



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

**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 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.

CONTENTS

1.0	QUALIFICATIONS AND EXPERIENCE	2
2.0	SCOPE AND STRUCTURE OF EVIDENCE	4
3.0	TRAFFORD PLANNING POLICY CONTEXT	6
	Trafford's Adopted Development Plan.....	6
	Trafford's Emerging Development Plan.....	6
	The National Planning Policy Framework.....	6
	The Presumption in Favour of Sustainable Development.....	7
	Weight Ascribed to Plans and Policies	9
	Adopted Development Plan.....	9
	Emerging Development Plan.....	10
	Summary	10
4.0	PLACES FOR EVERYONE JOINT LOCAL PLAN (2021-2037) FOR BURY, BOLTON, OLDHAM, ROCHDALE, SALFORD, TAMESIDE, TRAFFORD AND WIGAN	12
	Representations to Places for Everyone by the Appellant.....	15
	Summary	16
5.0	HOUSING LAND SUPPLY	18
	Historical Five-Year Housing Land Supply Positions.....	18
	The Current Five-Year Housing Land Supply Position	20
	Makeup of the Five-Year Housing Land Supply	22
	Summary	25
6.0	THE EMERGING LAND SUPPLY POSITION	27
	Summary	29
7.0	SUMMARY AND CONCLUSIONS	31
	Planning Policy Context and Places for Everyone joint Local Plan	31
	Trafford's Housing Land Supply	32
	The Emerging Land Supply	32

APPENDICES

- Appendix 1 – Appellant Regulation 19 Representation to Places for Everyone
- Appendix 2 – Summary of Regulation 19 Representations to Policy JPA.32
- Appendix 3 – Appellant Response to Matter 15 of the Places for Everyone Examination
- Appendix 4 – Trafford Council Five Year Housing Land Supply at 31st October 2022
- Appendix 5 – Site Specific Deliverability Evidence

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 Harlex (RLP Timperley) LLP (the 'Appellant').
- 2.2. The remit of this proof and my evidence contained therein extends only to matters of planning policy in particular the weight to be attached to the submitted Places for Everyone joint Local Plan and that of housing land supply within Trafford.
- 2.3. My evidence should be read in conjunction with the proof prepared by:
 - **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 and Green Belt policy.
- 2.4. The remainder of this proof is structured as follows:
 - Section 3 sets out relevant background information and a summary of the adopted and emerging Development Plan for Trafford and relevant material considerations – focusing on those related to the submitted Places for Everyone joint Local Plan and the Five-Year Housing Land Supply and any associated weighting that I ascribe to them.
 - In section 4, I provide an overview and update on the examination of the Places for Everyone joint Local Plan, insofar as it affects the appeal proposals.
 - Section 5 sets out the historical and current land supply position(s) within Trafford, to supplement the information contained in Appendix 2 of the CMC, providing a narrative to the context.
 - In section 6, I provide an assessment of the emerging housing land supply in Trafford, for illustration purposes.
 - In section 7, I summarise the latest positions in respect of the Development Plan and submitted Places for Everyone joint Local Plan as well as 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 8. 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 TRAFFORD PLANNING POLICY CONTEXT

- 3.1. In this section I set out the relevant background information and a summary of the adopted and emerging Development Plan for Trafford and relevant material considerations – focusing on those related to the submitted Places for Everyone joint Local Plan and the Five-Year Housing Land Supply in Trafford and any associated weighting that I ascribe to them.

Trafford's Adopted Development Plan

- 3.2. The adopted Development Plan for Trafford currently comprises the:
- Trafford Core Strategy (adopted January 2012);
 - Saved policies of the Revised Trafford Unitary Development Plan (UDP) (adopted June 2006);
 - Greater Manchester Joint Waste Plan (adopted April 2012);
 - Greater Manchester Joint Minerals Plan (adopted April 2013); and
 - Altrincham Town Centre Neighbourhood Business Plan (adopted November 2017)¹

