a prior decision by Trafford BC, it seems from the evidence of how their review was conducted highly unlikely that they would have removed Davenport Green from the list of strategic sites.

The non-delivery of Davenport Green should be seen in the context of the overall poor performance of strategic sites, as reported by the NWDA in their Strategic Sites Review Technical Report, Feb 2009, which records:

- 11 strategic sites identified in the North West in 2000, 14 more in 2001
- Very limited evidence of inward investment:
 - Daresbury: Government funding for two science centres
 - Central Park, Manchester: Fujitsu, a local relocation
 - Liverpool University Edge: Phase 1 of Liverpool Science Park Innovation Centre and an extension to the Liverpool School of Tropical Medicine
 - Chester Business Park: around 50 businesses employing some 7000 people; now fully developed; development and occupation of the Park (e.g. by MBNA and M & S Financial Services) pre-date the designation of Strategic Sites.

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In the same sites review technical report, February 2009, the Agency repeated the aims of designating strategic sites:

“The tactical aims remain as approved by the NWDA Board in December 2001. They are intended to:

- secure the effective implementation of the regional economic strategy;
- have priority, where necessary, for implementation in terms of all Agency resources and in Agency support in bids for other resources;
- be supported by the Agency through the planning system including, where appropriate, development plans, local transport plans, compulsory purchase orders, planning applications and public inquiries in the Agency's role as a Statutory Consultee and Specific Consultation Body.”

Clearly the intention of designating strategic sites was that they would be provided with (scarce) regional financial and other resources to assist them in coming forward for development and occupation.

We are not aware of any action having been taken by NWDA (or Trafford BC) to assist Davenport Green to be marketed and prepared for development.

Examination of the records of Manchester Investment Development Agency Services (Midas) for the years 2007-10 shows that none of the inward investors logged by MIDAS located in Greater Manchester Strategic Sites. The only site in the NW mentioned by UK Trade and Investment is MediaCity.

It is clear that Davenport Green is not alone in the Region in not being developed and in not generating significant volumes of inward investment. There has been too little attention paid to focusing on the one or two very best sites and to developing an investment package that has real national and international impact.

Also part of the evidence for the Core Strategy is the Employment Land Study (ELS) undertaken by Arup and Lambert Smith Hampton and published in May 2009. This records NWDA's recommendation for deletion of Davenport Green; it also records (page 43), based on its consultations with stakeholders a “general view that sites such as Carrington and Davenport Green are attractive to the market for employment development.” However the Council carried out its own assessment of the potential employment sites (Appendix D) and concluded, consistently with its earlier views expressed in Core Strategy documents, that Davenport Green should be released from employment use; the final word in the evaluation of Davenport Green is “REMOVE”. That was a given as far as the ELS was concerned. It was not an independent view reached by the consultants undertaking the ELS.

The Site Appraisals in Appendix D do not themselves stand up to scrutiny:

- a. There is no justification for either the evaluation criteria or the scores attached to them (the potential totals of which are not revealed); they are not for example the sustainability objectives used in the Council's sustainability appraisals elsewhere in the Core Strategy.
- b. Davenport Green scores badly on public transport without any consideration of the opportunities, which are much greater than in 1996 (when TBC took the site out of the Green Belt) to improve public transport to the site; the public transport interchange at the Airport has improved significantly for both rail and bus services and there is the certain prospect that Metrolink will be extended to the Airport. The Council has adopted the opposite view in 2009 from that which it took in 1996 in spite of contrary evidence.
- c. In the site summary which leads to the “REMOVE” conclusion the Council attaches particular weight to the Green Belt and greenfield status of the site. These qualities of the site have not changed one jot since the Council took the site out of the Green Belt in 1996 but the Council has taken the opposite view without any evidence to support their change of view.
- d. In the appraisal of Davenport Green there is no evidence provided as to why the environmental impact of development of the site should be “High”; as we demonstrate elsewhere in this representation the environmental performance of Davenport Green has improved significantly since the scheme that was accepted in the adopted UDP.
- e. There is unjustified inconsistency between the scoring of different sites, for example in relation to public transport all Carrington sites score 3 out of (unknown total) which compares with 1 for Davenport Green, whereas the evidence indicates that Carrington is a peripheral location which, by the Council's own account (for example Proposal E13 of the 2006 UDP, which, in relation to Sub-regional site SR4 – Manchester Road, Carrington, and E15 Priority Regeneration Area: Carrington, set out a long and expensive list of public transport and other infrastructure Improvements that are needed), needs major improvement. Either the score of 3 takes account of potential improvements in which case it is inconsistent with the scoring of Davenport Green or the score of 3 lacks justification if it relates to today's public transport accessibility.
- f. All the Carrington sites except the Powergen and Former Carrington Power Station sites score 3 in relation to pedestrian and cycle access, this in spite of the fact that there is hardly any population (relative to a

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strategic employment site) within walking or cycling distance.

- g. Two sites in Trafford Park (72066/02 and 70026 on or adjacent to Trafford Wharf Road) score 5 (possibly the maximum score) in relation to pedestrian and cycle access in spite of being remote from significant centres of population (in spite of the new pedestrian and cycle bridge over the Canal). The only evidence provided is that there are pavements and cycle lanes in the immediate vicinity, without any assessment of what residential areas are within safe and congenial cycling distance. All six sites in the Trafford Centre Rectangle score 5 on this count, based on the same purely local evidence of cycle and pedestrian facilities. There is no attempt to assess the population that might be within safe and congenial walking and cycling distance. The scores are not justified and probably could not be justified on a proper assessment. It is at least half a mile across the Ship Canal to the nearest significant residential area from these six sites.
- h. Davenport Green scores very badly against RSS policies; subsequently Regional Strategies have been revoked, so no weight can be attached to this factor.
- i. Curiously the assessment acknowledges that Davenport Green is a strategic development site in spite of the fact that the NWDA's Review of Strategic Sites had been published three months earlier.
- j. In relation to "Suitability for employment development – surrounding uses" Davenport Green scores 0; the text does acknowledge that the Airport is one of the surrounding uses but it fails to acknowledge, in spite of proposals in the Airport's Master Plan, the Manchester City Council Core Strategy (pre-publication draft) and the Wythenshawe Strategic Regeneration Framework, that there are active proposals for a corridor of development running west and north west of the airport (and east and north east) which includes Roundthorn Industrial Estate, Wythenshawe Hospital, Davenport Green and airport and airport related development. It also fails to acknowledge that the site is uniquely well located in relation to both the skilled professional and managerial labour supply in the south of the conurbation and in East Cheshire and the extensive deprived communities/potential labour force in Newall Green and Woodhouse Park.

The table below summarises some of the significant unjustified conflicts between the Council's assessment of Davenport Green in 1996 (and 2006) and in the Appendix D Assessment:

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Issue	Site Appraisal Results appended to ELS, May 2009	TBC UDP 1996 Provisions (confirmed in 2006 UDP)
Suitability for employment development – surrounding uses	Agricultural land, M56, Manchester Airport, residential. Score 0	The Planning Brief for Davenport Green (appended to the UDP)(PB) had as its express purpose: “to achieve development which is well integrated with the total site and its Green Belt setting.”
Access to public transport	Score 1	PB provided for additional public transport services to be made available by the developer to the satisfaction of the Council.
Pedestrian and cycle access	Score 0	Ditto
Environmental impact	High, Score 0, but no supporting evidence provided	PB addressed the development form, car parking (numbers of spaces and location (95% underground), landscaping, highway layout and traffic impact, and development guidelines for the rural park including new woodland and habitat enhancement.
Site within an area for priority regeneration, improvement or protection	No, Score 0	Justification for the Policy in the UDP states: “The development of Davenport Green.....will complement the development of sites in existing urban areas, and thereby promote urban regeneration, by stimulating indirect and spin-off development and jobs in other parts of the conurbation. It will further promote urban regeneration by directly creating jobs of a high quality that are readily accessible to disadvantaged communities in the former Urban Programme target areas of Greater Manchester.”

Critically the assessment recognises that “the quality of the surroundings is excellent and would be suitable for high quality/headquarters type development” but that “there has been no market interest in the site for the uses identified in the UDP”; this goes to the heart of our contention that the site is uniquely well qualified but that the uses prescribed in the UDP (with our client's acceptance at the time) were too constraining. If those constraints

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were at the time appropriate (and almost certainly, we are advised, they were not), they are certainly not so now because:

- a. Firms are no longer looking for that type of premises

Manchester faces an even tougher competitive challenge in the quest for mobile investment than it did in the 1990s and 2000s..

Other TBC Reasons: Economic Strategy and Employment Land Supply

In two versions of the Core Strategy that have been published for consultation the Council have expressed their intention to discontinue the allocation of Davenport Green as a major employment site. At the Preferred Options stage in June 2008 "the Council considers that in view of Trafford's Economic Strategy and emerging RSS [Davenport Green] should revert to Green Belt in the Core Strategy". (para 5.18) There was however nothing in the Trafford Economic Strategy or Manchester Economic Development Plan that justified the de-allocation of Davenport Green; and an Employment Land Review [Study] had not at that time been completed.

It should be noted that the Council's reliance on the Economic Development Plan is undermined by the chronology of the publications concerned: the Council confirmed Davenport Green as a major high amenity site for employment in the Review of the UDP in 2006, which was after the publication of the Economic Development Plan in 2005.

In the Further Consultation on the Preferred Option in July 2009 the Council justified the non-allocation of Davenport Green by reference to the May 2009 Employment Land Study (ELS) in which it was found that there was a sufficient supply of land without Davenport Green and by reference to NWDA's review of Strategic Sites which proposed – though at that point had not confirmed – elimination of Davenport Green because of its non-implementation. The latter (NWDA) point has been addressed above.

The first point to note about the ELS is that it stated wrongly that Davenport Green is in the Green Belt. More generally the ELS focused principally on the quantitative need for additional land, not the need to identify particular classes of site, such as those (for regionally significant economic development) defined in Policy W2 of the RSS (at that time) or sites which were capable of contributing to the sub-regional economy; the role and purpose of Davenport Green was not therefore appropriately considered.

RLAM submit that the above evidence has shown that:

- The Council is not proposing any strategic sites, not because there is no need, but because the possible sites were found to be too ill-prepared
- There are no sites or locations with a regionally or nationally competitive offer for B1 a and b, suitable for the Council's selected target sectors or other potential inward investors
- The Council has provided no evidence to justify the reversal of its position on Davenport Green in 1996 and 2006.

As a consequence RLAM contend that Chap 8, para 8.2, identification of five Strategic Locations and Policies SL 1-5 are

1. Not justified; the choices made in the plan are not backed by the facts
2. Not effective in that Core Strategy is not deliverable

We contend in this section that the choice made in the Plan (not to identify Davenport Green as a Strategic Site or Location for employment) was not backed by the facts.

Restoring Soundness

In the remainder of this representation we propose the designation of Davenport Green as a Strategic Site for employment as the means of restoring soundness to the Core Strategy, under the following headings:

- a. A Review of the Economic Need
- b. The Exceptional Qualities of the Site
- c. RLAM's Proposal and Its Justification

This section should be read in conjunction with Policy SS1 which provides for Davenport Green to be identified as a Strategic Site in a form that can be incorporated into the Core Strategy.

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Review of the Economic Need

The economic need for Davenport Green and for the quality of investment and employment it is capable of bringing to Greater Manchester is if anything greater than it was in 1996 and 2006. A common measure of regional and sub-regional economic progress is Gross Value Added (GVA), for which the Northern Way (the Government supported initiative to reduce regional disparities, which spans the three northern regions) set a target in 2004 to bridge the £29bn gap between the North and the UK:

The record for Gross Value Added in Greater Manchester in the high growth period 1998-2007 is not encouraging:

- Gross Value Added in GM increased 50%
- This was lower than either the UK or than a number of other development areas such as E Scotland, Northumberland & Tyne & Wear, SW Scotland and E Wales.

Forecasts produced by the Regional Economic Forecasting Panel, based on the forecasts of three forecasting houses, indicate that the North West will grow consistently 0.3 percentage points more slowly than the UK in the next 20 years.

National endorsement of the need for accelerated regional growth was provided by the Chancellor of the Exchequer in his budget speech (June 22, 2010) when he set out the Government's view (implicitly confirming the objective of the Northern Way) that regional imbalances need to be addressed:

"Mr Deputy Speaker, over the past decade the British economy has become deeply unbalanced. Nowhere are these disparities as marked as between the different regions of Britain. Between 1998 and 2008, for every private sector job generated in the North and the Midlands, 10 were created in London and the South."

At a local and human level the consequences of deficient economic growth (amongst other factors) are that the scale of deprivation in Greater Manchester has diminished little in recent years.

Economic Deprivation Index for Manchester and Trafford showing worst areas in 1999 and change between 1999 and 2005

	Area (Super Output Area)	Location*	EDI Score** 1999	EDI Score 2005	Change 1999- 2005***
Five worst SOAs in Trafford in 1999	Trafford Borough Council		19.8	19.1	96
	Trafford 001	Clifford	62.8	55.6	88.52
	Trafford 004	Longford	38.35	38.04	99.2
	Trafford 008	Priory	34.4	37	107.63
	Trafford 017	Bucklow St Martins	53.6	56.3	105.12
	Trafford 019	Broadheath	40.3	37.2	92.34
Areas near to D. Green	Manchester 048	Baguley	50.85	50.85	94.1
	Manchester 051	Benchill	58.23	53.19	91.35
	Manchester 053	Woodhouse Park	55.7	53	95.06
Five worst SOAs in Manchester in 1999	Manchester City Council		50.9	45.4	89
	Manchester 009	Harpurhey	86.9	84.48	97.21
	Manchester 013	Beswick and Clayton	80.29	77.12	96.05
	Manchester 015	Bradford	88.9	83.8	94.29
	Manchester 023	Burnage	80.65	76.21	94.5
	Manchester 024	Old Moat	86.24	77.38	89.72
External comparators	Macclesfield		10.3	10.4	100.97
	Vale Royal		17.9	16.1	89.94

Economic Deprivation Index: CLG 2008

* Wards that correspond approximately to the SOAs listed

** EDI Scores range from 0-100

*** Indices > 100 show deterioration; indices < 100 show

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improvement

The table shows that rates of economic (income and employment) deprivation have improved in many areas; however this needs to be seen in the context of a greater increase in income per capita nationally of 26% in the shorter period of 2000-2005.

The Council identifies with the City Region's commitment to accelerated economic growth over the next few decades (CS, paras 2.1 – 2.8), thereby acknowledging the need for faster growth.

The Exceptional Qualities of the Site

It is important to demonstrate the exceptional advantages of the location from the perspective of delivering investment and jobs in the growth sectors and others in cases where firms have choices over where to locate:

- a. The market view of S Manchester has long been that it is the favoured part of the conurbation; in the Manchester Independent Economic Review (2009)(MIER) it was recognised that if Manchester was to compete effectively for mobile investment it needed to provide sites where the demand is:

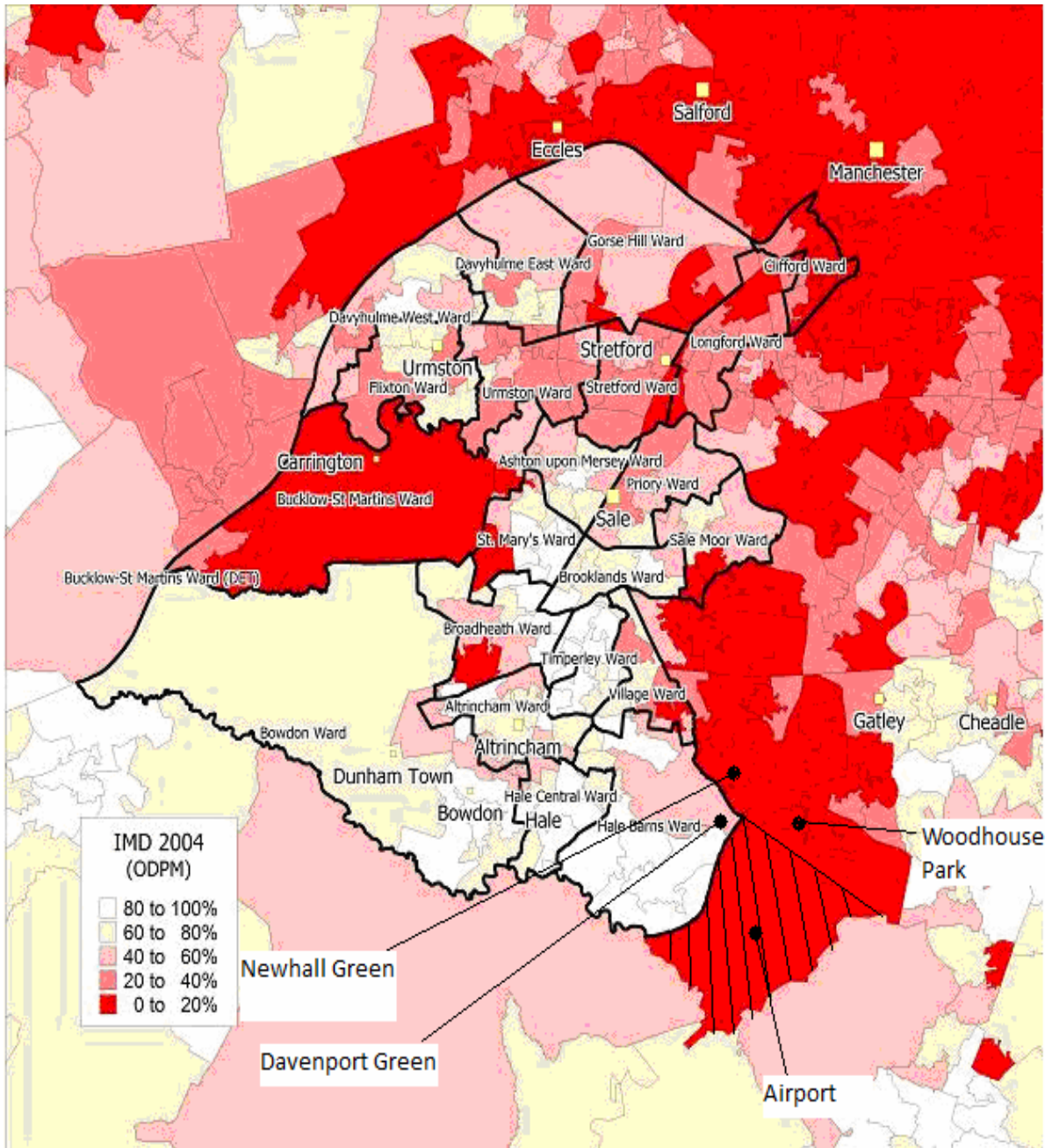
“...planning policy should be reviewed to acknowledge the reality of economic demand and permit more expansion of suitable business premises in those parts of the city region where demand is strongest. Broadly, this demand seems to be stronger in the south, although such locations are found elsewhere in the city region...” In addition to this, a supporting report by LSE recommends a softening of the 'brownfield first' approach, suggesting that current plans appear to favour almost exclusive use of brownfield land despite the evidence that this may not serve demand.” (Extract from Drivers Jonas, Greater Manchester Town Centres, Policy Position Statement, December 2009, for Commission for the New Economy)

- b. Davenport Green is at a pivotal location between the very large and diverse labour pool in Greater Manchester and the higher managerial and professional skills that are concentrated in S Manchester and Cheshire. A broad conclusion from MIER is that Greater Manchester should not focus on clusters, sectors or SME's. It did however major on agglomeration economies, which can be summarised as the economic benefits arising from a large concentration of labour especially higher skills (and their associated quality of life), of suppliers and markets, of opportunities for ideas exchange and of access to infrastructure and services. We have already described above the major concentration of higher skills in the south of the conurbation and in the adjacent areas of Cheshire. It is the quality of life in these locations that is the attraction for higher skilled people, who are more mobile than the firms they work for.
- c. Another aspect of the pivotal location is the ability for Davenport Green to contribute to regeneration in Trafford and in Wythenshawe. Wythenshawe is one of the largest concentrations of deprivation in Greater Manchester. Benchill in Wythenshawe is the most deprived ward in Manchester City. The diagram below (annotated to assist interpretation) shows the scale and distribution in and adjacent to Trafford and adjacent to Davenport Green. Manchester Airport already run an extensive programme of initiatives to engage local people, especially those who are disadvantaged, in Trafford and Manchester to participate in the economic benefits of economic development associated with the Airport; these are set out in the Airport's "Community Relations, Annual Review 2009-10". The Airport welcome the prospect of RLAM lending support to education, training, job access and community programmes which are being undertaken by the Airport and other major employers.
- d. Davenport Green can tap these labour markets sustainably because of the network of bus routes already serving surrounding areas and because of the proximity of the Airport's transport interchange, which brings together air, rail and bus travel and which will soon have a Metrolink connection
- e. A large volume of investment has been made in the landside transport facilities at Manchester Airport: rail and bus/coach stations and the committed Metrolink extension. Davenport Green is able to make good use of this existing capacity, which must be better value for money than creating expensive new capacity at other poorly served peripheral locations.
- f. The exceptional synergies that can be exploited in the Airport area have already been identified in the Airport's Master Plan and in the Wythenshawe Strategic Regeneration Framework. As we have reported

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above, the corridor of development and its opportunities have been recognised in MCC's Draft Core Strategy. Airport City and Wythenshawe Hospital are already being brought forward by MCC as Strategic Locations for employment in their Draft Core Strategy.



Index of Multiple Deprivation, TBC Wards and Adjacent Areas (Source: TBC Economic Development Plan, 2005)(not to scale)

RLAM's Proposal and Its Justification

Davenport Green can be a part of a major South Trafford-South Manchester strategy for integrated development, sustainability and regeneration; this would exploit the synergies and economies of scale offered by the corridor or arc of development for:

- focused business development in "export" sectors
- web-based business networking
- public transport
- regeneration,
- sustainable waste handling and treatment
- low carbon energy production and CHP
- sustainable urban drainage and
- air quality management.

