

VIA EMAIL ONLY: strategic.planning@trafford.gov.uk

Strategic Planning
Trafford Council
Trafford Town Hall
Talbot Road
Stretford
M32 0TH

21404/A3/CE
17th March 2014

Dear Sirs

**RE: TRAFFORD LOCAL PLAN: LAND ALLOCATIONS CONSULTATION DRAFT
ROYAL LONDON ASSET MANAGEMENT: LAND AT DAVENPORT GREEN**

We refer to the above matter and write to set out our representations on behalf Royal London Asset Management (RLAM) with respect to its land holding at Land at Davenport Green. RLAM welcomes the opportunity to engage further with the Council regarding its Site at Davenport Green.

As the Council will be aware, RLAM has a significant land holding interest in the Land at Davenport Green and has been promoting the Site since adoption of the Core Strategy. In this regard, RLAM has accepted the Council's proposal in 2012 to adopt a Supplementary Planning Document (SPD). Having read through the consultation draft of the Land Allocations DPD, RLAM overall supports the general thrust of the policy and strategy for its Site at Davenport Green. As the Council will be aware, the Site may now be subject to further development activity given the Government's announcement of its proposal to route the line for HS2 through part of the Site. This resulted in RLAM accepting that adoption of a SPD was unrealistic.

RLAM supports the Council's assumed "no HS2 scenario" relating to policies in Chapter 13, Employment. Notwithstanding HS2 Ltd having designated Davenport Green as a potential "Major Employment Site", the considerable uncertainty about HS2 means that the Council has made a sensible assumption in its Land Allocations DPD. RLAM believes that the Council will wish to adopt a consistent approach in Chapter 10, Transport, which would require some amendment to ensure consistency and soundness.

RLAM hopes that the Council sees the representations made as helpful and constructive. It is RLAM's strong desire to continue to work closely with the Council in order to realise the development of this Site in accordance with the adopted Local Plan and the Land Allocations DPD.

We trust that the representations made are clear, and look forward to the Council confirming receipt in due course.

Yours sincerely

]

CHRIS EDGE
Associate

cc: Charles Gardner, Goshawk (email only)
Gareth Dickinson, Royal London Asset Management (email only)

**Trafford Local Plan: Land Allocations Consultation Draft
Comment Form – February to March 2014**

Office Use Only	
Date	
Ref	
Ack	

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
strategic.planning@trafford.gov.uk

Name:		Agent (if applicable):	CHRIS EDGE
Organisation (if applicable):	ROYAL LONDON ASSET MANAGEMENT	Organisation (if applicable):	BARTON WILLMORE LLP
Address:	55 GRACECHURCH STREET LONDON	Address:	TOWER 12 18/22 BRIDGE STREET MANCHESTER
Postcode:	EC3V 0UF	Postcode:	M3 3BZ
Tel:	0207 506 6583	Tel:	0161 817 4900
Fax:		Fax:	
Email:		Email:	chris.edge@bartonwillmore.co.uk

Please use the consultation comment form to make a representation on the Trafford Local Plan: Land Allocations – Consultation Draft, the Sustainability Appraisal or other related evidence base. You should consider what it is you wish to comment on and let us know whether you support or oppose this particular element of the document. Please explain your reasons and suggest any improvements.

Please use a separate comment form for each specific policy, paragraph, figure or table you wish to comment on and attach it to this contact details sheet.

A separate site submission form is available to submit new sites which have not previously been assessed. This form is available on the Council's website via the Strategic Planning webpages, or directly from the team at the address below.

You only need to fill out one copy of your contact details if you are submitting all your comments at the same time, but please indicate the total number of comment sheets enclosed in the box below:

Total number of comment sheets enclosed:	8
---	---

 **The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way.** Responses can be submitted via the electronic version of the comment form which can be found on the Council's web site at: www.trafford.gov.uk. **This form is in 'Word' format and you can type in your response and return it as an e-mail attachment to strategic.planning@trafford.gov.uk.**

Alternatively, completed comment forms can be returned by post to the address below by no later than **17th March 2014**.

**Strategic Planning
Trafford Council
Trafford Town Hall
Talbot Road
Stretford
M32 0TH**

Data Protection Notice:

Please note that all comments will be held by the Council on the database for the duration of the Local Development Framework (LDF) and will be available for public inspection under the Freedom of Information Act 2000.

