



Draft Statement of Common Ground
Harlex (RLP Timperley) LLP

WORLD OF PETS AND
LEISURE, THORLEY LANE,
TIMPERLEY
WA15 7PJ

September 2022

Our Ref: 18-01961

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1 INTRODUCTION

- 1.1 This Draft Statement of Common Ground has been prepared on behalf of Harlex (RLP Timperley) LLP ('Appellant') to support an appeal against the refusal of Planning Application Ref: 105905/OUT/21 for the following description of development, which the parties agree accurately describes the proposals:

'Outline planning application for up to 116no. residential dwellings with all matters reserved aside from access, for which detailed consent is sought.'

- 1.2 This draft statement addresses the following areas of common ground between the Appellant and Trafford Metropolitan Borough Council ('Council'):

- Description of the site and surrounding area;
- Site planning history;
- Adopted and emerging Local Planning Policy; and
- Matters agreed.

- 1.3 In addition, this draft statement sets out details of matters which are subject of specific disagreement.

- 1.4 This draft statement should be read alongside the Planning Statement of Case and other submitted documentation.

- 1.5 It has been provided in draft as required. The Appellant will work with the Council to agree the statement of common ground at an early stage of the appeal process.

2 DESCRIPTION OF THE SITE AND SURROUNDINGS

THE SITE

- 2.1 The parties agree the following description of the site and surroundings:
- 2.2 The appeal site is located to the west of Thorley Lane (A5144) and to the south of Wood Lane within the administrative area of Trafford Council.
- 2.3 The site is approximately 2.9ha / 7.2 acres in size and is a mix of brownfield and greenfield land. The site is in the single freehold ownership of the Appellant.
- 2.4 The existing use of the site comprises the World of Pets and Leisure unit, the World of Water Aquatic Centre unit, car parking, storage areas and associated landscape areas. The site is accessed from two existing points, Thorley Lane (A5144) on the eastern boundary and Wood Lane on the northern boundary.
- 2.5 The site is of generally flat topography and is not subject to any Tree Protection Orders.
- 2.6 The existing lawful use of the site is Use Class E - Commercial Business and Service. The existing buildings on site have floor areas of 1,287 sq.m, 863 sq.m, 267 sq.m, and 72 sq.m. The total volume of the existing built form on site equates to 7,418.82 m3.
- 2.7 A large proportion of the site (3.27 acres of the 7.2 acre site area) is previously developed brownfield land.
- 2.8 The site is not allocated for any specific use within the adopted Development Plan. However, the site is currently located within the designated Green Belt. In addition, the southern part of the site is allocated as part of a Wildlife Corridor.
- 2.9 The site is located within a Critical Drainage Area as specified within the Council's Strategic Flood Risk Assessment, albeit the site is located within Flood Zone 1 (low probability of flooding).
- 2.10 The site has been identified for removal from the Green Belt through the Greater Manchester Spatial Framework (GMSF) in all consultation stages since the first draft consultation, which took place in 2016.
- 2.11 The site continues to be identified for removal from the Green Belt in the draft Places for Everyone: Publication Plan which was submitted to the Secretary of State for Examination on 14th February 2022.
- 2.12 The site's removal from the Green Belt is supported by the Council.

SURROUNDINGS

- 2.13 The immediate surrounding area is characterised by residential uses, located to the north and east off Wood Lane, and to the west off Green Lane.
- 2.14 The area to the south and east contains garden centres/nurseries. Timperley Brook borders the site to the south. Altrincham Town Centre is located approximately 2.5km from the site. There are several bus-stops in proximity to the site providing services into Altrincham and Timperley.
- 2.15 The site is bound by residential development on two sides (north and west boundaries), Timperley Brook to the south and Thorley Lane on the eastern boundary.
- 2.16 The key facilities accessible within 500m walking catchment include local shops along Wood Lane to the west of the site such as a veterinarian, hot food takeaway, kitchen/bedroom/bathroom designers, local culinary / baking food studio, hair salon, photo

lab and a dry cleaner's. These facilities are defined within the Unitary Development Plan as a Local and Neighbourhood Shopping Centre.