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Realisation of these opportunities depends on other sites being brought forward in a concerted fashion e.g. University Hospital of South Manchester (Wythenshawe) Hospital, Roundthorn Industrial Estate and Airport City, as well as Davenport Green. Connections could also be made to other major facilities in the corridor including:

- the superstore and retail centre (West Wythenshawe District Centre) on the A560,
- Manchester Health Academy (secondary school) and new community library, (also on the A560)
- Newall Green High School, a specialist Arts, Science with Mathematics and Vocational College (very near to Davenport Green)
- The rural park at Davenport Green opens up links into Trafford's communities.

Davenport Green is a critical link in this corridor and in unlocking these opportunities; RLAM is willing to develop the opportunities as soon as other sites, such as Roundthorn Industrial Estate and Airport City, are brought forward.

The time is right for bringing this strategy forward:

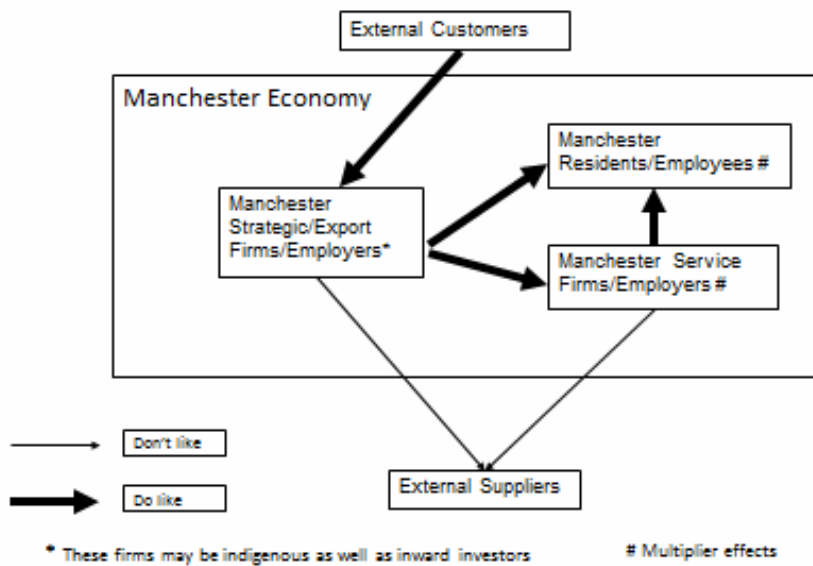
- The recession has slowed the growth of passenger numbers through the Airport and Manchester Airport Group are re-thinking their business model, within which Airport City is an important component.
- The recession has given the AGMA authorities pause to reflect on their economic development strategy as progress in bridging the GVA gap has been slower than expected even in the boom years.
- Major companies are seeing that sustainable practice is not just virtuous but also good for business: staff and customers expect it and it can reduce operating costs.
- RLAM see that Davenport Green has a key contribution to make to the strategy.
- Cuts to public expenditure are likely to require local partnerships to be created in order to deliver real progress on the sustainability agenda, possibly a Business Improvement District or Tax Increment Area for the strategy.

The immediate issue is for Davenport Green to be identified as a Strategic Site for employment in the Core Strategy. This is essential in order that the proposals for Davenport Green have any realism and to enable other parties in the corridor (for example Manchester Airport, who have expressed support for Davenport Green as a site for economic development, are preparing a Master Plan for Airport City) to have certainty about which sites will be brought forward for development and what the real scope is for corridor synergies.

Two policy amendments are needed: one to remove the part of Policy R4 which puts Davenport Green into the Green Belt and one (SS1, attached) which provides for Davenport Green to be a Strategic Site for employment.

The proposal is designed to contribute to the pressing Greater Manchester objective to accelerate sub-regional economic growth and bring growth in GVA closer to the UK figure. It will do this by creating an internationally competitive offer for mobile investments by firms that might have chosen a location outside Greater Manchester but for the existence of the Davenport Green offer. Knight Frank (Report at Appendix 15) have advised, on the basis of their knowledge of occupiers' requirements and of the competing offers that are being made in the UK and overseas, that the proposals will be attractive to demanding firms, provided occupancy is not tied up with heavy restrictions.

Manchester Economy: Major Money Flows



RLAM are convinced that the economic need is greater than in 1996 and that the firms attracted to

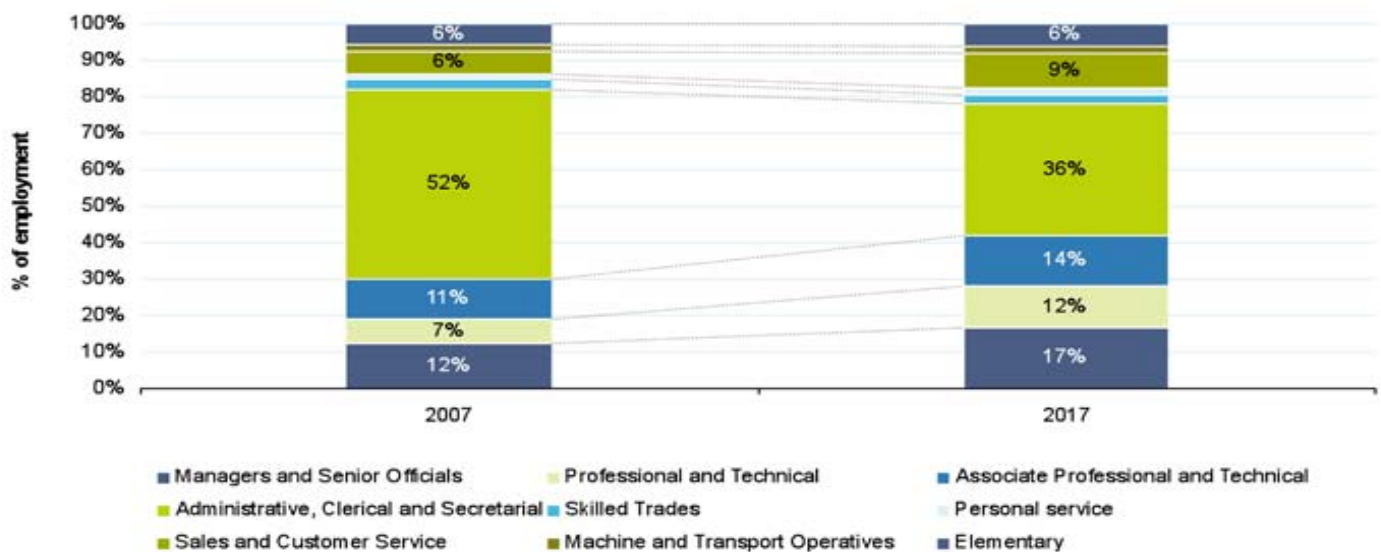
Davenport Green will be export or strategic firms in the terms of the diagram presented above and they will

generate major benefits for Trafford and the rest of the Greater Manchester economy. The spin-off, multiplier and regeneration effects of the proposal were summarised in the diagram and we have now quantified them where possible:

- a. Direct employment in the strategic or export firms attracted to Davenport Green, estimated at 4,471 jobs; these jobs will be in a wide range of occupations; see for example the anticipated occupational breakdown in the financial services sector:

Figure 53: Occupational mix for financial services, 2007-2017

Source: Warwick Institute for Employment Research: Working Futures II (2008)



- b. Indirect employment in service firms supplying goods and services to the Davenport Green firms estimated at 1520
- c. Induced employment created by the expenditure of direct and indirect employees of 1318
- d. Creation of a major rural park for the enjoyment of local residents, particularly those of Trafford (Hale, Hale Barns and Timperley)

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- e. Opportunities for residents in deprived communities in Trafford and Manchester to access the jobs supported by measures that RLAM will fund (working with the Airport and other major employers who are already engaged in such programmes)
- f. A major stimulus to people in Greater Manchester to develop skills in order to be able to access the jobs; RLAM will examine the opportunities for working with local colleges and schools in order to improve students' access to the jobs to be created.
- g. Improved access for local people through RLAM's support for new and extended bus routes e.g. access from Trafford communities to Wythenshawe Hospital (*tbc*)

The proposals and the objectives of the Sustainable Community Strategy and the Core Strategy which they fulfil are set out in the Policy SS1 attached to RLAM's Overview Statement.

The Policy is modelled on the Council's policy and justification for the five Strategic Locations in the Core Strategy e.g. SL1 – Pomona Island. However it provides the higher level of detail relating to the site boundary, the development proposals and their delivery which are appropriate for a Strategic Site.

In particular these demonstrate that:

- Davenport Green is a sustainable location when account is taken (as the Council did in 1996 and 2006) of the transport improvements and green infrastructure that RLAM will support (Sustainable Transport Strategy, Appendix 7)
- The proposal will do no harm to the purposes for which Green Belts are designated and it will promote the objectives of the Green Belt in the vicinity of the development site (Green Belt, Appendix 12)

In conclusion RLAM contend that the proposal restores soundness to the Core Strategy in the following ways, in which we believe it to be unsound in its present form:

- The site remains out of Green Belt, overcoming the errors that have been made in trying to put it into the Green Belt
- It delivers the ambitions in the Sustainable Community Strategy and the (amended as suggested) Vision and Objectives of the Core Strategy
- It has been subject to Sustainability Appraisal and found to be sustainable
- It is deliverable.

Please continue on a separate sheet if required

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PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: Strategic Planning Advice Ltd

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Draft Core Strategy Policy R4.3

1 In its Publication Draft of the Core Strategy the Council states that:

"It is proposed that the land previously identified for employment development at Davenport Green will be returned to the Green Belt"

(DPD1 Core Strategy: Publication (September 2010), Policy R4.3, page 136)

2 This is the only change that is proposed to the Green Belt in Trafford. It is a substantial change, involving 36.4ha of land. The Council has only felt the need to justify this proposed change in the September 2010 Core Strategy Report (paragraphs 24.9 – 24.17). Earlier

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references to the Green Belt at Davenport Green are brief and often contradictory (see Appendix 17), demonstrating, inter alia, a lack of integration and iteration with the SA process.

- 3 The Council's justification is examined further below (paragraph 16ff). It is necessary, first however, to consider how that justification relates to prevailing policy and guidance regarding the extent of Green Belts and changes to their boundaries.

Policy and Guidance on Green Belt change

- 4 Paragraph 2.1 of PPG2 states that:

"The essential characteristic of Green Belts is their permanence".

This overriding point is amplified to make clear that it is relevant both to the general extent and boundaries of Green Belts:

"Once the general extent of a Green Belt has been approved it should be altered only in exceptional circumstances . . . Similarly, detailed boundaries approved in local plans or earlier approved development plans should be altered only exceptionally."

(PPG2 paragraph 2.6)

- 5 There is no ambiguity in this. There is nothing to suggest that adding land to the Green Belt, as opposed to removing land from it, is subject to any other policy direction. It applies equally to the general extent and the detailed boundaries of the Green Belt. There is therefore need to demonstrate exceptional circumstances to warrant change in either direction. This premise has been tested and supported in the courts (notably in the cases of *Carpets of Worth v Wyre Forest DC* [1991] and *Copas v Royal Borough of Windsor and Maidenhead* [2002]).

- 6 Moreover, PPG2 indicates that a Green Belt boundary revision in a local plan should be preceded by approved changes to the relevant structure plan:

"Where existing local plans are being revised and updated, existing Green Belt boundaries should not be changed unless alterations to the structure plan have been approved, or other exceptional circumstances exist, which necessitate such revision"

(PPG2, paragraph 2.7)

The Planning Inspectorate, with their accumulated experience of dealing with Local Development Frameworks, has addressed this particular issue in the post-structure plan era, and has advised that:

"In the absence of a requirement in the RSS to review the Green Belt boundary, any change must be justified by exceptional circumstances".

(PINS, 'Examining Development Plan Documents: Learning from Experience', paragraph 44, page 11)

- 7 There are thus two circumstances when a local authority may make modifications to Green Belt boundaries. The first is where the need to do so is spelt out in the RSS and justified at that stage, in which event it becomes a requirement that the local authority has to meet. The

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second arises where no such need or requirement exists, in which case the Local Authority must demonstrate exceptional circumstances.

- 8 In respect of the first of these, the RSS for the North West (September 2008) contained Policy RDF 4 which stated that:

"There is no need for any exceptional substantial change to Green Belt and its boundaries in the North West within the timescales set out below:

- *Within Cheshire, Greater Manchester, Lancashire or Merseyside before 2011*

After 2011 the presumption will be against exceptional strategic change to the Green Belt in Cheshire, Greater Manchester, Lancashire or Merseyside. Strategic Studies, undertaken by the Regional Planning Body, together with relevant stakeholders should investigate both the need for change and options for implementation." (RSS Policy RDF 4)

- 9 The RSS has been revoked, but the evidence base for the RSS is still valid. Guidance accompanying the letter of 6 July 2010 sent to planning officers by Steve Quartermain, Chief Planner, DCLG, makes it clear that planning based on research held by previous Regional Assemblies will still be available to local authorities for the preparation of their DPDs when formulating or reviewing policies in respect of which the Regional Strategy would previously (until 6 July 2010) have supplemented the national policy framework. Advice by PINS for use by its inspectors in relation to revocation of Regional Strategies (20 July 2010) states that evidence that informed the preparation of the Regional Strategies may be a material consideration, to which regard should be had (paragraph 8). The data and research in support of the Regional Strategy makes it clear that changes to the Green Belt are neither needed nor anticipated in the region in the foreseeable future, and that any unforeseen significant changes should be investigated within a regional context:

"It is anticipated that future development in the North West . . . can generally be accommodated without need for strategic reviews of the Green Belt. Where new evidence . . . indicates the need for review, this should be investigated and informed by strategic studies carried out by the Regional Planning body together with relevant stakeholders."

(RSS. paragraph 5.25)

Trafford's LDF evidence base does not indicate that is relying upon any of its own evidence in connection with the re-drawing of Green Belt boundaries (other than its conclusions, addressed in paragraphs 26 and 27 below, regarding the prospects of development at Davenport Green going ahead).

- 10 There are, thus, no exceptional circumstances which would provide a regional justification for Green Belt change. Accordingly there is no 'requirement' for Trafford to make any boundary changes in its Local Development Framework in order to accord with any other policy document.

- 11 The Council's emerging Core Strategy purports to be entirely consistent with this. In its Preferred Options Report, the Council states, in terms, that:

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*"In accordance with this Regional Guidance, the Council intends **to carry forward the current Green Belt designation.**"*

(Core Strategy: Preferred Options (July 2008), paragraph 7.67, page 91, emphasis added).

That statement is clear and unequivocal, and carries with it the implication of the Council having understood what was in the Green Belt, and the absence of any basis for changing it. Readers of the document would have clearly understood the position and would not have needed to read further. The diagrams contained within that same report, however, depict an entirely different picture. On all three Option diagrams (on pages 34, 36 and 38) the land at Davenport Green is shown as Green Belt.

- 12 This contradiction can only be explained in one of two ways. Either,
- a) the Council believed the land was already in the Green Belt, and was consulting not on the basis of a major change in the Green Belt but the contrary, or
 - b) the Council believed that the guidance only related to changes that would reduce the extent of the Green Belt, and that changes in the other direction needed no such regional justification.

In respect of a), there is certainly evidence of confusion in previous documents about whether the land is in or out of the Green Belt (see Appendix 17). If, however, b) were to be the explanation, then no such explanation has been given in the report, and it seems, in any event, unlikely, unless the Council was completely unaware of the policy and legal requirements. Either way, the consultation document contained a worrying inconsistency that revealed a lack of rigour in the Council's approach to the question of Green Belt change.

- 13 By the time the 'Further Consultation' was issued in 2010, the Council appears to have acknowledged that some rationalisation and explanation was needed. It attempts an explanation of the Green Belt boundary change at Davenport Green in the following terms:

"The land at Davenport Green was removed from the Green Belt by way of the 1996 Trafford Unitary Development Plan (UDP). It was removed to enable a scheme of sub-regional significance to deliver a strategic high amenity employment site of 36.4ha. Outline planning approval was granted for half of the site, however detailed proposals were never submitted, and the outline consent has now lapsed. Therefore there does not appear to be any realistic prospect of this development going ahead."

(Trafford Core Strategy: Further Consultation on the Vision, Strategic Objectives, and Delivery Strategy", March, 2010, paragraph 16.10).

The idea that Davenport Green should revert to Green Belt appears, in this document, to be something which the Council regarded as a simple consequence of the non-implementation of development on the site. There is no mention of the RSS in the explanation. More fundamentally, there is a conspicuous absence of any attempt to demonstrate exceptional circumstances.

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- 14 RLAM made representations in 30 April 2010 drawing attention, inter alia, to these shortcomings, and stated that, unless they were rectified, the soundness of the Core Strategy could be justifiably challenged.
- 15 In the Publication Draft of the Core Strategy (September 2010) the Council made an attempt to address these matters. Changes were made to the text, under the heading of 'justification', to deal with the RSS omission and the absence of exceptional circumstances, through the insertion of two new paragraphs (24.9 and 24.17).

The Regional 'Requirement' (paragraph 24.9)

- 16 In respect of the RSS omission, the Council says, in the first 'new' paragraph, that the Regional Planning Body has confirmed that the proposed alteration can be dealt with through the Trafford LDF:

"The Regional Planning Body (4NW) has the ability to determine whether a proposed alteration is a local detailed boundary change and can therefore be determined through the LDF process. During the preparation of the Core Strategy 4NW has confirmed that the proposed alteration to the Green Belt at Davenport Green can be considered by way of the Trafford Core Strategy".

(DPD1 Core Strategy: Publication (September 2010), paragraph 24.9)

- 17 It is not known what form this 'confirmation' took, nor when it was given, although it was not mentioned in the March 2010 consultation report. On the face of it, this is no more than a confirmation of procedure (i.e. the change can be dealt with through the LDF process) which, of itself is unsurprising given that the Green Belt boundary change to facilitate Davenport Green in the first place was made through the demonstration of exceptional circumstances at the Trafford UDP Inquiry.
- 18 There is however, a clear implication here that the regional planning body has used its discretion to determine that this is 'a local, detailed boundary change', and does not require any regional justification. This is rather more surprising, given the scale of Green Belt change, the evidence base and policy of the RSS, and the absence of any earlier reporting of a dialogue on the matter between the Council and 4NW. Be that as it may, 4NW's 'confirmation' does not change the fact that there is not, nor was there ever, any 'requirement' for Green Belt change, and thus, it is incumbent upon the local Authority, in line with the law and the guidance given in PPG2 and by PINS, to demonstrate exceptional circumstances.

Exceptional Circumstances (paragraph 24.17)

- 19 The Council have introduced another 'new' paragraph to deal with the omission of any reference to exceptional circumstances in their March 2010 report. It states:

"The exceptional circumstances which would justify the return of this site to the Green Belt are the important functions which it has continued to serve, and which were recognised by the UDP inspector"

(DPD1 Core Strategy: Publication (September 2010), paragraph 24.17)

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This is illogical. According to the Council, the site has continued to fulfil green belt purposes notwithstanding the non-implementation of a candidate development, its physical circumstances have not changed, and no change in the locality is identified which would affect them. The Council appears to be confirming not that there has been some change in the sites position that might constitute exceptional circumstances, but, rather, the reverse, that there has been no change. These circumstances (regardless of whether they are exceptional or not) would surely justify status quo, given the PPG2 exhortations regarding Green Belt permanence.

- 20 Elsewhere in the District, the Council, faced with comparable circumstances, has chosen not to indulge in any such argument. Land at Carrington, south of and abutting the Shell petrochemical complex, has been retained as unallocated land outside the Green Belt since the Green Belt boundaries were first drawn (i.e. through two successive UDPs and now the draft Core Strategy). The justification for having this Protected Open Land (formerly, and generally still, referred to as 'white land') was to allow for the longer term expansion of the Petrochemical Works. That justification has long since disappeared as Shell has contracted, but the Council appears to be content to leave the land outside the Green Belt because, presumably, it continues to serve Green Belt purposes and is subject to a policy and development control regime which ensures that it stays that way.
- 21 Why, therefore, is there such a different response to the land at Davenport Green? Whilst the circumstances at Carrington are not precisely the same as at Davenport Green, the Green Belt issues are virtually identical. Time has elapsed, economic circumstances have changed, the land is undeveloped and has continued to fulfil Green Belt purposes. At Carrington, status quo is accepted. At Davenport Green, a major Green Belt change is proposed.

Other factors (paragraphs 24.10 - 24.16)

- 22 The Council's other arguments for returning the land to the Green Belt at Davenport Green are set out in paragraphs 24.10 – 24.16. They remain unaltered from the earlier report. They can be paraphrased:
- *The land fulfils three Green Belt purposes and was taken out of the Green Belt in 1996 because there was an economic need which constituted exceptional circumstances, and which outweighed the 'significant harm' to those purposes (paragraph 24.10 and 24.11)*
 - *That economic need was expressed through a 'very specific development proposal' which has not materialised (paragraphs 24.11 and 24.14),*
 - *No up to date evidence supporting the proposal has been provided by the owners of the site (paragraph 24.12)*
 - *The Council's SA found Davenport Green to be relatively unsustainable as a location (paragraph 24.13)*
 - *Davenport Green is no longer one of NWDA's strategic sites (paragraph 14.15),*
 - *There is, therefore, no reason why the land should not be returned to the Green Belt (paragraph 14.16).*

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These points are addressed in turn.

1. The land fulfils three Green Belt purposes and was taken out of the Green Belt in 1996 because there was an economic need which constituted exceptional circumstances, and which outweighed the 'significant harm' to those purposes.

- 23 The UDP inspector did indeed find that the land at Davenport Green fulfilled three Green Belt purposes. Extracts of his report are attached. He did not, however, find, or use the term 'significant harm', as the Council alleges. His wording was that

"...the development would contravene the purposes 1-3 of the Green Belt"

(UDP Inspector's Report, paragraph 3.63)

Importantly, however, the balance he sought to make was not between the economic benefits of the development and the Green Belt harm it would cause, but between the economic case for that development on the one hand and the benefits of retaining the land in the Green Belt on the other:

"In my view the special economic case for this development represents an exceptional circumstance which is capable of outweighing the importance of retaining the site in the green belt."

