



TRAFFORD COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Appeal by: McCarthy and Stone Retirement Lifestyles Ltd

Site Address: 35 Oakfield Road, Sale

LPA reference: 109745/FUL/22

PINS reference: APP/Q4245/W/23/3325034

PROOF OF EVIDENCE OF MRS CAROLINE WRIGHT
ON BEHALF OF THE LOCAL PLANNING AUTHORITY

REGARDING TRAFFORD'S HOUSING LAND SUPPLY

1.0 QUALIFICATIONS AND EXPERIENCE

- 1.1. My name is Caroline Wright, and I am the Strategic Planning and Growth Manager for Trafford Council. I have 16 years' experience in the field of town and country planning in both the public and private sectors, working in planning policy and development management at one other local planning authority and two planning consultancies within the North West of England. During the course of my professional career, I have been involved in many aspects of the planning process including the preparation and processing of planning applications and appeals, the drafting and production of development plan documents, including Local Plans and their relevant evidence bases, encompassing detailed housing and five-year land supply assessments.
- 1.2. I have been in my present role and employed by Trafford Council since May 2021. I am the Council's lead authority on matters of planning policy within the field of town and country planning, advising the Corporate Leadership Team, Elected Members including the Council's Executive and senior officers on such matters across the Council. I lead and manage the Strategic Planning and Growth Team, the remit of which includes the preparation, submission and examination of planning policy documents including the joint Local Plan for nine of the ten Greater Manchester authorities (Places for Everyone), Trafford's own Local Plan, the Community Infrastructure Levy (CIL) Charging Schedule and the monitoring of development on the ground, alongside matters of strategic transport infrastructure planning and delivery.
- 1.3. I am currently leading Trafford Council's input and support of the Examination in Public of the joint Local Plan for nine of the ten Greater Manchester authorities - Places for Everyone (PfE).
- 1.4. Over the course of my professional career, I have been heavily involved in the identification and demonstration of local authority land supply, in both public and private sector capacities. In the latter capacity, I acted on behalf of numerous house builders across the North West, and England more generally. I therefore have an extensive knowledge of the factors underpinning and contributing to land supply.
- 1.5. I hold a Masters in Town and Country Planning (MTCP) from the University of Manchester and have been a Chartered Member of the Royal Town Planning Institute (RTPI) since 2010.
- 1.6. The evidence which I have prepared and provided for this Appeal is true to the best of my knowledge and belief and has been prepared and is given in accordance with the guidance of the RTPI. I confirm that the opinions expressed are my true and professional opinions.

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2.0 SCOPE AND STRUCTURE OF EVIDENCE

- 2.1. In this proof of evidence (proof) I present the evidence for Trafford Council in response to the refusal of planning permission pursuant to Section 78 of the Town and Country Planning Act 1990 ('principal Act') by McCarthy and Stone Retirement Lifestyles Ltd (the 'Appellant').
- 2.2. The remit of this proof and my evidence contained therein extends only to matters of housing land supply within Trafford.
- 2.3. My evidence should be read in conjunction with the proofs prepared by:
- **Elisabeth Lewis BA (Hons) DIP TP (Conservation) MRTPI**, Heritage & Urban Design Manager at Trafford Council, who will give evidence on heritage and design (reason for refusal 1).
 - **Sarah Lowes BA (Hons) in Human Geography and MA in Planning Policy and Practice**, Major Planning Projects Manager Planning and Development at Trafford Council, who will give evidence on design and street scene (reasons for refusal 2 and 3).
 - **Cormac McGowan BSc (Hons) in Town and Regional Planning**, Major Planning Projects Officer, Planning and Development at Trafford Council, who will give evidence on general planning matters, external amenity space and adverse impact of amenity of residential occupants (reasons for refusal 4 and 5).
 - **Murray Lloyd, Director at Continuum**, who will give evidence on viability and affordable housing provision (reason for refusal 6).
- 2.4. The remainder of this proof is structured as follows:
- Section 3 sets out the historical and current land supply position(s) within Trafford.
 - In section 4, I provide an assessment of the emerging housing land supply in Trafford, for illustration purposes.
 - In section 5, I summarise the latest positions in respect of the Trafford's current Five-Year Housing Land Supply and the emerging land supply. This section should be read as a summary of my proof.
 - Appendices are headed, to be filed under section 6. They are provided herewith the electronic version of this proof.