Trafford Local Plan: Land Allocations Consultation Draft

Comment Form – February 2014



PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:

strategic.planning@trafford.gov.uk

Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	✓	Page number	
SA Report		Paragraph number	
SA Appendices		Policy number	TR1
SA Options Report		Site reference	
SA Flood Risk Sequential Test		Table/Figure reference	
SA Scoping Report		Other (including omissions and suggestions for proposed amendments)	
Topic Paper (please specify)			
HRA Scoping report			
SHLAA (2013)			
Conservation Area Appraisal (please specify)			
Other document, (please specify)			

Do you support, oppose or have general comments about this specific part of the document?				
Support	X	Object		General Comment
<p>Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.</p> <p>SEE ATTACHED SHEET.</p>				

Please continue on a separate sheet if required

Thank you for taking the time to fill in our Land Allocations Plan comments form; your comments are very much appreciated.

**TRAFFORD LOCAL PLAN: LAND ALLOCATIONS DPD CONSULTATION DRAFT
REPRESENTATIONS ON BEHALF OF ROYAL LONDON ASSET MANAGEMENT**

**SECTION 10: TRANSPORT
POLICY TR1 – ACTIVE TRAVEL NETWORK**

RLAM's Representations on Policy TR1

RLAM supports Policy TR1 and the Council's aspirations to enhance the pedestrian and cycle network in Trafford. Paragraph 10.3 states that developers will be expected to provide safe and secure links to existing and proposed routes, thus contributing towards the improvement and enhancement of the (active travel) network.

The rural park, which forms a key part of the Davenport Green site, presents a significant opportunity to enhance pedestrian and (potentially) cycle routes in the area. The remainder of the Davenport Green site (i.e. the employment site) will also include new pedestrian and cycle links which will be defined as the details for the site are developed. These routes will connect to the existing networks in the area, including the strategic cycleway identified in the Land Allocations DPD at Brooks Drive. This is referred to in Policy TR1.3 which RLAM supports (and also referred to at paragraph 10.17).

There is significant potential for the employment site to promote active travel due to its proximity to the rural park and other cycle routes in the area. As details of the site are brought forward through planning applications, consideration will be given on how best to maximise the active travel connectivity of the site. This will include the provision of appropriate on-site facilities and measures to encourage walking and cycling.

Trafford Local Plan: Land Allocations Consultation Draft

Comment Form – February 2014



PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:

strategic.planning@trafford.gov.uk

Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	✓	Page number	
SA Report		Paragraph number	
SA Appendices		Policy number	TR2
SA Options Report		Site reference	
SA Flood Risk Sequential Test		Table/Figure reference	
SA Scoping Report		Other (including omissions and suggestions for proposed amendments)	
Topic Paper (please specify)			
HRA Scoping report			
SHLAA (2013)			
Conservation Area Appraisal (please specify)			
Other document, (please specify)			

Do you support, oppose or have general comments about this specific part of the document?				
Support	X	Object		General Comment
<p>Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.</p> <p>SEE ATTACHED SHEET.</p>				

Please continue on a separate sheet if required

Thank you for taking the time to fill in our Land Allocations Plan comments form; your comments are very much appreciated.

**TRAFFORD LOCAL PLAN: LAND ALLOCATIONS DPD CONSULTATION DRAFT
REPRESENTATIONS ON BEHALF OF ROYAL LONDON ASSET MANAGEMENT**

**SECTION 10: TRANSPORT
POLICY TR2 – PUBLIC TRANSPORT NETWORK**

RLAM's Representations on Policy TR2

RLAM supports the proposed policy to grant planning permission for development proposals that do not prejudice the public transport network. The Davenport Green site is well located to encourage use of the public transport network and details of how this will be achieved will be provided as part of any planning applications for the development.

Trafford Local Plan: Land Allocations Consultation Draft

Comment Form – February 2014



PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:

strategic.planning@trafford.gov.uk

Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	✓	Page number	
SA Report		Paragraph number	
SA Appendices		Policy number	TR2.1
SA Options Report		Site reference	
SA Flood Risk Sequential Test		Table/Figure reference	
SA Scoping Report		Other (including omissions and suggestions for proposed amendments)	
Topic Paper (please specify)			
HRA Scoping report			
SHLAA (2013)			
Conservation Area Appraisal (please specify)			
Other document, (please specify)			

Do you support, oppose or have general comments about this specific part of the document?				
Support	X	Object		General Comment
<p>Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.</p> <p>SEE ATTACHED SHEET.</p>				

Please continue on a separate sheet if required

Thank you for taking the time to fill in our Land Allocations Plan comments form; your comments are very much appreciated.

