



TRAFFORD
COUNCIL

**COUNCIL'S RESPONSE TO MAIN
MATTERS, ISSUES AND
QUESTIONS**

MAIN MATTER 4

TOPIC PAPER

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Policy W1

MAIN MATTER 4.1

Policy W1 and its associated text and Table W1 do not make it clear whether the figures for employment land provision relate to the development of new employment land only (i.e. land that is being brought forward for employment use for the first time) or will result in proposals to 'recycle' existing employment land or buildings for new employment uses. In the absence of such clarity the policy is not effective.

Council's Response

4.1.1 Policy W1 paragraph 18.7 demonstrates that the focus for this policy is on the recycling/re-use of currently-developed land. Therefore, the policy and employment land supply targets in Table W1 refer largely to recycled employment land. The main 'new' land for employment in the CS is Pomona (which is currently allocated for mixed-use including employment in the Trafford UDP) and Trafford Quays which is proposed for mixed-use in Policy SL4 (mostly residential although with a significant employment element).

4.1.2 CD8.3.5 and CD12.3 Response to Factual Matter 3 set out more details of which land is recycled and which land is 'new'. From this, it can be seen that only 7% of the land proposed for employment has never been allocated or used for employment purposes. It is suggested that a new paragraph at W1.4 is provided. This is detailed as Suggested Change S.200.31 in CD12.4.

Suggested Change S200.31

~~The amount of land proposed for new employment development within these places is shown in Table W1.~~

Table W1 shows the amount of land proposed for employment development within these places. It includes recycling of existing employment land and buildings and land that is being brought into employment use for the first time.

MAIN MATTER 4.2

If the intention is to 'recycle' existing employment land what certainty/evidence is there that this approach will provide sufficient choice of land and sites for developers to compete with regional, national and international alternatives?

Council's Response

4.2.1 Refer to CD8.3.5 Section 5 which sets out how the employment land supply targets have been derived and why they are considered to be realistic and achievable.

- 4.2.2 The portfolio of employment land in Trafford is extensive and varied with Pomona, Wharfside and Trafford Centre Rectangle capable of providing high quality space attractive to national and international employers; Trafford Park Core and Carrington more suitable for national and regional manufacturing and warehousing operators and; areas such as Old Trafford, Sale and Broadheath meeting more local needs.
- 4.2.3 Recent planning consents and developments within the Trafford Centre Rectangle and Altrincham town centre, such as the completed Venus office block; the recent applications at Trafford Quays and the former Kratos building (both in the Trafford Centre Rectangle and; the Altair development in Altrincham indicate the ability of these “recycled” sites to offer high quality developments. (Also see response to MM3.21).

MAIN MATTER 4.3

How have the assumptions upon which the economic strategy is based been tested? How does the economic strategy link with the Core Strategy housing strategy and the housing strategies of adjoining Authorities, together with the likely impact on future travel to work patterns?

Council’s Response

- 4.3.1 The economic strategy set out in Policy W1 accords generally with the spatial strategy for the Greater Manchester sub-region set out in RSS Policy MCR1 to MCR3 and specifically with the sub-regional targets in W3 and L4 (CD3.1.1).
- 4.3.2 The housing strategy set out in Policy L1, of the Core Strategy, reflects the priorities established in RSS in terms of MCR1, MCR2 and MCR3. It seeks to locate new residential development in sustainable locations close to existing or planned employment areas. The scale of housing provision and its distribution is designed to meet the needs of the existing community and to support the economic growth of the City Region.
- 4.3.3 Despite the current uncertainties surrounding the status of RSS, CLG has made it clear that the evidence base underpinning that document remains valid. Therefore the Council considers that it is appropriate to rely on the economic and housing growth evidence that underpinned the RSS. The CS Policy W1 also accords with CD4.2.2 Section7 Table 12.
- 4.3.4 The policy is also consistent with the Manchester Independent Economic Review (CD4.2.1) and the Greater Manchester Forecasting Model (CD4.2.7/10/11/12) which were based on comprehensive assessments of Greater Manchester’s economic and employment

needs and housing market. The Core Strategy has been developed through joint working with both Manchester and Salford City Councils.

