



**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

**SUMMARY 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 at Trafford council. I have 15 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 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.

2.0 SUMMARY AND CONCLUSIONS

- 2.1. 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.
- 2.2. My evidence extends only to housing land supply within Trafford.
- 2.3. General planning matters, heritage and viability considerations (among others) are dealt with in colleagues' proofs of evidence.

Trafford's Housing Land Supply

- 2.4. 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.
- 2.5. 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.
- 2.6. Consequently, there is no shortage of land in Trafford, no actual shortage of land supply for housing and no impediment to delivery.
- 2.7. 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.
- 2.8. 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.
- 2.9. 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.

Make-Up of the Five-Year Housing Land Supply

- 2.10. Deliverable sites as required by paragraph 68a of the NPPF, are defined in Annex 2 of the Framework with examples set out in Paragraph: 007 Reference ID: 68-007-20190722 of the PPG.
- 2.11. Together, these sets out that 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.
- 2.12. All other sites within the supply, should only be considered where there is clear evidence that housing completions will start within five years.
- 2.13. 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

- 2.14. 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.
- 2.15. 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

2.16. 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.

The Emerging Land Supply

2.17. 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.

- 2.18. 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.
- 2.19. Were a more liberal approach to the supply adopted, the Council would be able to demonstrate a land supply of 5.96 years.
- 2.20. 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.
- 2.21. 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.
- 2.22. 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.
- 2.23. 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.