(UDP Inspector's Report, paragraph 3.64)

- 24 The inspector recommended, on the basis of this balanced judgment, that the site should be removed from the Green Belt and allocated as a High Amenity Employment Site in the UDP. He recommended that strict controls over the development be imposed via a Planning Brief, which was appended to the Policy. This brief contained parameters which regulated such matters as height, footprint and landscaping. These were imposed not to prevent harm to Green Belt purposes, for the site would no longer be in the Green Belt, but to ensure that the visual impact on the adjoining Green Belt was minimised, and the land management objectives of the Green Belt were supported robustly by the proposals for a Rural Park.
- 25 There is absolutely no reason why the key parameters cannot be reinstated in order to ensure that any development at Davenport Green is equally respectful of the visual amenity of the Green Belt and supportive of Green Belt objectives. Appendix 12 by Duncan Thomas, supporting the Davenport Green allocation, addresses these physical parameters in detail.

2. The economic need was expressed through a 'very specific development proposal' which has not materialised

- 26 The development parameters referred to in paragraph 24 above, taken together with the very strict limitation on qualifying occupiers, did in fact mean that this was a UDP Policy which could only be implemented, as the Council admits, through a very specific development proposal. That specific development proposal, or rather the specific matrix of constraints and requirements which dictated the form and type of development, may have been the physical

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embodiment of the economic case that the Inspector assessed in 1996, but it was not the case itself, and yet this is how it has been regarded recently by the Council. The non-implementation of the development proposal has been equated, in the Council's mind, to the collapse in the economic case, but this is a *non sequitur*.

- 27 The inconvenient truth is that it is the strictures of the Planning Brief and occupier controls bearing upon ***the development***, rather than any inherent weakness in the strategic value of ***the site***, that has rendered it unattractive to occupiers. This caused development inertia, coupled with the inter-relationship between the international economic climate and commercial market. The position is explained more fully in the representations on Chapter 8 of the CS – "Restoring Soundness", and Appendix 15 to those representations by Knight Frank.

3. No up to date evidence supporting the proposal has been provided by the owners of the site

- 28 The Council assert that no up to date evidence supporting the proposal has been provided. This is quite simply untrue. Representations made at each stage of the CS process as follows:

- Issues and Options July 2007, Preferred Options, July 2008
- Draft Land Allocations Development Plan Document, September 2007
- Preferred Options, July 2008
- Proposed assessment criteria for Key Strategic Sites, January 2009,
- Three workshops in 2009
- Further Consultation on the Vision (etc) April 2010.

What was submitted and discussed on each of these occasions is set out in full in the Representations on Policies W1, SL1, SL4 and SL5. Attention is drawn specifically to the April 2010 representations which contained new evidence relating to:

- The changing requirements of corporate occupiers
- The opportunities for synergistic development and green infrastructure investment in the area around Manchester Airport
- The implications of a single owner of Davenport Green
- The implications of climate change
- An update on the scale and nature of deprivation in Greater Manchester

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- The new opportunities opening up for cross border working in Greater Manchester as a result of City Region status.
- Updated evidence on the economic need for a scheme such as Davenport Green
- The results of the Manchester Independent Economic Review and their implications for the location of development opportunities.
- The lack of high quality B1 office business development sites in Trafford.

These representations combine to provide a detailed and up to date assessment of the economic case supporting Davenport Green as a strategic site/location.

4. The Council's SA found Davenport Green to be relatively unsustainable as a location

29 The Council asserts additionally that its Sustainability Assessment shows the Davenport Green site to be less sustainable than other sites in the Borough. The flaws in the SA are deep and fundamental. Representations have been made on this in full under the heading "Sustainability Appraisals, together with Appendix 17 by experts on Sustainability Appraisal, JAM. In summary the main points are as follows:

- Incorrect baseline data (i.e. Davenport Green is not Green Belt land)
- Inappropriate sustainability objectives and indicators
- Lack of information on the scoring mechanism used
- Absence of key stages in the process and a clear audit trail
- Lack of transparency on the selection of options and the decisions taken between competing alternatives
- Inadequate appraisal of options and alternatives with insufficient evidence to justify decisions
- No assessment or identification of the 'exceptional circumstances' needed to alter the Green Belt boundary
- Inaccurate and inconsistent appraisal results
- Lack of evidence to support decisions taken or reference to evidence available
- Lack of information on the viability, deliverability and timescales of the proposals
- Contradictory results between the Strategic Locations and Core Strategy Core Policies
- Significant failure to comply with guidance and the regulations.

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5. Davenport Green is no longer one of NWDA's strategic sites

30 The fact that the site is no longer on NWDA's Strategic Site list cannot be taken as an indication of anything more than NWDA's acceptance of the Council's request that the site should be removed, and perhaps a resignation to the view (reflecting the Council's own view) that the non-implementation over the last 15 years of the Davenport Green scheme probably signifies that it never will come forward.

31 However, it should be noted that NWDA's recommendation was not in fact that the Davenport Green site should be deleted. The Agency recommended that it was retained on its list:

*"DAVENPORT GREEN. **Retain, subject to further investigation:** Whilst this is a potentially attractive Greenfield site close to Manchester Airport, to date no development has taken place. The Agency should consult on the site with a view to understanding development potential including market context and highway capacity issues"*

(NWDA Strategic Regional Sites Review: "Stage 1 Recommendations for Consultation". Appendix B, page 11).

32 The decision to omit Davenport Green was therefore made contrary to the initial recommendation of the Agency. Notwithstanding this, it needs to be pointed out that deletion from NWDA's Strategic site's list does not disqualify a site from being proposed as a strategic site/location within the Core Strategy. Carrington has been deleted from the NWDA list, but is still being promoted by the Council as a strategic location.

6. There is no reason why the land should not be returned to the Green Belt

33 This demonstrates a fundamental error in the Council's approach. The Council's sixth point is a negative one, and is a clear indication that it has been unable to demonstrate any exceptional circumstances to make a positive case for this Green Belt change. The necessary components of such a case are neatly summed up by Simon Brown LJ in his judgement on the Copas case:

*"I would hold that the requisite necessity in a PPG 2 Paragraph 7 case like the present – where the revision proposed is to increase the Green Belt – cannot be judged to arise unless some **fundamental assumption** which caused the land initially to be excluded from the Green Belt is thereafter **clearly and permanently falsified** by a later event."*

(Copas v Royal Borough of Windsor and Maidenhead, 2002, paragraph 40 of the judgment, emphasis added)

34 It is evident that the Council's case rests quite simply on a desire to have the land in the Green Belt rather than any rigorous and objective examination of the 'fundamental assumptions' that excluded it in the first place, and whether those assumptions have been 'clearly and permanently falsified' by events since. Without this examination there can be no exceptional circumstances to warrant the change the Council so obviously seeks.

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35 There has, since at least 2008, been a political determination at Trafford Council, to increase the Green Belt at Davenport Green, and this pre-determination has diverted the Council ineluctably from the task of making a case that will be consistent with PPG2.

Conclusion

36 Trafford's decision to change the Green Belt boundary at Davenport Green

- is in direct contravention of the advice in PPG2 regarding exceptional circumstances
- is not supported by the RSS or its evidence base regarding the need for Green Belt boundary change
- is not supported by any evidence prepared for the Core Strategy, specifically evidence that examines the commercial realities that have prevented the Davenport Green scheme from being implemented, or any economic analysis of the sub-regional potential of the site, and the consequences of extinguishing that potential at a stroke.

37 This renders the Core Strategy unsound.

38 Soundness in relation to Green Belt policy can only be restored by retaining the Green Belt boundary as fixed in the UDP of 1996, and as renewed in 2006.

Please continue on a separate sheet if required

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PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: Strategic Planning Advice Ltd

3. To which part of the DPD does this representation relate?

Paragraph Number

SA of CS

Policy Number

The Sustainability Appraisal of the Core Strategy

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

X

4. (2) Sound*

Yes

No

X

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

X

(2) Effective

X

(3) Consistent with national Policy

X

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

Review of Trafford Metropolitan Borough Council's Sustainability Appraisal of the Core Strategy

1.0 The Review of Trafford Metropolitan Borough Council's (TMBC) Sustainability Appraisal Process has been prepared by jam consult ltd on behalf of Royal London Asset Management (RLAM) to provide a review of the Sustainability Appraisal reports undertaken by the Council, in support of the production of the draft Core Strategy documents.

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2.0 The report identifies the Regulations and Guidance that are applicable to the development of the Core Strategy in relation to the SA process. The document then provides a review of the SA process and the flaws that have been identified to date. The report should not be seen as an exhaustive catalogue of every deficiency in the process. Instead, the review draws attention to the significant defects that have occurred to enable a view to be taken on the legal compliance of the process.

3.0 The review of the Council's Sustainability Appraisal documents in support of the Core Strategy has revealed a deeply and fundamentally flawed process that is contrary to the regulatory requirements (PPS12 and SEA Regulations) and good practice guidance (A Practical Guide to SEA, ODPM 2005). The key failings of the SA process can be identified as follows:

4.0 Scoping Report, June 2007

- Inappropriate Sustainability Objectives, Indicators and Methodology is set out
- Lack of information on the scoring mechanism to be used

5.0 Issues and Options, 2007

- The SA report is not published for consultation. Only a summary of the findings is provided contrary to the Practical Guide to SEA (section 3, p16) and the Scoping Report, 2007
- The failure to publish the SA report means that it is not possible to demonstrate the requirement for transparency or an adequate audit trail
- The Options identified in the summary report did not include a 'Business as Usual' option as set out in the Scoping Report (para 6.12)
- There is a lack of information on whether all reasonable alternatives have been assessed

6.0 Core Strategy Preferred Options – SA of Spatial Options, July 2008

- Incorrect baseline data used in the assessment (i.e. Davenport Green is now shown as Green Belt land)
- No assessment of the 'Business as Usual' Option as identified in the Scoping Report
- There is no compatibility assessment of the spatial objectives against the sustainability objectives
- There is a lack of transparency on the selection of options and the decisions taken between competing alternatives
- Inadequate appraisal of options and reasonable alternatives with insufficient evidence to justify decisions
- Davenport Green is removed as an option (page 64 para 5.18), which conflicts with the Green Belt Policy page 90-91 that states the current Green Belt designation will be carried forward.

7.0 Core Strategy Preferred Options - SA Report and Appendices, June 2009

- Davenport Green is introduced as a development option. No explanation is given. The site is once again dismissed as an option
- The results of the appraisal are significantly flawed and considered:
 - Inaccurate and inconsistent, the performance of different options is not clear
 - Mitigation measures are included for some locations but not for others, in particular Davenport Green
 - Various assumptions have been made without clear evidence to support the decisions taken

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- Neither robust nor, in several instances, credible
- Deficient in the justification for the rejection of Davenport Green
- Lack information on viability, deliverability and timescales
- Show no assessment or identification of the 'exceptional circumstances' needed to alter the Green Belt boundary
- Contradict results between the Strategic Locations and Core Strategy Core Policies
- Reveal a significant failure to comply with guidance and the regulations at every stage.

8.0 Further Consultation on the Vision, Strategic Objectives and Delivery Strategy – SA Report and Appendices, March 2010

- Many of the results are scored more favourably but without suitable evidence to support the changes in the scores
- Results are inaccurate and inconsistent
- No reference is made to viability and deliverability particularly in relation to the findings of the Strategic Flood Risk Assessment
- Davenport Green is again inaccurately referred to as within the Green Belt. There is still no assessment or identification of the 'exceptional circumstances' needed to alter the Green Belt boundary.

9.0 DPD1: Trafford Core Strategy: Publication Document – Sustainability Appraisal Report and Appendices, June 2010 (Published September 2010)

- The results for flood risk and drainage are neither credible or justified and do not represent the evidence that is available
- Section 2.5, page 13 of the SA report states that an SA report has been provided alongside each version of the Core Strategy issued for consultation. This statement is incorrect. The SA report at the Issues and Options stage was not published.
- There is no evidence of any analysis of the responses received through the consultation process, in particular, RLAM's representation April 2010, which identified many of the significant flaws in the SA process
- No attempt has been made to rectify the flaws identified
- Policy R4 now includes in the justification of the policy the Council's 'exceptional circumstances' for the expansion of Green Belt land at Davenport Green.
- The 'exceptional circumstances' have not been appraised in any of the SAs.

10.0 The Planning Inspectorate's guidance on the soundness of Local Development Frameworks identifies the following key questions that should be considered, particularly in relation to the consideration of options or alternatives.

"Key Questions – Alternatives

- *Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives?*
- *Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?*
- *Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why these decisions were taken?*

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- *Does the Sustainability Appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?*
- *Does the DPD adequately expand upon regional guidance rather than simply duplicate it? Does the strategy take forward the regional context reflecting the local issues and objectives?"*

The Planning Inspectorate – Local Development Frameworks: Examining Development Plan Documents – Soundness Guidance, August 2009, 2.9 pp6

11.0 The review of the SA has shown that Trafford's approach cannot be considered to be the most appropriate given the reasonable alternatives as the SA process has failed to comply with guidance and regulations at each stage. The audit trail is not clear and in many instances totally absent, making it impossible to determine why decisions were made.

12.0 The failures of the audit trail can be further illustrated by the assessment of Davenport Green specifically:

- The site is not included at the Issues and Options Stage, 2007 and no SA report was published. The 'Business as Usual' option identified in the Scoping Report is not assessed
- The site is excluded at the Appraisal of the Spatial Options, 2008 without adequate explanation or justification for its rejection
- The site is introduced and appraised at the Preferred Options Stage, June 2009 (without an explanation) but incorrectly represented as within the Green Belt and dropped as an option as a result of 'insufficient evidence or justification to put the site forward'. The 'exceptional circumstances', needed to extend the Green Belt, are not addressed.
- The Submission Version June 2010 adds to the Core Strategy Core Policy R4 justification, the Council's view on the 'Exceptional Circumstances'.
- The 'Exceptional Circumstances' to extend the land at Davenport Green to the Green Belt have not been subject to sustainability appraisal.

13.0 The failings in the SA continue throughout the process, with the later iterations of the SA improving the scores for all the Strategic Locations. Given the lack of adequate commentary and use of appropriate evidence for the changes in the results, it appears to be an attempt to post rationalise the decisions taken. The facts to back up the decisions are not apparent.

14.0 As the Planning Inspectorate guidance states:

"PPS12 provides that to be 'justified' a DPD needs to be:

- *founded on a robust and credible evidence base involving:*
 - *evidence of participation of the local community and others having a stake in the area*
 - *research/fact finding – the choices made in the plan are backed up by facts*
- *the most appropriate strategy when considered against reasonable alternatives"*

The Planning Inspectorate – Local Development Frameworks: Examining Development Plan Documents – Soundness Guidance, February 2010, 2.8 pp6

Furthermore the lack of rigour in the assessment is exposed by the contradictions in the assessment between the results for the Strategic Locations and the Core Strategy Core Policies.

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- 15.0 The level of inconsistency in the scoring and commentary, coupled with the lack of reference to appropriate evidence in the results reveals a thoroughly flawed and partial approach to the assessment. This lack of objectivity and justification in the assessment would appear to show a desire to provide the results for predetermined decisions. The findings cannot be considered credible, justified or robust and can only lead to the conclusion that the SA is not fit for purpose and that the Core Strategy is not sound.

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Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please note also that the Inspector is not obliged to consider any previous representations that have been made in respect of this Plan. You are urged, therefore, to re-submit, on copies of this form, any previously submitted representations that, in your view, remain valid and that you wish the Inspector to consider.

8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the Oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The issue that has been raised in this representation is of such strategic importance to the Core Strategy that it should be aired in open discussion at the EiP

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

Strategic Planning Advice Ltd for
Royal London Asset Management

Date:

1/11/10

Thank you for taking the time to fill in our Core Strategy representation form, your comments are very much appreciated.

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Guidance Notes to Accompany Representation Form

1. Introduction

The development plan document (DPD) is published in order for representations to be made prior to submission to the Communities and Local Government (CLG) Minister. Once they have been considered by the Council, the representations will be submitted alongside the published DPD to CLG and an independent Planning Inspector will be appointed to hold an Examination in to the Plan. The Planning and Compulsory Purchase Act 2004 (as amended)¹ (the 2004 Act) states that the purpose of the examination is to consider whether the DPD complies with the legal requirements and is 'sound'.

2. Legal Compliance

The Inspector will first check that the DPD meets the legal requirements under s20 (5) (a) of the 2004 Act before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The DPD in question should be within the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the Local Development Documents it proposes to produce over a 3 year period. It will set out the key stages in the production of any DPDs which the LPA propose to bring forward for independent examination. If the DPD is not in the current LDS it should not have been published for representations. Trafford's LDS can be found on Trafford's website and is available at Sale Waterside.
- The process of community involvement for the DPD in question should be in general accordance with the LPA's Statement of Community Involvement (SCI). The SCI is a document which sets out the strategy for involving the community in the preparation and revision of Local Development Documents (including DPDs and the consideration of planning applications). Trafford's SCI (2010) can be found on Trafford's website and is available at Sale Waterside.
- The DPD should comply with the Town and Country Planning (Local Development) (England Regulations) 2004 (as amended). On publication, the LPA must publish the documents prescribed in the regulations, and make them available at their principal offices and their website. The LPA must also place local advertisements and notify the DPD bodies (set out in the regulations) and any persons who have requested to be notified.
- The LPA is required to provide a Sustainability Appraisal Report when they publish a DPD. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure that they reflect social, environmental and economic factors. The Sustainability Appraisal for the Core Strategy can be found on Trafford's website and is available at Sale Waterside.

¹ View the 2004 Act at:

http://www.opsi.gov.uk/acts/acts2004/ukpga_20040005_en_1

View the amending 2008 Act at:

http://www.opsi.gov.uk/acts/acts2008/pdf/ukpga_20080029_en.pdf

View the 2009 amending Regulations at:

http://www.opsi.gov.uk/si/si2009/pdf/uksi_20090401_en.pdf

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The DPD must have regard to any Sustainable Community Strategy (SCS) for its area Trafford's SCS – 2021: A blueprint has been prepared by Trafford's Local Strategic Partnership (The Trafford Partnership) and is available on the Partnership's website.

3. Soundness

Soundness is explained fully in Planning Policy Statement 12: Local Spatial Planning in paragraphs 4.36 4.47, 4.51 and 5.52 and the boxed text². The Inspector has to be satisfied that the DPD is justified, effective and consistent with national policy. To be sound a DPD should be:

Justified

This means that the DPD should be founded on a robust and credible evidence base involving:

- Evidence of participation of the local community and others having a stake in the area
- Research/fact finding: the choices made in the plan are backed up by facts.

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

Effective

This means the DPD should be deliverable, embracing:

- Sound infrastructure delivery planning
- Having no regulatory or national planning barriers to delivery
- Delivery partners who are signed up to it
- Coherence with the strategies of neighbouring authorities

The DPD should also be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen.

The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make it clear that major changes may require a formal review including public consultation.

Any measures which the LPA has included to make sure that targets are met should be clearly linked to an Annual Monitoring report. This report must be produced each year by all local authorities and will show whether the DPD needs amendment.

Consistent with national policy

The DPD should be consistent with national policy, where there is a departure, LPAs must provide clear and convincing reasoning to justify their approach. Conversely you may feel that the LPA should include a policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you to say in your representations what the local circumstances are that justify a different policy approach to that in national or regional policy and support your assertion with evidence.

² View at <http://www.communities.gov.uk/publications/planningandbuilding/pps12lsp>

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Soundness

To be “sound” a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

- “Justified” means that the document must be:
- founded on a robust and credible evidence base
- the most appropriate strategy when considered against the reasonable alternatives

“Effective” means that the document must be:

- deliverable
- flexible
- able to be monitored

The concepts of justification and effectiveness are expanded at paragraphs 4.36 – 4.38 and 4.44 – 4.47 in PPS 12.

If you think the content of a DPD is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by any national planning policy? If so it does not need to be included.
- Is what you are concerned with covered by any other policies in the DPD on which you are seeking to make representations or in any other DPD in the LPA's Local Development Framework (LDF). There is no need for repetition between documents in the LDF.
- If the policy is not covered elsewhere, in what way is the DPD unsound without the policy?
- If the DPD is unsound without the policy, what should the policy say?

4 General Advice

If you wish to make a representation seeking a change to a DPD or part of a DPD you should make it clear in what way the DPD or part of the DPD is not sound having regard to the legal compliance check and the three tests set out above. You should try to support your representation by evidence showing why the DPD should be changed. It will be helpful if you also say precisely how the DPD should be changed. Representations should cover succinctly all the information, evidence and supporting information to necessary to support/justify the representation and suggested change as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Where there are groups who share a common view on how they wish to see a DPD changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Further detailed guidance on the preparation, publication and examination of DPDs is provided in PPS12.

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MONITORING INFORMATION

Please complete the following if you are responding as an individual, by ticking the relevant option. This information will be used for statistical purposes only and will not be kept with your representation form. Please complete one form per person, not per representation.

What gender are you?

Male	<input type="checkbox"/>	Female	<input type="checkbox"/>
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What is your age?

Under 16	<input type="checkbox"/>	16-25	<input type="checkbox"/>	26-35	<input type="checkbox"/>	36-45	<input type="checkbox"/>
46-55	<input type="checkbox"/>	56-65	<input type="checkbox"/>	66-75	<input type="checkbox"/>	76+	<input type="checkbox"/>

What do you do in Trafford? (tick those which apply)

Live	<input type="checkbox"/>	Work	<input type="checkbox"/>	Study	<input type="checkbox"/>
Other (please state)					

Do you consider yourself to have a disability or impairment, as defined in the Disability and Discrimination Act 1995*?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

* The Disability and Discrimination Act 1995 defines a disabled person as someone with a physical or mental impairment, which has substantial long term adverse effects on his/her ability to carry out normal day to day activities.

What is your ethnic group? Please tick the box that you believe best describes your ethnic origin.

