



**TRAFFORD**  
**COUNCIL**

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

**MAIN MATTER 6**

**TOPIC PAPER**

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## Policy L1

### MAIN MATTER 6.1

**Taking into account an under performance in completions over the last few years, does L1.2 make sufficient provision for residential development to meet the RSS minimum requirements projected to 2026, together with Housing Growth Point uplift? A detailed housing trajectory, as required by PPS3, is necessary to demonstrate that adequate provision will be made and that the intended phasing for delivery is realistic.**

### Council Response

- 6.1.1 L1.2 and Table L1 summarise the growth aspirations of the RSS (CD3.1.1) for the years between 2008/9 and 2025/6 and those of the Council via the National Housing Growth Point initiative between 2008/9 and 2016/7.
- 6.1.2 Table L1 of the Core Strategy (CD6.2.1) sets out the Council's housing development proposals for this period area by area and phase by phase and in the three rows at its foot relates these proposals (summarised in the Policy L1 Allocation Total row) to the basic RSS Trafford Target and the RSS Target plus the 20% National Housing Growth Point uplift target figure. The Policy L1 Allocation Total (11,956) is some 4% above the Target plus the 20% National Housing Growth Point uplift target figure (11,450) and 15% above the RSS Trafford Target figure (10,400).
- 6.1.3 Advice received from PINS during the preparation of the Trafford Core Strategy suggested that the Core Strategy should be prepared under "normal" market conditions. This advice is summarised in section 3 of CD 12.24
- 6.1.4 In response to Factual Matter 2, in CD12.3, the Council proposed that a graph form of the trajectory could be included within the adopted version of the Plan to illustrate the development proposals in greater detail. This proposed change can be found at reference 100.01 in CD 12.4. Further to this suggested change, 200.17 in CD 12.4 details the inclusion of a housing trajectory in the Plan.
- 6.1.5 The RSS target has been rolled forward from a 2003 start date in the RSS to a 2008 start date in the Core Strategy. The end date has been extended from a 2021 end date in the RSS to a 2026 end date in the Core Strategy. The total housing provision proposed in the Core Strategy of 10,400 (excluding the Housing Growth Point uplift) remains at 10,400 for an identical 18 year plan period. The policy L1 allocation dwelling total of 11,956 makes provision over and above the RSS target provision (including the Housing Growth Point uplift) of some 500

dwellings to take account of the net new dwelling construction under performance recorded in the 2010 AMR between 2003/4 and 2009/10.

- 6.1.6 The Council therefore considers that given all the above, sufficient provision is being made within the plan to allow the RSS and Housing Growth Point targets to be achieved.

### **Suggested Change**

[A detailed housing trajectory is set out in Appendix 4 to illustrate the current year on year development progress over the Plan period anticipated to deliver the new housing target of policy L1. The trajectory will be updated and published in the Council's Annual Monitoring Report to record the degree of progress being made towards meeting the policy target.](#)

### **MAIN MATTER 6.2**

**Does the most up-to-date evidence support the intended scale of housing provision?**

#### **Council Response**

6.2.1 The Council believes that it does – given that the development proposals set out in policy L1 and Table L1 seek to make provision for growth in a way that is consistent with the spatial development and regeneration objectives of the RSS, taking account of the current and potential future land supply. It should be noted that despite the current uncertainties surrounding RSS, the Government has made it clear that the evidence base provided to support RSS remains valid.

6.2.2 The available evidence supporting the position of the Council is well summarised in a recent (December 2010) report of the AGMA Planning, Housing and Environment Research Team (CD12.15).

### **MAIN MATTER 6.3**

**What is the evidence to demonstrate that there is a five year deliverable supply of housing, as required by PPS3?**

#### **Council Response**

6.3.1 The evidence is set out in the SHLAA reports of 2009 and 2010 (CD8.8.5 and CD8.8.6) where the potential supply for up to 5, between 6 and 10, between 11 and 15 and beyond 15 years is set out.