Trafford's Emerging Development Plan

- 3.3. Like many Local Planning Authorities (LPAs), Trafford is in the process of updating and replacing its adopted Development Plan, some Local Development Documents of which are at an advanced stage.
- 3.4. The emerging Development Plan for Trafford therefore comprises:
- The Civic Quarter Area Action Plan (CQAAP) (Inspectors' report finding the plan sound published 06.12.22. Adoption planned for January 2023);
 - The Places for Everyone joint Local Plan (PfE) (currently at examination until March 2023); and
 - The draft Trafford Local Plan (February 2021)

The National Planning Policy Framework

- 3.5. The National Planning Policy Framework ('NPPF'), last updated in July 2021, sets out the Government's planning policies for England and how they should be applied. It is a material consideration for decision-taking purposes and can affect the weight attached to policies of the Development Plan. It cannot,

however, alter whether there is a conflict with the Development Plan nor undermine the statutory primacy that a Development Plan holds.

3.6. Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. At Paragraph 8, this is defined as meaning that there are three overarching objectives which are interdependent and need to be pursued in mutually supportive ways: economic, social, and environmental. The NPPF goes on to state, however, that they are not criteria against which every decision can or should be judged (paragraph 9).

3.7. I am of the opinion that for the purposes of taking decisions, the policies of the NPPF should be considered as a whole (including its footnotes and annexes). However, the following paragraphs and sections are of particular and direct relevance to the appeal proposals insofar as they relate to the remit of this proof:

- Paragraphs 11 and 12 (the presumption in favour of sustainable development);
- Section 3 (Plan-making);
- Paragraphs 47 and 48 (Determining applications);
- Paragraphs 60, 61 (Delivering a sufficient supply of homes);
- Paragraphs 68, 73 (Identifying land for homes);
- Paragraphs 7 – 77 (Maintaining supply and delivery);
- Paragraph 218 (Annex 1: Implementation); and
- Annex 2: Glossary – ‘Deliverable’ and ‘Developable’

3.8. The NPPF is supported and complemented by the national Planning Practice Guidance (‘PPG’). The guidance provided by the PPG is advice on procedure and elaboration of NPPF policies rather than explicit additional policy and is an online reference as a living document. It is a material consideration alongside the NPPF and where relevant I refer to it in this proof.

The Presumption in Favour of Sustainable Development

3.9. Paragraph 11 of the NPPF directs that planning decisions should apply a ‘*presumption in favour of sustainable development*’. For decision-taking purposes, that policy operation is set out as follows:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date [see footnote 8], granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed [see footnote 7]; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 3.10. Footnote 7 provides an exhaustive and closed list of policies in the NPPF that protect areas and assets of particular importance, such as designated heritage assets.
- 3.11. Footnote 8 provides, amongst other things, that the most important policies for determining a housing application will be deemed to be out of date where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites, or where the Housing Delivery Test is below 75% for the previous three years.
- 3.12. In respect of the operation of paragraph 11 for decision-taking purposes, where planning proposals accord with an up-to-date development plan, they should be granted planning permission without delay. The opposite, therefore, is that where a proposed development does not accord with an up-to-date development plan there should be an expectation that planning permission will be refused unless there are prevailing material considerations to the contrary, as per NPPF paragraph 12.
- 3.13. Paragraph 11,d(ii). is widely known as the “tilted balance”. This is because there is, where engaged, a presumptive tilt in favour of a granting planning permission unless there are demonstrably significant adverse impacts that outweigh that presumption.
- 3.14. At the present time Trafford Council cannot demonstrate a deliverable five-year housing land supply.
- 3.15. However, the Housing Delivery Test (HDT) 2021 concluded that Trafford met 79% of its housing requirement, and therefore the second part of footnote 8 to paragraph 11.d(ii) is not engaged.

- 3.16. Nonetheless, due to the lack of demonstratable five-year housing land supply, the presumption in favour of sustainable development (the tilted balance) applies.

Weight Ascribed to Plans and Policies

- 3.17. Paragraph 48 of the NPPF states that LPAs may give weight to relevant policies in emerging plans according to the stage of preparation, the extent to which there are unresolved objections and the degree of consistency to the Framework.
- 3.18. In this regard, I note paragraph 42 of the Gladman Developments Ltd v Secretary of State for Housing, Communities and Local Government [2021] EWCA Civ 104 (CD-F12) decision, whereby Sir Keith Lindblom, Lady Justice Simler and Sir Gary Hickinbottom concluded (contrary to the case advocated by Gladman) that (inter alia):

42. it is implicit in previous discussion of this question – not only in the Planning Court but also in this court and in the Supreme Court – that decision-makers are not legally bound to disregard policies of the development plan when applying the “tilted balance” under paragraph 11d)ii. (My emphasis)

- 3.19. Clearly, therefore, it has been concluded that Development Plan policies can (and should) be taken into account in the determination of planning applications.