**TRAFFORD LOCAL PLAN: LAND ALLOCATIONS DPD CONSULTATION DRAFT
REPRESENTATIONS ON BEHALF OF ROYAL LONDON ASSET MANAGEMENT**

**SECTION 10: TRANSPORT
POLICY TR2.1 – METROLINK**

RLAM's Representations on Policy TR2.1

RLAM supports the Council's encouragement and promotion of the improvement and extension of the Metrolink. It is noted, however, that the proposed stop at Davenport Green is not listed within paragraph 10.22 despite it appearing on the Policies Map and in Policy TR2.6 (paragraph 10.27). It is requested that the Davenport Green stop is also referred to in Policy TR2.1 for consistency.

Trafford Local Plan: Land Allocations Consultation Draft

Comment Form – February 2014



PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:

strategic.planning@trafford.gov.uk

Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	✓	Page number	
SA Report		Paragraph number	
SA Appendices		Policy number	TR2.6
SA Options Report		Site reference	
SA Flood Risk Sequential Test		Table/Figure reference	
SA Scoping Report		Other (including omissions and suggestions for proposed amendments)	
Topic Paper (please specify)			
HRA Scoping report			
SHLAA (2013)			
Conservation Area Appraisal (please specify)			
Other document, (please specify)			

Do you support, oppose or have general comments about this specific part of the document?					
Support	X	Object	X	General Comment	X
<p>Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.</p> <p>SEE ATTACHED SHEET.</p>					

Please continue on a separate sheet if required

Thank you for taking the time to fill in our Land Allocations Plan comments form; your comments are very much appreciated.

**TRAFFORD LOCAL PLAN: LAND ALLOCATIONS DPD CONSULTATION DRAFT
REPRESENTATIONS ON BEHALF OF ROYAL LONDON ASSET MANAGEMENT**

**SECTION 10: TRANSPORT
POLICY TR2.6 – SAFEGUARDED ROUTES / FACILITIES**

RLAM's Representations on Policy TR2.6

This Policy sets out provisions for four specific elements of a sustainable transport network in the Borough, three of which relate to Metrolink and one of which related to central Government's HS2 proposal.

Metrolink

Two of the three Metrolink provisions relate directly to Davenport Green. Paragraph 10.27 states that routes and infrastructure/facilities that have the potential to contribute towards the provision of an efficient and sustainable transport network, as identified in the policies maps, will be safeguarded.

The extent of the proposed safeguarded route for Metrolink is highlighted on the draft policies map. For a long time, RLAM has consistently supported the principle that development at Davenport Green should keep open the possibility that at a future date, the proposed route of Western Loop Extension of Metrolink could be delivered.

Therefore, RLAM supports in principle the inclusion of a safeguarded route for Metrolink that runs through the Davenport Green site. The provision of a Metrolink stop at Davenport Green will provide a significant opportunity to enhance the accessibility of the site by public transport and will also help to link the site to the wider existing public transport networks serving Trafford and the wider Greater Manchester area.

HS2

RLAM supports the Council's assumed "no HS2 scenario" relating to policies in Chapter 13, Employment. Notwithstanding HS2 Ltd having designated Davenport Green as a potential "Major Employment Site", the considerable uncertainty about HS2 means that the Council has made a sensible assumption in its Land Allocations DPD.

This is because, at this stage, the proposals for HS2 are embryonic and have only been subject to one round of public consultation. We understand that a further public consultation exercise will be held in 2015 at which point more detailed proposals for HS2 and its routing and the station at Manchester Airport may be more certain. HS2 will also be subject to a Hybrid Bill which will allow the compulsory purchase of land required for the development of the HS2 route in due course. The timeline for this Bill, if achieved, and the outcome, is unknown. This is likely to be followed by a safeguarding direction from the Secretary of State which will provide sufficient protection for the delivery of HS2 and need not be duplicated in the Land Allocations DPD. We therefore do not consider that it should form the basis of planning policy at this stage, nor should the proposed safeguarded route for HS2 be highlighted on the draft policies map.