- 4.3.5 The Manchester Core Strategy identifies the City Centre as the economic driver for the City-Region and the primary strategic location for economic development within the City and City Region.
- 4.3.6 Salford's UDP identifies a number of regionally and sub-regionally significant sites, many of which are located close to, or within the Regional Centre; included within these sites is that part of the Media City UK site which lies within Salford,
- 4.3.7 The aim of Salford's Core Strategy in terms of its housing strategy is to ensure that Salford plays its part in meeting the housing needs of the growing number of households in Greater Manchester and the North West region; meets the needs of all types of household, including those with specialist requirements; increases the quality, adaptability and affordability of housing and; supports economic growth by increasing the supply of housing that will attract high income households and entrepreneurs to the City.
- 4.3.8 Manchester's Core Strategy housing objective is to provide for a significant increase in high quality housing provision at sustainable locations throughout the City, to both address demographic needs and to support economic growth. The most recent iteration of the Plan seeks to focus new residential development within the area to the east and north of Manchester City Centre because this area has been shown (through their SHLAA) to have the greatest capacity.
- 4.3.9 The Council therefore considers that both its economic housing strategies are linked closely to and indeed complement those of our adjoining AGMA authorities.
- 4.3.10 This, together with the development requirements included within the Strategic Locations will ensure that the growth strategies will not have an adverse impact on the future travel to work patterns. Instead the Council is confident that promoting growth in the areas that it has, will contribute to more sustainable patterns of travel in the future.

MAIN MATTER 4.4

What is the evidence to support the selection of the employment foci listed in W1.3? Is that evidence sufficiently robust? Are these areas the most appropriate and what certainty is there that they are deliverable?

Council's Response

- 4.4.1 The Council considers that CD8.3.3 provides a comprehensive and robust assessment of the availability of employment land in Trafford. This is a key piece of evidence which supports Policy W1.

- 4.4.2 The focus of economic activity listed in W1.3 is supported by the Council's Economic Development team.
- 4.4.3 Whilst the spatial strategy set out in Policy W1.3 largely reflects the historic pattern of employment land use it is consistent with the objectives of the of the Local Strategic Partnership sub-group, the Trafford Economic Alliance and the Economic Development Plan (CD 8.3.8). The Council therefore considers that this approach is the most appropriate in order to meet the overall objectives,
- 4.4.4 Policy W1 anticipates that some locations will need to adapt to meet projected demand. There are a number of large, well-established employment areas in Trafford which still have significant capacity and capability to meet future demand. Trafford Park is the oldest planned industrial estate in the world and has already demonstrated its ability to adapt to changing demands when it was extensively modernised during the 1980s and 1990s. The Council is confident that it will be able to adapt to new challenges as they arise particularly in the light of the work emerging out of the Trafford Park Master Plan (CD8.2.2 and 8.2.3). Other areas such as Wharfside and Carrington are very significant in scale and have the capability to provide a different form of employment (e.g. a change from chemical industry to general industrial and storage/distribution uses in the case of Carrington).
- 4.4.5 Evidence to justify the deliverability of development at Carrington (CD12.22) has been provided by the owners of the site and its implementation will be secured through the Land Allocations DPD.

MAIN MATTER 4.5

What is the evidence to support the selection of foci for office development listed in W1.5? Is that evidence sufficiently robust? What certainty is there that they will deliver the required amount, quality and choice of B1 sites? What certainty is there that they are deliverable?

Council's Response

- 4.5.1 The economic strategy set out in Policy W1 accords generally with the spatial strategy for the Greater Manchester sub-region set out in RSS.
- 4.5.2 Despite the current uncertainties surrounding the status of RSS, CLG has made it clear that the evidence base underpinning that document remains valid. Therefore the Council considers that it is appropriate to rely on the economic evidence which underpinned the RSS.
- 4.5.3 CD8.3.6 provides further detail at the local level as to the Council's approach to identifying suitable locations for B1 office development, in line with PPS4.
- 4.5.4 The Council considers that this evidence together with that which underpinned the RSS is sufficiently robust.