- 2.17 This 500m catchment also includes a florist, children's nursery, garden centre and place of worship to the north of the site, and a village hall and garden nursery to the east of the site. There is also another garden centre to the south of the site.
- 2.18 There are bus stops along Wood Lane accessible within a 500m distance of the site.
- 2.19 A 1,000m walking catchment around the site includes schools such as Cloverlea Primary School, Altrincham College and Sixth Form, Bromwood Primary School, and a children's art club. There are also amenities such as a public house, convenience stores and hot food takeaways along the A560 Stockport Road, a Tesco Express and post office at Broomwood Local and Neighbourhood Shopping Centre located off Mainwood Road to the north.
- 2.20 There are other facilities within a 1,000m walking catchment of the site such as Timperley Sports Club, Hale Country Club & Spa, Bowdon Rugby Club, places of worship, retirement homes, Manor Park Farm, and several allotments.
- 2.21 A 2,000m walking catchment includes additional convenience stores to the north at Timperley Town Centre and northwest at Shaftesbury Avenue defined Local and Neighbourhood Shopping Centre, as well as recreational facilities such as Altrincham Golf Course, Heyes Grove Tennis Club, Altrincham & District Athletics Club, Altrincham Kersal Rugby Football Club, a scout hall, and Altrincham Football Club and Community Sports Hall.

3 RELEVANT PLANNING HISTORY

3.1 The parties agree that the site's relevant planning history is as summarised within Table 1 below.

Table 1: Planning History

Reference	Description	Decision	Decision Date
H19063	Application for Established Use Certificate for the Storage of Caravans.	Approved	February 1984
H25300	Erection of Bungalow for Occupation by Proprietor of the Nurseries.	Refused	July 1987
H26747	Change of Use of Part of Site from Market Garden to Storage Area for Caravans	Undetermined	May 1988
H28756	Use of Part of Nurseries for the Display of Conservatories for Sale.	Refused	April 1989
H33244	Alterations to Access to Thorley Lane.	Refused	June 1991
H41710	Retention of Earth Embankments to Part of Thorley Lane. Frontage to Boundary with Fairywell Brook & Along the Common Boundary With 21 & 23 Green Lane. Erection Of 2.4m High Security Fence to Part of Thorley Lane Frontage and Landscaping of Embankments.	Approved	April 1996
H44856	Erection of A Metal Framed Canopy Structure to Form Additional Plant Display and Retail Area.	Refused	February 199.
75590/CLEUD/2010	Application for Certificate of Lawfulness for existing use of the site for retail sales (Use Class A1).	Appeal Withdrawn	September 2010
76696/CLEUD/2011	Application for Certificate of Lawfulness for existing use of the site for retail sales (Use Class A1).	Approved	November 2011

77607/CLEUD/2011	Application for Certificate of Lawfulness for existing use of site for retail sales (Class A1).	Approved	December 2011
78180/FULL/2012	Alterations to sales building including timber cladding of existing elevations and installation of new windows and doors.	Approved	April 2012
89944/OUT/16	Outline application for the erection of 23 dwellings.	Refused	February 2017
106043/EIASC/21	Request for a screening opinion in respect of outline planning application for up to 116no. residential dwellings with all matters reserved aside from access, for which detailed consent is sought.	EIA Not Required	November 2021
105905/OUT/21	Outline planning application for up to 116no. residential dwellings with all matters reserved aside from access, for which detailed consent is sought.	Refused	March 2022

- 3.2 The parties agree that the lawful use of the site is Use Class E - Commercial, Business and Service.
- 3.3 The parties agree that the site's lawful use was established by the lawful development certificate with reference 77607/CLEUD/2011, which confirmed the exiting use of the site for retail sales (Class A1) and was granted in December 2011.
- 3.4 The parties agree that Use Class A1 was subsumed into Use Class E on 1st September 2020. The site's lawful use therefore becomes Use Class E.
- 3.5 The parties agree that under the site's existing lawful use (Use Class E) it could be operated / occupied on the following basis:
- E(a) Display or retail sale of goods, other than hot food
 - E(b) Sale of food and drink for consumption (mostly) on the premises
 - E(c) Provision of:
 - E(c)(i) Financial services,
 - E(c)(ii) Professional services (other than health or medical services), or
 - E(c)(iii) Other appropriate services in a commercial, business or service locality
 - E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms or use as a swimming pool or skating rink,)

- E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
- E(f) Creche, day nursery or day centre (not including a residential use)
- E(g) Uses which can be carried out in a residential area without detriment to its amenity:
 - E(g)(i) Offices to carry out any operational or administrative functions,
 - E(g)(ii) Research and development of products or processes
 - E(g)(iii) Industrial processes.