RLAM considers that there is an inherent contradiction between Policy TR2.6 and the broad thrust of the Land Allocations DPD as set out in Paragraph 13.52. As a consequence, RLAM considers that the

wording of policy TR2.6 is unsound because it is neither justified nor effective. Therefore, RLAM does not support the current draft of the Land Allocations DPD with respect to this policy.

Instead, RLAM believes that the Council will wish to adopt a consistent approach in Chapter 10, Transport, with the approach in Chapter 13, Employment. This will require some amendment to Chapter 10 to ensure consistency and soundness, including that the term safeguarded is removed from the Land Allocations DPD.

On account of the considerable uncertainty relating to HS2, RLAM submits that, when greater certainty about the project and its confirmed delivery timetable become known, the Council will wish to embark upon an early review of its Core Strategy. This would enable the Council to consult about revised Transport policies which take account of a major project like HS2. This is in accordance with the national policy in the form of paragraph 8 of the Planning Policy Guidance which requires Local Planning Authorities to review the relevance of Local Plans at regular intervals to assess whether part or all of it may need updating. The Council will wish also to ensure that it has adopted Employment policies, which would enable the sub-region to deliver economic growth driven by a major infrastructure project like HS2.

Trafford Local Plan: Land Allocations Consultation Draft

Comment Form – February 2014



PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:

strategic.planning@trafford.gov.uk

Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	✓	Page number	
SA Report		Paragraph number	
SA Appendices		Policy number	TR3
SA Options Report		Site reference	
SA Flood Risk Sequential Test		Table/Figure reference	
SA Scoping Report		Other (including omissions and suggestions for proposed amendments)	
Topic Paper (please specify)			
HRA Scoping report			
SHLAA (2013)			
Conservation Area Appraisal (please specify)			
Other document, (please specify)			

Do you support, oppose or have general comments about this specific part of the document?				
Support	X	Object		General Comment
<p>Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.</p> <p>SEE ATTACHED SHEET.</p>				

Please continue on a separate sheet if required

Thank you for taking the time to fill in our Land Allocations Plan comments form; your comments are very much appreciated.

**TRAFFORD LOCAL PLAN: LAND ALLOCATIONS DPD CONSULTATION DRAFT
REPRESENTATIONS ON BEHALF OF ROYAL LONDON ASSET MANAGEMENT**

**SECTION 10: TRANSPORT
POLICY TR3 – HIGHWAY NETWORK**

RLAM's Representations on Policy TR3

RLAM supports Policy TR3.

Trafford Local Plan: Land Allocations Consultation Draft

Comment Form – February 2014



PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:

strategic.planning@trafford.gov.uk

Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	✓	Page number	
SA Report		Paragraph number	
SA Appendices		Policy number	TR3.1
SA Options Report		Site reference	
SA Flood Risk Sequential Test		Table/Figure reference	
SA Scoping Report		Other (including omissions and suggestions for proposed amendments)	
Topic Paper (please specify)			
HRA Scoping report			
SHLAA (2013)			
Conservation Area Appraisal (please specify)			
Other document, (please specify)			

Do you support, oppose or have general comments about this specific part of the document?				
Support	X	Object		General Comment
<p>Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.</p> <p>SEE ATTACHED SHEET.</p>				

Please continue on a separate sheet if required

Thank you for taking the time to fill in our Land Allocations Plan comments form; your comments are very much appreciated.

**TRAFFORD LOCAL PLAN: LAND ALLOCATIONS DPD CONSULTATION DRAFT
REPRESENTATIONS ON BEHALF OF ROYAL LONDON ASSET MANAGEMENT**

**SECTION 10: TRANSPORT
POLICY TR3.1 – STRATEGIC ROAD NETWORK**

RLAM's Representations on Policy TR3.1

RLAM supports in principle the improvements to the Strategic Road Network, and, in particular, the M56 Junction 6 and airport access improvement scheme and the replacement of Thorley Lane Bridge.

RLAM supports the text within paragraph 10.43 as it is consistent with Policy EM4 which is drafted in a 'no HS2 scenario'.