4.5.5 The locations identified represent a variety of attractive, accessible sites that can meet a range of requirements. Further evidence on the relationship of these locations to projected demand can be found in CD8.3.3 Section 5 and CD4.2.2 Section 4.43i. Additionally recent planning applications and completed developments in the Trafford Centre Rectangle support their ability to deliver the proposed level and quality of development.

MAIN MATTER 4.6

Does policy W1 make it sufficiently clear that the sequential approach of PPS4 will be followed in allocating land and making decisions on proposals for office development?

Council's Response

4.6.1 The proposed changes to Paragraphs 18.13 to 18.16 in CD6.1.2 (Suggested Change 41 (SC41)) provide greater clarity to W1 with regards to these issues.

MAIN MATTER 4.7

What is the justification for not identifying land at Davenport Green as a major focus for B1 office development, given its importance in the current development plan? Is such evidence robust and are its conclusions transparent?

Council's Response

4.7.1 Policy EC2 (h) PPS4 – CD2.1.6 states that “Existing site allocations should not be carried forward from one version of the development plan to the next without evidence of the need and reasonable prospect of their take up during the plan period. If there is no reasonable prospect of a site being used for the allocated economic use, the allocation should not be retained, and wider economic uses or alternative uses should be considered”. This advice followed earlier informal advice offered by PINS in relation to the production of LDF documents (CD2.4.1).

4.7.2 Following comments received to earlier iterations of the Plan, not least those submitted by the GONW, the Council undertook a piece of work to detail the amount of B1 Office land and floorspace required up to 2026 to meet the identified need for Trafford. It also assessed how much of this need could be met within or on-the edge-of town centres and identified areas outside of the town centres where the need that cannot be met in-centre could be located. In so doing it took account of Policy EC5 of PPS4 and the supporting Practice Guidance.

4.7.3 Having established the need for office space, CD8.3.6 Section 6 considers the Davenport Green site on the same basis as the assessment of other potential areas for office development (such as the town centres, Wharfside, Trafford Centre Rectangle, etc.). CD 8.3.6

concludes that these locations are suitable for varying amounts of office development based on PPS4 and wider sustainability criteria, whereas it concludes that Davenport Green would not be.

4.7.4 PPS4, however, does not only require an assessment of need, but one also of the reasonable prospect of an existing site's take up during the plan period. In this respect the Council concluded that because despite outline planning permission being granted in 1998 and extended until 2009, no end user was ever forthcoming and no detailed application was ever submitted for approval there were considerable doubts as to the deliverability of this proposal during the Plan period.

4.7.5 The Council considers that this approach is robust and consistent with national policy, in particular PPS4.

MAIN MATTER 4.8

Should this land be retained as an employment site to provide flexibility in the Core Strategy employment land portfolio and to take account of cross-boundary housing/employment strategies?

Council's Response

4.8.1 The proposal for Davenport Green was only included in the original Trafford UDP and carried forward in the Revised Trafford UDP subject to certain environmental and infrastructural conditions. It is evident from the submissions by RLAM (CD10.7.5 Appendix 15 Section 1.4/1.5) that the site is not deliverable under these conditions. The Council does not think it would be appropriate to relax these conditions to facilitate this development given the sensitivities of the site in particular its relatively low rating in sustainability terms and strategic fit with the Council's Development Strategy, particularly the impact on our regeneration areas.

4.8.2 The Council also considers that the portfolio of employment land proposed in Policy W1 is sufficiently varied and extensive to allow flexibility in meeting future demands and is also sufficiently well-related and accessible to meet sub-regional economic and social objectives.

MAIN MATTER 4.9

What improvements to the public transport system are required by W1.6? Are they in addition to those listed in the SL policies? What is the evidence to justify their requirement and to give certainty to their delivery at the appropriate time?

Council's Response

4.9.1 The improvements to the public transport system referred to in W1.6 are not in addition to those listed in the SL policies. The improvements required are listed in the updated implementation tables included in the Proposed Minor Changes document (CD6.1.2) and include: the Bridgewater Way Scheme; direct link across Manchester Ship Canal at

Clippers Quay; strategic processional route; extension of Metrolink to Trafford Park or some alternative form of public transport; water taxi; pedestrian link across Trafford Boulevard etc.