### **MAIN MATTER 6.4**

**With reference to L1.3 what is the current position regarding funding for the Housing Growth Point uplift? To what extent is this funding necessary to provide the infrastructure for this uplift? Why is the uplift dependant upon such funding being forthcoming?**

#### **Council Response**

- 6.4.1 In 2008 Trafford, as part of the GM Housing Growth Point, committed to providing a 20% uplift in housing targets above RSS levels through to 2018. The Housing Growth Point was an agreement with Government to deliver a stretch housing target in return for Government funding to deliver key infrastructure to bring unused and underused land back into use.
- 6.4.2 To date, the Council has accessed Growth Point funding of approximately £650,000 from growth fund sources to assist in the delivery of this higher level of growth. This funding has been spent on increasing organisational capacity, site appraisal, investigations, master planning and providing new infrastructure.
- 6.4.3 However, following the Comprehensive Spending Review on the 20 October 2010, the Department for Communities and Local Government (CLG) provided guidance to all Growth Point Authorities stating that the separate funding programme for Housing Growth would end, and that projects and programmes of this type would be required to bid for funds from the Regional Growth Fund (RGF).
- 6.4.4 AGMA is currently reviewing its position and exploring other mechanisms to support Greater Manchester's growth ambitions. A bid for the Regional Growth Fund is being developed by the LEP, of which, housing will be one of the investment streams contained within the bid.
- 6.4.5 Under Localism, Trafford will be responsible for setting its own housing growth targets. Whilst the Council remains committed to delivering growth, to meet its own housing and economic growth aspirations, it recognises that without additional funding to deliver key infrastructure and bring sites back into use it will not be possible to deliver these higher levels of growth. Paragraph L1.3 therefore remains important to reflect the uncertainty created by the loss of this funding stream.

## **MAIN MATTER 6.5**

**Is the indicative 80% PDL target the most appropriate? Is it justified by evidence? Have alternative targets been considered and if so, why were they rejected?**

### **Council Response**

- 6.5.1 The 80% indicative target set out in Core Strategy Policy L1 reflects the indicative target set for the South Manchester/North East Cheshire area in RSS (CD3.1.1), Policy L4 and the findings of the SHLAA reports of 2009 and 2010 (CD8.8.5 and CD8.8.6) - particularly in so far as the supply of PDL potentially forthcoming from sites not already within the planning process is concerned; Table L1 demonstrates that this target is achievable.
- 6.5.2 It should be noted once more that despite the current uncertainties surrounding RSS, the Government has made it clear that the evidence

base provided to support RSS remains valid. For the above reasons, the Council considers that the PDL target is the most appropriate.

#### **MAIN MATTER 6.6**

**Is the sequential approach to housing land release consistent with PPS3 which takes account of the possibility of some greenfield sites being more sustainable than some brownfield (PDL) sites? Should the policy be less prescriptive in this regard?**

#### **Council Response**

6.6.1 The Council considers that the sequential approach to greenfield land release, together with paragraph L1.9 provide an approach which is consistent with PPS3, taking into account the PDL target set for the Borough by RSS.

#### **MAIN MATTER 6.7**

**To what does 'Section B' in the third bullet point of L1.7 refer?**

#### **Council Response**

6.7.1 This is a typographical error. It should refer to the Strategic and Place Objectives' Sections of the Plan (Chapters 4 and 5), which were derived from a re-drafted version of "Section B" in the Core Strategy Preferred Options (2009) document (CD 6.3.9). This change is detailed in Suggested Change 200.15 (CD 12.4).

#### **Suggested Change 200.15**

Thirdly other such land outside the Regional Centre and Inner Areas that can be shown to be of benefit to the achievement of the wider Plan objectives set out in ~~Section B~~ Chapters 4 and 5 of this Plan.