3.6 The planning application to which the appeal relates was validated by Trafford Council on 1st October 2021. The planning application was refused by Trafford Council, with the Decision Notice dated 10th March 2022.

3.7 The Decision Notice includes one reasons for refusal which is as follows:

“The proposed development is located within the Green Belt where there is a presumption against inappropriate development. The proposed development provides for the erection of new buildings, but is not considered to be one of the exceptions listed in Paragraph 149 of the NPPF. Moreover, the proposed development would harm the openness of the Green Belt and would fail to safeguard against encroachment into the Green Belt, contrary to the purposes of including land within it. The applicant has failed to demonstrate that there are any very special circumstances which would outweigh the harm to the Green Belt by reason of inappropriateness and any other harm. The development is also contrary to the spatial strategy of the development plan which seeks to direct new development to sustainable locations within the urban area. As such the development is contrary to the Policies L1 and R4 of the Trafford Core Strategy and Policy C4 of the Revised Trafford Unitary Development Plan and the National Planning Policy Framework.”

3.8 The parties agree that they have worked collaboratively before and during the planning application process to ensure that all technical issues with respect to the application were resolved. This has resulted in a single reason for refusal of the application.

4 ADOPTED AND EMERGING LOCAL PLANNING POLICY

LOCAL PLANNING POLICY

4.1 The parties agree that the Development Plan for Trafford Borough Council comprises the following:

- Core Strategy (Adopted January 2012);
- Revised Unitary Development Plan (UDP) (Adopted June 2006);
- Greater Manchester Joint Waste Plan (Adopted April 2012); and
- Greater Manchester Joint Minerals Plan (Adopted April 2013).

4.2 The parties agree that the Greater Manchester Joint Waste Plan and Joint Minerals Plan are not directly relevant to the proposed development.

Core Strategy

4.3 The parties agree that the Core Strategy sets out an overarching strategy and development principles for Trafford to guide development until at least 2026. It was adopted on 26 January 2012.

4.4 The parties agree that the following policies of the Core Strategy are relevant for the purposes of the appeal:

- Policy L1 (Land for New Homes);
- Policy L2 (Meeting Housing Needs);
- Policy L4 (Sustainable Transport and Accessibility);
- Policy L5 (Climate Change);
- Policy L6 (Waste);
- Policy L7 (Design);
- Policy L8 (Planning Obligations);
- Policy R1 (Historic Environment);
- Policy R2 (Natural Environment);
- Policy R3 (Green Infrastructure);
- Policy R4 (Green Belt, Countryside and Other Protected Open Land); and
- Policy R5 (Open Space, Sport and Recreation).

4.5 The parties agree that of the above policies, the most important policies for the determination of this appeal are Policy L1 and Policy R4 of the Core Strategy.

REVISED UNITARY DEVELOPMENT PLAN (2002)

4.6 The parties agree that the following policies of the Revised Unitary Development Plan are relevant for the purposes of the appeal:

- Policy C4 (Green Belt);
- Policy ENV10 (Wildlife Corridors);
- Policy H3 (Land Release for New Housing Development); and

- Policy H4 (Release of Other Land for Development).

4.7 The parties agree that of the above policy, the most important policy for the determination of this appeal is Policy C4.

EMERGING PLANNING POLICY

Places for Everyone (Formerly Greater Manchester Spatial Framework)

4.8 Places for Everyone is a joint Development Plan Document being produced by nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). Once adopted, Places for Everyone will be the overarching Development Plan, setting the policy framework for individual district Local Plans. Places for Everyone was published for Regulation 19 consultation from 9th August 2021 to 3rd October 2021 and was submitted to the Secretary of State for Levelling Up, Housing and Communities on 14 February 2022. Inspector's have now been appointed to examine the Plan and the examination hearings are scheduled to take place from 1st November 2022 to 30th March 2023.