Trafford Local Plan: Land Allocations Consultation Draft

Comment Form – February 2014



PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:

strategic.planning@trafford.gov.uk

Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	✓	Page number	
SA Report		Paragraph number	
SA Appendices		Policy number	TR5
SA Options Report		Site reference	
SA Flood Risk Sequential Test		Table/Figure reference	
SA Scoping Report		Other (including omissions and suggestions for proposed amendments)	
Topic Paper (please specify)			
HRA Scoping report			
SHLAA (2013)			
Conservation Area Appraisal (please specify)			
Other document, (please specify)			

Do you support, oppose or have general comments about this specific part of the document?				
Support	X	Object		General Comment
<p>Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.</p> <p>SEE ATTACHED SHEET.</p>				

Please continue on a separate sheet if required

Thank you for taking the time to fill in our Land Allocations Plan comments form; your comments are very much appreciated.

**TRAFFORD LOCAL PLAN: LAND ALLOCATIONS DPD CONSULTATION DRAFT
REPRESENTATIONS ON BEHALF OF ROYAL LONDON ASSET MANAGEMENT**

**SECTION 10: TRANSPORT
POLICY TR5 – OFF AIRPORT CAR PARKING**

RLAM's Representations on Policy TR5

RLAM supports the Council's intention to include a policy on this matter within the Land Allocations DPD given the proximity of the Borough (and in particular the Davenport Green Site) to Manchester Airport.

RLAM supports the criteria that the Council is proposing under this policy which appears to be soundly drafted.

Trafford Local Plan: Land Allocations Consultation Draft

Comment Form – February 2014



PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:

strategic.planning@trafford.gov.uk

Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	✓	Page number	
SA Report		Paragraph number	Various
SA Appendices		Policy number	EM4
SA Options Report		Site reference	
SA Flood Risk Sequential Test		Table/Figure reference	
SA Scoping Report		Other (including omissions and suggestions for proposed amendments)	
Topic Paper (please specify)			
HRA Scoping report			
SHLAA (2013)			
Conservation Area Appraisal (please specify)			
Other document, (please specify)			

Do you support, oppose or have general comments about this specific part of the document?					
Support	X	Object	X	General Comment	X
<p>Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document. Please include suggestions as to how you think we can improve the document.</p> <p>SEE ATTACHED SHEET.</p>					

Please continue on a separate sheet if required

Thank you for taking the time to fill in our Land Allocations Plan comments form; your comments are very much appreciated.

**TRAFFORD LOCAL PLAN: LAND ALLOCATIONS DPD CONSULTATION DRAFT
REPRESENTATIONS ON BEHALF OF ROYAL LONDON ASSET MANAGEMENT**

SECTION 13: EMPLOYMENT

POLICY EM4 – DAVENPORT GREEN EMPLOYMENT SITE

RLAM strongly supports the overall intention as set out in paragraph 13.1 and it considers that its site at Davenport Green is uniquely positioned to help diversify Trafford's employment offer.

RLAM's Representations on the Preamble (Paragraph 13.31)

RLAM is supportive of the inclusion of its Site within the Land Allocations DPD for employment use. It also supports the Council's intention to draft the Land Allocations DPD in a 'no HS2 world'.

Policy EM4 accords with the Council's strategy for the Borough as set out within the adopted Core Strategy. However, since the adoption of the Core Strategy in January 2012, the Government has published the National Planning Policy Framework (NPPF) in March 2012. In terms of the Local Plan review process, this requires Council's to prepare plans which are sound and one of the tests of soundness set out in the NPPF is that Development Plan Documents (DPDs) and Local Plans should be 'positively prepared'.

Whilst Policy EM4 follows Core Strategy Policy R4, RLAM considers that there is scope to re-word policy EM4 to make it 'positively prepared' in accordance with the NPPF.

RLAM's Representations on the Principles of Development (Paragraphs 13.32 and 13.33)

RLAM confirms its intention to bring forward the Davenport Green site for exemplar, very high quality development. It supports the Council's intention to permit complementary uses within the Davenport Green Site alongside B1 (office) uses, such as 'main town centre uses'. However, RLAM considers it would be helpful if the Council identified which uses would be acceptable in principle on the Site. RLAM suggests that this should include 'A' Class uses (Shops) as well as 'C1' Class (Hotels) uses and also 'D1' Class (Non-residential institutions) and 'D2' Class (Assembly and leisure) uses. This would provide greater clarity on the permitted uses for the Site and would follow examples elsewhere where B1 (office) uses are supported by a range of other complementary uses.