White British _____ Irish _____ Any other white background (please specify) _____ _____ _____	Mixed White and Black Caribbean _____ White and Black African _____ White and Asian _____ Any other mixed background (please specify) _____ _____ _____
Asian or Asian British Indian _____ Pakistani _____ Bangladeshi _____ Kashmiri _____ Sikh _____ Any other Asian background (please specify) _____ _____	Black or Black British Caribbean _____ African _____ Any other Black background, (please specify) _____ _____ _____
Chinese or other ethnic group _____ Chinese _____ Any other ethnic background (please specify) _____ _____	

Trafford's Core Strategy: Publication Document Representation Form – September 2010

Sexual Orientation

How would you describe your sexual orientation?

Heterosexual	_____
Gay	_____
Lesbian	_____
Bisexual	_____
Do not wish to answer	_____

Religion / Belief

What is your religious belief?

Buddhist	_____	Jewish	_____
Christian	_____	Muslim	_____
Hindu	_____	Sikh	_____
Humanist	_____	No Religion	_____
Other Religious Belief (please specify)	_____		

Do not wish to answer			

Trafford's Core Strategy: Publication Document Representation Form – September 2010

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME: Ian McDonald	ORGANISATION: Strategic Planning Advice Ltd
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1. By which method/s did you hear about the consultation? (tick as many as appropriate)

Mail shot	
Website	
Helpline	
Material in libraries/Access Trafford	
Press publicity	
Email	X

Other (please state)

2. Are there any other methods by which you would like to see future consultations publicised?
(please state)

COMPLETE THE FOLLOWING SECTIONS AS APPROPRIATE

3. Consultation Representation Form

	No	Could be better	Yes
Was the representation form easy to complete?			X
Did the representation form allow you to adequately express your comments?			X

Have you any suggestions for improving any aspect of the representation form? (please comment)

The forms are OK; it is the convoluted preparation procedure for LDF's and the formulaic tests of soundness etc which are unfriendly and which militate against effective participation

4. Website

	No	Could be better	Yes
Was it easy to find the Publication consultation material?			X
Was it easy to find the Evidence Base material?		X	
Was the facility useful for making comments?		DK	

Any other comments?

Trafford's Core Strategy: Publication Document Representation Form – September 2010

5. Helpline N/A, but staff generally very helpful

	No	Could be better	Yes
Was your query dealt with quickly and effectively?			

Any other comments?

6. Material in libraries/Access Trafford offices N/A

	No	Could be better	Yes
Was it easy to locate the Publication consultation material?			
Were facilities for inspection satisfactory?			

Any other comments?

7. Any further comments/suggestions

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

**Please return this form by Monday 1st November 2010 to:
Strategic Planning and Developments
Trafford Council
First Floor
Sale Waterside
Sale, M33 7ZF**

The form can also be **faxed** to: 0161 912 3128.

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.

**Trafford's Core Strategy: Publication Document
Representations on behalf of RLAM**

OVERVIEW

**RLAM REPRESENTATION ON TMBC's PUBLICATION DRAFT CORE STRATEGY
(SEPTEMBER 2010)**

THE SUBMISSION

1. Overview
2. Attachments to the Overview
 - Policy SS1 – Davenport Green and Proposals Map extract
 - Selected Executive Summaries of Representations on the CS
 - Guide to the Structure of Representations by RLAM on the Core Strategy in TMBCs format
3. Full submission of representations within TMBC's Format

RLAM REPRESENTATION ON TMBC's PUBLICATION DRAFT CORE STRATEGY (SEPTEMBER 2010)

OVERVIEW

1 Introduction

RLAM's formal representations have been made in the format dictated by Trafford Borough Council's ("TMBC's") prescribed forms. The following concise overview of those representations has been prepared to assist understanding of RLAM's position on the Proposed Submission Draft Core Strategy ("CS"). Selected Executive Summaries of key aspects of the representations and the case highlighted by this Overview. Proposed policy SS1 – Davenport Green – is also attached. Also attached is a chart which explains where each of the representatives on behalf of RLAM are to be found, in accordance with TMBC's format.

2 Summary

2.1 Objections are submitted in respect of the following chapters of the CS:

- 2, 3, 4, 5, 8, 18, 24 and in respect of policies W1, SL1, 2, 4, 5 and R4. Objections are also submitted in respect of the Council's Sustainability Appraisal ("SA"). These objections contend that:
- Green Belt Policy R4 is not justifiable and is unsound, the proposal to extend the Green Belt is not based on a robust evidence base, and conflicts with national guidance in PPG2 by failing to demonstrate exceptional circumstances;
- Policy W1 is not "justified" in that the Major High Amenity Site at Davenport Green has been omitted;
- Policy W1 is not "effective" in that the selected four employment Locations (SL1, 2, 4 and 5) are not "deliverable" and not "flexible" and will not contribute properly to the achievement of the Strategic Objectives and the Vision for Trafford;
- the SA is "unsound" in its assessment of the Strategic Locations; in its assessment of Davenport Green, and in its assessment of a proposed extension of the Green Belt, with the result that the SA is not "legally compliant" and is in breach of the Environmental Regulations;
- the CS is not consistent with "national policy". In particular PPS1, PPG2, PPS4, PPS12, PPG13 and PPS25.

2.2 Soundness of the CS can be restored by:

- allocating Davenport Green as a Strategic Site, bringing jobs and major economic benefits to Trafford and to the sub-region which would otherwise be lost, together with environmental benefits for the people of Trafford from the designation of a Rural Park;
- retaining the Green Belt boundary in its current position.

3 The status of Davenport Green: Major High Amenity Site, not in the Green Belt

- 3.1 Davenport Green is currently allocated as a Major High Amenity Site (RS1 – Davenport Green), under Proposal E13 – Strategic Development Sites, Trafford's UDP Adopted in 2006 (a policy "saved" by the Secretary of State's Direction Letter of 13 May 2009).
- 3.2 Davenport Green is not in the Green Belt. See Trafford UDP 2006 Proposals Map.
- 3.3 Davenport Green was designated as a Major High Amenity Site in Policy E13 of Trafford UDP, Adopted in 1996. It provided for "*the development of a strategic high amenity employment site on 36.4ha (90 acres)...*". Up to 98,000m² of development was permissible. Planning permission for 49,000m² was granted in 2001, and renewed in 2003. Development was not commenced and the permission expired in 2009. In Trafford's revised UDP, Adopted in 2006 Policy E13 was renumbered E14, and new Policy E13 designated Davenport Green as a Major High Amenity Site.

4 The Sustainability Appraisal process is not legally compliant, and is unsound, as is the Core Strategy's reliance upon it

- 4.1 The Core Strategy, Issues and Options Paper, July 2007, does not include Davenport Green in any of its three strategic spatial options for Trafford. The omission of a current UDP allocation as a Major High Amenity Site was not justified and resulted in the failure to examine reasonable alternatives. The earlier Sustainability Appraisal – Scoping Report for the Core Strategy, June 2007, stated that "*One of the options will be "business as usual" which in this case means the policy of the saved UDP*". It is clear that this option, however, was not evaluated.
- 4.2 The SA of the CS, Issues and Options, July 2007, has not been published, so there is no audit trail and it is not transparent, in breach of Guidance, and this means that the Issues and Options Paper does not have a robust or credible evidence base. The document is clear, however, that no alteration to the Green Belt was proposed, and the plans showing the three options all show Davenport Green, correctly, as outside the Green Belt.
- 4.3 The SA of Spatial Options, July 2008, introduces plans showing the extension of the Green Belt in all three Options, but there is no assessment of this as a proposed change. Those undertaking the SA lacked key components of the evidence base which meant that it was not possible at that stage properly to assess the alternatives. However, these shortcomings were not identified.
- 4.4 The CS Preferred Options, July 2008, wrongly states that the Options are based on sound evidence and are deliverable. There is no clear audit trail, nor is there a sufficient evidence base, to explain or justify the exclusion of Davenport Green (the current UDP allocation) as an alternative. The CS states, for the first time, that Davenport Green should become Green Belt, without any support from the SA, or from the evidence base, and there is no attempt to identify or to assess the exceptional circumstances as required by PPG2. Further, the CS is inconsistent, as elsewhere it states that "*in accordance with Regional Guidance, the Council intends to carry forward the current Green Belt designation*".
- 4.5 The SA report on the CS Preferred Option, June 2009, introduced an assessment of Davenport Green. It wrongly reaches negative conclusions concerning the loss of Green Belt – when in fact Davenport Green is not in the Green Belt. The assessment of Davenport Green has not been undertaken on the same basis as the 5 Preferred

Strategic Sites and 3 Preferred Strategic Locations, and is not transparent and there is no clear audit trail, contrary to the Guidance. The SA fails to take into account the available evidence to demonstrate the deliverability and the benefits of Davenport Green including the material submitted in support of the, at that time live, planning permission.

- 4.6 The CS: Further Consultation on the Preferred Option, June 2009, wrongly rejects Davenport Green as an option on the basis of the flawed SA and repeats the error that DG would result in loss of Green Belt. The justification for Green Belt Policy merely records that Davenport Green will be *retained* within the Green Belt – compounding the error. Nowhere is there a proposal for the extension of Green Belt and consideration whether there are exceptional circumstances to justify this, as required by PPG2.
- 4.7 The CS, Further Consultation, March 2010, either removed the Strategic Sites or downgraded them to Strategic Locations, and reduced the number of Strategic Locations from 13 to 5 - as a direct result of intervention by the Government Office for the North West (GONW) which concluded that TMBC had not justified their inclusion. The SA Report March 2010, does not undertake an assessment of the effects of this major change in policy on the ability of the CS to fulfil its objectives and vision. This is a major omission. The CS, for the first time includes a policy proposal in R4 to extend the Green Belt at Davenport Green. It does not set out the exceptional circumstances, as required, nor does the SA Report of 2010 seek to assess any exceptional circumstances as required.
- 4.8 In the CS; Publication Document, September 2010, the justification for R4 finally correctly refers to the proposed addition to the Green Belt at Davenport Green, and following representations by RLAM and their own legal advice, have finally applied the appropriate test of exceptional circumstances, albeit manifestly inadequately some years after the decision to extend the Green Belt was taken. Further, there is no Sustainability Appraisal of the purported exceptional circumstances. Both the SA and the CS are fundamentally flawed in this respect.
- 4.9 A review of the treatment of Davenport Green and Green Belt issues throughout the CS process leads to the inevitable conclusion that the decisions to de-allocate Davenport Green and to extend the Green Belt were predetermined from the outset, before the consideration of any options or alternatives, that there has been no genuine assessment of either of these two significant policy changes albeit it there has been a belated attempt to retro-fit the case in an attempt to justify the original decision. This process is in clear breach of the Guidance and Regulations, is not justified, credible or robust, and is unsound.

5 The Core Strategy is unsound

- 5.1 The core strategy is unsound in the following ways:
 - The Vision and Objectives in the CS are significantly inconsistent with the Sustainable Community Strategy ("SCS") contrary to guidance. The SCS introduces the concept as Trafford as the enterprise capital and puts Trafford's economic role onto a regional plain.
 - The economic policies and Strategic Locations are not justified and effective for the achievement of the Objectives and the vision of the CS, in that they are not deliverable, and even if delivered would not achieve the economic strategic objective to remain competitive and contribute towards the growth of the

economy of the sub-region. In particular there is a lack of competitive sites for B1(a) and B1(b) Use.

5.2 The core strategy is not effective, meaning deliverable. Key economic proposals will not be delivered:

- TMBC is not proposing any strategic sites, not because there is no need, but because sites proposed by TMBC were found to be unsupported.
- There are no sites or locations with a regional or nationally competitive offer for B1(a) and (b) Uses.
- TMBC has provided no real evidence to justify the reversal of the Council's position on Davenport Green in 1996 and 2006.
- TMBC has failed to take into account relevant emerging policies in neighbouring authorities as required to do by Guidance, resulting in policies which ignore major economic and regeneration initiatives at Manchester Airport and Wythenshawe, on the doorstep of Trafford and Davenport Green.

5.3 Green Belt Policy R4 is unsound. PPG2 states that "once the general extent of Green Belt has been approved it should be altered only in exceptional circumstances". This applies equally to adding land to the Green Belt, as opposed to removing land from it. Early stages of the SA which treated Davenport Green as lying within the Green Belt cannot be relied upon, and early stages of the SA and CS are inconsistent on the Green Belt issue.

5.4 Trafford's decision to change the Green Belt boundary at Davenport Green

- is in direct contravention of the advice in PPG2 regarding exceptional circumstances
- is not supported by the RSS or its evidence base regarding the need for Green Belt boundary change
- is not supported by any evidence prepared for the Core Strategy, specifically evidence that examines the commercial realities that have prevented the Davenport Green scheme from being implemented, or any economic analysis of the sub-regional potential of the site, and the consequences of extinguishing that potential at a stroke.

5.5 The review of TMBC's Sustainability Appraisal undertaken by JAM Consult is supported by critiques of the Strategic Locations by specialists in relevant fields, including Arup and Buchanan on transport, infrastructure, flooding and air quality and Knight Frank with a commercial review. These critiques have contributed to the conclusions reached by JAM Consult in respect of the SA.

5.6 The Sustainability Appraisal is fundamentally flawed. Taken as a whole the SA in its individual stages and as a process, is unsound and is not "legally compliant". There is a whole raft of reasons, including;

- Failure to assess reasonable alternatives

- Lack of transparency and audit trail – lack of credibility and robustness
- Inadequate appraisal of options and reasonable alternatives, with insufficient evidence to justify decisions
- Significant errors as to the correct Green Belt position
- Inconsistent basis for evaluation of Options, with a lack of transparency
- Inadequate evidence base
- Failure to assess purported "exceptional circumstances for extension of the Green Belt"

6 Restoring soundness to the Core Strategy

- 6.1 Davenport Green should be allocated as a Strategic Site. Proposed policy wording and the proposed extract of the Proposals Map are attached to this Overview.
- 6.2 The economic need for activity which will be attracted to Davenport Green, both for Trafford and for the Greater Manchester sub-region is as great now as it was when Trafford included Davenport Green in the UDP in 1996, and renewed the policy in 2006, and when it granted planning permission.
- 6.3 The characteristic qualities of the Site have in no way diminished, and in some ways have improved even further than when first allocated and reviewed, particularly in terms of attractiveness to inward investing companies and activities, access to appropriate labour markets. These qualities may increase even further over time with the advent of major integrated proposals in connection with Manchester Airport and Wythenshawe.
- 6.4 The allocation of Davenport Green as a Strategic Site will achieve a different economic target than the Strategic Locations selected by TMBC, and only Davenport Green will succeed in significantly contributing to Trafford as an enterprise capital and its sub-regional role as proposed in the SCS.
- 6.5 Davenport Green's qualities as a location, and site specific credentials, including accessibility, sustainability and ability to respect and enhance the adjoining Green Belt are equal, if not superior to the position both when allocated in 1996 and 2006, and when granted permission in 2001. TMBC have chosen to first ignore this and secondly to "skew" the assessment of Davenport Green, as identified and highlighted by JAM Consults.
- 6.6 Designation of the Rural Park will be an important benefit to the people of Trafford; it will be a major environmental asset, forming a significant component of sub-regional green infrastructure consistent with CS draft Policy R3.
- 6.7 Davenport Green's qualities as a site and proposal is evidenced by the reports of specialist consultants including SPA on the economic case, Buchanan on no-car accessibility, Arup on sustainability, highways access, infrastructure and flooding, and the Knight Frank commercial review. These lead to the conclusion that the proposal is sustainable, deliverable and will bring economic benefits to Trafford and to the sub-region which would otherwise be lost.

- 6.8 JAM Consult have undertaken an appraisal of the sustainability of Davenport Green to identify whether it is appropriate for inclusion in the Core Strategy. Whilst this cannot be a formal sustainability appraisal for the CS, it performs an important role in showing that this can be achieved.
- 6.9 Soundness of the CS can be restored by maintaining the Green Belt boundary in its current position.

7 Conclusion

- 7.1 The CS is unsound; it is not effective and is not justified. The SA process is not legally compliant and is fatally flawed, including the failure properly to assess alternatives. The failure to allocate Davenport Green is not sound or justified. Exceptional circumstances have not been established to support the proposal to extend the Green Belt at Davenport Green.
- 7.2 Soundness can be restored to the CS by allocating Davenport Green thus securing economic benefits aspired to for Trafford and the sub-region, by providing a Rural Park for the people of Trafford and by maintaining the Green Belt boundary in its current position.

ATTACHMENTS TO THE OVERVIEW

1 Proposed Policy SS1 – Davenport Green

2 Selected Executive Summaries

- (a) Review of SA by JAM Consults
- (b) Representations on Policy R4 by Duncan Thomas
- (c) Highways, public and other non-car transport - Critique of TBC Strategic Locations by Arup and Colin Buchanan
- (d) Commercial Review by Knight Frank
- (e) History and Current Planning Status by SPA
- (f) Vision and Strategic Objectives Unsound by SPA
- (g) Review of the Sub-Regional Economic Need and Lack of Justification or Effectiveness of the Economic Development Policies by SPA
- (h) Restoring Soundness to the Core Strategy by SPA
- (i) Appraisal of the Sustainability of TBC's CS with the inclusion of DG (not a formal SA) by JAM Consults
- (j) Green Belt and Landscape Implications of Identifying 36.4ha (90ac) of Development Area at Davenport Green as a Strategic Site by Duncan Thomas
- (k) Highways - Davenport Green by Arup
- (l) Sustainable Transport Strategy - Davenport Green by Colin Buchanan
- (m) Environmental Sustainability Strategy - Davenport Green by Arup

3 Structure of representations on the CS in TMBC's format

SS1 - Davenport Green

Davenport Green is identified as a Strategic Site for business use development. It plays a significant role at the regional level as it will enable Trafford to contribute to the growth of the City Regional (as in the area to be covered by the Greater Manchester Combined Authority) economy. A rural park will be created alongside the Site, creating a major new open space resource for Trafford.

Policy SS1 – Strategic Site: Davenport Green

An exemplar development of business space with supporting services and infrastructure is anticipated, the proposals being designed to integrate progressively with the wider strategy for airport-related development and regeneration (the arc/corridor of development identified in the Airport Master Plan, Manchester CC Draft Core Strategy and in the Wythenshawe Strategic Regeneration Framework)

Specifically, development of this Site will deliver but is not limited to (areas are gross internal):

- a. B1 a and b uses: 55,762 sq.m.
- b. Supporting uses: A1-A5, D1: 1,394 sq.m.
- c. Hotel C1: 128 rooms, 9,294 sq.m.

The above to be located on the identified Strategic Site (see accompanying plan);

- d. A new rural park (see accompanying plan)
- e. New and improved pedestrian and cycle links.
- f. New and extended bus services, including links to nearby regeneration areas in Trafford and Manchester, to Altrincham transport interchange and to the Airport, which is a major interchange for buses, coaches, trains, taxis and proposed Metrolink as well as national and international flight connections.
- g. Access to the site will be via the existing Thorley Lane bridge over the M56; capacity will be expanded at Junction 6 and on other local roads.
- h. Car parking to appropriate sustainable standards

The proposals will be taken forward through planning applications and master plans for succeeding phases of development.

The boundary of the site is shown on the attached plan (hatched and marked E18), which is taken from the 1996 UDP; it is provided solely for site identification.

Development Requirements

In order for the grant of planning permission for the development on this Site to be acceptable the following will be required:

- a. Environmental Impact Assessment
- b. Improved pedestrian and cycle routes
- c. Exemplary sustainability standards – Excellent BREEAM, aiming for Outstanding where feasible
- d. Compliance with parameters to safeguard the amenity of the Green Belt, establish and attractive development edge, support Green Belt objectives, and protect/ enhance landscape quality and bio-diversity generally.
- e. Sensitive treatment of landscape and buildings
- f. Appropriate improvements to public transport infrastructure/services and development of a site travel plan.
- g. Access to the site will be from the M56 via the existing Thorley Lane bridge over the motorway; capacity will be expanded at Junction 6 and on other, local roads.
- h. Development of (and/or participation in existing) programmes to assist disadvantaged people to access the jobs created; and commitment to appropriate programmes.
- i. Laying out and management of the rural park to support the purposes and objectives of the Green Belts and the Council's policies for open spaces and countryside.
- j. The provision of appropriate retail, catering and meeting facilities to support those people using the development

Floorspace Phasing, subject to detailed phasing in Master Plan (cumulative)(sq.m.)					
	(1) 2011/12-2015/6	(2) 2011-12-2015/6	(3) 2016/7-2020/1	(4) 2020/1-2025/5	Total
B1 Employment	5,000	9,300	33,000	55,762	55762
Hotel C1	-	9,294	9,294	9,294	9,294
Supporting uses A1-A5, D1	1,394	1,394	1,394	1,394	1.394
Total by phase	6,394	13,594	23,700	22,762	66,450
Total cumulative	6,394	19,988	43,688	66,450	66,450

Floorspace Phasing, subject to detailed phasing in Master Plan (cumulative)(sq.ft.)					
	(1) 2011/12-2015/6	(2) 2011-12-2015/6	(3) 2016/7-2020/1	(4) 2020/1-2025/5	Total
B1 Employment	53,800	100,000	355,000	600,000	600,000
Hotel C1	-	100,000	100,000	100,000	100,000
Supporting uses A1-A5, D1	15,000	15,000	15,000	15,000	15,000
Total by phase	68,800	146,270	254,930	245,000	715,000
Total cumulative	68,800	215,070	470,000	715,000	715,000

Implementation

Implementation will be through private sector development initiatives with support from infrastructure providers where necessary.

Infrastructure Requirements / Funding Sources

Project	Status	Estimated Costs	Phasing	Responsibility	Funding Source
Local road works	Required for Phase 2	£6.05m	2011/12-15/16	Trafford BC and Manchester CC	RLAM s.106/s.278
Rural Park	To be laid out before occupation of first	£2.5m	2011/12-15/16	RLAM	RLAM s.106

	building				
Additional utility capacity	Required for Phase 1	No abnormal costs anticipated	2011/12-15/16	Various	RLAM s.106
New bus services	Required for all phases, with increasing frequency/coverage	Up to £450k pa 'kickstart' funding, then commercially viable	2011/12-2020/1	RLAM, bus operators,	RLAM S.106 Fares
Bus infrastructure improvements	Implemented with phasing, some elements required for Phase 1	£3m	2011-12-2016/7	RLAM, MAG, Trafford BC and Manchester CC	RLAM S.106
M-way and trunk road works: Phase1	Required for Phase 3	£1.85m	2016/7-2020/1	Highways Agency	RLAM s.106/s.278
M-way and trunk road works: Phase2	Required for Phase 4	£1.4m	2020/1-2025/5	Highways Agency	RLAM s.106/s.278

The Highways Agency, Manchester Airport Group (in relation to access to their roads and transport interchange) and Stagecoach are supportive of the proposals (subject to more detailed checking when an application is submitted) and they see no significant barriers to implementation.