4.9 The parties agree that key policy within Places for Everyone which is of direct relevance to this appeal is:

- Policy JP Allocation 3.2 (Timperley Wedge)

4.10 The parties agree that draft policy JP Allocation 3.2 (Timperley Wedge) identifies the appeal site for residential development and removal from the Green Belt.

Trafford Local Plan

4.11 The Council are preparing a new Local Plan which will guide development in Trafford up to 2037. A Regulation 18 Consultation Draft was released for consultation in February 2021. The Council have stated that the Publication version of the Plan is dependent on progress with respect to Places for Everyone.

4.12 The parties agree that the key policies within the Draft Trafford Local Plan which are relevant to this appeal proposal are as follows:

- Policy AF8 (Timperley Wedge); and
- Policy HO1 (Scale, Phasing and Distribution of New Housing Development).

5 MATTERS AGREED

5.1 The agreed matters fall under the following headings:

- Green Belt;
- Housing Land Supply;
- Previously Developed Land;
- Affordable Housing;
- Design;
- Residential Amenity;
- Noise, Air Quality and Contaminated Land;
- Access, Highways, and Car Parking;
- Drainage and Flooding;
- Trees and Landscaping;
- Ecology;
- Sustainability and Energy Efficiency;
- Heritage;
- Equalities Assessment;
- Crime and Security.

GREEN BELT

5.2 The parties agree that the appeal proposal is inappropriate development in the context of Paragraph 149 of the National Planning Policy Framework.

5.3 The parties agree that the site forms part of the Places for Everyone JP Allocation 3.2 - Timperley Wedge draft site allocation policy.

5.4 The parties agree that once the Places for Everyone Plan is adopted the appeal site will be removed from the Green Belt.

5.5 The parties agree that once the Places for Everyone Plan is adopted development of the type proposed through the appeal scheme would be supported and accords with the adopted planning framework.

HOUSING LAND SUPPLY

5.6 The parties agree that the Council cannot demonstrate a 5 year housing land supply and that there is a significant need for new housing in Trafford.

5.7 The Appellant will work with the Council to seek to agree the extent of the shortfall in the Council's housing land supply position.

PREVIOUSLY DEVELOPED LAND

5.8 The parties agree that part of the appeal site is previously developed land.

5.9 It is agreed that 3.27 acres of the 7.2 acre site area is previously developed.

- 5.10 In this context, the parties agree that residential development on previously developed element of the site could be deemed appropriate development within the Green Belt under the provisions of paragraph 149 (g), which is permissive of the following:

“limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- *not have a greater impact on the openness of the Green Belt than the existing development; or*
- *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”*

- 5.11 The parties agree that the site could be occupied by an alternative Use Class E operator.

- 5.12 It is agreed that this represents a fallback position for the Appellant.

AFFORDABLE HOUSING

- 5.13 The parties agree that the development proposes to provide a fully policy compliant quantum of 45% of the residential units as affordable housing which equates to 52 units on site. It is further agreed between the parties that both the quantum of affordable housing provision (45%) and the proposed tenure split (75% intermediate: 25% affordable/social rent) is fully acceptable in planning terms.

- 5.14 The parties agree that there is a significant need for additional affordable housing in Trafford and in the Altrincham Area where the appeal site is located.

- 5.15 It is also agreed between the parties that the significant contribution that the scheme can make to affordable housing delivery in Trafford should attract very substantial weight.

DESIGN

- 5.16 The parties agree that Appearance, landscaping, layout and scale are reserved matters which the appeal proposal does not seek consent for at this stage.

- 5.17 The parties agree that the design of the scheme, based upon the information submitted as part of the planning application, is considered acceptable in principle. It is further agreed between the parties that the site could accommodate 2-3 storey development and up to 116 units.

- 5.18 The parties agree that a Design Code can be utilised with respect to the appeal site to ensure that a truly high quality scheme is delivered.

RESIDENTIAL AMENITY

- 5.19 The parties agree that the indicative masterplan submitted in support of the planning application demonstrates that the quantum of development proposed can be readily achieved across the appeal site.

- 5.20 The existing site has had a retail/commercial use for a number of years and therefore the site has been subject to the associated activity of the businesses on site in terms of comings and goings including vehicle noise.

