

**BY POST AND EMAIL ([strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk))**

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

17 March 2014

Dear Sir,

**TRAFFORD LOCAL DEVELOPMENT FRAMEWORK  
CONSULTATION ON TRAFFORD LOCAL PLAN: LAND ALLOCATION  
CONSULTATION DRAFT**

To comply with the National Planning Policy Framework (NPPF), it is considered that there should be more flexibility in land allocations policies to recognise a wide range on employment uses in addition to traditional B class uses.

Promoting Economic Growth

The NPPF promotes sustainable economic growth and emphasises the need for flexibility to ensure opportunities for development can be met. Paragraph 14 states:

**“At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking.**

**For plan-making this means that:**

- **Local Planning Authorities should positively seek opportunities to meet the development needs of their areas;**
- **Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless**

**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; or**

**Specific policies in this Framework indicate development should be restricted.”**



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This is clear emphasis in Government guidance that local authorities should not be overly prescriptive regarding specific uses and should be seeking to positively promote economic growth and support businesses. It is important for local authorities to provide sufficient flexibility in policies to promote a prosperous economy able to accommodate changing business needs. Markets and economies evolve and not all new businesses fit with traditional use class definitions. Specialist operations have an important role to play in the economy and it is helpful for local authorities to recognise those uses that are appropriate on employment land within the relevant planning policy framework. Documents should provide clear guidance to operators and developers thus encouraging development.

The NPPF promotes flexibility and emphasises at Paragraph 21 that:

**“Investment in business should not be overburdened by the combined requirements of planning policy expectations”**

It goes on to indicate that local authorities should:

**“Support existing business sectors, taking account of whether there are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policy should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid responses to changes in economic circumstances”**

## **Representations and Proposed Amendments**

### **Policy TCR1 – Trafford Centre Rectangle Strategic Location**

To comply with the NPPF, it is considered that there should be flexibility within this policy to recognise that a wide range of employment generating uses including sui generis uses, that are considered acceptable on strategic mixed-use locations.

We support Policy TCR1 which seeks to support and enhance the delivery of major mixed-use sustainable development including residential, employment, retail, leisure and community facilities in accordance with Core Strategy Policy SL4.

Policy SL4 of the Core Strategy is the strategic proposal for Trafford Centre Rectangle. The policy states “a major mixed-use development will be delivered in this location, providing a new residential neighbourhood, together with commercial, leisure and community facilities and substantial improvements to the public transport infrastructure.” The area can deliver:

- 1,050 residential units;
- 15 hectares of land for employment activity;
- New community facilities; and
- A high quality hotel and conference facility.

The definition of “employment activity” is not defined in the adopted Core Strategy.

However, CgMs considers that many specialist operations have an important role in the economy and it is important to annotate these ranges in the policy document to provide sufficient flexibility to support an economy fit for the 21<sup>st</sup> Century.

Within the Trafford Centre Rectangle, there are a number of existing businesses that do not fall within traditional B class uses which provide substantial economic benefits and are entirely appropriate in mixed-used employment locations, such as builders merchants, trade specialists, warehouse clubs, cash and carry operators.

**Proposed Amendments to Paragraph 5.3, Policy TCR1**

“In order to support and enhance the delivery of major mixed-use sustainable development, the Council will grant planning permission for the development of a mix of residential, employment, retail, leisure and community facilities **and other closely related uses not falling within a use class i.e. sui generis uses (such as builders merchants, trade specialists, warehouse clubs, cash and carry operators)** as set out below, in accordance with Core Strategy Policy SL4 and where it is consistent with other policies within the Local Plan and national planning policy, as appropriate.”

CgMs wish to reserve the right to be heard at the examination.

If you wish to discuss these representations further, please do not hesitate to contact me.

Yours faithfully,

**Sally Miles**

Enc –Response Form

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

Office Use Only	
Date	
Ref	
Ack	

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[strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

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**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:

<b>Total number of comment sheets enclosed:</b>	<b>1</b>
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 **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](http://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](mailto: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**.

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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:**

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### 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 <b>and</b> the specific paragraph number, policy, map or table you are commenting on.			
Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	✓	Page number	<b>22</b>
SA Report		Paragraph number	<b>5.3</b>
SA Appendices		Policy number	<b>TCR1</b>
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		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 style="text-align: center;"><b>See attached covering letter.</b></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.