

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

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| 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 | X | Page number | 74 |
| SA Report | | Paragraph number | 20.4 and 20.6 |
| SA Appendices | | Policy number | OR1 |
| SA Options Report | | Site reference | WHITE CITY RP |
| 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) | | | |

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| <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>We note the construction of this section which sets out policy ambitions and policy requirements. Paragraph 20.3 sets out a policy direction which would effectively support proposals for bulky comparison development which would thus cement the Council's view that these are preferred locations for those uses.</p> <p>Paragraph 20.4 largely identifies the appropriate tests for out-of-centre retail development consistent with the NPPF. However, the first bullet of this policy is not consistent with national policy and should be removed.</p> <p>Paragraph 20.6 seeks to provide justification for the policy and we object to this phrasing. Whilst we agree that the Retail Study sets out that the established role of this site has been to support bulky retail uses, this in itself is no justification for that role to be protected. To do so would be inconsistent with the earlier advice from much of para 20.4 which rehearses the NPPF position which advises that proposals for retail development outside centres should be considered on their merits subject to the tests of significant adverse impact and failure of the sequential approach.</p> <p>To artificially suppress development opportunity in conflict with the NPPF would fail to maximise the regeneration opportunities that can be secured on this gateway site which falls within the Priority Regeneration Area.</p> <p>We would suggest the removal of bullet 1 from para 20.4, and the removal of para 20.6.</p> | | | | |

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| Document | | Section | |
| Trafford Local Plan: Land Allocations – Consultation Draft | X | Page number | 36 |
| SA Report | | Paragraph number | 9.3 |
| SA Appendices | | Policy number | RE1 |
| SA Options Report | | Site reference | WHITE CITY RP |
| 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 | | | |
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| <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>We firstly re-confirm our support for the inclusion of the above sites (White City Retail Park and 39 Talbot Road) within the Old Trafford Priority Regeneration Area. As has been previously stated, these sites provide extensive opportunity to deliver employment and investment to reduce pronounced deprivation and secure localised regeneration. The enhanced use of these sites not only provides direct contribution to the performance of the local economy, but also enhances the gateway which thus provides the opportunity for indirect beneficial impacts.</p> <p>Core Strategy Policy L3 has identified geographic areas with genuine and stark needs for regenerative intervention, and has also identified what the specific issues are by locality. In the case of the Old Trafford PRA, these include low employment and low average income levels amongst other domains.</p> <p>As such, the range of developments being promote by RE1 in the context of the advice of paragraph 9.3 is unnecessarily prescriptive and would fail to maximise the opportunity to deliver the regeneration actually sought. Put simply, it fails to promote development that would directly create any significant permanent local employment. We therefore object strongly.</p> <p>We would propose the following amended wording for para 9.3: “Within these areas the Council will support development proposals which deliver new homes, community facilities, employment opportunity, gateway improvement and transportation improvements where they meet regeneration objectives set out in the Core Strategy and Policy L3, those of the Trafford Partnership and where they are in accordance with relevant policies of the Trafford Local Plan and national guidance.”</p> | | | | | |

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| Document | | Section | |
| Trafford Local Plan: Land Allocations – Consultation Draft | | Page number | |
| SA Report | | Paragraph number | 162.4 |
| SA Appendices | | Policy number | W2.14 |
| 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) | TP18 | | |
| HRA Scoping report | | | |
| SHLAA (2013) | | | |
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| <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>The document refers to the comment contained at policy W2.14 that “Further development at the Retail Warehouse Parks should be limited to the sale of bulky comparison goods only”.</p> <p>This is inconsistent with the general advice from policy W2.13 and of course the NPPF which directs retail development to preferred locations but also sets out that there is a general presumption for economic development unless those proposals would result in significant adverse impact upon the viability of centres or there is a clear fail of the sequential approach. To directly prohibit a range of uses and investment opportunities without proper analysis would not be acceptable or good planning.</p> <p>Whilst it is noted that these are extracts from Core Strategy policy, as such, the comment in para 162.4 should be given little or no weight in terms of it being read as a “policy requirement” as it would conflict with the NPPF albeit if read as a policy aspiration then it is credible.</p> | | | | | |

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| Document | | Section | |
| Trafford Local Plan: Land Allocations – Consultation Draft | | Page number | 83 |
| SA Report | | Paragraph number | 75.1 |
| SA Appendices | | Policy number | CS L3 |
| SA Options Report | | Site reference | WHITE CITY RP & 39 TALBOT RD |
| SA Flood Risk Sequential Test | | Table/Figure reference | |
| SA Scoping Report | | Other (including omissions and suggestions for proposed amendments) | |
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