Adopted Development Plan

- 3.20. Only the Core Strategy is of particular relevance to the appeal proposals.
- 3.21. A review of all Core Strategy Policies was undertaken in April (2019) with regards to their consistency with the NPPF and the weight to be afforded. A copy of this review of the policies is included within the core document list (CD-D3).
- 3.22. The Core Strategy covers the period 2008 to 2026 and contains an annualised housing target of 694 units per annum up to 2018 and 578 per annum between 2019 and 2026. However, as this plan is deemed “out of date” in terms of its housing targets by the NPPF, these have been replaced by the Local Housing Need (LHN) requirement of 1,407 units per annum (net) as of 1 April 2022.
- 3.23. As such, with exception to the above and other ‘out of date’ policies identified in CD-D3, **I ascribe full weight to the relevant policies contained within the adopted Core Strategy.**

Emerging Development Plan

- 3.24. The examination of the CQAAP concluded earlier this year, and the inspectors report which found the plan 'sound' was published 06.12.22. The plan is due to be adopted in January 2023., Consequently, **I accord the CQAAP and the policies contained therein substantial weight.**
- 3.25. The Places for Everyone joint Local Plan is currently undergoing examination, which is scheduled to last until March 2023.
- 3.26. In terms of paragraph 48 of the NPPF:
- a) The Places for Everyone joint Local Plan is at a significantly advanced stage of preparation, currently undergoing Examination in Public;
 - b) There do remain unresolved objections to the plan, however it should be noted that PfE is not a standard Local Plan, rather a joint plan of nine authorities, to which many representations have been made, some of which may be considered to be significant; and
 - c) The Places for Everyone joint Local Plan has been prepared in accordance with the NPPF, and as such is consistent with the Framework
- 3.27. In light of the above, **I accord the Places for Everyone joint Local Plan some weight.**
- 3.28. Conversely, as Trafford's Local Plan is still only draft (at the Regulation 18 stage), **I accord it only limited weight.**

Summary

- 3.29. The Council cannot demonstrate a deliverable five-year housing land supply, and despite the HDT 2021 concluding that 79% of the borough's housing requirement had been met in the preceding three years, the presumption in favour of sustainable development (the tilted balance) applies and paragraph 11.d(ii) of the Framework is engaged.
- 3.30. The most relevant component of the adopted Development Plan is respect of the appeal proposals is the Core Strategy, which save for the housing targets, should be given full weight.
- 3.31. While not directly and specifically related to the appeal proposal, the CQAAP has implications for the land supply, and given its advanced stage of preparation, should be given substantial weight,

- 3.32. The Places for Everyone joint Local Plan is currently undergoing examination and is consistent the Framework, and as such should be afforded some weight.
- 3.33. The draft Trafford Local Plan should only be granted limited weight.

4.0 PLACES FOR EVERYONE JOINT LOCAL PLAN (2021-2037) FOR BURY, BOLTON, OLDHAM, ROCHDALE, SALFORD, TAMESIDE, TRAFFORD AND WIGAN