- 2.5. This proof of evidence has been prepared having regard to The Planning Inspectorate's Procedural Guide: Planning appeals – England (April 2022).
- 2.6. This proof has also been prepared having regard to the Inspector's pre and post Case Management Conference ('CMC') notes.

3.0 HOUSING LAND SUPPLY

3.1. This section sets out the historical and current land supply position(s) within Trafford.

Historical Five-Year Housing Land Supply Positions

3.2. Trafford has been unable to demonstrate a deliverable five-year housing land supply since 2014, and the situation has been exacerbated since the introduction of the Local Housing Need Target and Housing Delivery Test. Reaching an all-time low point in 2020, with only a 2.4-year supply.

3.3. Significant efforts by the Council have been made since that point, resulting in a steady upward trajectory, culminating in the current second highest land supply position of 3.85 years, since 2014.

3.4. The above evolution is set out in the following table for ease of reference, and context.

Table 3.1: Historical Five-Land Supply Positions

Year (as at 31st March)	Source of target	Total target 5 yr land supply	Identified 5 yr land supply	No. Years supply
2012	LDF Core Strategy Policy L1 + HGP	3,470	4,346	6.2
2013	LDF Core Strategy Policy L1 +HGP	3,470	4,493	6.5
2014	Core Strategy Policy L1 + Shortfall (08/09-13/14) + HGP + 20% NPPF Buffer	6,697	4,272	3.2
2015	Core Strategy Policy L1 + Shortfall (08/09-14/15) + HGP + 20% NPPF Buffer	7,037	4,173	3
2016	Core Strategy Policy L1 + shortfall (08/09-15/16) + HGP + 20% NPPF Buffer	7,230	4,301	3
2017	Core Strategy Policy L1 + shortfall (08/09-16/17) + HGP + 20% NPPF buffer	7,535	5,947	3.9
2018	Core Strategy Policy L1 + shortfall (08/09-16/17) + HGP + 20% NPPF buffer	7,622	4,239	2.8
2019	LHN Target (1,362) 2019-2024 + 20% NPPF buffer	8,172	4,550	2.8
2020	LHN Target (1,369) 2020-2025 + 20% NPPF buffer	8,214	3,870	2.4

Year (as at 31st March)	Source of target	Total target 5 yr land supply	Identified 5 yr land supply	No. Years supply
2021	LHN Target (1,377) 2021-2026 + 20% NPPF buffer	8,262	4,273	2.58
2022	LHN Target (1,407) 2022-2027 + 20% NPPF buffer	8,442	6,328	3.47
2023	LHN Target (1,407) 2023 – 2028 + 20% NPPF Buffer	8,442	6,592	3.85

3.5. Notwithstanding the great strides taken by the Council to influence and improve the supply of housing land Trafford, it should be noted that in my opinion, the lack of an identifiable five-year housing land supply arises not from any failure of the Council to allocate sufficient land or to grant permission when applications are made. As will be evidenced later in this proof, the Council is granting a sufficient number of residential planning approvals to meet identified needs (see paragraph 3.21 for details). Consequently, there is no shortage of land in Trafford, no actual shortage of land supply for housing and no impediment to delivery.

3.6. This is demonstrated in the existing (urban) land supply identified in Table 7.1 of the Places for Everyone plan (page 167 Composite version). For ease, I provide an extract in the table below in relation to the figures for Trafford.

Table 3.2: Extract from Table 7.1 of Places for Everyone (Main Modifications Consultation 2023) – ‘Sources of Housing Land Supply to 2039’

	Strategic Housing Land Availability Assessment: Brownfield land	Strategic Housing Land Availability Assessment: Greenfield land	Strategic Housing Land Availability Assessment: Mix brownfield land and greenfield land
Trafford	14,716	2,465	825
Total	18,006		

3.7. The inherent problem is (largely) unrealistic expectations of land values and thus landowners holding back until the Council agrees to give way on matters such as density, infrastructure and affordable housing contributions.

3.8. In the last two to three years, the Council has focused on the real cause of the problem and has actively engaged with landowners to ensure that their sites are brought forward (via CPO if necessary) and challenged the prevailing narrative on land values. The Council has pushed back on unrealistic

assumptions of land value holding back S.106 negotiations and approval of reserved matters.