#### **MAIN MATTER 6.8**

**Does the intended housing distribution set out in policy L1 and Table L1 accord with Core Strategy vision, which says that the focus of development will be within the urban area, whereas the housing strategy intends to direct 70% to the South City Region.**

#### **Council Response**

6.8.1 The Vision seeks to focus development within the urban area, primarily (but not exclusively) in the north east of the Borough. The distribution of land identified in Table L1 reflects the aspirations of the City Region and the Council's wider objectives, particularly relating to economic development, regeneration and the meeting of identified housing need. 3 out of 5 of the Strategic Locations are within the north east of the Borough; the remaining 2, the Trafford Centre Rectangle and Carrington Locations are within the urban area and will contribute significantly to the Plan's Strategic and Place Objectives

**MAIN MATTER 6.9**

**With reference to L1.6 clarification is required if the ‘half to support key regeneration priorities’ refers to the 70% housing to be provided in the South City Region.**

**Council Response**

6.9.1 The Council can confirm that the “half will support regeneration priorities” reference relates to the 70% land release proposed within the South City Region area. The text of L1.6 could be amended as detailed in Suggested Change 200.14 (CD 12.4).

**Suggested Change 200.14**

*Table L1 demonstrates that approximately 30% of the land to be released will be within the Regional Centre and the Inner Area ~~and of the remaining~~ 70% within the South City Region area. ~~Within the South City Region area half of the land to be released~~ will support key regeneration priorities set out in Policy L3 and/or strengthen and support Trafford’s 4 town centres.*

**MAIN MATTER 6.10**

**What is the evidence to justify the intended housing distribution split? What others have been considered and consulted upon? Why were those alternatives rejected?**

**Council Response**

6.10.1 The proposed housing distribution seeks to reflect 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.

6.10.2 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 and housing growth evidence that underpinned the RSS.

6.10.3 Additionally this distribution has necessarily been informed by the results of the SHLAA (CDs 8.8.3, 8.8.5 and 8.8.6) and the level 2 SFRA (8.4.4).

6.10.4 In 2007 the Council consulted upon 3 possible spatial options, (CD6.4.2). Subsequent to this the Council published its Preferred Options document in 2008 (CD6.3.1), with a single option not being

chosen until 2009 (CD 6.3.9). CD6.3.10 details the process and the justification as to why the other options were rejected.

### **MAIN MATTER 6.11**

**What is the evidence to demonstrate that the intended distribution will be deliverable?**

#### **Council Response**

6.11.1 The proposed housing distribution seeks to reflect 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.

6.11.2 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 and housing growth evidence that underpinned the RSS.

6.11.3 Additionally this distribution has necessarily been informed by the results of the SHLAA (CDs 8.8.3, 8.8.5 and 8.8.6) and the level 2 SFRA (8.4.4).

6.11.4 CD12.12 sets out the 'what' 'why' 'who' 'how' and 'when' for each Strategic Location which together provides the justification for the proposals and a strategy for their delivery. CD8.8.25 provides an independent assessment of how housing growth can be delivered in Trafford with an emphasis on the input of development of the Strategic Locations. CD12.3 in response to Factual Matter 1.0 refers to a comprehensive list of evidence documents which support the inclusion of each of the Strategic Locations individually and in general.

6.11.5 Together, these documents form a robust and up-to-date evidence base that shows that proposals in each of the Strategic Locations and the rest of Trafford are achievable, flexible and can be monitored.

### **MAIN MATTER 6.12**

**What is the evidence to demonstrate the feasibility of re-assigning housing at SL1 to SL4 and SL5 if consistency PPS25 indicates that new planning permissions for housing at Pomona Island should not be granted?**

#### **Council Response**

6.12.1 The Council provided more details in relation to this matter in its Response to Factual Matter 7 in CD12.3.



6.12.2 The evidence provided in that document is supported by the responses received from key stakeholders at various consultation stages. This includes the Trafford Quays Delivery Report (*CD 10.4.11*) and the Carrington Delivery Statement (*CD 12.22*).

### **MAIN MATTER 6.13**

**Is Table L1 too prescriptive? Is it sufficiently flexible to allow a greater/lesser number of units to be provided at the SLs if detailed proposals and evidence show such deviation to be necessary to enable overall housing delivery?**

#### **Council Response**

6.13.1 As set out in paragraph 10.5 of CD 6.2.1 Table L1 demonstrates where and when the proposed housing land will be delivered. It indicates that there is sufficient land to accommodate the housing land target, expressed as a minimum. It reflects the outcomes of the SHLAA and as such needs to be relatively prescriptive in order to demonstrate that sufficient land exists in the Borough over the Plan period.