- 4.9.2 The Salford Quays/Trafford Park Accessibility Study (CD: 8.6.1) makes recommendations for improvements to accessibility within the study area. These include: the introduction of two shuttle services connecting destinations within Trafford Park, and the Trafford Centre, to frequent, longer distance, public transport services at designated interchanges; the expansion of the Metrolink from Pomona to the Trafford Centre (via Trafford Park); a review of public transport services to potentially improve co-ordination between services and to identify if reduction/withdrawal of certain services could be undertaken and associated funding be reassigned to support new routes/or enhanced frequencies; and that the needs of pedestrians and cyclists are fully considered through new development.
- 4.9.3 Trafford Park is located within the Least Accessible area in accordance with the Accessibility Map at Appendix 4 within SPD 1: Developer Contributions to Highway and Public Transport Schemes (CD7.2.30). The schemes proposed are intended to improve accessibility to and around the area.
- 4.9.4 The Council is working with GMPTE to ensure that appropriate public transport schemes are identified and can be delivered. The Phase 2a and 2b LDF transport modelling work will inform the development of the Land Allocations DPD.

MAIN MATTER 4.10

Are policy W1 and text at paragraph 13.8 entirely consistent? The latter reference recognises the airport as a major asset with the potential to stimulate economic activity, but W1.10 seeks to restrict economic activity associated with the airport.

Council's Response

- 4.10.1 The CS as a whole and policies L4 and W1 in particular seek to promote sustainable development that supports the priorities for Trafford. Manchester Airport is a key driver for the economy of Greater Manchester and the North West as a whole but this must not be achieved at the expense of other sustainability factors such as social or environmental issues. The criteria in Policy W1.10 are considered necessary and reasonable to achieve this balance between the above objectives.
- 4.10.2 The RSS Panel Report (CD12.24) Page 53 Paragraph 4.68) did not identify *"...the airports as particular centres for growth, though operational development will clearly take place there on a substantial scale. In general however their edge of town locations, and surrounding Green Belts, do not fit with (RSS) spatial principles for most forms of development."*

MAIN MATTER 4.11

What is the justification for the restrictive approach of policy W1 towards airport associated development? How does this align with cross-boundary economic strategies?

Council's Response

4.11.1 The CS as a whole and policies L4 and W1 in particular seek to promote sustainable development that supports the priorities for Trafford. Manchester Airport is a key driver for the economy of Greater Manchester and the North West as a whole but this must not be achieved at the expense of other sustainability factors such as social or environmental issues. The criteria in Policy W1.10 are considered necessary and reasonable to achieve this balance between the above objectives.

4.11.2 Manchester Core Strategy proposes a significant allocation for airport related uses through the Airport City concept. Through joint working with MCC and the Manchester Airport Group, Trafford are led to believe that the proposal for Airport City adequately met from within the MCC area. Further information is contained within Appendix 1.5 in the response to Matter 1.0.

4.11.3 Page 163 – 170 of the RSS Panel Report (CD12.21) detailed that non operational land does not have to be immediately adjacent the airport and that all districts within GM have a role to play in maximising growth associated with the Airport. Trafford considers that the Core Strategy allows for the growth of economic development in relation to the airport and contributes to the growth of the Manchester City Region (see also response to Matter 4.0). It is considered that this can be done in tandem with addressing the borough's regeneration objectives and will be best served by development at Carrington and Trafford Park, and the borough's Strategic Locations.

MAIN MATTER 4.12

All existing employment land should be reviewed with regards to its future suitability as part of the Land Allocations DPD process. Therefore, why are the requirements of W1.11 necessary? If they are necessary are they stated sufficiently clearly to enable effective implementation? Are the tests reasonable, consistent with national policy and not unreasonably restrictive?

Council's Response

4.12.1 Policy W1.11 refers to unallocated employment sites that may still have value for employment use. The criteria in the policy seek to ensure that this value is not lost unnecessarily and that the amenity of longstanding neighbouring uses is not compromised. It is considered to be flexible enough to allow for non-employment uses to be justified and is not unduly restrictive. It is suggested that W1.11 is clarified as detailed in Suggested Change 200.32 in CD12.4.