- 3.9. The Council has also entered into significant joint venture arrangements with private sector partners to bring forward its own landholdings, acquiring with those partners land for residential development. This is starting to have effect. The recent robust stance of the Council has been reflected in much improved delivery, assisted, it is acknowledged, by favourable market conditions, and an improved quality of schemes coming forward as planning applications.
- 3.10. In this regard, it should be noted that several recent appeals for residential development have been dismissed, despite the lack of a five-year housing land supply, including:
- Barton Road (Appeal Reference APP/Q4245/W/22/3293093)
 - Former B&Q inquiry (Appeal Reference APP/Q4245/W/20/3258552)
 - Seymour Grove (Appeal Reference APP/Q4245/W/22/3301467)
 - Pelican Inn and Motel (Appeal Reference APP/Q4245/W/22/3296154)
- 3.11. Copies of these appeal decisions are provided at Appendix 3.

The Current Five-Year Housing Land Supply Position

- 3.12. As of 16 October 2023, Trafford Council can demonstrate a 3.85-year housing land supply, the detail of which is set out in Appendix 1. This is an improvement from the position in 2022, which was 3.47.
- 3.13. Being in such close proximity to the centre of Manchester, much of the supply within Trafford is comprised of large-scale complex schemes (e.g., Trafford Waters), requiring substantial and prolonged phasing, with reserved matters coming forward at an ad-hoc pace. It should be noted therefore, that the Council's current five-year housing land supply is an artificially deflated figure which represents a snapshot in time.
- 3.14. Notwithstanding the above, circumstances are changing, and schemes are coming forward into reserved matters and as full applications, and these will be entering the supply in the coming months, as illustrated in table 4.1 of this proof.
- 3.15. Despite the overall improving land supply position, the sites included in the supply (and more pertinently, not included) have still been approached with rigour and a degree of caution. There are a number of significant schemes which have not been included in the land supply, that the Council is aware of

which developers are very keen to bring forward and will likely come into the supply in the next 12-24 months.

- 3.16. The land supply does not, therefore, give the true picture of an improving situation as developers adopt more realistic land value and development potential expectations leading to a virtuous circle of more appropriate permissions being delivered with the infrastructure and affordable housing they require, together with the Council's own intervention in the market bringing forward significant numbers of new homes. Thus, the land supply does not yet give the true picture of the improving situation on the ground.
- 3.17. The five-year housing land supply shortfall should therefore be given less weight in the planning (tilted) balance than would be the case if the problem arose from lack of land or refusal of the Council to grant appropriate permissions.
- 3.18. In this regard, it should be noted that whilst the full impact of the Covid 19 pandemic on the delivery of housing in Trafford is still being fully understood, the short-term housing completions have continued to improve. As shown in Table 3.3, completions in Trafford in 2020/2021 were in fact at the highest since the adoption of the Core Strategy; with 2022/2023 completions demonstrating the start of an anticipated repeating pattern of high housing delivery.

Table 3.3: Trafford's Housing Completions 2013/14 – 2021/22

Year	Housing requirement (Net) ¹	Housing completions (Net)
2013/14	694	145
2014/15	694	215
2015/16	694	361
2016/17	694	250
2017/18	694	468
2018/19	1,335	953
2019/20	1,362	689
2020/21	1,369	1,081
2021/22	1,377	501
2022/23	1,407	939
2023/24 ²	1,407	353

- 3.19. In the three-year period prior to the current monitoring period, i.e., 2017/2018 to 2019/2020 there were 2,110 homes built, compared to 2,521 built between 2020/2021 to 2022/2023 which is an 119% increase.