RLAM considers that a site, such as this, will need to be supported by a range of complementary uses in order to be attractive to the type of operators which are explicitly required by Core Strategy Policy R4 and Policy EM4 of the Land Allocations DPD.

RLAM's Representations on Building and Design Principles (Paragraph 13.34)

In respect of the first bullet point, there is some ambiguity as to how 'very high, exemplar standard of development' can be defined. This is an issue which is hard to quantify and to be able to refer to examples elsewhere. RLAM supports the Council's intention to allow flexibility within the drafting of the text, but it considers that reference to best practice elsewhere would be helpful.

With regards to the second bullet point of this paragraph, RLAM considers that the Council should not seek to apply a limit to the area, within the development area, which it can develop. In addition, the 30% figure requires clarification. The Council should make it clear that this figure refers to the ground floor footprint of buildings and any land required for car parking.

If the Council is minded to apply a limit to the developable area, then RLAM does not object to the imposition of a 30% limit across the development area for buildings and car parking so long as the wording is clarified (as suggested above).

With respect to the third bullet point of this paragraph, RLAM considers the wording to be somewhat ambiguous, but supports the flexibility that is afforded by this part of the policy.

With regards to the fourth bullet point, there is some ambiguity as to what is referred to here. RLAM considers that the intention to develop a very high quality, exemplar business use across the site will almost certainly mean that high standards of construction will be incorporated. RLAM suggests that this bullet point may be superfluous given the need to adhere to standards at the time of construction and therefore should be deleted.

RLAM's Representations on Transport (Paragraph 13.35)

RLAM supports this part of the policy and has no comments to make.

RLAM's Representations on Environmental Safeguards (Paragraph 13.36)

RLAM supports this part of the policy and has no comments to make.

RLAM's Representations on Infrastructure (Paragraph 13.37)

With regards the first bullet point, RLAM confirms it had no objection to the proposed CIL tariff for office development at £10 sq.m. Arup has confirmed on behalf of RLAM, that the site is deliverable in a 'No HS2 World'.

RLAM considers that in the event the Land Allocations DPD is drafted to include HS2, which RLAM does not believe is necessary for the reasons set out elsewhere in this response, the Council will need to revisit its Infrastructure List to include infrastructure which should be funded by all developers within the Borough and not just RLAM.

With respect to the second bullet point, at this stage consideration has not been given to the energy demands of other developments in the area. This is because development proposals for neighbouring sites are, as yet, unknown and are outside its control. RLAM considers that at the point which it is able to develop the Site and that other developments within the area known, it will consider assessing those energy requirements and assessing the viability with other developers at the appropriate time. The policy as drafted is unclear and at this stage should be deleted.

RLAM's Representations on Landscape (Paragraph 13.38)

RLAM supports this part of the policy as the Site will inherently provide a unique for Trafford, high quality landscaped employment environment with strong links to the rural park.

RLAM's Representations on Ownership (Paragraph 13.39)

With regards the first bullet point, it is not necessary for the Council to require a Site to be in single ownership at the plan making stage. Of the 135 ha identified in the Core Strategy, RLAM owns 96% which is the vast majority of the Site. RLAM confirms that there are no abnormal costs to its

development that would hamper its deliverability. As a result, RLAM considers that this bullet point is deleted.

In RLAM's view, the text in the second bullet point of Paragraph 13.39 is unnecessary and should refer simply to the preparation of a masterplan only, and not an SPD. Reference to an SPD in the Land Allocations DPD adds an additional tier of planning policy which is simply unnecessary given the Core Strategy and allocation for development for the Davenport Green Site. Paragraph 153 of the NPPF states that a SPD should only be used where clearly justified and where they can help assist an applicant make a successful application. In this case, RLAM considers that a SPD is not justified and the existing adopted planning policy in the Core Strategy provides control for the Council over the development of the Site. In short, the policy is not sound as drafted as it is not in accordance with national policy.

RLAM has the same comments in relation to Paragraph 13.41 and 13.51 in that it considers that the text is not necessary and that reference to only a masterplanning exercise is included in Paragraph 13.39.

Other Comments

RLAM's Representations on Paragraph 13.41

RLAM had spent a significant amount of time liaising with the Council and assisting it in drafting a Supplementary Planning Document (SPD) to guide the development of the Davenport Green Site in 2012/2013. The SPD was being prepared before the Government's announcement on HS2 which had the effect of providing great uncertainty over the timescales for the development of the Davenport Green Site. As a result, RLAM agreed with the Council that work on the SPD should be suspended at that time. Since then, the Council has drafted the Land Allocations DPD, resulting in the consultation document which proposes the allocation of Davenport Green and provides further detail on the proposed development of the Site.