Suggested Change 200.32

In determining applications for the redevelopment of unallocated ~~existing~~ employment sites for non employment uses, developers will be required to provide a statement to the satisfaction of the Local Planning Authority, demonstrating that:

MAIN MATTER 4.13

Is W1.11 entirely consistent with the Strategic Location (SL) policies which prescribe a mix of uses on such sites, some of which are not B class employment uses?

Council's Response

4.13.1 See response to MM4.12.

4.13.2 By clarifying that these criteria apply only to unallocated employment sites, sites within the Strategic Locations (which will be allocated through the Land Allocations Plan) will not be subject to the provisions of Paragraph W1.11.

Policy W2**MAIN MATTER 4.14**

Is the retail evidence upon which policy W2 is based sufficiently up-to-date?

Council's Response

4.14.1 The evidence which supports Policy W1 is set out in CD8.1.2 and CD8.1.3, CD8.3.5 and CD8.3.6. together these form an appropriate and comprehensive assessment of retail, leisure, office and other town centre requirements in the Borough and, although, the supporting data for the retail and leisure study is from 2007, the basic approach is considered to be consistent with PPS4 and is a sound basis for Policy W2.

4.14.2 The policy also reflects the granting of planning permission for a large Tesco associated with the redevelopment of Lancashire County Cricket Club although it is recognised that this permission is currently subject to Judicial Review.

MAIN MATTER 4.15

Is the policy too prescriptive regarding the delivery requirements for the town centres? Are these requirements supported by robust evidence? What certainty is there that they are deliverable?

Council's Response

4.15.1 The policy sets out what "can be delivered" in each town centre. As such, it is an indicative minimum target for retail, employment, etc.

development to meet the CS Vision and Objectives. It is not, however, prescriptive and the actual allocation for each Town Centre will be set out in the Land Allocations Plan, based on the requirements at that time.

4.15.2 The evidence to support these targets in the CS is contained within CD8.1.2, CD8.1.3 and CD8.3.6 and is generally based on recent planning permissions or potential capacity.

MAIN MATTER 4.16

Should the Core Strategy approach towards out-of-centre retail developments be clarified to inform that sequentially extensions to existing out-of-centre developments will be preferred ahead of proposals for new ones?

Council's Response

4.16.1 The Council considers that the existing policy is appropriate in that it refers to government guidance. It is not clear how such an amendment would be consistent with guidance in CD2.1.6. Neither is clear what evidence base would suggest such an approach.

MAIN MATTER 4.17

Is the inclusion of the word 'normally' in W2.14 too permissive? For clarity should it be omitted?

Council's Response

4.17.1 It is considered that the use of the word 'normally' is appropriate in this instance in that it allows some flexibility in the application of this policy where there are exceptional circumstances which could justify the development of non-bulky comparison goods facilities on the existing retail warehouse parks.

MAIN MATTER 4.18

Is it intended that proposals for the provision of community/small scale retail development will be permitted, in principle, in association with new residential development at the SLs? If so, should this be clarified in policy W2 or its supporting text?

Council's Response

4.18.1 The policies for all 5 of the Strategic Locations allow for community and commercial uses (including retail) to support the communities that will be created there.

4.18.2 Whilst it is not considered necessary to repeat these policies in W2, a clarification to the supporting text is proposed for paragraph 19.5. This is detailed as Suggested Change 200.33 in CD12.4.

Suggested Change 200.33

Policies SL1 to SL5 of the Core Strategy refer to the provision of community or commercial facilities to support the needs of people living, working or using the area. In retail terms, except where stated, the expectation is that these will be small-scale convenience retail facilities of a scale appropriate to support the needs of the new community.

Policy R6

MAIN MATTER 4.19

What is the evidence to justify and support the bullet point proposals of R6.4? Is their delivery feasible?

Council's Response

4.19.1 CD8.1.3 concluded that there is a quantitative and/or qualitative need for an additional hotel and art gallery in Trafford. Further details of the need and the deliverability of these proposals is set out in CD8.1.3 Section 9.0.