- 4.1. In this section, I provide an overview and update on the examination of the Places for Everyone joint Local Plan, insofar as it affects the appeal proposals.
- 4.2. The Places for Everyone (PfE) joint Local Plan was submitted to the Secretary of State on 14 February 2022. Hearings for the examination in public started on 4 November 2022 and are currently scheduled to continue until the end of March 2023.
- 4.3. PfE sets the strategic planning policy framework for all of the nine Greater Manchester (GM) authorities in the plan. Amongst other things, the plan seeks to establish a city regional spatial approach to the distribution of new development, including setting development requirements across the plan area and for each of the districts. It also takes the opportunity to review the GM Green Belt boundaries, first established over 40 years ago¹.
- 4.4. As part of this overarching strategy, 38 allocations are proposed – most requiring the release of Green Belt; of which two are located within Trafford. These proposed allocations and associated policies (in particular) are intended for use by applicants, development management officers and planning committees in the preparation and determination of planning applications.
- 4.5. Of most relevance to the appeal proposals is the proposed allocation at Timperley Wedge, a cross boundary allocation between Manchester City Council's Medi Park (Policy JPA 3.1) and Timperley Wedge (Policy JPA 3.2) in Trafford.
- 4.6. The appeal site is located within the boundary of proposed allocation JPA 3.2 Timperley Wedge, forming the most north-westerly parcel. The appeal site and vast majority of the proposed allocation are currently located within the Green Belt.
- 4.7. Picture 11.10 (part of Policy JPA 3.2) illustrates that the appeal site together with other adjoining areas are intended for residential development. This intention is further illustrated in the supporting and draft masterplan for the Timperley Wedge allocation, prepared by AWW on behalf of Trafford Council and local land owners, to which the appellants are party.

¹ The broad extent of the Green Belt in Greater Manchester appeared in draft in the 1978 Greater Manchester Structure Plan approved by the Secretary of State in 1981. Detailed boundaries were introduced in the Greater Manchester Green Belt Local Plan adopted in 1984.

- 4.8. In order to deliver the quantum of residential and employment development required by the Plan, 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. It is one of the largest allocations in the plan.
- 4.9. Consequently, 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 (inter alia):

Be in accordance with a masterplan or SPD agreed by the Local Planning Authority to ensure the site is planned and delivered in a coordinated and comprehensive manner;

....

11. Co-ordinate the phasing of development with the delivery of infrastructure on the site, ensuring sustainable growth at this location;

12. Make a proportionate contribution, by means of an equalisation mechanism, to infrastructure. Detailed requirements will be set out in the masterplan/SPD;

13. Deliver accessible streets which prioritise cycling, walking and public transport over the private car;

14. Deliver a network of new safe cycling and walking routes through the allocation, including enhancements of Brooks Drive and creating new/enhancing existing Public Rights of Way;

15. Accommodate and contribute to the delivery of the Manchester Airport Metrolink Line Western Leg extension including Metrolink stop(s); delivery.

16. Deliver a new spine road through the site with connections to the existing road network and local access to development sites, incorporating separate pedestrian and cycling space and provision for future bus rapid transit to improve east west connections between Altrincham and Manchester Airport;

17. Make the necessary improvements to the Strategic, Primary and Local Road Networks to enable the proposed level of development and mitigate the impact of increased vehicle numbers, including:

i. Road Widening at Dobbinetts Lane

ii. Junction improvement to Thorley Lane/Runger Lane

iii. New roundabout junction at Thorley Lane/Green Lane/Clay Lane

iv. Contributions to improvements at M56 Junction 3 and Terminal 2 roundabout

- 4.10. In this regard, Section 5.9 'Indicative Regions' of the draft masterplan identifies the site as being within region 1, which illustrates that the appeal site, together with other development parcels in the vicinity have the potential to be developed more quickly, due to their proximity to the existing urban area.
- 4.11. Notwithstanding this, the masterplan clearly also identifies that whilst sites in region 1 will be accessed off the existing road network, *"upgrades to the existing road network will be required in some areas"*.
- 4.12. Turning briefly to the weight to be attached to Policy JPA 3.2, I would highlight in terms of the requirements of paragraph 48 of the NPPF, that:
- a) Policy JPA 3.2 is contained within a Plan that has been submitted to the Secretary of State for Independent Examination, hearings for which are currently ongoing. It is therefore at a significantly advanced stage of preparation, to which weight can be attached.
 - b) The Plan has been subject to significant Regulation 18 consultation as well as Regulation 19 Publication consultation. The proposed allocation of Timperley Wedge featured within each relevant version of GMSF/ PfE. There remain unresolved objections to the policy, however these relate, principally, to matters of affordable housing provision and infrastructure contributions. The principle of the allocation for residential and commercial development is accepted and supported by all the landowners (including the appellant). Weight can therefore be attached to the principle and direction of the policy.
 - c) Paragraph 73 of the NPPF states that *"the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)"*. In this regard, sufficient evidence had been provided to justify that exceptional circumstances exist, to remove the site from the Green Belt, as required by paragraph 141 of the NPPF. Moreover, Policy JPA 3.2 is consistent with the main aims and objectives of the Framework and is thus consistent with it. Weight can therefore be attached to the policy.
- 4.13. In tandem with the reasons set out in paragraph 3.26 of this proof, some **weight** should be afforded to the policies contained within Places for

Everyone, and the requirements set out in Policy JPA 3.2 should be a material consideration in the determination of this appeal.