Land Ownership

The majority of the site is in a single ownership, that of Royal London Asset Management, the Fund having acquired the balance of 50% of the interest in December 2009.

Site Constraints

- a. The site is not in the Green Belt. The development would not therefore constitute inappropriate development (PPG2 paragraph 3.2), and accordingly would not be harmful to Green Belt purposes by virtue of inappropriateness. This is why the land at Davenport Green was taken out of the Green Belt in the first case, and why safeguarded land ('Other Protected Land') has been similarly excluded from the Green Belt in Trafford.
- b. The effect on the adjacent Green Belt needs to be carefully managed through planning controls to ensure that the visual amenity of the Green Belt (PPG2 paragraph 1.5) are not prejudiced and that an attractive and defensible new edge to the development is created (PPG2 para B4).
- c. The land use objectives of the adjacent Green Belt (PPG2 paragraph 1.6) need additionally to be strongly supported by the development. The establishment and management of a Rural Park on 99ha (245ac) of land west of Roaring Gate Lane, and including Davenportgreen Wood, will be a fundamental requirement of a Development Brief. There is an opportunity to investigate different ways of managing the Park, and to increase substantially its recreational and bio-diversity value as a result.

- d. The development parameters for the site have been reviewed in the light of an up-to-date assessment of site conditions of the current development proposals (Knight Frank Report). The parameters are summarized:

	Parameter description	Comment
Protection of Key Landscape Features	<p>Seven features individually identified,</p> <p>The desirability of retaining all of the principal hedgerows within the site to be considered.</p> <p>Buffer zones defined, where necessary, to protect landscape features and hedgerows.</p> <p>No development shall take place that impacts directly upon the retained landscape features or encroaches on defined buffer zones.</p>	<p>This parameter will have the effect of defining a 'net developable area' within the Development Area.</p> <p>Built development will be strictly confined to the area so defined.</p>
Built Footprint	<p>Overall built footprint (buildings, car parking and hard landscaping) not to exceed 40%, within which:</p> <p>Building footprint not to exceed 15%</p> <p>Car parking areas not to exceed 25%</p> <p>Car parking to be provided at a ratio of not greater than 1:32 gross floorspace.</p> <p>Each phase of the development to demonstrate, by reference to a Masterplan for the whole site, how it is compliant with these parameters, and how it does not prejudice the compliance of subsequent phases.</p>	<p>This maintains 60% of the Development Area to accommodate retained landscape features and new structural landscaping.</p> <p>The footprint parameters to allow flexibility over the life of the project.</p>

Building Height	Not to exceed 13.9m as measured from the existing ground level.	This will control the most important component of visual impact, and reflects the earlier height ceiling
New Landscaping	<p>Structural landscaping is required to reinforce boundaries of the development area, form an extension of Brooks Drive, protect the setting of listed buildings, and provide native woodland.</p> <p>Landscaping of the highest quality is also required elsewhere within the development.</p> <p>Specifically, parking areas shall be laid out to gross a density of no less than 300 spaces/ha (33m² gross per space) to ensure space for landscaping to the highest standard.</p>	The scheme will still be landscape led, and designed to the highest standards

- e. The land contains substantial hedgerows and three woodland blocks. These will be specifically protected and used to assimilate the development into the landscape, and protect the network of wildlife corridors that connect with the landscape beyond the site. The management of these features will be secured through appropriate s106 obligations. The site and the Rural Park lie within the Red Rose Forest area and present a major opportunity to establish new woodland and thereby further the Green Infrastructure objectives of this regional initiative.
- f. Davenportgreen Wood borders the site. The woodland is a Site of Biological Importance and there should be no development within 30m of its northern edge.
- g. Other habitats within the site include unimproved grassland and small ponds, although informal recreational use, and invasive bramble and thorn scrub has reduced their value. A re-assessment of the site's ecology should be undertaken to inform and update the Development Brief.
- h. There are no listed buildings on the site, but the setting of nearby listed buildings on Shay Lane and Roaring Gate Lane, needs to be carefully considered, protected and, where possible, enhanced.
- i.
- j. The site, apart from that portion south of Thorley Lane, is no longer in agricultural use. None of the soils anywhere within the site fall within the higher ALC grades. There are thus no agricultural or soil quality constraints to the development of the site.
- k. A public footpath (FP26) runs across the northern part of the site connecting Newall Green with Roaring Gate Lane. The amenity of that route needs to be protected.
- l. New access needs to be provided for public transport and road vehicles.
- m. In other respects the site is subject to few development constraints.

Existing Infrastructure

- a. In terms of public transport, the major public transport interchange at Manchester Airport, the second largest in the City Region, is located approximately 2 kms to the south east of the Strategic Site and there is a large number of bus routes serving areas adjacent to the Site. Direct rail services from Manchester Airport connect to the City Centre, Sheffield, York, Newcastle, Leeds, Huddersfield, Bolton, Preston, Chester and (via Manchester Piccadilly) to London, Birmingham and many other national destinations. There is also a proposed Metrolink extension to the airport.
- b. In relation to utility services it is not anticipated that any abnormal increases in capacity will be required; as recently as 2003, when planning permission for 500,000 sq.ft. of B1 space was renewed, the Council acknowledged that sufficient infrastructure capacity existed or could viably be created.

Justification

Davenport Green is singularly well placed to address the expressed sustainable development needs and ambitions of Trafford and Greater Manchester:

1. It will contribute to the regional, sub-regional and local objectives of improving their economic performance and narrowing the gap in GVA per head between Greater Manchester and the rest of the country.
2. It is in the south of the conurbation which has long been recognized, in a complementary capacity to the city centre, as the most attractive location within Greater Manchester for business investment.
3. It gives good access to the Airport public transport interchange, the second most important interchange in the conurbation. . It builds on existing (and proposed in the case of Metrolink) investments and assets in the conurbation.
4. It has good access to the high quality housing markets of south Trafford and Cheshire, which in turn provides good access to skilled professional and managerial staff.
5. It is immediately adjacent to Wythenshawe, a very large area of deprivation, close to smaller areas of deprivation in Trafford (e.g. around Broomwood Primary School) and readily accessible (with planned transport improvements) to areas such as Sale West.
6. It is adjacent to the Airport and would integrate well with Manchester Airport's Master Plan, Manchester City Council's draft Core Strategy, the Wythenshawe Strategic Regeneration Framework and the West Wythenshawe Local Plan, which are promoting a comprehensive approach to economic development, the development of the Airport, transport, improvements in environmental performance and regeneration.
7. It will support the objectives of Green Belt in relation to the adjacent Green Belt land, by creating a new rural park for a range of community benefits for example community food production, nature conservation and public recreation.
8. The Trafford Other Main Town Centre Uses Study (2009) concluded that due to a low number of suitable and available sites in town centre locations, it may be necessary to consider further sites situated in regeneration areas. However those sites will not be deliverable and competitive for the quality of regionally significant investment that Davenport Green will attract.
9. The Council with the site owners are looking to create an exemplar scheme and will be examining new ways of addressing some of the challenges that have persisted in the Borough and the adjacent areas, for example:
 - a. New ways of engaging deprived communities and individuals in the benefits of the construction phase, the long term business activities and the rural park; this will include working with local partners e.g. the Council, local schools, other employers such as the Airport.
 - b. Series of initiatives to address climate change (which will also be a priority for the class of occupier being targeted) e.g. a cordon charge for vehicles entering the

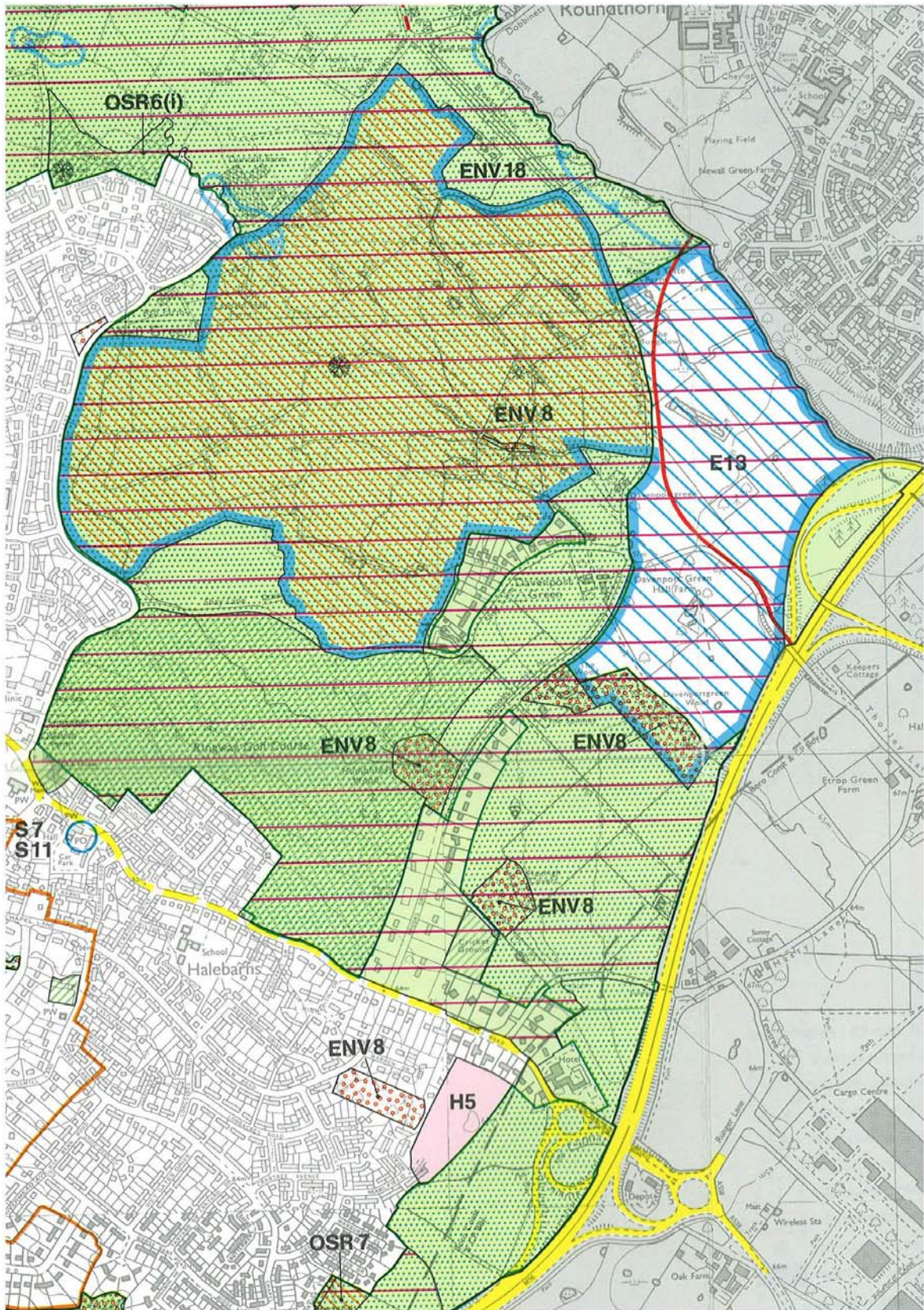
- site (graded according to emissions), the proceeds being devoted to improved public transport services.
- c. Working with local communities in both Trafford and Manchester to identify ways to engage local people in the creation and use of the rural park.

Policy Justification – National / Regional

- a. An exemplar development is supported through general policies and principles defined within PPS1: Delivering Sustainable Development (2005), including the policies relating to climate change.
- b. The proposal is highly supportive of the policies and objectives of PPS4 in which the Government’s overarching objective is described as “sustainable economic growth”
- c. The B1 development is compatible with the locational policies of PPS4 in that the Council’s Other Town Centre Uses Study has demonstrated the lack of attractive sites within the Borough’s town centres for significant office development. It has also been shown (in RLAM’s Submission to which this is appended) that the Council’s next most favoured locations, Pomona and Trafford Wharfside, are also unsuitable for the class of office-based business investment that will contribute net additional employment and investment to the City Region
- d. The hotel, retail and catering component is in accordance with recommendations in PPS4 in that it is designed principally to serve the users of the new development with facilities within walking distance, reducing the need to travel.

Contribution to Sustainable Community Strategy and Core Strategy Objectives

Which Objective(s) delivered by this Strategic Location/Policy	Reference Number(s)
Key Objective(s) of the Refreshed SCS	18, 20, 22, 24, 25, 26, 27, 29, 30, 31, 32, 34, 35, 37, 38, 40, 41, 42, 43.
Core Strategy Strategic Objective(s)	<u>SO2, SO3, SO5, SO6, SO7</u>
Core Strategy Place Objective(s)	<u>OTO9, STO7, SAO10, ALO4, ALO10, ALO11, ALO17, ALO18, ALO19, ALO20, ALO25, ALO26, ALO27.</u>



IM/SPA

Version 1 21/10/10

2 Selected Executive Summaries

(a) Review of SA by JAM Consults

Executive Summary

Review of Trafford Metropolitan Borough Council's Sustainability Appraisal of the Core Strategy

- 1.0 The Review of Trafford Metropolitan Borough Council's (TMBC) Sustainability Appraisal Process has been prepared by jam consult ltd on behalf of Royal London Asset Management (RLAM) to provide a review of the Sustainability Appraisal reports undertaken by the Council, in support of the production of the draft Core Strategy documents.
- 2.0 The report identifies the Regulations and Guidance that are applicable to the development of the Core Strategy in relation to the SA process. The document then provides a review of the SA process and the flaws that have been identified to date. The report should not be seen as an exhaustive catalogue of every deficiency in the process. Instead, the review draws attention to the significant defects that have occurred to enable a view to be taken on the legal compliance of the process.
- 3.0 The review of the Council's Sustainability Appraisal documents in support of the Core Strategy has revealed a deeply and fundamentally flawed process that is contrary to the regulatory requirements (PPS12 and SEA Regulations) and good practice guidance (A Practical Guide to SEA, ODPM 2005). The key failings of the SA process can be identified as follows:
 - 4.0 Scoping Report, June 2007
 - Inappropriate Sustainability Objectives, Indicators and Methodology is set out
 - Lack of information on the scoring mechanism to be used
 - 5.0 Issues and Options, 2007
 - The SA report is not published for consultation. Only a summary of the findings is provided contrary to the Practical Guide to SEA (section 3, p16) and the Scoping Report, 2007

- The failure to publish the SA report means that it is not possible to demonstrate the requirement for transparency or an adequate audit trail
- The Options identified in the summary report did not include a 'Business as Usual' option as set out in the Scoping Report (para 6.12)
- There is a lack of information on whether all reasonable alternatives have been assessed

6.0 Core Strategy Preferred Options – SA of Spatial Options, July 2008

- Incorrect baseline data used in the assessment (i.e. Davenport Green is now shown as Green Belt land)
- No assessment of the 'Business as Usual' Option as identified in the Scoping Report
- There is no compatibility assessment of the spatial objectives against the sustainability objectives
- There is a lack of transparency on the selection of options and the decisions taken between competing alternatives
- Inadequate appraisal of options and reasonable alternatives with insufficient evidence to justify decisions
- Davenport Green is removed as an option (page 64 para 5.18), which conflicts with the Green Belt Policy page 90-91 that states the current Green Belt designation will be carried forward.

7.0 Core Strategy Preferred Options - SA Report and Appendices, June 2009

- Davenport Green is introduced as a development option. No explanation is given. The site is once again dismissed as an option
- The results of the appraisal are significantly flawed and considered:
 - Inaccurate and inconsistent, the performance of different options is not clear
 - Mitigation measures are included for some locations but not for others, in particular Davenport Green
 - Various assumptions have been made without clear evidence to support the decisions taken
 - Neither robust nor, in several instances, credible
 - Deficient in the justification for the rejection of Davenport Green
 - Lack information on viability, deliverability and timescales
 - Show no assessment or identification of the 'exceptional circumstances' needed to alter the Green Belt boundary
 - Contradict results between the Strategic Locations and Core Strategy

Core Policies

- Reveal a significant failure to comply with guidance and the regulations at every stage.

8.0 Further Consultation on the Vision, Strategic Objectives and Delivery Strategy – SA Report and Appendices, March 2010

- Many of the results are scored more favourably but without suitable evidence to support the changes in the scores
- Results are inaccurate and inconsistent
- No reference is made to viability and deliverability particularly in relation to the findings of the Strategic Flood Risk Assessment
- Davenport Green is again inaccurately referred to as within the Green Belt. There is still no assessment or identification of the 'exceptional circumstances' needed to alter the Green Belt boundary.

9.0 DPD1: Trafford Core Strategy: Publication Document – Sustainability Appraisal Report and Appendices, June 2010 (Published September 2010)

- The results for flood risk and drainage are neither credible or justified and do not represent the evidence that is available
- Section 2.5, page 13 of the SA report states that an SA report has been provided alongside each version of the Core Strategy issued for consultation. This statement is incorrect. The SA report at the Issues and Options stage was not published.
- There is no evidence of any analysis of the responses received through the consultation process, in particular, RLAM's representation April 2010, which identified many of the significant flaws in the SA process
- No attempt has been made to rectify the flaws identified
- Policy R4 now includes in the justification of the policy the Council's 'exceptional circumstances' for the expansion of Green Belt land at Davenport Green.
- The 'exceptional circumstances' have not been appraised in any of the SAs.

10.0 The Planning Inspectorate's guidance on the soundness of Local Development Frameworks identifies the following key questions that should be considered, particularly in relation to the consideration of options or alternatives.

"Key Questions – Alternatives"

- *Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives?*
- *Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?*
- *Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why these decisions were taken?*
- *Does the Sustainability Appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?*
- *Does the DPD adequately expand upon regional guidance rather than simply duplicate it? Does the strategy take forward the regional context reflecting the local issues and objectives?"*

The Planning Inspectorate – Local Development Frameworks: Examining Development Plan Documents – Soundness Guidance, August 2009, 2.9 pp6

11.0 The review of the SA has shown that Trafford's approach cannot be considered to be the most appropriate given the reasonable alternatives as the SA process has failed to comply with guidance and regulations at each stage. The audit trail is not clear and in many instances totally absent, making it impossible to determine why decisions were made.

12.0 The failures of the audit trail can be further illustrated by the assessment of Davenport Green specifically:

- The site is not included at the Issues and Options Stage, 2007 and no SA report was published. The 'Business as Usual' option identified in the Scoping Report is not assessed
- The site is excluded at the Appraisal of the Spatial Options, 2008 without adequate explanation or justification for its rejection
- The site is introduced and appraised at the Preferred Options Stage, June 2009 (without an explanation) but incorrectly represented as within the Green Belt and dropped as an option as a result of 'insufficient evidence or justification to put the site forward'. The 'exceptional circumstances', needed to extend the Green Belt, are not addressed.

- The Submission Version June 2010 adds to the Core Strategy Core Policy R4 justification, the Council's view on the 'Exceptional Circumstances'.
- The 'Exceptional Circumstances' to extend the land at Davenport Green to the Green Belt have not been subject to sustainability appraisal.

13.0 The failings in the SA continue throughout the process, with the later iterations of the SA improving the scores for all the Strategic Locations. Given the lack of adequate commentary and use of appropriate evidence for the changes in the results, it appears to be an attempt to post rationalise the decisions taken. The facts to back up the decisions are not apparent.

14.0 As the Planning Inspectorate guidance states:

“PPS12 provides that to be ‘justified’ a DPD needs to be:

- *founded on a robust and credible evidence base involving:*
 - *evidence of participation of the local community and others having a stake in the area*
 - *research/fact finding – the choices made in the plan are backed up by facts*
- *the most appropriate strategy when considered against reasonable alternatives”*

The Planning Inspectorate – Local Development Frameworks: Examining Development Plan Documents – Soundness Guidance, February 2010, 2.8 pp6

Furthermore the lack of rigour in the assessment is exposed by the contradictions in the assessment between the results for the Strategic Locations and the Core Strategy Core Policies.

15.0 The level of inconsistency in the scoring and commentary, coupled with the lack of reference to appropriate evidence in the results reveals a thoroughly flawed and partial approach to the assessment. This lack of objectivity and justification in the assessment would appear to show a desire to provide the results for predetermined decisions. The findings cannot be considered credible, justified or robust and can only lead to the conclusion that the SA is not fit for purpose and that the Core Strategy is not sound.

(b) Representations on Policy R4 by Duncan Thomas

DAVENPORT GREEN: Summary of Representations on Policy R4

1. Paragraph 2.6 of PPG2 states that:

*“Once the general extent of a Green Belt has been approved it should be **altered only in exceptional circumstances** . . . Similarly, detailed boundaries approved in local plans or earlier approved development plans should be altered only exceptionally.”*

2. There is nothing to suggest that adding land to the Green Belt, as opposed to removing land from it, is subject to any other policy direction. It applies equally to the general extent and the detailed boundaries of the Green Belt. There is therefore need to demonstrate exceptional circumstances to warrant change in either direction.

3. The need to change the Green Belt boundary in an LDF would normally be set out and justified in the appropriate Regional Spatial Strategy (RSS). This expectation is set out in PPG 2 (paragraph 2.7) and PINS ‘Learning from Experience Report’ (paragraph 40).

4. Neither the RSS, nor its evidence base, suggest any such need. Precisely the contrary is evident (former RSS Policy RDF 4, and justification at paragraph 5.25).

5. The Council’s emerging Core Strategy purports to be entirely consistent with this:

*“In accordance with this Regional Guidance, the Council intends **to carry forward the current Green Belt designation.**”* (Preferred Options (July 2008), paragraph 7.67, page 91, emphasis added).