¹ 2013/14 – 2017/18 based on Trafford's Core Strategy housing target

² 2023/2024 – Correct at end of Q1 2023 – Q2 – Q4 completions not included/ available

- 3.20. The increase in delivery over recent years has been predominantly focused on small to medium size sites, which has in part been aided by the identification (and removal) of barriers to development through the 'housing tracker' operated by the Growth, Communities & Housing Service, including the monitoring of stalled development sites with planning permission.
- 3.21. Additionally, and of significant note in increasing the housing delivery rate in Trafford, the Council is itself leading the way, demonstrating to the market that planning policy compliant, exemplar schemes are capable of being viably delivered. Through its property and development portfolio the Council is delivering its own schemes through Joint Ventures (JVs) or with development partners. The Planning & Development and Growth, Communities & Housing Services are involved from the outset with the schemes, advising on planning policy requirements and assisting with the design process to ensure that the schemes brought forward reflect the Council's aspirations.
- 3.22. Moreover, the recent uplift in completions can be directly linked to the Council's deliberate actions to increase the numbers of residential permissions granted which between 01 April 2018 and 31 March 2023 totalled 13,741 equating to annual residential approvals of c. 3,400 units. The current, upward adjusted LHN per annum is 1,688 (including a 20% buffer for under delivery). The Council is therefore granting almost twice as many (49% more) permissions to meet supply, even if a substantial non-implementation allowance is applied.
- 3.23. Together, these measures are leading to a continuously improving delivery rate in the borough, tripling over the past 9 years, with the three-year average increasing as follows:
- 2014/15 – 2016/17 – 275 homes per annum
 - 2017/18 – 2019/20 – 703 homes per annum
 - 2020/21 – 2022/23 – 840 homes per annum
- 3.24. This unremitting increase in delivery has resulted in the Housing Delivery test (HDT) measurement for Trafford increasing from 58% in 2019, to 61% in 2020 and most recently 79% in 2021.
- 3.25. All the above trends, culminated in the Inspector for the Former B&Q inquiry (Appeal Reference APP/Q4245/W/20/3258552) stating that:

197. "... there has been an upward trajectory of new homes being delivered in Trafford in recent years with the Council no longer falling into the 'presumption' category compared to the 2020 HDT. This is due to the action that the Council has taken and continues to take to address the shortfall through its Action Plan. It appears to be doing everything it

can in this regard. The Council is granting more permissions than the housing requirement and taking other proactive steps”.

Makeup of the Five-Year Housing Land Supply

3.26. Paragraph 68a of the NPPF requires Local Planning Authorities to identify a supply of ‘specific, deliverable sites for years one to five of the plan period’.

3.27. Annex 2 of the NPPF provides the following definition of ‘deliverable’:

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

3.28. In other words, sites with planning permission for minor residential development (less than 10 dwellings) and ALL sites with detailed planning permission (full and reserved matters) are considered deliverable until the expiration of the permission, unless there is clear evidence to the contrary.

3.29. It follows therefore, that in the absence of any substantive evidence to the contrary, sites which fall into this category (Category A) are by definition of the Framework, deliverable.

3.30. All other sites within the supply, should only be considered where there is clear evidence that housing completions will start within five years.

3.31. Paragraph: 007 Reference ID: 68-007-20190722 of the PPG, sets out that such sites may include those which:

- have outline planning permission for major development;
- are allocated in a development plan;

- have a grant of permission in principle; or
 - are identified on a brownfield register
- 3.32. Paragraph 007 of the PPG also provides the type of evidence that may be used to demonstrate deliverability, including:
- Current planning status and associated application progress
 - Firm progress towards submission of an application – confirmed in writing with the developer
 - Firm progress with site assessment work; or
 - Clear and relevant information about site viability, ownership constraints or infrastructure provision – including successful participation in bids
- 3.33. The use of ‘or’ within each list stipulates that only one of the items is relevant for a site to be considered deliverable.
- 3.34. It is on this basis upon which Trafford’s five-year housing land supply is calculated and evidenced, the outputs of which are summarised in Table 3.4 below.

Table 3.4: Summary of Supply in NPPF ‘Deliverable’ Categories

NPPF Category A/B Sub Category	Sum of <5 Years
A. Detailed Consent	4,244
A. Minor Approval	417
B. Allocated Site	160
B. Full Application Submitted	698
B. Identified on Brownfield Register	208
B. Other	366
B. Outline Application Submitted	413
Grand Total	6,506

- 3.35. Additional evidence (as outlined in Paragraph 007 of the PPG) is therefore only required to demonstrate the deliverability of the 1,845 (28% of the five year supply) units in Category B.
- 3.36. The sites that comprise this element of the supply are listed in Table 3.5 below for ease of reference.