Representations to Places for Everyone by the Appellant

- 4.14. As established previously, the appellants have been involved in the preparation of Places for Everyone (formerly the Greater Manchester Spatial Framework - GMSF) for several years, responding to the relevant consultation stages.
- 4.15. They have therefore, had sufficient time to take account of the contents and aspirations of the plan, specifically Policy JPA 3.2.
- 4.16. In this regard, the appellant submitted representations to the Regulation 19 Publication stage of the joint Local Plan. Their submissions can be summarised as follows:
 - i. Support for the development of land at 39 Clay Lane, Thorley Lane site and a site north of Dobbinetts Lane. Thorley Lane can deliver in the early part of the plan period.
 - ii. Affordable housing policy is not flexible enough. Delivery of 45% affordable housing is not deliverable/viable and hasn't been justified. Policy should refer to 30-45% affordable housing which can be determined at application stage. The evidence is considered to be high-level and relatively out of date. A more detailed, comprehensive, and up-to date viability appraisal is required that reflects different market conditions affecting individual parcels/plots.
 - iii. 'Where appropriate' should be added to a number of policies e.g.) 15,19,31.
- 4.17. The appellants full representation is provided at Appendix 1 and a summary of representations and a response from the Council (the Greater Manchester Combined Authority [GMCA]) is provided at Appendix 2.
- 4.18. Most recently, and as part of the examination, the appellants submitted a response to Matter 15: Cross Boundary Allocations: Manchester/ Trafford, which stated (among other things) that *"Harlex fully support the proposed allocation of Timperley Wedge through Policy JPA3.2 and the site's removal from the Green Belt"*.
- 4.19. Moreover, their representation advises that the appellant "signed up to a Statement of Common Ground between landowners associated with the Timperley Wedge allocation, dated January 2022, which confirmed that

overall, the landowners agree with and support the majority of the policies proposed in the Places for Everyone Plan”.

- 4.20. Turning briefly to viability and delivery, I would draw the Inspectors attention to paragraph 2.25 of the appellants Matter 15 submission, which states:

Harlex can confirm that the site they control, the World of Pets & Leisure the World of Pets & Leisure site, Thorley Lane, Timperley, Altrincham, can be delivered viably at the point envisaged. (My emphasis)

- 4.21. This point is noted, simply due to the timing of delivery envisaged in Places for Everyone (which is supported by the appellant), and the desired jump-starting of this process through this appeal, ahead of the cohesive and planned approach required across the whole site.
- 4.22. The appellants full response to Matter 15 is provided at Appendix 3.
- 4.23. Notwithstanding the above, it should be noted that 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.

Summary

- 4.24. 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.
- 4.25. The Places for Everyone joint Local Plan is currenting 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.
- 4.26. 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 add 60,000 square metres of office space between 2021 and 2037, and one of the largest allocations in the plan.
- 4.27. 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.
- 4.28. As **some weight** should be afforded to the policies contained within Places for Everyone, and specifically to JPA 3.2, this should be a material consideration in the determination of this appeal.

- 4.29. 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.
- 4.30. They have therefore, had sufficient time to take account of the contents and aspirations of the plan, specifically Policy JPA 3.2.

5.0 HOUSING LAND SUPPLY

- 5.1. This section sets out the historical and current land supply position(s) within Trafford, to supplement the information contained in Appendix 2 of the CMC, providing a narrative to the context and evolving situation, in the borough.

Historical Five-Year Housing Land Supply Positions

- 5.2. 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.
- 5.3. Significant efforts by the Council have been made in the intervening years, resulting in the second highest land supply position in 2022 since 2014, where the Council was able to demonstrate a 3.75-year supply.
- 5.4. The above evolution is set out in the following table for ease of reference, and context.