6. The three diagrams contained within the Preferred Options report, however, all show the land at Davenport Green as Green Belt. Whilst it is possible that the Council believed that the guidance only related to changes that would reduce the extent of the Green Belt, and that changes in the other direction needed no such regional justification, and were self-justifying, no such explanation has been offered and seems in any event unlikely unless the Council was completely unaware of the policy and legal requirements.

- 7. By the time the ‘Further Consultation’ was issued in 2010, the Council appears to have acknowledged that some rationalisation and**

explanation was needed. It attempts an explanation of the Green Belt boundary change at Davenport Green in paragraphs 24.9 – 24.17.

8. **The regional requirement:** It is stated that 4NW had indicated that the Council could deal with the boundary change in its LDF. This is surprising, given the scale of Green Belt change, the evidence base and policy of the RSS, and the absence of any earlier discussion of this matter between the Council and 4NW. Be that as it may, 4NW's 'confirmation' does not change the fact that there is not, nor was there ever, any 'requirement' for Green Belt change, and thus, it is incumbent upon the local Authority, in line with the guidance given in PPG2 and by PINS, to demonstrate exceptional circumstances.

9. **Exceptional circumstances:** The Council asserts, for the first time in any Core Strategy document, that:

"The exceptional circumstances which would justify the return of this site to the Green Belt are the important functions which it has continued to serve, and which were recognised by the UDP inspector"

This is illogical. The site has continued to fulfil green belt purposes notwithstanding the non-implementation of a candidate development, its physical circumstances have not changed and no change in the locality is identified which would affect them. The Council appears to be confirming not that there has been some change in the site's circumstances but rather that there has been no change. These circumstances (regardless of whether they are exceptional or not) would surely justify status quo rather than change, given the PPG2 exhortations regarding Green Belt permanence.

10. **Other factors:** The Council reiterated a number of other factors which, in its view, indicated that Davenport Green should become Green Belt:

- The site continues to fulfil three Green Belt Purposes: Whether or not this is the case, Green Belt policy, insofar as it relates to purposes, does not, and cannot apply to the site. Other aspects of Green Belt policy (amenity and objectives) are relevant, however, and their application to a Strategic Site at Davenport Green is discussed fully in Appendix 12.
- The economic need for the development (as judged by the UDP inspector in 1996) was expressed through a '*very specific development proposal*' which has not materialised: This is true, but the non-implementation of the development proposal has been equated, in the Council's mind, to the collapse in the economic case for a strategic site at Davenport Green, which is a *non sequitur*. The inconvenient truth is that it is constraints imposed by occupier and other planning controls on

that specific development proposal, rather than any inherent weakness in the strategic value of the site, *per se*, that have prevented its realisation.

- No up to date evidence to support the development has been produced by the owners: This is simply not true. Detailed and current representations have been made at each stage of the Core Strategy process.
- The Council's SA found Davenport Green to be relatively unsustainable as a location: The flaws in the Council's SA are deep and fundamental. Representations have been made on this in full under the heading "Sustainability Appraisals, together with Appendix 17, by experts on Sustainability Appraisal, JAM. The soundness of the plan has been questioned in consequence.
- Davenport Green is no longer one of NWDA's strategic sites: this signifies little, and does not represent economic evidence that can be used to support the Core Strategy. Carrington is no longer an NWDA site, but is being carried forward as a Strategic Location on the Core Strategy.
- There is no reason why the land should not be returned to the Green Belt: This demonstrates a fundamental error in the Council's approach. It is looking for some reason as to why the land should not be returned to the Green Belt, rather than undertaking a rigorous and objective examination of whether exceptional circumstances exist and what the economic consequences of eliminating a strategic employment site would be.

11. **In conclusion**, Trafford's decision to change the Green Belt boundary at Davenport Green

- is in direct contravention of the advice in PPG2 regarding exceptional circumstances
- is not supported by the RSS or its evidence base regarding the need for Green Belt boundary change
- is not supported by any evidence prepared for the Core Strategy, specifically evidence that examines the commercial realities that have prevented the Davenport Green scheme from being implemented, or any economic analysis of the sub-regional potential of the site, and the consequences of extinguishing that potential at a stroke.

(c) Highways, public and other non-car transport – Critique of TBC Strategic Locations by Arup and Buchanan

Executive Summary

Arup and Colin Buchanan and Partners have undertaken a critique of Trafford Borough Council's (TBC) Strategic Locations in relation to highways, public and other non-car transport modes.

The review has concentrated on objectives S2, S3, E1 and E3.

The scoring for accessibility used appears to be unsuitable for assessing the potential of a site such as Davenport Green on the boundary of the council area, and with significant potential to link to adjacent public transport hubs.

Analysis suggests that Pomona Island, Wharfside and the Lancashire County Cricket Club Quarter (LCCC) have good access to public transport, but that the Davenport Green site has much greater potential to encourage sustainable development than Carrington and has a similar level of accessibility as the Trafford Centre Rectangle. The accessibility scoring used does not appear to reflect this.

For the five selected locations highway mitigation works have not been identified to the same level of detail as Davenport Green. Therefore there is no justification for the five chosen locations to score higher than Davenport Green.

Significant public transport, walking and cycling improvement have been identified in relation to Davenport Green, but does not appear to have been taken into account in the assessment process.

(d) Commercial Review by Knight Frank

Executive summary

- Davenport Green has the potential to be the premier office led location park in the North West of England, rivalling other more established locations across the UK in terms of its environment, connectivity, catchment area, scale of building opportunity and sustainable credentials, all of which are key drivers for major businesses when choosing the location of their office accommodation. There is a real opportunity to create an exemplar location which will attract those businesses who would consider this site alongside others across the UK or beyond.
- Various restrictions included within the previous planning permission were fundamental to Davenport Green being undeliverable. At no stage was the developer able to offer full certainty to an occupier that they could deliver the site in order to match market demand. These concerns drove a market perception that the site was 'not viable' and 'undeliverable'. This message is known in the market place and is regularly relayed back to companies by their advisers.
- At any stage of the property cycle requirements from say 4,645 sq m (50,000 sq ft) upwards are rare. When the occupier controls are taken into consideration, securing one is almost impossible.
- In terms of economic growth and reducing the gap between regional and national GVA, there is a requirement for a step change in the Greater Manchester property offer in order to increase the sub-region's international and national competitiveness in the inward investment market. Davenport Green can provide the key platform to attract this, becoming the benchmark for the region.
- There is a proven record of demand and take up of space over the past 15 years from occupiers who require being located within close proximity of Manchester Airport. However, the majority of occupiers have moved within Greater Manchester rather than being true inward investors.
- Davenport Green is the only scheme with a clear office use within Trafford Metropolitan Borough Council (TMBC) capable of attracting large levels of investment from multi national businesses. This site has no credible alternatives and this could be seen as Trafford's Southern Gateway.
- None of the strategic locations within TMBC's proposed core strategy are fully office led

schemes. They all promote mixed use opportunities with large elements of residential, leisure and, in some instances, light industrial. All are based in locations dominated by an established alternative use rather than offices. In our opinion, many companies seeking new office buildings will not consider these locations to be appropriate for their business. Reliance on them will significantly limited Trafford's ability to compete for large footloose inward investment opportunities.

-
- There is a real opportunity to realign the scheme to match market demand in terms of overall building design and size incorporating a viable development phasing structure, whilst protecting the key environmental constraints of its immediate environment.
-

(e) History and Current Planning Status by SPA

History and Current Planning Status

In this summary we briefly review the case that the Council made for the allocation of Davenport Green as a high amenity employment site and at the current planning status of the site.

Justification in 1996 UDP

In May 1996 Trafford BC (TBC) adopted their Unitary Development Plan (UDP 1996) which provided (Policy E13) for a strategic high amenity employment site on 36.4 ha of land within a 135.6 ha estate at Davenport Green. The justification referred to the need for a truly exceptional site, the lack of comparable sites, the need to compete on national and European scales for mobile investment and the revitalising effect on the sub-regional economy, complementing the development of existing sites in urban areas. The direct and indirect regenerative impacts of the proposal for Greater Manchester were acknowledged. Part of the justification was that “a key feature of a competitive site is ready availability including in planning terms.” The policy was subject to a number of conditions, including one related to the nature of the permitted occupiers.

Planning Permission & 2006 UDP

The Council granted outline planning consent for half of the UDP-allocated floorspace in 2001 and renewed that consent in 2003. The Council confirmed the proposal (Part 2 Proposals E13 and E14) in the same terms in the UDP which they adopted in 2006 (UDP 2006).

The proposal has thus been confirmed by TBC relatively recently. This is important because there had already been delay by then from the original allocation: the Council was already aware of non-implementation.

Current Planning Status

Appendix 18 contains a summary of the way in which the proposals for Davenport Green have been treated in planning documents since the UDP in 1996. The very brief conclusion from this review is that Policy E13 of the UDP 2006 has been saved:

“Part II Proposal E13 – Strategic Development Sites

The Council proposes to retain the following committed development sites to ensure a supply of high quality strategic employment opportunities over the Plan period: -

Major High Amenity Site RS1 – Davenport Green, Hale”

However the policy that set the restrictions on how Davenport Green was to be developed and which introduced the Planning Brief which had been appended to both UDPs was not saved. It is therefore apparent that the current planning status of the site is:

Strategic, Major High Amenity Site for Employment, not in the Green Belt and not subject to any restrictions or controls over how the site should be developed.

(f) Vision and Strategic Objectives Unsound by SPA

Vision and Strategic Objectives Unsound

RLAM contend that the Core Strategy is unsound on the following grounds:

- It is not founded on a robust and credible evidence base in that the Profile neglects important factors affecting the future development of the Borough, which has led to a failure to consider alternative strategies. It is not coherent with the Core Strategy being prepared by Manchester City Council (PPS12, paras 4.17 and 4.45)
- The Vision and Strategic Objectives do not relate closely to the Sustainable Community Strategy (PPS12, para 4.2)

We now address each of these grounds in turn.

Evidence not Robust or Credible: Cross Boundary Issues

The context for the first ground is:

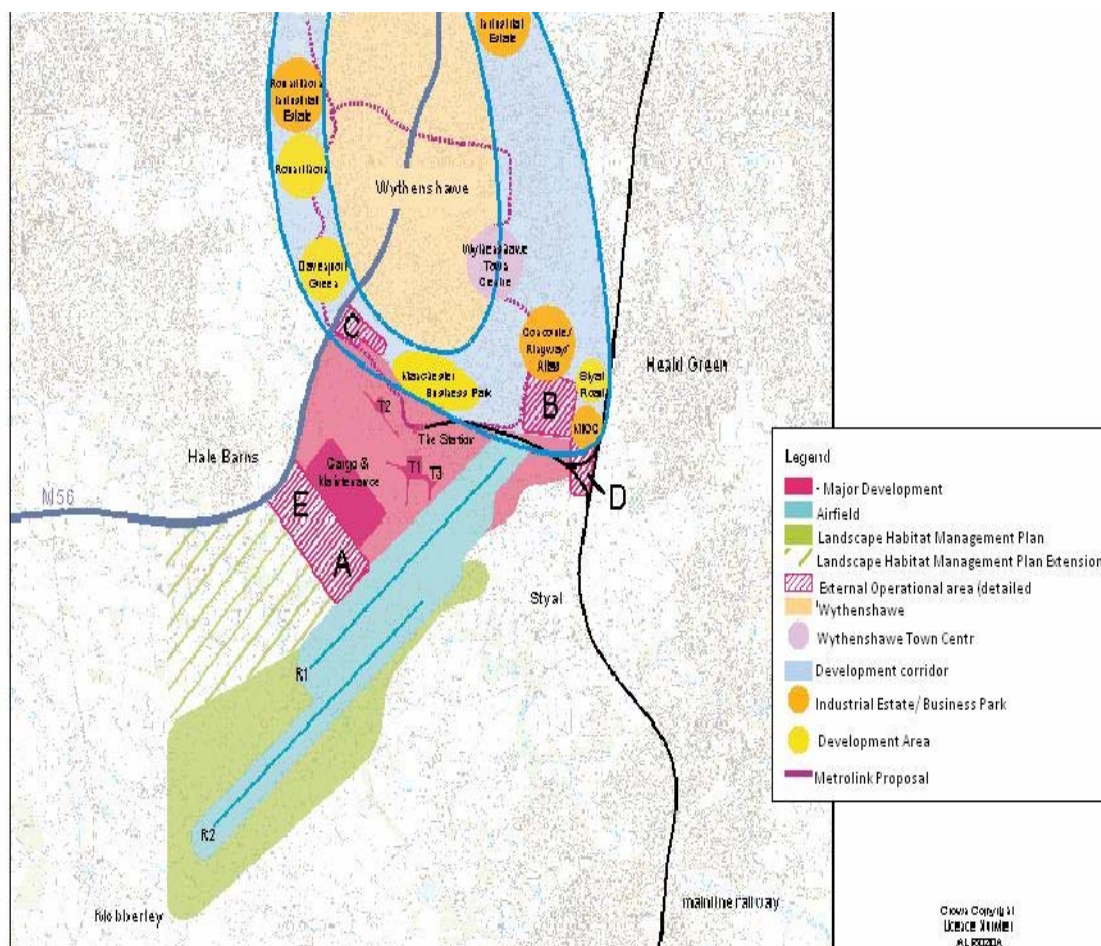
- a. Guidance in PPS12 (para 4.17) that local authorities' areas cannot be planned in isolation
- b. Also in PPS12 at para 4.45 that the evidence should "be coherent with the core strategies prepared by neighbouring authorities, where cross boundary issues are relevant."
- c. TBC is fully committed to the Greater Manchester Combined Authority, which will have extensive powers in relation to economic development, when it comes into being in April 2011.

In spite of the obvious need to see Trafford in a wider strategic context for the benefit of Trafford residents and businesses, the Council has failed to take sufficient account of three major factors beyond its borders:

- Manchester Airport, which lies immediately east of the Trafford Borough boundary, and economic development related to the Airport. The Airport has produced a Master Plan (Manchester Airport Master Plan to 2030, November 2007) which is not a statutory plan but which the Government (Future of Air Transport, White Paper, 2003) expects local authorities to take into account in the preparation of local plans and in planning decisions. The Master Plan takes an integrated approach to the development of the Airport (operational needs, environmental strategy, opportunities for economic development, access to the Airport and the regeneration needs of the large adjacent community of Wythenshawe). The Master Plan identifies an arc of development extending from Roundthorn Industrial Estate in the west, via Wythenshawe Hospital and Davenport Green to the Airport and beyond to the east. This arc wraps round Wythenshawe and is designed to maximise the opportunities for Wythenshawe residents, amongst others, to benefit from access to the employment opportunities in the Airport and in related sites. Figure 4, Airport Site and Development Corridor, in the Master Plan expressly identifies Davenport Green as a development area (see Plan below).

The Core Strategy contains no references to the Airport Master Plan.

Manchester Airport Strategic Master plan Map



- Wythenshawe, which has important regeneration needs and the western part of which, Newall Green, lies immediately adjacent to Trafford's boundary (and Davenport Green site). Manchester City Council's (MCC) Draft Core Strategy (Pre-Publication Draft, September 2010, para 3.14) endorses the Wythenshawe Strategic Regeneration Framework (WSRF) which established a similar concept to the arc of development: development corridors (one East and one West), the relevant one for present purposes being the West Wythenshawe Development Corridor (WSRF, para 6.5), which corresponds to the western part of the arc identified in the Airport Master Plan. It is described as "incorporating the new retail/services centre proposal at Baguley, Roundthorn Industrial Estate, Wythenshawe Hospital and any future development at Davenport Green."

One of four opportunities identified in the Framework is "capturing the South Manchester effect by extending the strong employment and property markets to Wythenshawe". It is noteworthy that the "effect" is twofold: employment, in that the area has access to a wide range of skills in the south Manchester and adjacent Cheshire areas, and property, in that it is an area in which commercial occupiers wish to locate, and investors and developers are consequently willing to invest and develop. One of the objectives of the

Framework is to “make Wythenshawe the location of choice for investors and employers.....to meet the needs of inward and indigenous employers, particularly those linked to Manchester Airport” (Summary, Objectives, bullet 4).

Within this corridor the MCC Draft Core Strategy identifies both Airport City and University Hospital South Manchester (Wythenshawe Hospital) as Strategic Employment Locations (Policies EL4 and EL5) and in both cases there is a requirement that they contribute to the regeneration of Wythenshawe. The Draft Core Strategy sees the Economic Development Corridors as providing spatial integration of the opportunities for economic development in Wythenshawe.

The diagram below, taken from the WSRF, makes it very clear how Davenport Green is embedded in the Western corridor of development. Note: the diagram has been annotated to bring out key features including Davenport Green, other major employment sites and the Metrolink Extension to Airport.

There is no mention of Wythenshawe in the Trafford Core Strategy.

(g) Review of the Sub-Regional Economic Need and Lack of Justification or Effectiveness of the Economic Development Policies by SPA

Review of the Sub-Regional Economic Need and Lack of Justification or Effectiveness of the Economic Development Policies

Before addressing the economic development policies of the Core Strategy themselves we review briefly the scale of the need for economic growth in Greater Manchester. This assessment demonstrates how high the hurdles are that the sub-region has to cross.

The economic need for Davenport Green and for the quality of investment and employment it is capable of bringing to Greater Manchester is if anything greater than it was in 1996 and 2006. A common measure of regional and sub-regional economic progress is Gross Value Added (GVA), for which the Northern Way (the Government supported initiative to reduce regional disparities, which spans the three northern regions) set a target in 2004 to bridge the £29bn gap between the North and the UK:

The record for Gross Value Added in Greater Manchester in the high growth period 1998-2007 is not encouraging:

- Gross Value Added in GM increased 50%
- This was lower than either the UK or than a number of other development areas such as E Scotland, Northumberland & Tyne & Wear, SW Scotland and E Wales.

Forecasts produced by the Regional Economic Forecasting Panel, based on the forecasts of three forecasting houses, indicate that the North West will grow consistently 0.3 percentage points more slowly than the UK in the next 20 years.:

National endorsement of the need for accelerated regional growth was provided by the Chancellor of the Exchequer in his budget speech (June 22, 2010) when he set out the Government's view (implicitly confirming the objective of the Northern Way) that regional imbalances need to be addressed:

“Mr Deputy Speaker, over the past decade the British economy has become deeply unbalanced. Nowhere are these disparities as marked as between the different regions of Britain. Between 1998 and 2008, for every private sector job generated in the North and the Midlands, 10 were created in London and the South.”

The Council identifies with the City Region's commitment to accelerated economic growth over the next few decades (CS, paras 2.1 – 2.8), thereby acknowledging the need for faster growth.

At a local and human level the consequences of deficient economic growth (amongst other factors) are that the scale of deprivation in Greater Manchester has diminished little in recent years.

The Strategy is not Effective, Meaning Deliverable

The strategy, RLAM contend, is not effective, meaning that key proposals will not be delivered and, even if they were, they would not achieve the vision and objectives of the Core Strategy. We make this case under three headings:

- The Council is not proposing any strategic sites, not because there is no need, but because the possible sites were found to be too ill-prepared
- There are no sites or locations with a regionally or nationally competitive offer for B1 a and b, suitable for the Council's selected target sectors or other potential inward investors
- The Council has provided no evidence to justify the reversal of the Council's position on Davenport Green in 1996 and 2006.

No Strategic Sites

The Council in the Core Strategy: Further Consultation on the Preferred Option (June 2009) had proposed 13 Strategic Locations and 5 Strategic Sites. However the consultation responses, especially those from the Government Office for the North West, included a continuing theme of casting doubt as to whether "there is sufficient information to justify a site's inclusion and whether there is sufficient certainty that a site will be delivered as proposed" (Trafford Core Strategy: Technical Note on Strategic Locations and Sites Selection, Sections 3 and 4, March 2010). Given that Strategic Sites are (PPS12, para 4.6) central to the achievement of the strategy, it is remarkable that the Core Strategy was so dramatically altered as to reduce the 18 Sites and Locations to five Locations at a late stage in a process that is designed to be front loaded.

Given the wording of the Vision and Objectives, it is highly inappropriate that there should be no sites for economic development that are central to the strategy. A significant consequence of the Core Strategy being reliant on Locations is that all of them require Development Plan Documents to take them forward, which implies a real delay on any action being taken. PPS12 was expressly amended to enable Strategic Sites to be brought forward more rapidly.

The Council has provided no evidence that there is no longer a need for Strategic Sites for economic development, but it has dropped them from the current draft Core Strategy. The reason for dropping them is that the Council did not know enough about them and their deliverability. This undermines confidence in the effectiveness of the Core Strategy.

Lack of Competitive Sites for B1 (a) and (b) Use

There are no sites with a regionally or nationally competitive offer for B1 a and b, meaning that the strategy of the Core Strategy is incapable of delivering an important part of the Vision and Objectives. In our representation on Policies SL1 to SL5, which relates also to Policy W1, we have set out our contention that the land identified for significant employment development, especially for B1 a and b uses, fails the test of soundness in that the policies are not effective in two respects:

- a. There are major constraints on the deliverability of the Strategic Locations.
- b. Even if they are delivered they will not meet the intentions of the Core Strategy as set out in the Vision and Objectives in relation to key targets.

We review briefly each of the sites from these two perspectives.

Pomona (Policy SL1) is identified as having potential for 10 hectares of employment development and Policy W1 indicates that it is one of the key locations for B1 offices. The constraints on development include:

- a. The Strategic Flood Risk Assessment which shows that the site is unsuitable for residential and some leisure development yet it has planning permission (expiring in May 2012) for 546 residential units and it is said (para 8.26) that it will serve to enhance Trafford's image as a tourist destination
- b. Unspecified and uncoded improvements to highways and public transport.

- c. The viability of the site must be questionable as (para 8.21) it has been vacant for over 20 years following remediation; even after remediation and during a period of very buoyant economic conditions the site has not been developed.