6.13.2 Advice received from PINS during the preparation of the Trafford Core Strategy suggested that the Core Strategy should be prepared under “normal” market conditions. This advice is summarised in section 3 of CD 12.24.

6.13.3 Therefore, the Council considers that given that the targets within this table are expressed as minimums, the table provides the necessary information at this point in time. Should deviation be required at the time of the Land Allocations DPD the Council will consider the impact of this on the phasing expressed in this table and the overall land supply totals.

### **MAIN MATTER 6.14**

**Is L1.8 necessary and justified? Is it consistent with PPS3?**

#### **Council Response**

6.14.1 Advice during the preparation of the Plan (particularly from PINS in CD 12.24) was to plan for normal market conditions. Table L1 demonstrates that sufficient land exists in the Borough over the Plan period, however as expressed in the Council’s response to Factual Matter 7 (CD12.3), Trafford is a constrained Borough and as such it is important that the mere fact that there is a slow down in the market, should not act as a trigger for planning permission to be granted for the development of greenfield sites, which are not in accordance with the provisions of L.1.7.

6.14.2 The Council considers that this approach will enable the Council to continue to divert housing development to appropriate locations in accordance with PPS3.

**MAIN MATTER 6.15**

**Are the intended contingency proposals referred to in paragraph 10.16 appropriate? Should the housing strategy have greater flexibility to ensure that early review of the Core Strategy housing strategy will not be triggered by under delivery of new housing?**

**Council Response**

6.15.1 This matter is addressed in part by the Council's response to Factual Matter 7 (CD 12.3). Additionally the strategy for delivering housing, as presented within the Core Strategy, includes a degree of flexibility over and above the housing targets originally expressed within RSS. This flexibility is provided by the Council's identification of additional land to support the Housing Growth point, which anticipates a 20% uplift of delivery until 2018.

**MAIN MATTER 6.16**

**With reference to the last paragraph of the implementation mechanisms for policy L1 which follow the policy text, clarification is required that this is not a reference to an intended reliance on windfalls to contribute to the housing supply. If it is justification is required.**

**Council Response**

6.16.1 The Implementation Mechanisms text was not intended to convey the intention that the housing supply would rely on the use of windfall development sites but that such sites would make some contribution above and beyond the provision to be identified in detail in the Land Allocations Plan and Area Action Plans. For the avoidance of any doubt the text within the Implementation schedule at L1 could be amended as detailed in Suggested Change 200.16 (CD12.4).

**Suggested Change 200.16*****Implementation Mechanisms***

*Implementation generally will be through private sector and RSL development. ~~Other~~ Significant ~~development~~ sites within the Strategic Locations ~~identified in this Core Strategy~~ and elsewhere in the ~~Borough Inner Area and South City Region~~, constituting the majority of the provision proposed in Table L1, will be ~~allocated~~ identified in ~~a~~ the Land Allocations Plan and/or Area Action Plans. ~~Other sites~~ Many of these sites will be smaller than identified through the Land Allocations DPD and delivered through the planning application process, taking account of the development monitoring arrangements set out in this policy.*

## Policy L2

### MAIN MATTER 6.17

**What is the evidence to support and justify each of the thresholds specified in the policy? Are they the most appropriate? What others were considered, consulted upon and subjected to Sustainability Appraisal? Why were such alternatives rejected? Is the evidence that is relied upon sufficiently up-to-date and robust?**

#### Council Response

6.17.1 PPS3, paragraph 29 sets out that the national indicative minimum site size threshold is 15 dwellings. However it also states that local authorities can set lower site size thresholds where viable and practical. Therefore as part of the process of developing the Core Strategy's policy relating to affordable housing, the Council commissioned the Trafford Economic Viability Study (CD 8.8.22). Until such time that the viability study was available (2009), the Council proposed to adopt the minimum indicative threshold set out in PPS3, boroughwide. Therefore this threshold appeared in the Development Management Policy Direction, DM5, in 2008. The "policy directions" were not subjected to SA in 2008.