Table 5.1: 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

Year (as at 31st March)	Source of target	Total target 5 yr land supply	Identified 5 yr land supply	No. Years supply
2020	LHN Target (1,369) 2020-2025 + 20% NPPF buffer	8,214	3,870	2.4
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	3.75

- 5.5. 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 5.21 for details). Consequently, there is no shortage of land in Trafford, no actual shortage of land supply for housing and no impediment to delivery.
- 5.6. This is demonstrated in the existing (urban) land supply identified in Table 7.1 of the Places for Everyone plan (page 130). For ease, I provide an extract in the table below in relation to the figures for Trafford.

Table 5.2: Extract from Table 7.1 of Places for Everyone – ‘Sources of Housing Land Supply to 2037’

	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	12,293	2,568	824
Total	15,685		

- 5.7. The 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.
- 5.8. In the last two 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.

- 5.9. 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.
- 5.10. 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.

The Current Five-Year Housing Land Supply Position

- 5.11. As of 31st October 2022, Trafford Council can demonstrate a 3.47-year housing land supply, the detail of which is set out in Appendix 4. This minor reduction in supply from March 2022 (equating to 465 dwellings), is due to a large number of completions coming from the supply (evidence of the effectiveness of the above Council efforts etc.), that have not yet been replaced by new schemes coming forward; thus, leading to the current deficit.
- 5.12. There is a natural delay, worsened in the last two years by the impact of restrictions associated with the pandemic, in developers deciding to bring a scheme forward and a planning application being submitted. Moreover, it should be noted that 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. The Council's current five-year housing land supply is therefore an artificially deflated figure which represents a snapshot in time.
- 5.13. Notwithstanding the above, it should be noted that 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 6.1 of this proof.
- 5.14. 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.
- 5.15. 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.

- 5.16. 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.
- 5.17. 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 to be fully understood, the short-term housing completions have continued to improve. As shown in Table 5.2, completions in Trafford in 2020/2021 were in fact at the highest since the adoption of the Core Strategy.

Table 5.2: Trafford's Housing Completions 2013/14 – 2021/22

Year	Housing requirement (Net) ²	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

- 5.18. In the three-year period prior to the current monitoring period, i.e., 2016/2017 to 2018/2019 there were 1,671 homes built, compared to 2,271 built between 2019/2020 to 2021/2022 which is a 136% increase.
- 5.19. 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.
- 5.20. 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

² 2013/14 – 2017/18 based on Trafford's Core Strategy housing target

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.

- 5.21. Moreover, the recent uplift in completions is directly linked to the Council's deliberate actions to increase the numbers of residential permissions granted, which between 1 April 2018 and 31 March 2022 totalled 9,560, equating to annual residential approvals of c. 3,100 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 (45% more) permissions to meet supply, even if a substantial non-implementation allowance is applied.
- 5.22. Together, these measures are leading to an improving delivery rate in the borough, with the three-year average increasing from 768 dwellings per annum (2017-2020) to 1,033 dwellings per annum (2018-2021). The HDT measurement for Trafford has increased accordingly, from 58% in 2019, to 61% in 2020 and most recently 79% in 2021.
- 5.23. This has translated noticeably in terms of the Strategic Locations identified in the Core Strategy, where delivery until 2020 had been slow to non-existent. Delivery has increased markedly since then, with 22% of the residential allowance (as of March 2022) now completed, compared with a mere 3% in March 2020. An additional 75% of the allowance has planning permission, which taken together equates to 97% of the Strategic Locations having either been delivered or having planning permission in place as of March 2022.
- 5.24. In addition, a further 1,963 (42%) dwellings have been identified within the Strategic Locations, excluding the significant planned developments at both New Carrington (SL5) and within the Civic Quarter (SL4).
- 5.25. All of the above, has culminated (most recently) 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

- 5.26. 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'.

5.27. 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.

5.28. 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.

5.29. 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.

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

5.31. 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

5.32. 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
- 5.33. The use of ‘or’ within each list stipulates that only one of the items is relevant for a site to be considered deliverable.
- 5.34. 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 5.3 below.

