



# **TRAFFORD COUNCIL**

## **TOWN AND COUNTRY PLANNING ACT 1990**

**Appeal by: Harlex (RLP Timperley) LLP**

**Site Address: World of Pets, Thorley Lane,  
Timperley, WA15 7PJ**

**LPA reference: 105905/OUT/21**

**PINS reference: APP/Q4245/W/22/3306715**

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

### **REGARDING THE SUBMITTED PLACES FOR EVERYONE JOINT LOCAL PLAN FOR GREATER MANCHESTER AND 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 matters of planning policy, including the weight to be attached to the submitted Places for Everyone joint Local Plan and that of housing land supply within Trafford.
- 2.3. General planning matters including impact on the Green Belt and its openness, design of the proposed development, amenity impacts and Green Belt considerations (among others) are dealt with in colleagues' proofs of evidence.

### Planning Policy Context and Places for Everyone joint Local Plan

- 2.4. The appeal site lies within the proposed allocation JPA 3.2 Timperley Wedge, part of the submitted Places for Everyone joint Local Plan. It is one of the largest proposed allocations in the plan.
- 2.5. The Places for Everyone joint Local Plan is currently undergoing examination until end of March 2023. A specific date to discuss the proposed allocation of the Timperley Wedge site under policy JPA 3.2 has been scheduled to take place on 18 January 2023; the week following this Inquiry.
- 2.6. Policy JPA 3.2 proposes to remove the appeal site and other surrounding areas from the Green Belt to facilitate the development of up to 1,700 homes and 60,000 square metres of office space between 2021 and 2037.
- 2.7. Due to the strategic and large-scale development proposed for the area, Policy JPA 3.2 states that development of the site will be required to undertake/ provide and/or contribute towards various items of infrastructure and affordable housing.
- 2.8. Due to the advanced stage of this Plan, **some weight** should be afforded to the policies contained within Places for Everyone, and the requirements set out in JPA 3.2 should be a material consideration in the determination of this appeal.
- 2.9. The appellants have been involved in the preparation of Places for Everyone for several years, responding to the relevant consultation stages, culminating most recently in a response to Matter 15 of the examination, whereby support for the plan and the proposed allocation at Timperley Wedge and its associated delivery assumptions was confirmed.

### Trafford's Housing Land Supply

- 2.10. As of 31<sup>st</sup> October 2022, Trafford Council can demonstrate a deliverable 3.47-year housing land supply. The presumption in favour of sustainable development (the tilted balance) therefore applies and paragraph 11.d(ii) of the Framework is engaged.
- 2.11. The reduction in supply from March 2022 (3.75 years), is due to a large number of completions coming from the supply, that have not yet been replaced by new schemes coming forward.
- 2.12. 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 a sufficient number of residential planning approvals to meet identified needs.
- 2.13. Consequently, there is no shortage of land in Trafford, no actual shortage of land supply for housing and no impediment to delivery.
- 2.14. 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 15,685 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.
- 2.15. 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.
- 2.16. Thus, the current land supply does not yet give the true picture of an 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.
- 2.17. 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.

### Make-Up of the Five-Year Housing Land Supply

- 2.18. 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.

- 2.19. 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.
- 2.20. All other sites within the supply, should only be considered where there is clear evidence that housing completions will start within five years.
- 2.21. 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 5.3 below.

*Table 5.3: Summary of Supply in NPPF 'Deliverable' Categories*

<b>NPPF Category A/B Sub Category</b>	<b>Sum of &lt;5 Years</b>
A. Detailed Consent	3464
A. Minor Approval	423
B. Allocated Site	160
B. Full Application Submitted	376
B. Identified on Brownfield Register	318
B. Major Outline Permission	639
B. Other	43
B. Outline Application Submitted	440
<b>Grand Total</b>	<b>5863</b>

- 2.22. Additional evidence (as outlined in Paragraph 007 of the PPG) is therefore only required to demonstrate the deliverability of the 1,976 (34%) of the five year supply) units in Category B.
- 2.23. The 12 sites that comprise this element of the supply are listed in Table 5.4 below for ease of reference.

<b>Category B Sites</b>	<b>5 Yr Supply</b>
Former Kellogg's site, Talbot Road, Stretford, M16 0PG	639
Stretford Mall, Chester Road, Stretford	440
Former Bakemark UK, Skerton Road, Stretford	180
Civic Quarter AAP	160
Land off Bold Street, Old Trafford, M15 5PW	161
Warwick Road South, Old Trafford	80
Clarendon House, Stamford New Road, Altrincham, WA14 1BY	68

<b>Category B Sites</b>	<b>5 Yr Supply</b>
Christie Road, Stretford	67
39 Talbot Road	56
Curzon Cinema, Urmston	42
Stretford Memorial Hospital, Seymour Grove, M16 ODU	40
Land East of Partington Shopping Centre, off Central Road, Partington	43
<b>Total Supply Contribution</b>	<b>1976</b>

- 2.24. The Council's evidence to demonstrate that the above sites (in particular) are deliverable, is provided at Appendix 5. I am satisfied that these sites are therefore deliverable as per the definition(s) and purpose(s) of the NPPF.

#### The Emerging Land Supply

- 2.25. 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.
- 2.26. The current housing land supply position of 3.47 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.
- 2.27. Were a more liberal approach to the supply adopted, the Council would be able to demonstrate a land supply of 5.41 years.
- 2.28. Were the current five-year housing land supply of 5,633 to be applied to the minimum housing target set out in PfE, Trafford would be able to demonstrate a 5.12-year land supply, increasing to 8.21 years if the additional sites were added to the supply.
- 2.29. 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.

- 2.30. In light of the improving situation and assertive, proactive actions of the Council, less weight should also be given to the appellant's assertion that the site would contribute to the Council's shortfall in housing land.
- 2.31. 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.