6.17.2 Section 6 of the Viability study summarises the results of the economic viability model and provides the evidence for a variations in the minimum indicative threshold specified in this policy. This study was available to inform the production of the Preferred Option document in 2009 and this version of the policy was subject to SA in both 2009 and 2010.

6.17.3 The Council considers that this evidence is sufficiently up-to-date and robust to support these locally specific thresholds.

### MAIN MATTER 6.18

**With regards to dwelling mix, is Table L2 too prescriptive?**

#### Council Response

6.18.1 Informal advice offered by GONW during the preparation of the further consultation document (CD 6.3.19) suggested that in order for the policy to address the requirements set out in paragraph 22 of PPS 3, it should be more specific about dwelling type, mix and size, of accommodation.

6.18.2 The Council considers that the evidence supplied by the HMA in relation to the need for family accommodation, in particular the need for affordable family accommodation and the conclusion that there is no net need for one bed accommodation, warrants the prescriptive nature of table L2.

**MAIN MATTER 6.19**

With reference to requirements for affordable housing provision, how are each of the requirements of paragraph 29 of PPS3 met in policy L2 and its associated supporting text?

**Council Response**

6.19.1 PPS3 Paragraph 29, bullet point 1 is met through the identification of the overall affordable housing target of 40%. This is derived from the HMA (8.8.12), however this target was derived prior to a viability assessment being carried out. The Council published its viability study in May 2009 (CD 8.8.22) and this informed the production of both the Preferred Option consultation document (CD 6.3.9) and the interim consultation document CD 6.3.19, where a variable target was introduced.

6.19.2 Additionally PPS3 Paragraph 29, bullet point 1 is met through the requirement of paragraph L2.14 seeks to ensure that developments will not only be affordable at the first time of occupation.

6.19.3 PPS3 Paragraph 29, bullet point 2 is met through paragraph L.2.13 (d), which establishes a split of 50:50 intermediate units: social rented units. This target is supported by both the HMA and the viability study.

6.19.4 PPS3 Paragraph 29, bullet point 3 is met through Table L2 which sets the size of units, based on the findings of the HMA, with further clarification being provided in paragraph L.2.13.

6.19.5 PPS3 Paragraph 29, bullet point 4 is met through paragraph L.2.11 which sets out the site size thresholds for affordable housing contributions.

6.19.6 PPS3 Paragraph 29, bullet point 5 is met through paragraph L.2.13 which states that the expected delivery of affordable housing units will be on site.

6.19.7 In terms of accepting exceptions to the policy requirements set out in Policy L2 of the Core Strategy and summarised above, further guidance will be provided to developers in the Planning Obligations SPD which will be adopted alongside the Core Strategy, following the required level of consultation.

**MAIN MATTER 6.20**

**What is the evidence to justify the market locations defined in L2.9 and the places listed within them? Is that evidence sufficiently robust? For example, what is the evidence to demonstrate that 40% is a justified and viable target for affordable housing provision in Altrincham?**

**Council Response**

6.20.1 Section 4 of the Viability Study (CD 8.8.22) provides the evidence to justify the market locations. As stated in that section it was considered most robust to maintain a commonality between the places in the Core Strategy and the Places in the Viability Study, to ensure consistency.

6.20.2 Section 6 of the Viability Study provides the findings in relation to the variable affordable housing targets. Further guidance on establishing the viability on a site by site basis will be provided within the Planning Obligations SPD (CD12.26).

**MAIN MATTER 6.21**

**Clarity is required regarding the affordable housing requirements for housing development at the Trafford Centre Rectangle by adding reference to an appropriately justified market location for this SL.**

**Council Response**

6.21.1 The Trafford Economic Viability Study (CD 8.8.22) stated that Trafford Park could not be identified as an existing housing market location because there is currently no residential market in that area and no relevant comparator which could inform the Viability Study

6.21.2 In order to clarify the position in relation to this location and other areas where the type of development proposed will be different to that currently in the relevant area, the affordable housing contribution will be calculated on a site by site basis.