Table 3.5: Category B Sites

	Category B Sites	5 Yr Supply
1	STRETFORD MALL, CHESTER ROAD	250
2	THE SQUARE, TOWN SQUARE, SALE, M33 7WZ	202
3	WHARFSIDE, TRAFFORD PARK	200
4	CIVIC QUARTER AAP	160
5	PETROL STATION AND ADJ LAND AT 499 CHESTER ROAD, M16 9HF	160
6	LAND OFF BOLD STREET, OLD TRAFFORD, M15 5PW	120
7	WORLD OF PETS, THORLEY LANE, TIMPERLEY, WA15 7PJ	116
8	NEW STREET, ALTRINCHAM (ALBERT COURT, LLOYD COURT AND CHAPEL COURT)	104
9	94a TALBOT ROAD, OLD TRAFFORD	102
10	CHESTER HOUSE, 1 BOYER STREET, STRETFORD, M16 0RE	100
11	CLARENDON HOUSE, STAMFORD NEW ROAD, ALTRINCHAM, WA14 1BY	68
12	39 TALBOT ROAD, OLD TRAFFORD	68
13	STRETFORD MEMORIAL HOSPITAL, SEYMOUR GROVE, M16 0DU	40
14	BRIDGE WORKS, 2 BRIDGEWATER EMBANKMENT, ALTRINCHAM, WA14 4RL	32
15	PELICAN INN AND HOTEL, 350 MANCHESTER ROAD, ALTRINCHAM, WA14 5NH	30
16	SALE MASONIC HALL / SALE POLICE STATION	30
17	ROBIN HOOD HOTEL, 125 BARTON ROAD, STRETFORD	15
18	LAND OFF SHAW ROAD, URMSTON	12
19	2-8 KINGSWAY, ALTRINCHAM, WA14 1PJ	9
20	LAND AT STOKOE AVENUE	8
21	475 AND 477 BARTON ROAD, STRETFORD, MANCHESTER, M32 9TA	6
22	ERLES DENE, GREEN WALK, BOWDON	5
23	DAVENPORT GREEN HALL, SHAY LANE, HALE BARNS, WA15 8UD	3
24	16 MARKET STREET, ALTRINCHAM, WA14 1QB	3
25	71 CROSS STREET, SALE, M33 7HF	1
26	65 - 65A ROSENEATH ROAD, URMSTON, MANCHESTER, M41 5AY	1
	Total Supply Contribution	1,845

3.37. The Council's evidence to demonstrate that the above sites (in particular) are deliverable, is provided at Appendix 2. I am satisfied that these sites are therefore deliverable as per the definition(s) and purpose(s) of the NPPF.

Summary

3.38. As of 16 October 2023, Trafford Council can demonstrate a 3.85-year housing land supply. This is an improvement from the position in 2022, which was 3.47.

- 3.39. Sufficient evidence to demonstrate the deliverability of relevant sites within the five-year land supply in accordance with the definition(s) and purpose(s) of the NPPF and PPG has been provided in Appendix 2 of this proof.
- 3.40. The lack of an identifiable five-year housing land supply arises not from any failure of the Council to allocate sufficient land or to grant permission when applications are made, but from a failure of major landowners to bring forward development or to apply for reserved matters in a timely fashion. Instead choosing to engage in land speculation. There is no shortage of land in Trafford, no actual shortage of land supply for housing and no impediment to delivery.
- 3.41. This is demonstrated in the existing (urban) land supply identified in Table 7.1 of the Places for Everyone plan which demonstrates a supply of some 18,006 dwellings over the plan period, along with a number of significant schemes (not included in the land supply), that the Council is aware of, which developers are very keen to bring forward and will likely come into the supply in the next 12 months.
- 3.42. Notwithstanding the current position, the situation in Trafford is improving, thanks in part to the Council's interventions and implementation of its Housing Delivery Test Action Plans. This upward trend is illustrated through an improving delivery rate in the borough, alongside a corresponding increase in the HDT measurement for Trafford to 79% in 2021, up from 58% in 2019.