Table 5.3: Summary of Supply in NPPF ‘Deliverable’ Categories

NPPF Category A/B Sub Category	Sum of <5 Years
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
Grand Total	5863

- 5.35. 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.
- 5.36. The 12 sites that comprise this element of the supply are listed in Table 5.4 below for ease of reference.

Category B Sites	5 Yr Supply
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

Category B Sites	5 Yr Supply
Clarendon House, Stamford New Road, Altrincham, WA14 1BY	68
Christie Road, Stretford	67
39 Talbot Road	56
Curzon Cinema, Urmston	42
Stretford Memorial Hospital, Seymour Grove, M16 0DU	40
Land East of Partington Shopping Centre, off Central Road, Partington	43
Total Supply Contribution	1976

- 5.37. 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.

Summary

- 5.38. As of 31st October 2022, Trafford Council can demonstrate a 3.47-year housing land supply. This minor reduction in supply from March 2022 (equating to 465 dwellings), is due to a large number of completions coming from the supply that have not yet been replaced by new schemes coming forward; thus, leading to the current deficit.
- 5.39. 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 5 of this proof.
- 5.40. 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.
- 5.41. 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 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.

- 5.42. 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.

6.0 THE EMERGING LAND SUPPLY POSITION

- 6.1. As demonstrated in 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.
- 6.2. Despite a small reduction, the current improved position of the land supply is due to sites quickly and consistently entering into 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.
- 6.3. Nevertheless, the 3.47-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 a number of phases.
- 6.4. 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, even though regular detailed discussions regarding the two proposed allocations in Trafford are ongoing, with applications being prepared for submission in 2023 and/or immediately after adoption.
- 6.5. Taking these facts into account, it is clear that there a number of sites that have been deliberately excluded from the supply, which are expected to come forward in the next 12 – 24 months.
- 6.6. 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 6.1 below.

Table 6.1: 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		
GMP Site	200	428
Centrica		250
SL4 – Trafford Centre Rectangle		
Trafford Waters	150	2,400
SL5 – Carrington		
Wain Homes RM Approved	177	
Wain Homes Phase 5	148	303
Others		
Altair	59	393
Grafton Centre	60	
Hale Road	20	
Bridge Works	30	
499 Chester Road	400	
Empress	50	
Chester Road	60	
Places for Everyone Proposed Allocations		
Timperley Wedge (JPA 3.2)	240	1,358
New Carrington (JPA 33)	199	2,614
Additional Sites Supply	3,143	11,130
Current Five-Year HLS	5,863	
Total Supply	9,006	
LHN + 20% Buffer	1,688	
Five-Year HLS with additional sites	5.34	

- 6.7. Each of these sites is identified through discussions with developers or landowners where there is known interest in bringing them forward.
- 6.8. These sites coming forward into the supply in the next 12-24 months would yield a land supply of 5.34 years.

- 6.9. 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.
- 6.10. For Trafford the PfE average annual housing requirement is 1,112. Were the current five-year housing land supply of 5,863 to be applied to this target, Trafford would be able to demonstrate a 5.27-year land supply. In applying the additional sites identified above to the supply, the Council would be able to demonstrate an 8.10-year land supply.
- 6.11. 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.
- 6.12. 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

- 6.13. 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.
- 6.14. 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.
- 6.15. Were a more liberal approach to the supply adopted, the Council would be able to demonstrate a land supply of 5.41 years.
- 6.16. 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.

- 6.17. 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.
- 6.18. 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.

7.0 SUMMARY AND CONCLUSIONS

- 7.1. 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.
- 7.2. 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.
- 7.3. 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

- 7.4. 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.
- 7.5. 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.
- 7.6. 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.
- 7.7. 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.
- 7.8. 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.
- 7.9. 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

- 7.10. As of 31st 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.
- 7.11. 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.
- 7.12. 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.
- 7.13. Consequently, there is no shortage of land in Trafford, no actual shortage of land supply for housing and no impediment to delivery.
- 7.14. 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.
- 7.15. 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.
- 7.16. 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.
- 7.17. 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.

The Emerging Land Supply

- 7.18. 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.

- 7.19. 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.
- 7.20. Were a more liberal approach to the supply adopted, the Council would be able to demonstrate a land supply of 5.41 years.
- 7.21. 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.
- 7.22. 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.
- 7.23. 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.