- 5.21 The parties agree that the details of house types and final site layout will be considered at reserved matters stage to ensure no adverse impact on residential amenity would occur as a result of the development of the site for residential use.

IMPACTS ON NEIGHBOURING AMENITY

- 5.22 The parties agree that any adverse impacts from the proposed development on adjoining residential properties can be appropriately mitigated (as required) through suitably worded planning conditions.
- 5.23 The Appellant is willing to accept suitably worded planning condition which require details of the following matters to be submitted and approved by the Local Planning Authority:
- Details of any external plant noise;
 - Electric Vehicle Charging Points; and
 - External Lighting Scheme.

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN / CONSTRUCTION METHOD STATEMENT

- 5.24 The parties agree that any impacts from construction on the site can be appropriately managed and mitigated through a Construction Environmental Management Plan / Construction Method Statement to ensure impacts from construction on neighbouring residents are limited. To be secured by a suitably worded planning condition.

CONTAMINATED LAND

- 5.25 A Phase 2 contaminated land site investigation was submitted in support of the application. It is agreed between the parties that any additional site investigation required can be covered by a suitably worded planning condition.

ACCESS, HIGHWAYS, AND CAR PARKING

- 5.26 It is agreed between the parties that the two proposed access junctions will provide suitable and safe access to the proposed development.
- 5.27 It is agreed between the parties that there are no adverse impacts with regard to traffic generation, and that the development would have an acceptable highways impact in NPPF terms.
- 5.28 It is agreed between the parties that details of the final parking provision and the internal site layout would be detailed and approved at reserved matters stage and would also include provision for accessible parking.
- 5.29 The parties agree that the Appellant is committed to providing pedestrian improvements in the immediate vicinity of the appeal site. The parties agree that these measures will comprise a signalled controlled crossing on Thorley Lane near the roundabout with Wood Lane/Clay Lane and a zebra crossing on Wood Lane with associated highway works such as pedestrian refuges.
- 5.30 The parties agree that these pedestrian improvements can be secured by a suitably worded planning condition.

DRAINAGE AND FLOODING

- 5.31 The application site is located within a Critical Drainage Area as specified within Trafford Council's Strategic Flood Risk Assessment. It is agreed between the parties that the majority of the site is within Flood Zone 1 and a small area is identified as being within Flood Zone 2 alongside Timperley Brook.

5.32 A Flood Risk Assessment was submitted in support of the planning application. The Appellant has also committed to deliver SUDS as part of the final drainage scheme for the site. The submitted FRA has been reviewed by the Council's Flood Risk Officer, the Environment Agency, and United Utilities.

5.33 The parties agree that it is appropriate to impose a suitably worded planning condition requiring the submission of a drainage scheme with the reserved matters application(s).

LANDSCAPING

5.34 A preliminary Arboricultural Impact Assessment, Landscape Strategy and Masterplan were submitted in support of the application. The Appellant is committed to ensuring that a robust and well-planned landscaping scheme is integral to the development.

5.35 The parties agree that full details of both hard and soft landscaping can be addressed at the reserved matters stage and incorporated in a Design Code for the scheme. The Appellant would accept a suitably worded planning condition on this basis.

ECOLOGY

5.36 The planning application was supported by an Ecological Impact Assessment (July 2020) and also an updated Ecological Impact Assessment (July 2021). The Greater Manchester Ecology Unit raised no objections to the proposed development subject to suitably worded planning conditions being imposed with regard to protected species, nesting birds, invasive species and proximity to Timperley Brook. The Appellant is prepared to agree to such planning conditions being imposed

5.37 It is agreed between the parties that an off-site contribution in relation to Biodiversity Net Gain can be provided in the event that Biodiversity Net Gain is not achievable on the development site.

5.38 It is agreed between the parties that to the extent that any off-site contribution is required that it would be directed to one of three receptor sites which are:

- King George Pool;
- Altrincham Golf Course; or
- Davenport Green.

5.39 The parties agree that the biodiversity net gain provisions can be secured by a suitably worded planning condition/ planning obligation.