4.0 THE EMERGING LAND SUPPLY POSITION

- 4.1. As demonstrated in the previous sections of this proof, the housing land supply position in Trafford is an improving situation, largely due to the Council's assertive actions in bringing forward sites into the supply, ensuring that they can be delivered.
- 4.2. The current improved position of the land supply is due to sites quickly and consistently entering the supply, which is anticipated to continue and accelerate. These positive strides forward are due to the significant successful advancements in plan-making in Trafford most notably via the Civic Quarter AAP and Places for Everyone joint Local Plan, as well as the proactive identification and enablement of sites, whose future progress is already known and understood.
- 4.3. Nevertheless, the 3.85-year figure is still put together with a significant degree of caution. It does not simply insert every potential available site in the Borough into the supply, nor does it suggest unrealistic rates of delivery, including where outline applications have been granted which will be delivered over several phases.
- 4.4. Instead, it applies a conservative approach to the capacity of sites, with reasonable and contextual densities utilised. Despite the significant advancement of the Places for Everyone joint Local Plan, the supply also does not include any sites from future potential Green Belt release, even though regular detailed discussions regarding the two proposed allocations in Trafford are ongoing, with applications being prepared for submission in later this year and/or immediately after (potential) adoption in 2024.
- 4.5. Taking these facts into account, there several sites that have been deliberately and purposefully excluded from the supply, which are expected to come forward in the next 12 – 24 months.
- 4.6. Consequently, it is appropriate to illustrate the full potential of the land supply in Trafford, which has not been included within the relatively cautious approach taken. This illustrative assessment, which includes the additional land supply in the Strategic Locations (SL1-5) of the Core Strategy is outlined in the Table 4.1 below.

Table 4.1: Illustrative Five-Year Housing Land Supply

Site	Units in 5 yr HLS (potential delivery in 5 years)	Units in 6-15 HLS
SL1 – Pomona		
Pomona	350	2,203
SL2 – Wharfside		
Wharfside Way A	400	150
Wharfside Way B	300	500
Metrolink	300	531
SL3 – Civic Quarter		
Centrica	0	250
SL4 – Trafford Centre Rectangle		
Trafford Waters	450	800
SL5 – Carrington		
Wain Homes RM Approved	177	
Wain Homes Phase 5	148	303
Others		
Altair	59	393
Grafton Centre	60	
Hale Road	20	
Empress	50	
Chester Road	60	
Places for Everyone Proposed Allocations		
Timperley Wedge (JPA 3.2)	240	1,546
New Carrington (JPA 33)	942	3,206
Additional Sites Supply	3,556	
Current Five-Year HLS	6,506	
Total Supply	10,062	
LHN + 20% Buffer	1,688	
Five-Year HLS with additional sites	5.96	

- 4.7. Each of these sites is identified through discussions with developers or landowners where there is known interest in bringing them forward.
- 4.8. These sites coming forward into the supply in the next 12-24 months would yield a land supply of 5.96 years.
- 4.9. As set out previously, the Places for Everyone joint Local Plan will (among other things) establish the minimum housing requirements for districts in the Plan. These will replace the Local Housing Need figures.

- 4.10. For Trafford, the PfE average annual housing requirement is 1,112. Were the current five-year housing land supply of 6,506 to be applied to this target, Trafford would be able to demonstrate a 5.85-year land supply. In applying the additional sites identified above to the supply, the Council would be able to demonstrate an 9.05-year land supply.
- 4.11. Although the Council does not directly rely on either the additional sites figure or the PfE figure in this appeal, it demonstrates that there is a direction of travel in which the Council will be able to clearly demonstrate a five-year housing land supply within 12-24 months and a more than adequate supply of housing land thereafter.
- 4.12. It is also telling that if the former Greater Manchester Spatial Framework (now PfE), had progressed as originally anticipated (and which did not progress for reasons unrelated to Trafford), Trafford would now have a five- year housing land supply.

Summary

- 4.13. The housing land supply position in Trafford is an improving situation, largely due to the Council's assertive actions in bringing forward sites into the supply, ensuring that they can be delivered.
- 4.14. The current housing land supply position of 3.85 years has been composed with a significant degree of caution. It does not simply insert every potential available site in the Borough into the supply, nor does it suggest unrealistic rates of delivery. Instead, it applies a conservative approach to the capacity of sites, with reasonable and contextual densities utilised. Despite the advancement of the Places for Everyone joint Local Plan, and these appeal proposals, the supply also does not include any sites from future potential Green Belt release.
- 4.15. Were a more liberal approach to the supply adopted, the Council would be able to demonstrate a land supply of 5.96 years.
- 4.16. Were the current five-year housing land supply of 6,506 to be applied to the minimum housing target set out in PfE, Trafford would be able to demonstrate a 5.85-year land supply, increasing to 9.05 years if the additional sites were added to the supply.
- 4.17. Consequently, and for illustration and context purposes only, if the former GMSF, now PfE, had progressed as originally anticipated, Trafford would now have a five-year housing land supply.
- 4.18. The lack of a five-year housing land supply is therefore a short-term problem, rather than a failure of the Council and/or its partners to deliver necessary