RLAM considers that, as a result, it is not necessary to reference the need to guide the development at Davenport Green. RLAM considers that allocation provided under Policy R4 (which is quite clear in terms of the criteria and the precise area to which Policy R4 refers) as well as Policy EM4 of the Land Allocations DPD will provide the appropriate level of planning guidance for the development of this Site. RLAM is happy to continue to liaise with the Council through its design team on the preparation of a comprehensive masterplan for the Site in advance of a planning application being prepared.

RLAM's Representations on Paragraph 13.43

RLAM supports the Council's aspiration that development at Davenport Green will maximise its sustainability qualities, which is RLAM's intention.

However, RLAM considers that reference to specific energy efficiency and renewable energy measures is unnecessary for a Land Allocations DPD and may actually provide a restriction on the ability of the RLAM to deliver an exemplar site in terms of sustainability. At the stage when the Site is being brought forward for planning, the specific measures listed may no longer represent best practice due to subsequent developments in technology. Similarly, the specific measures listed may not represent appropriate solutions for this Site at that time.

It therefore considers that this would be more appropriate at the planning application stage when the costs for the development of the Site and the site specific operator requirements are known, and these are assessed when considering the viability of the development of the Site.

Therefore, RLAM suggests that the second sentence of Paragraph 13.43 is deleted.

RLAM's Representations on Paragraph 13.46

To reiterate, RLAM's comments in relation to this paragraph are the same as its comments in relation to Paragraph 13.39 and 13.41, in that it considers that the preparation of an SPD is not justified and reference to it should be deleted from the Land Allocations DPD.

RLAM's Representations on Paragraph 13.47

RLAM supports the identification of the safeguarding of the line for the western loop of the Metrolink extension.

RLAM considers that the final sentence of this paragraph should be deleted as it is not justified and not soundly drafted.

RLAM's Representations on Paragraph 13.48

RLAM considers that this is an ambiguous statement on highways. It considers it is unnecessary to add this paragraph into the Land Allocations DPD, as the impact of the proposed development on the highway network and its operation would be more appropriately dealt with at the planning application stage. RLAM supports the text in paragraph 13.35 which is clear and deals with the issue and it considers that this paragraph should therefore be deleted.

RLAM's Representations on Paragraph 13.49

RLAM objects to this text as it is inconsistent with Policy L4 of the Core Strategy which states that any transport schemes required for each phase of development should be in place before first occupation of that phase. The omission of the word 'phase' from paragraph 13.48 therefore makes it ambiguous. RLAM considers that the last sentence of this paragraph should be amended to make it clear that only those mitigation measures relating to each phase should be operational in advance of that individual phase.

As per comments on paragraphs 13.47 and 13.48, RLAM considers that the transport mitigation measures required would be more appropriately dealt with in some detail at the planning application stage. This put at the LADPD seeks to duplicate this and in its view is not soundly drafted as it is not justified.

RLAM's Representations on Paragraph 13.50

RLAM's comments are the same as its comments to Paragraphs 13.39 and 13.46, in that it considers an SPD not to be justified given the allocation within the Core Strategy and Land Allocations DPD for Davenport Green. However, RLAM does not take any objection to the Council identifying within its Land Allocations DPD (in general) those key environmental and heritage assets to be protected and reserved through the development of the Davenport Green Site.

RLAM's Representations on Paragraph 13.51

RLAM's comments on this matter are set out above in response to paragraph 13.39.

RLAM's Representations on Paragraph 13.52

RLAM's supports the Council's assumed 'no HS2 scenario' relating to policies in Chapter 13, Employment. Notwithstanding HS2 Ltd having designated Davenport Green as a potential 'Major Employment Site', the considerable uncertainty about HS2 means that the Council has made a sensible assumption in its Land Allocations DPD. RLAM believes that the Council will wish to adopt a consistent approach in Chapter 10, Transport, which would require some amendment to ensure consistency and soundness.

Equally, implementation of HS2 may demand a different configuration of development at Davenport Green such as increased density in the immediate vicinity of the proposed station.