SL1.1 states that a new mixed use commercial district will be created to complement the offers of the city centre and Salford Quays/Mediacity:uk and the justification refers to Trafford's northern gateway, the site's location relative to the regional centre and the Salford Quays/Irwell Corridor Strategic Regional Site as evidence of the commercial realism of the proposals. We comment on these points as follows:

- a. Given that the site is at least 2kms from the city centre we take it that complementary means cheaper, secondary offices, which will not be competing for regionally or nationally mobile investment.
- b. It is unclear what it means to complement Salford Quays/Mediacity:uk given that Pomona is physically unrelated to either and that Phase 1 of Mediacity:uk includes 950,000 sq.ft. of office and studio space; Phase 1 accounts for only one fifth of the land available in Salford for Mediacity:uk; it unclear what else remains for Pomona to provide in a complementary role.
- c. Trafford's northern gateway, the regional centre and the Salford Quays/Irwell Corridor Strategic Regional Site are not recognisable property market locations and so give no rationale for the future development and use of Pomona.

Trafford Wharfside (SL2) is shown as having the potential for 10 hectares of mainly B1 offices and light industrial development, leisure (including hotels) and residential (900 units) development, an opportunity to create "a major mixed use area of regional and international significance" where the focus will be on opportunities for new economic (particularly digital and media) industries. Constraints that need to be addressed to enable development of the site include:

- a. Provision of a new high frequency public transport system by 2016, which seems inconceivable given that the Metrolink extension to Trafford Park is "subject to private sector funding" according to the Metrolink website.
- b. Land assembly; the location is in multiple ownership.
- c. Apart from during the lifetime of the Trafford Park Development Corporation, there have never been satisfactory mechanisms for delivering major infrastructure works or for assembling development sites; the Core Strategy contains no indication of how these longstanding issues will be resolved.

In relation to the product that could be delivered at Trafford Wharfside SL2.2 identifies the employment uses as being in the Mediacity:uk area; however none of Phase 1 is in Trafford, and there is no mention of Trafford on the website for Mediacity:uk in relation to future phases for which 200 acres is identified in Salford. There seems very little prospect that Wharfside will attract significant "digital and media" industries in the face of huge competition from Mediacity:uk, the City Centre and the Sharp Project in East Manchester. The claims to international significance appear to be based on the presence of Manchester United FC rather than business activity.

Major infrastructure proposals are included in the 1996 and 2006 UDP for Trafford Park and there has been little progress in changing the character and potential of the area, particularly in relation to the target sectors.

Lancashire County Cricket Club (LCCC) Quarter (SL4) contains no significant employment development proposals so can be discounted in the present analysis.

Trafford Centre Rectangle (SL4) is identified as a Strategic Location but Policy W1 does not indicate it as a focus for B1 office development. Nevertheless SL4.2 refers to 15 has of land for

employment providing high quality B1 commercial development and including a landmark office building at the former Kratos site. Constraints to be addressed to enable the development of the location include:

- a. Provision of a new high frequency public transport system by 2016, (same comment as for Trafford Wharfside)
- b. Significant but uncosted additions to highway and motorway capacity
- c. A large number of other items (para 8.54) including a new secondary school at £10m plus land costs (at the expense of the developer).
- d. A lack of appropriate measures to address infrastructure and land assembly issues (as Wharfside).

In relation to the quality of the office product we quote in our representation concerns in the Council's Trafford Other Town Centre Uses Study (January 2010) about Trafford Park as an office location: not historically an office location, lack of suitable sites, unsuitability of committed office developments for Trafford's growth sectors and uncertainty about developments coming forward.

Given that the Council (Core Strategy, Vision, para 3.4) see Trafford Park as the key focus for the Council's contribution to the local and City Region economies, it is a major gap in the delivery strategy that none of the sites in or adjacent to Trafford Park are capable of competing on this regional scale in relation to the target sectors that require B1 office activities.

Carrington (SL5) is identified as a Strategic Location but Policy W1.7 indicates that it is primarily suitable for large scale employment development, particularly for general industrial, storage and distribution uses. The Council does not see it as an office location and the intended uses would be incompatible with a high quality office development. There are major infrastructure, contamination and nature conservation issues to be addressed, but we do not dwell on those because it is not an office location.

Paragraph 18.4 of the Core Strategy sets out the target growth sectors for Trafford:

- financial and business services;
- distribution;
- cultural, creative and media industries;
- advanced engineering, and,
- other personnel services.

The first, third and probably at least some of the fifth sectors require office premises. Some could be accommodated in the secondary office locations identified by the Council (provided they are delivered); however those that have choices about where they locate their business will find no high quality locations within the portfolio offered by the Core Strategy. It will fail to deliver the Vision aspiration of prosperous communities and the SO3 of contributing to the growth of the economy of the sub-region. This is a major defect in the effectiveness of the Core Strategy.

Lack of Evidence to Justify Reversal of the Council's Position on Davenport Green in 1996 and 2006

Justification in 1996 UDP & Inspector's Report

The context for the Council's current policy stance is provided by the Council's advocacy of Davenport Green in two previous UDP's.

In May 1996 Trafford BC (TBC) adopted their Unitary Development Plan (UDP 1996) which provided (Policy E13) for a strategic high amenity employment site on 36.4 ha of land within a 135.6 ha estate at Davenport Green. The justification referred to the need for a truly exceptional

site, the lack of comparable sites, the need to compete on national and European scales for mobile investment and the revitalising effect on the sub-regional economy, complementing the development of existing sites in urban areas. The direct and indirect regenerative impacts of the proposal for Greater Manchester were acknowledged. Part of the justification was that "a key feature of a competitive site is ready availability including in planning terms." The policy was subject to a number of conditions, including one related to the nature of the permitted occupiers.

The policies providing for Davenport Green as a strategic high amenity site in the 1996 UDP were subject to detailed scrutiny at the UDP Inquiry and were subsequently approved by the Inspector.

The Council confirmed the proposal (Part 2 Proposals E13 and E14) in the same terms in the UDP which they adopted in 2006 (UDP 2006). The proposal has thus been confirmed by TBC relatively recently.

The Council's Change of Mind

The records of RLAM's solicitor's show the following telephone conversation:

Gary Pickering , Deputy Chief Executive (then and now) in June 2008 in telephone conversation with Oliver Goodwin, planning lawyer to developer / owners APSL (MUSE / RLAM) advised;

" - it's a political decision, the Conservatives resolved 5 years ago, made it clear, they wanted it [Davenport Green] dropped. The Tories demanded it. The NWDA said it [Davenport Green] could have been kept. No chance at all with the Tories, and the Liberals support. Mike Horner [Director of MUSE] has been made well aware [of the political decision] I met him at a social function a couple of months ago. It was an electoral promise ".

This indicates that in about 2003 the Conservative Party in Trafford took a political decision to put Davenport Green into the Green Belt. The decision pre-dated the start of the preparation of the current Core Strategy for Trafford.

The Council, having taken a prior political decision to put the Davenport Green development site into the Green Belt, have devised a number of reasons for their decision:

1. No new evidence has been provided to support the continued exclusion of Davenport Green from the Green Belt (CS, para 24.12)
2. The Sustainability Appraisal related to the June 2009 Preferred Option Consultation Document suggested that development at Davenport Green would not be as sustainable as other locations for employment activity such as Trafford Park and the main town centres (CS, para 24.13)
3. In spite of planning permission being granted , there does not appear to be any realistic prospect of the development going ahead (CS, para 2.14)
4. The North West Development Agency (NWDA) removed Davenport Green from their list of strategic sites (CS, para 24.15).

RLAM's brief responses to these points are:

1. It is the Council that is proposing the change from the policy that they had previously promoted in two UDP's and they have produced no evidence that the circumstances that justified the designation of Davenport Green as an employment site in 1996 and 2006 have changed sufficiently to justify their changed approach and policy.

2. The flaws in the process and execution of the Council's Sustainability Appraisals have been shown in JAM Consult's analysis to be very serious.
3. Having adopted a policy to designate Davenport Green as, in effect, the flagship site for the Borough, the Council have not sought or provided any evidence why development has not proceeded. RLAM's review of the site (since becoming sole owner) has exposed the real reasons why the site has not been developed: its designation and the lapsed permission were so hedged about with restrictions on the occupancy of the site that it was impossible to let, develop or fund the scheme
4. It is clear from the chronology of the review undertaken by the NWDA (see RLAM's representation relating to Policy W1 in CS Chapter 8) that there was little option but for the Agency to remove Davenport Green from the list, given that TBC had already decided to put the site into the Green Belt. We show that, on the refocusing criteria quoted by the Council in paragraph 24.15 of the CS in support of the NWDA point, that in fact Davenport Green scores well. And the Agency does not refer to these criteria in their dismissal of Davenport Green; they attribute its delisting to non-development, a comment which, according to the NWDA's Review, could be applied to almost all the 25 strategic sites.

Also part of the evidence for the Core Strategy is the Employment Land Study (ELS) undertaken by Arup and Lambert Smith Hampton and published in May 2009. This concluded that Davenport Green should not be taken forward as an employment site. However that was not a conclusion reached independently by the consultants but was a directive ("REMOVE") issued by the Council at the end of their own one page appraisal of Davenport Green in Appendix D of the ELS. As we show in our evidence relating to the economic development policies this Appendix is based on negligible evidence and demonstrates frequent, serious and unjustified inconsistencies between (a) the appraisals of Davenport Green and other sites and (b) between the Council's appraisal and justification of Davenport Green in the UDP (in 1996 and 2006) and their appraisal in Appendix D. No evidence is given for these inconsistencies. Furthermore the ELS did not consider the quality of sites, only their broad use class allocations.

At the Preferred Options stage in June 2008 it was stated that "the Council considers that in view of Trafford's Economic Strategy and emerging RSS [Davenport Green] should revert to Green Belt in the Core Strategy". (para 5.18) There was however nothing in the Trafford Economic Strategy justified the de-allocation of Davenport Green. Furthermore it should be noted that the Council's reliance on the Economic Development Plan is undermined by the chronology of the publications concerned: the Council confirmed Davenport Green as a major high amenity site for employment in the Review of the UDP in 2006, which was after the publication of the Economic Development Plan in 2005. And the RSS has of course been revoked.

Other Areas

Trafford BC could have taken the view that other sites, even outside Greater Manchester, could fulfil the need that their own locations were incapable of meeting. They have not however given any evidence to that effect. Furthermore RLAM's advisers are not aware of other sites in or accessible to Greater Manchester that could fulfil the required strategic role. It must also be recalled that public funds to bring sites forward, especially those with major infrastructure requirements such as in Trafford Park, will be very constrained in the near future: for example the Regional Growth Fund of £1.4bn is about half the combined budgets of the RDA's.

Conclusion

The evidence underlying this summary leads RLAM to the view that the strategy to deliver the vision and objectives is ineffective and unjustified on the following grounds:

1. The Council has not identified sites for employment that are capable of being delivered in a timely manner.
2. The identified Locations (for employment) will not produce the high quality of property offer that is needed to meet the requirements of firms with locational choices in the target sectors and others that could deliver net additional activity.
3. The Council has not produced robust evidence to justify their non-selection of Davenport Green as a Strategic Site particularly given their repeated support for it in the recent past.

SPA
30/10/10

(h) Restoring Soundness to the Core Strategy by SPA

Restoring Soundness to the Core Strategy

RLAM propose that the development site at Davenport Green be identified in the Core Strategy as a Strategic Site for employment. A draft policy is appended to this summary. We now address the principal factors that make Davenport Green a suitable proposal to remedy the deficiencies of the Core Strategy.

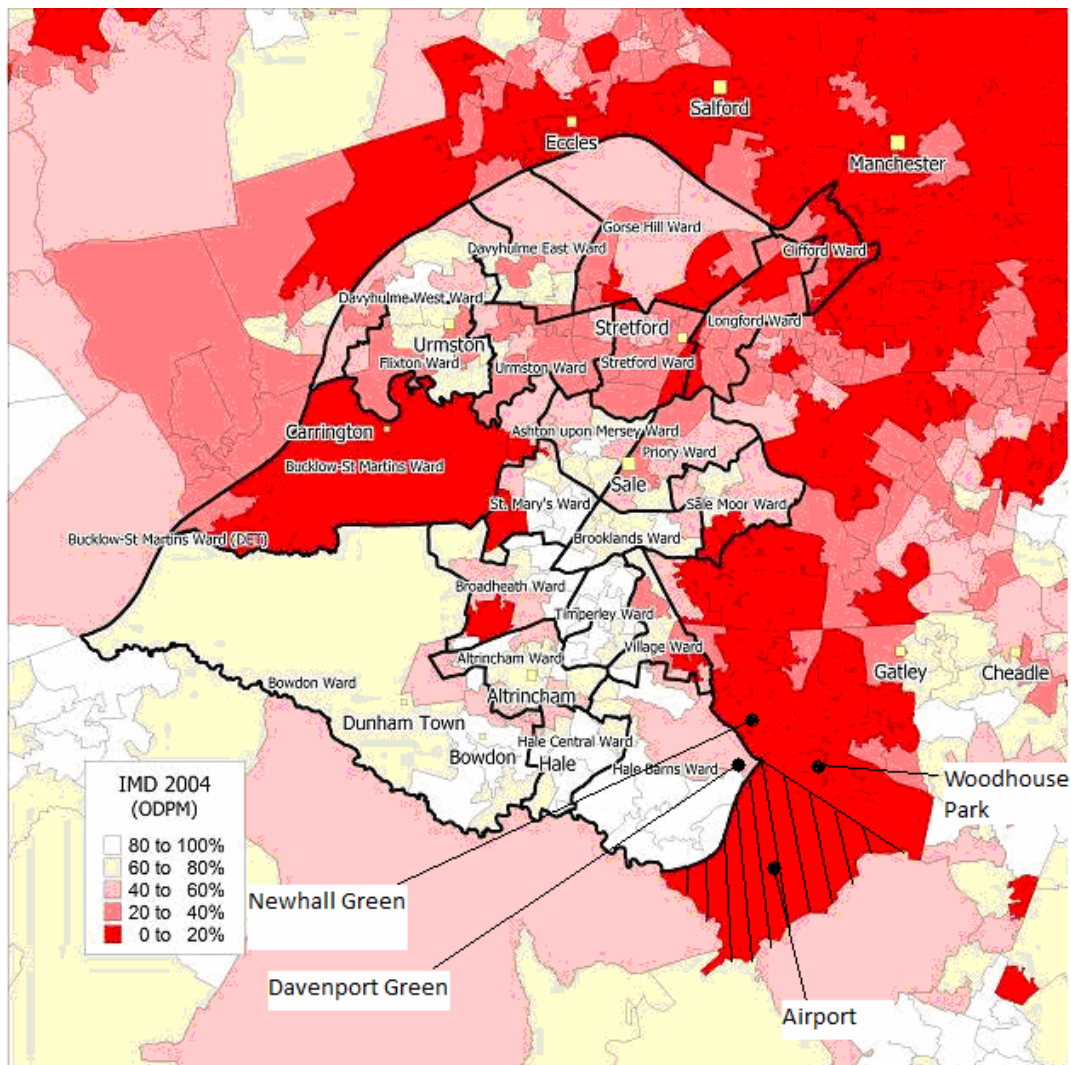
The Exceptional Qualities of the Site

These qualities have changed little since the Council proposed Davenport Green. It is important to demonstrate the exceptional advantages of the location from the perspective of delivering investment and jobs in the growth sectors and others in cases where firms have choices over where to locate:

- i. The market view of S Manchester has long been that it is the favoured part of the conurbation; in the Manchester Independent Economic Review (2009)(MIER) it was recognised that if Manchester was to compete effectively for mobile investment it needed to provide sites where the demand is:

“...planning policy should be reviewed to acknowledge the reality of economic demand and permit more expansion of suitable business premises in those parts of the city region where demand is strongest. Broadly, this demand seems to be stronger in the south, although such locations are found elsewhere in the city region...”.

- ii. Davenport Green is at a pivotal location between the very large and diverse labour pool in Greater Manchester and the higher managerial and professional skills that are concentrated in S Manchester and Cheshire. A broad conclusion from MIER is that Greater Manchester should not focus on clusters, sectors or SME's. It did however major on agglomeration economies, which can be summarised as the economic benefits arising from a large concentration of labour especially higher skills (and their associated quality of life), of suppliers and markets, of opportunities for exchange of ideas and of access to infrastructure and services. It is the quality of life in these southern locations that is the attraction for higher skilled people, who are more mobile than the firms they work for.
- iii. Another aspect of the pivotal location is the ability for Davenport Green to contribute to regeneration especially in Wythenshawe. This is one of the largest concentrations of deprivation in Greater Manchester. Benchill in Wythenshawe is the most deprived ward in Manchester City. The diagram below (annotated to assist interpretation) shows the scale and distribution of deprivation in and adjacent to Trafford and adjacent to Davenport Green. Particular pockets of deprivation are found in Village Ward (Broomwood) and in Broadheath, both of which are near to Davenport Green.
- iv. Davenport Green can tap these labour markets sustainably because of the network of bus routes already serving surrounding areas and because of the proximity of the Airport's transport interchange, which brings together air, rail and bus travel and which will soon have a Metrolink connection.
- v. A large volume of investment has been made in the landside transport facilities at Manchester Airport: rail and bus/coach stations and the committed Metrolink extension. Davenport Green is able to make good use of this existing capacity, which must be better value for money than creating expensive new capacity at other poorly served peripheral locations.



Index of Multiple Deprivation, TBC Wards and Adjacent Areas (Source: TBC Economic Development Plan, 2005)

- vi. The exceptional synergies that can be exploited in the Airport area have already been identified in the Airport's Master Plan and in the Wythenshawe Strategic Regeneration Framework. The corridor of development and its opportunities have been recognised in MCC's Draft Core Strategy. Airport City and Wythenshawe Hospital are already being brought forward by MCC as Strategic Locations for employment in their Draft Core Strategy. The Master Planners for Airport City will be looking at wider opportunities beyond their site boundary.

RLAM's Review of the UDP Proposals for Davenport Green

The context for the review of the proposals for Davenport Green that has been undertaken by RLAM since they became sole owner is provided by PPS4, Planning for Sustainable Economic Growth, which adopts a wide definition of economic development whilst identifying activities to which town centre policies apply (para 4). PPS4 adopts a positive approach (para 9) to encouraging sustainable economic growth and (para 10) to reducing "the gap in economic growth rates between regions, promoting regeneration and tackling deprivation".

It does however caution that “existing site allocations should not be carried forward from one version of the development plan to the next without evidence of the need and reasonable prospect of their take up during the plan period.” It also suggests that local planning authorities should “assess the existing and future supply of land available for economic development, ensuring that existing site allocations for economic development are reassessed against the policies in this PPS, particularly if they are for single or restricted uses.”(para EC1.3) There is clear recognition that restrictive use conditions may be hampering development and be contrary to the broad definition of economic activity contained in PPS4.

RLAM have therefore for their own commercial reasons undertaken a review of the proposals for Davenport Green, which covered:

- The development concept has been revised
- Supporting uses have been introduced to improve sustainability performance
- The size of the built scheme has been reduced whilst retaining similar total job creation
- The occupier conditions, apart from that relating to B1(a and b) use, have been abandoned; it remains however a realistic objective that the occupiers will be firms that might otherwise not have located in Greater Manchester
- The public transport offer has been improved.
- The rural park will be retained in a role or roles that will meet the Council’s ambitions for green infrastructure
- The proposals will include strong support for the regeneration of deprived communities in Trafford and Wythenshawe

RLAM’s Proposal

Davenport Green can be a part of a major South Trafford-South Manchester strategy for integrated development, sustainability and regeneration; this would exploit the synergies and economies of scale offered by the corridor or arc of development for:

- focused business development in export sectors
- web-based business networking
- public transport
- regeneration,
- sustainable waste handling and treatment
- low carbon energy production and CHP
- sustainable urban drainage and
- air quality management.

Realisation of these opportunities depends on other sites being brought forward in a concerted fashion e.g. University Hospital of South Manchester (Wythenshawe) Hospital, Roundthorn Industrial Estate and Airport City, as well as Davenport Green. Connections could also be made to other major facilities in the corridor including

- the superstore and retail centre (West Wythenshawe District Centre) on the A560,
- Manchester Health Academy (secondary school) and new community library, (also on the A560)
- Newall Green High School, a specialist Arts, Science with Mathematics and Vocational College (very near to Davenport Green)
- The rural park at Davenport Green opens up links into Trafford’s communities.

Davenport Green is a critical link in this corridor and in unlocking these opportunities; RLAM is willing to develop the opportunities as soon as other sites, such as Roundthorn Industrial Estate and Airport City, are brought forward.

The time is right for bringing this strategy forward:

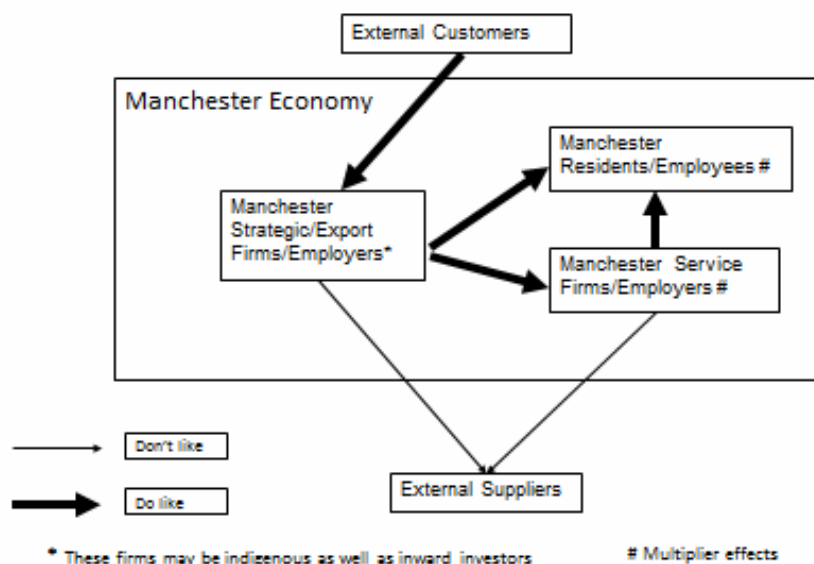
- The recession has slowed the growth of passenger numbers through the Airport and Manchester Airport Group are re-thinking their business model, within which Airport City is an important component.
- The recession has given the AGMA authorities pause to reflect on their economic development strategy as progress in bridging the GVA gap has been slower than expected even in the boom years.
- Major companies are seeing that sustainable practice is not just virtuous but also good for business: staff and customers expect it and it can reduce operating costs.
- RLAM see that Davenport Green has a key contribution to make to the strategy.
- Cuts to public expenditure are likely to require local partnerships to be created in order to deliver real progress on the sustainability agenda, possibly a Business Improvement District or Tax Increment Area for the strategy.