infrastructure improvements or to maximise the full potential of residential allocations, which would conversely give rise to a long-term and permanent harm.

5.0 SUMMARY AND CONCLUSIONS

- 5.1. This proof of evidence draws on my experience of leading Trafford's Strategic Planning and Growth Team since May 2021 taken together with extensive previous professional experience in both the public and private sectors.
- 5.2. My evidence extends only to matters of housing land supply within Trafford.
- 5.3. General planning matters, heritage and viability considerations (among others) are dealt with in colleagues' proofs of evidence.

Trafford's Housing Land Supply

- 5.4. As of 16 October 2023, Trafford Council can demonstrate a 3.85-year housing land supply. This is an improvement from the position in 2022, which was 3.47. Despite this continuous improving picture, the presumption in favour of sustainable development (the tilted balance) therefore applies and paragraph 11.d(ii) of the Framework is engaged.
- 5.5. The lack of an identifiable five-year housing land supply arises not from any failure of the Council to allocate sufficient land or to grant permission when applications are made. As evidenced in this proof, the Council is granting enough residential planning approvals to meet identified needs.
- 5.6. Consequently, there is no shortage of land in Trafford, no actual shortage of land supply for housing and no impediment to delivery.
- 5.7. This is demonstrated in the existing (urban) land supply identified in Table 7.1 of the Places for Everyone plan which demonstrates a supply of some 18,006 dwellings over the plan period, along with a number of significant schemes (not included in the land supply), that the Council is aware of, which developers are very keen to bring forward and will likely come into the supply in the next 12 months.
- 5.8. Notwithstanding the current position, the situation in Trafford is improving, thanks in part to the Council's interventions and implementation of its Housing Delivery Test Action Plans. This upward trend is illustrated through an improving delivery rate in the borough, alongside a corresponding increase in the HDT measurement for Trafford to 79% in 2021, up from 58% in 2019.
- 5.9. Thus, the current land supply does not yet give the true picture of the improving situation, and the beginnings of a long overdue shift in the land market in the borough which has arisen as a result of the Council's assertive action.

- 5.10. The deficit in housing land supply should therefore be given less weight in the planning balance than if it had arisen as a result of the Council not allocating sites or not granting sufficient planning permissions.

The Emerging Land Supply

- 5.11. The housing land supply position in Trafford is an improving situation, largely due to the Council's assertive actions in bringing forward sites into the supply, ensuring that they can be delivered.
- 5.12. The current housing land supply position of 3.85 years has been composed with a significant degree of caution. It does not simply insert every potential available site in the borough into the supply, nor does it suggest unrealistic rates of delivery. Instead, it applies a conservative approach to the capacity of sites, with reasonable and contextual densities utilised. Despite the advancement of the Places for Everyone joint Local Plan, the supply also does not include any sites from future potential Green Belt release.
- 5.13. Were a more liberal approach to the supply adopted, the Council would be able to demonstrate a land supply of 5.96 years.
- 5.14. Were the current five-year housing land supply of 6,506 to be applied to the minimum housing target set out in PfE, Trafford would be able to demonstrate a 5.85-year land supply, increasing to 9.05 years if the additional sites were added to the supply.
- 5.15. Consequently, and for illustration and context purposes only, if the former GMSF, now PfE, had progressed as originally anticipated, Trafford would now have a five-year housing land supply.
- 5.16. The lack of a five-year housing land supply is therefore a short-term problem, rather than a failure of the Council and/or its partners to deliver necessary infrastructure improvements or to maximise the full potential of residential allocations, which would conversely give rise to a long-term and permanent harm.
- 5.17. In light of the improving situation and assertive, proactive actions of the Council, less weight should also be given to the assumption that the site would contribute to the Council's shortfall in housing land.