SUSTAINABILITY AND ENERGY EFFICIENCY

5.40 A Sustainability and Energy Statement is submitted in support of the proposed development.

5.41 The Appellant is willing to accept a suitably worded planning condition to ensure specific details of energy efficiency measures can be incorporated into the development. Specifically, the Appellant will accept a condition demonstrating a commitment to achieve a 19% CO2 reduction reflecting the Places for Everyone Policy JP-S 2 Carbon and Energy (Trafford's current policy seeks a 5% reduction

5.42 The parties agree that the Appellant is fully committed to delivering a low / zero carbon scheme.

HERITAGE

5.43 The parties agree that the site does not contain any designated or non-designated heritage assets.

- 5.44 The parties agree that there is a cluster of five non-designated heritage assets located to the east of the site. These assets comprise Laurel House (circa. 200m east), South View (circa. 300m east), Clay Lane Cottages (circa. 200m east), Cambridge House / Wellfield Cottages (circa. 250m east), and Oak Cottage (circa. 250m east).
- 5.45 These non-designated heritage assets and their settings are physically separated from the planning application site by both Thorley Lane and the existing built development, which sits between the planning application site and these properties.
- 5.46 The parties agree that the proposed development would not have any adverse effects on the setting or significance of these non-designated heritage assets.

EQUALITY ASSESSMENT

- 5.47 It is agreed between the parties that based upon the Equalities Statement which has been submitted in support of the proposed development that no persons with protected characteristics would be adversely impacted from an equalities perspective by the appeal proposals.

CRIME AND SECURITY

- 5.48 A Crime Impact Statement is submitted in support of the application which has been reviewed by Greater Manchester Police (GMP) Design for Security team.
- 5.49 It is agreed between the parties that the proposed development has been satisfactorily designed when having regard to the objective of minimising the potential for crime through design.
- 5.50 The Appellant would accept a suitably worded condition in relation to the reserved matters application being produced in accordance with the Crime Impact Statement.

PLANNING OBLIGATIONS

- 5.51 It is agreed between the parties that the heads of terms with respect to planning obligations will comprise the following heads agreed at committee namely:
- Affordable Housing - 45% provision (75% intermediate tenure / 25% affordable or social rented);
 - Education Contribution;
 - Electric vehicle charging spaces for public use (2);
 - On site children's play area¹;
 - A financial contribution and scheme detailing pedestrian access improvements to the Thorley Lane/Wood Lane roundabout junction; and
 - Biodiversity Net Gain provision².

¹ To be agreed whether this matter should be secured by planning condition or planning obligation

² To be agreed whether this matter should be secured by planning condition or planning obligation

6 AREAS OF DISAGREEMENT

6.1 The main areas of disagreement between the Parties are set out below.

HOUSING LAND SUPPLY

6.2 The extent of the shortfall in the housing land supply position of the Council.

6.3 At the point the appeal scheme was determined by Trafford Council, the Council considered their housing land supply position to be 4.24 years.

6.4 The Appellant considers the Council's housing land supply position to be 2.45 years.

GREEN BELT

6.5 The contribution of the appeal site to the purposes of the Green Belt.

6.6 The nature and extent of any actual harm to the Green Belt arising from the proposed development to include the nature extent and impact of the loss of openness in visual and spatial terms.

6.7 Whether the benefits of the appeal proposal, relied upon by the Appellant, clearly outweigh the harm by way of inappropriateness and any other harm such that very special circumstances exist.

6.8 The nature extent and impact of the landscape and visual impacts arising from the appeal proposal.

LOCATION OF THE APPEAL SITE

6.9 Whether the appeal site is sustainably located in terms of access to services and facilities.

6.10 The Council question the sustainability of the appeal site's location and suggest that there is a lack of public transport and services offer.

6.11 The Council considers the appeal site to be an unsustainable location.

6.12 As particularised in its highways statement of case, the Appellant consider the appeal site to be in a sustainable location, which is accessible from sustainable modes of transport, and which is located in close proximity to key local services and facilities.

PLACES FOR EVERYONE JOINT DEVELOPMENT PLAN

6.13 The weight to be attached to the emerging Places for Everyone joint Development Plan document and the emerging site allocation policy.

7

SIGNATURES

Signed on behalf of the Appellants:

Name: Jonathan Harper MA (Hons) MTCP MRTPI AssocRICS

Position: Partner, Rapleys LLP on behalf of the Appellants

Date:

Signed on behalf of Trafford Council:

Name:

Position:

Date:

DRAFT