The immediate issue is for Davenport Green to be identified as a Strategic Site for employment in the Core Strategy. This is essential in order that the proposals for Davenport Green have any realism and to enable other parties in the corridor (for example Manchester Airport, who have expressed support for Davenport Green as a site for economic development, are preparing a Master Plan for Airport City) to have certainty about which sites will be brought forward for development and what the real scope is for corridor synergies.

Two policy amendments are needed: one to remove the part of Policy R4 which puts Davenport Green into the Green Belt and one (SS1, attached) which provides for Davenport Green to be a Strategic Site for employment.

The proposal is designed to contribute to the pressing Greater Manchester objective to accelerate sub-regional economic growth and bring growth in GVA closer to the UK figure. It will do this by creating an internationally competitive offer for mobile investments by firms that might have chosen a location outside Greater Manchester but for the existence of the Davenport Green offer. Knight Frank (Report at Appendix 15) have advised, on the basis of their knowledge of occupiers' requirements and of the competing offers that are being made in the UK and overseas, that the proposals will be attractive to demanding firms, provided occupancy is not tied up with heavy restrictions.

Manchester Economy: Major Money Flows



RLAM are convinced that the economic need is greater than in 1996 and that the firms attracted to Davenport Green will be export or strategic firms in the terms of the diagram presented above and they will generate major benefits for Trafford and the rest of the Greater Manchester economy.

The spin-off, multiplier and regeneration effects of the proposal were summarised in the diagram and we have now quantified them where possible:

- Direct employment in the strategic or export firms attracted to Davenport Green, estimated at 4,471 jobs; these jobs will be in a wide range of occupations (as set out in RLAM's representation on restoring soundness to the economic development policies)
- Indirect employment in service firms supplying goods and services to the Davenport Green firms estimated at 1520
- Induced employment created by the expenditure of direct and indirect employees of 1318
- Creation of a major rural park for the enjoyment of local residents, particularly those of Trafford (Hale, Hale Barns and Timperley)
- Opportunities for residents in deprived communities in Trafford and Manchester to access the jobs supported by measures that RLAM will fund (working with the Airport and other major employers who are already engaged in such programmes)
- A major stimulus to people in Greater Manchester to develop skills in order to be able to access the jobs; RLAM will examine the opportunities for working with local colleges and schools in order to improve students' access to the jobs to be created.
- Improved access for local people through RLAM's support for new and extended bus routes e.g. access from Trafford communities to Wythenshawe Hospital (*tbc*)

The proposals and the objectives of the Sustainable Community Strategy and the Core Strategy which they fulfil are set out in the Policy SS1 attached.

The Policy is modelled on the Council's policy and justification for the five Strategic Locations in the Core Strategy e.g. SL1 – Pomona Island. However it provides the higher level of detail relating to the site boundary, the development proposals and their delivery which are appropriate for a Strategic Site.

In particular these demonstrate that:

- Davenport Green is a sustainable location when account is taken (as the Council did in 1996 and 2006) of the transport improvements and green infrastructure that RLAM will support (Sustainable Transport Strategy, Appendix 7)
- The proposal will do no harm to the purposes for which Green Belts are designated and it will promote the objectives of the Green Belt in the vicinity of the development site (Green Belt, Appendix 12)

In conclusion RLAM contend that the proposal restores soundness to the Core Strategy in the following ways, in which we believe it to be unsound in its present form:

- The site remains out of Green Belt, overcoming the errors that have been made in trying to put it into the Green Belt
- It delivers the ambitions in the Sustainable Community Strategy and the (amended as suggested) Vision and Objectives of the Core Strategy
- It has been subject to Sustainability Appraisal and found to be sustainable
- It is deliverable.

(i) Appraisal of the Sustainability of TBC's CS with the inclusion of DG (not a formal SA) by JAM Consults

Executive Summary –

Appraisal of the Sustainability Appraisal of the Core Strategy with the inclusion of Davenport Green (not a formal SA)

- 1.0 The Appraisal of the Sustainability Appraisal (SA) of the Core Strategy with the inclusion of Davenport Green has been prepared by jam consult ltd on behalf of Royal London Asset Management (RLAM). As Trafford Metropolitan Borough Council (TMBC) did not include Davenport Green in their SA reports, the assessment has been undertaken to demonstrate the likely impacts of the development.
- 2.0 The report considers the SA of TMBC's Proposed Submission Core Strategy, September 2010 with the inclusion of the Davenport Green development site. It has not been possible or appropriate to undertake a formal Sustainability Appraisal using the methodology that TMBC has used in the SA of the Core Strategy, owing to the fundamental flaws that have been identified in the Council's SA process (see Appendix 17 to RLAM's representation on the review of the SAs). The lack of rigour of the SA process and the failure of the Council to comply with the relevant regulations and guidance has meant that simply adding Davenport Green into the SA structure would give an inaccurate and misleading result.
- 3.0 Whilst a formal SA has not be possible at this stage, the report sets out the issues that relate to the Council's Sustainability Objectives in order to show the likely impacts of including Davenport Green within the Core Strategy. If it is decided to reconsider the status of the land at Davenport Green, a formal SA of the Core Strategy with the inclusion of Davenport Green will need to be undertaken by the Council. The SA will need to be subject to public consultation and full accordance with the regulations.
- 4.0 Jam has carried out the informal SA on the basis of the inclusion of Davenport Green as a Strategic Site, in addition to the other Strategic Locations identified by the Council. The Sustainability Objectives have been used, despite the identified shortcomings, for ease of reference on the sustainability issues concerned. The appraisal has not assessed the Core Strategy Core Policies as a result of the difficulties set out in Appendix 17 to RLAM's representation on the SA review.

- 5.0 The purpose of the appraisal is to provide the policy makers with information on the full range of effects and make recommendations for improvement where appropriate. Whilst the strategic nature of the assessment does not enable sufficient certainty of effects to be established at this stage, the commentary seeks to explain the potential impacts, benefits and mitigation with regard to sustainability.
- 6.0 The commentary shows that Davenport Green offers significant positive impacts as an exemplar sustainable development for Trafford in the Greater Manchester Sub-Region, particularly with regard to economic growth, social benefit and environmental improvement. Where potential negative impacts have been identified, mitigation measures have been identified.
- 7.0 Some of the key benefits of the development include:
- improved accessibility to the area by providing new, efficient, inclusive and affordable public transport
 - the use of existing road and public transport services is maximised, in particular the Manchester Airport public transport interchange
 - sustainable modes of transport will be encouraged through the implementation of the sustainable transport strategy and travel plan
 - a high employment generation site will be provided in close proximity to the motorway and Manchester airport offering new jobs, skills and training opportunities
 - BREEAM 'excellent' and in selected cases 'outstanding' will be achieved in a zero carbon development built to high sustainability standards.
 - The landscape treatment of the development and the provision of the Rural Park will offer opportunities for biodiversity and habitat improvement and enhancement
 - None of the site is located in the flood plain
 - The site will provide positive impacts for green infrastructure including excellent opportunities for the use of SUDS and improvement to water quality
- 8.0 Given the quantum of development, some negative impacts have been found in relation to:
- the contributions to climate change
 - the environmental impacts of consumption and production
 - air quality (although negligible).
- 9.0 It should be noted that such negative impacts would be applicable to all the strategic locations that Trafford has identified. The extent of the impact will be dependent

upon the type and scale of the proposals and the proposed mitigation measures to minimise the effects. The suggested mitigation measures for Davenport Green are considered appropriate for the type of development proposed and the potential residual impacts do not raise any significant issues that should prevent the selection of Davenport Green as a Strategic Site.

10. Although the deficiencies in the Council's SA process have made it impossible to show how Davenport Green would perform through a formal SA, the commentary provides details of the likely impacts, supported by a thorough review of the evidence available, which can be used to inform a future appraisal. Whilst it has not been possible to undertake a direct comparison with the other strategic locations, the results would appear to confirm that there is no obvious reason why Davenport Green should not have been considered as a 'reasonable' option in the SA. In fact, the results of the appraisal reveal that Davenport Green should perform just as well, if not better in some instances, as the other Strategic Locations and that suitable mitigation measures can be delivered. This assessment also provides further support to the conclusions of the review of the Council's SA process (Appendix 17 of RLAM's representation) that the results do not back up the decisions taken.

(j) **Green Belt and Landscape Implications of Identifying 36.4ha(90ac) of Development Area at Davenport Green as Strategic Site by Duncan Thomas**

SUMMARY

1. The site is not in the Green Belt, and it is important to be absolutely clear as to the application of Green Belt policy to it if it is to be allocated as a Strategic Site in the Core Strategy of Trafford Metropolitan Borough Council (TMBC).
2. Development at Davenport Green cannot be contrary to Green Belt Policy relating to the purposes of the Green Belt. The fact that the undeveloped land has continued to fulfil '*important functions*' (this is TMBC's wording about the Davenport Green site at paragraph 24.17 of DPD1, September 2010) does not alter the way that Green Belt policy applies to it.
3. This is not to say that Green Belt policy and guidance is irrelevant to the development of Davenport Green. The relevant aspects of Policy and guidance are set out below.
4. The effect of development on **visual amenity** of the adjoining Green Belt (PPG2, paragraph 3.15) is a material consideration, as is the role that the development might play in supporting the land use and **management objectives** of the neighbouring Green Belt (see PPG2, paragraph 1.6).
5. These matters have been addressed in the past through a Planning Brief for the site and the adjoining Rural Park (ie the 'Total Estate'). Whilst circumstances have changed it is important to note that RLAM do not wish either to withdraw from a commitment to a Rural Park or to resile from the principle of being bound by key development parameters set out in a new Planning Brief.
6. The **Rural Park** is potentially a major component of the sub-regional Green infrastructure, and would, in this role, be hugely supportive of Green Belt objectives in this urban fringe. The Rural Park would not only be entirely congruent with PPG2 but Core Strategy Policy R3. RLAM's commitment to the principle of the Rural Park is absolutely undiminished, but there is an opportunity now to investigate different ways of managing the Park, and to increase substantially, thereby, its recreational and bio-diversity value as a result.
7. The physical **development parameters** were embodied in the Planning Brief in order to minimise visual impact, prevent further erosion of habitats, and

generally prevent over development of the site. These parameters have been re-visited in the light of Appendix 15 (Knight Frank's Report on the site and the likely form of development that would capitalise on its locational advantages).

8. They are summarised here:

	<i>Parameter description</i>	<i>Comment</i>
<i>Protection of Key Landscape Features</i>	<p>Seven features individually identified,</p> <p>The desirability of retaining all of the principal hedgerows within the site to be considered.</p> <p>Buffer zones defined, where necessary, to protect landscape features and hedgerows.</p> <p>No development shall take place that impacts directly upon the retained landscape features or encroaches on defined buffer zones.</p>	<p>This parameter will have the effect of defining a 'net developable area' within the Development Area.</p> <p>Built development will be strictly confined to the area so defined.</p>
<i>Built Footprint</i>	<p>Overall built footprint (buildings, car parking and hard landscaping) not to exceed 40%, within which:</p> <p>Building footprint not to exceed 15%</p> <p>Car parking areas not to exceed 25%</p> <p>Car parking to be provided at a ratio of not greater than 1:32 gross floorspace.</p> <p>Each phase of the</p>	<p>This maintains 60% of the Development Area to accommodate retained landscape features and new structural landscaping.</p> <p>The footprint parameters to allow flexibility over the life of the project.</p>

	development to demonstrate, by reference to a Masterplan for the whole site, how it is compliant with these parameters, and how it does not prejudice the compliance of subsequent phases.	
Building Height	Not to exceed 13.9m as measured from the existing ground level.	This will control the most important component of visual impact, and reflects the earlier height ceiling
New Landscaping	<p>Structural landscaping is required to reinforce boundaries of the development area, form an extension of Brooks Drive, protect the setting of listed buildings, and provide native woodland.</p> <p>Landscaping of the highest quality is also required elsewhere within the development.</p> <p>Specifically, parking areas shall be laid out to gross a density of no less than 300 spaces/ha (33m² gross per space) to ensure space for landscaping to the highest standard.</p>	The scheme will still be landscape led, and designed to the highest standards.

Conclusions

9. The development area is not in the Green Belt, but the Rural Park is. In respect of the former, Green Belt Policy requires that the amenity of the adjoining Green Belt is protected and that landscaping creates an attractive new edge to the development along the Green Belt Boundary. In respect of

the latter (Rural Park) Green Belt policy is capable of being supported by the enhancement of amenity, public access, and conservation interest.

10. These matters have in the past been addressed through a Planning Brief, and should continue to be so. Changes to the site itself and to the development concept for the site warrant a number of changes, but consistency with Green Belt policy, and minimisation of landscape and visual impact can still be achieved to the same degree. Indeed, reconsideration of the proposals for the Rural Park could bring about a material enhancement in recreational and conservation value over that which has been envisaged through earlier proposals.
11. Elements of a revised planning brief that embody key physical parameters to secure the protection of key landscape features, the establishment of structural landscaping along the site boundaries, controls over height and footprint, and the management of the Rural Park as a public asset, are set out in this report.
12. RLAM fully endorses these parameters and requirements.

(k) Highways – Davenport Green by Arup

Executive Summary

Royal London Asset Management's (RLAM) current indicative proposals for the Davenport Green site include a minimum of 55,740 m² (600,000 ft²) Gross Floor Area (GFA) of B1 development. Ancillary uses include a 128 bedroom hotel and 1,394m² (15,000ft²) GFA retail development.

This compares with Trafford Borough Council's (TBC) Unitary Development Plan (UDP), in which there was an allocation for up to 92,900 m² (1,000,000 ft²) GFA B1 development, and the January 2001 planning permission for 46,450 m² (500,000ft²) B1 development. Planning consent was subject to improvements to the motorway and non-motorway network. The agreed improvements are typical for a development of this scale and location.

Arup has reviewed the revised development proposal in terms of national and regional policies relating to transport which give greater emphasis to the use of public transport and less reliance on the private car. These policies are fully supported by RLAM's own sustainable transport objectives for the site. The planned improvements to the local transport infrastructure along with Royal London Asset Management's (RLAM) own proposals to enhance the site's accessibility by public transport would make Davenport Green a very sustainable location.

Arup, along with RLAM's public transport advisor (Colin Buchanan and Partners), have liaised with the Highways Agency (HA), the Greater Manchester Transportation Unit (GMTU) and with the local major stakeholder –Manchester Airport Group (MAG). All parties have welcomed and offered broad support for the proposed highway and public transport/non car proposals that RLAM wishes to deliver.

Arup, having reviewed the highway proposals attached to the consented scheme, has concluded that the current development proposal would be well served by the proposed highways improvement works and that these are deliverable. Access to the site would still be from Thorley Lane via improved highways serving Junction 6 of the M56 Motorway. Improvements would be implemented so as to link with the completion of various phases of the development.

Measures would be put in place to ensure that the proposed development would be well served by public transport and other non car modes. RLAM intends to restrict car parking on the development. For example, notwithstanding TBC's emerging parking standards for B1 developments being 1 car space per 30 m² GFA which is equivalent to 1858 car parking spaces, RLAM would provide only 1750 spaces (1 space per 32m² GFA) for office users.

RLAM would also safeguard on the land within their ownership the proposed route of the western loop to the Metrolink extension serving the Airport and South Manchester.

(I) Sustainable Transport Strategy – Davenport Green by Colin Buchanan

Summary

Davenport Green is a strategic employment location in the south-east part of Trafford Metropolitan Borough Council (TMBC), identified in the Unitary Development Plan (UDP) as a site suitable for up to 1m sq.ft. of employment land use (it also had outline planning permission for 500,000 sq.ft). .

The location is extremely well situated in order to be able to:

- Contribute to the objectives of the Trafford Core Strategy, and the implementation of a 'Development Corridor' identified in the pre-publication Manchester City Council Core Strategy, the West Wythenshawe Strategic Regeneration Framework and Local Plan and Manchester Airport Masterplan.
- Maximise the use of existing road and public transport infrastructure and services, in particular the Manchester Airport and Altrincham public transport interchanges, which have a number of frequent rail Metrolink services as well as bus and coach services and the proposed Metrolink extension;
- Provide enhanced links on the Development Corridor between key locations such as the Airport, Altrincham, Wythenshawe, the Roundthorn industrial estate and Wythenshawe Hospital.

Transport strategy overview

The provision of significant new employment at Davenport Green offers the opportunity to provide an exemplar development focussed on sustainable travel and making best use of existing and proposed infrastructure and services. It will serve to increase the potential market for public transport in the area, and support existing services and make new services viable. The transport strategy for Davenport Green includes deliverable and costed proposals to:

- Significantly improve bus services to the rail, bus and proposed Metrolink interchange at the airport, the current Metrolink/rail station at Altrincham and the proposed Metrolink stops at Roundthorn and Wythenshawe Hospital. Through interchanges and links with other services, these also provide access to many other parts of Trafford, and Manchester, including key regeneration areas.
- Improve walking and cycling facilities to the adjacent areas of Trafford and Manchester, including Altrincham, Wythenshawe and the airport (there are approximately 177,000 people within 30minutes cycling distance);
- Provide on-site facilities and measures to encourage car share, cycling and public transport use and increase non-car mode share.
- Protect the 'Western Loop' alignment of the Metrolink on this corridor and potentially use this for a Bus Rapid Transit corridor
- Manage overall travel through a comprehensive travel plan that aims at an aspirational but achievable mode share target of 65% car driver (compared to the 78% for employment in the adjacent parts of Trafford/Manchester)
- Provide parking at appropriate levels to ensure that mode share targets are achieved.

Conclusion

The conclusion is that Davenport Green will be a location accessible by a range of sustainable transport options, and provides a real opportunity to 'stitch' a number of key development areas together with public transport. The proposed improvements are deliverable, acceptable in principle to key stakeholders such as the Highways Agency and Manchester Airport Group. The proposals will make effective use of the significant investment already made to rail and bus connections to the airport, and complement planned Metrolink extension proposals.

(m) Environmental Sustainability Strategy – Davenport Green by Arup

Executive Summary

The environmental context for commercial development has changed significantly over the last 5 years. Market expectations, national policy and regulation all point towards a significant improvement over the current business-as-usual case, leading to the realisation of low carbon sustainable development.

The Davenport Green site incorporates a comprehensive package of sustainable design features including:

- The massing and design of the Davenport Green buildings will ensure a level of environmental performance ahead of the current legislative requirement, targeting zero carbon operation before the current government target of 2019.
- The construction of the buildings will achieve best environmental practice through BREEAM Excellent and in selected cases may achieve BREEAM Outstanding.
- The setting of the buildings in the landscape will provide a green environment that not only contributes to an attractive countryside setting but actively enhances environmental performance through sustainable drainage techniques and biodiversity enhancement.

The location of the site provides further opportunities for improved environmental performance by connecting the low and zero carbon technologies on the site to the adjacent low and zero carbon developments at Wythenshawe Hospital and Airport complex. The Davenport Green development would then create a key link in a growing low carbon network, allowing the UK's ambitious carbon emission reduction targets to be achieved cost effectively for all new constructions and reducing the impact of all existing buildings that are connected to this network.

3 Structure of representations on the CS in TMBC's format

RLAM – DAVENPORT GREEN STRUCTURE OF REPRESENTATIONS ON THE CS IN TMBC's FORMAT

Core Strategy Policy	
A.	Chapter 2: The Profile
B.	Chapters 3,4 and 5: Core Strategy Vision and Objectives
C.	Alternative Strategies Considered
D.	Chapter 8, para 8.2, identification of Strategic Locations, SL1, 2, 4, 5
Appendices:	
1	Arup and Buchanan: critique of TMBC Strategic Locations: highways, public and other non-car transport
2	Arup: Critique of TMBC Strategic Locations: Utilities
3	Arup: Critique of TMBC Strategic Locations: Flood Risk and Drainage
4	Arup: Critique of TMBC Strategic Locations: Air Quality
5	Knight Frank: Critique of TMBC Strategic Locations; Commercial Viability (extract from Knight Frank; Davenport Green Commercial Review, Appendix 15)
E.	Chapter 8. Restoring Soundness to the CS
Appendices:	
6	Arup: Davenport Green: Highways
7	Arup: Davenport Green: Sustainable Transport Strategy
8	Arup: Davenport Green Utilities
9	Arup: Davenport Green: Environmental Sustainability Strategy
10	Arup: Davenport Green: Air Quality
11	Arup: Davenport Green: Flood Risk and Drainage Review
12	Duncan Thomas: Green Belt and Landscape Implications of Identifying 36.4ha (90ac) of Development Area at Davenport Green as a Strategic Site
13	JAM: Appraisal of the Sustainability of TMBC's CS with the inclusion of Davenport Green (not a formal SA)
14	Ecology Solutions: Davenport Green: Ecology Update
15	Knight Frank: Davenport Green: Commercial Review
	Annexes to Knight Frank report:
	<ul style="list-style-type: none">• UDP 1996 policies E13 and E4• UDP 2006 Policies E13 and E14• Planning Brief• Planning Permission 2001

Core Strategy Policy	
	<ul style="list-style-type: none"> • Section 106 (extracts)
F.	Chapter 18 - Policy W1: Economy
G.	Chapter 24 - Policy R4 Green Belt and Other Protected Open Land
	Appendix: 16 SPA: Summary of previous representations on CS
H.	Sustainability Appraisals by TMBC
	Appendices: 17 JAM: Review of TMBC's Sustainability Appraisal of the CS. 18 SPA: Chronology of provision for Davenport Green in Planning Documents

SPA