6.21.3 In section 8 of the TEVS an assessment was made of those development locations that were being proposed by the Council at that point in time (the emerging PO June 2009 document). This included Trafford Quays as a mixed use site. Carrington at that time was not identified as a residential site and therefore was not considered by the TEVS.

**MAIN MATTER 6.22**

**When will the intended Affordable Housing SPD be produced? How will the policy be implemented prior to its adoption?**

**Council Response**

6.22.1 The Council has now decided to produce one composite Planning Obligations SPD (CD12.26) which will combine all those SPDs which had been identified to support Core Strategy policies that seek planning contributions (including the Affordable Housing SPD). This composite SPD will be considered by the Executive on 10th February 2010 in advance of it being issued for consultation purposes at the end of February 2010. The intention is that this SPD will be adopted alongside that Core Strategy therefore the implementation of this policy will be supported by an adopted SPD.

**MAIN MATTER 6.23**

**In the context of L2.12 how are ‘normal market conditions’ defined? Is this the most appropriate benchmark?**

**Council Response**

6.23.1 Advice received from PINS during the preparation of the Trafford Core Strategy suggested that the Core Strategy should be prepared under “normal” market conditions. This advice is summarised in section 3 of CD 12.24.

6.23.2 Paragraphs 3.20 – 3.24 of the Trafford Viability Study (CD 8.8.22) give further explanation/justification for adopting the approach followed in relation to market conditions.

**MAIN MATTER 6.24**

**Paragraph 11.11 states that the policy is based on assumption. However, national policy requires affordable housing provision to be based on robust evidence. Clarification of the intended meaning of this supporting text is required.**

**Council Response**

6.24.1 The reference in paragraph 11.11 relates to the conclusions of the HMA (CD 8.8.12).

6.24.2 Section 21 of the HMA looks at the policy implications arising out of the housing needs assessment. The amount of new affordable housing was derived by assuming a 50% target on all qualifying developments. However the HMA acknowledged that such a target was unlikely to be achievable and therefore in Table 21.1 the HMA assumes a ratio of 60:40, market:affordable housing.

6.24.3 The conclusions of the HMA were appropriately taken as the starting point for the Economic Viability Study in determining the viability of affordable housing provision within the Borough.

6.24.4 Therefore the Council considers that the target set out in Policy L2 is justified and robust, based as it is on the findings of the HMA.

**MAIN MATTER 6.25**

**With reference to the required provision for the ‘frail elderly’ is there sufficient evidence to justify the inclusion of the 4% target in L2.17?**

**Council Response**

6.25.1 Informal advice offered by GONW during the preparation of the further consultation document (CD 6.3.19), suggested that in order for the policy to address the requirements set out in paragraph 22 of PPS 3, it should be more specific about dwelling type, mix and size, and the amount and type of older peoples accommodation.

6.25.2 Section 17 of the HMA (CD 8.8.12) identifies the households with support needs. Within this section it identifies the number of frail elderly in need as 4,289. The Housing Strategy (CD 8.8.14) deals with this matter in section 8, "Housing for Vulnerable People" with objective 5(b) being "through the provision of new housing stock meet current shortfalls in the provision of housing which meets the needs of identified vulnerable household groupings including older person households".

### **MAIN MATTER 6.26**

**Should reference to the revocation of the RSS in paragraph 11.24 be deleted?**

#### **Council Response**

6.26.1 Agree. Text to be amended as detailed in Suggested Change 200.18 (CD12.4).

#### **Suggested Change 200.18**

*Research that was conducted in relation to the Partial Review of the RSS suggested that there is a shortfall (to 2016) of 25 Gypsy and Traveller Pitches. ~~Despite the revocation of RSS~~ Given that this research remains an important part of the Council's evidence base. This target will be applied until such time that more long-term targets are identified and agreed through the Gypsy and Traveller Accommodation Strategy to be prepared at the local level. The Strategy will identify sites to meet any identified accommodation needs of Gypsies and Travellers and provide further guidance in relation to the criteria for the assessment of sites that are not allocated. Sites to be allocated will be identified in the LADPD.*