

## TRAFFORD COUNCIL

**Report to:** Executive  
**Date:** 23 May 2011  
**Report for:** Decision  
**Draft Report of:** Executive Member for Economic Growth & Prosperity.

### Report Title

**Trafford Core Strategy: Proposed Changes to the Submission Document**

### Summary

The Council has undertaken further work to address matters raised by the Inspector during the Core Strategy Examination Hearing sessions. This work was published for a period of consultation between 18<sup>th</sup> April and 9<sup>th</sup> May 2011 and relates to:

- The Regional Centre and Inner Areas Boundaries;
- Policy L5 – Climate Change; and
- The proposed inclusion of the Unitary Development Plan High Amenity Strategic Development Site, at Davenport Green, within the Green Belt.

In addition, a number of minor wording changes to the submitted version of the Plan were consulted on over the same period.

This report provides the Executive with the findings of that consultation and makes recommendations in relation to the forthcoming Hearing sessions of the Trafford Core Strategy. It also provides Executive with an update on the proposed GM Enterprise Zone.

### Recommendation(s)

1. That the Executive approves the additional wording and detailed boundaries related to the Regional Centre and Inner Areas as outlined in section 2 of this report and Appendix A.
2. That the Executive approves the wording changes to Policy L5 – Climate Change, as outlined in section 3 of this report and Appendix B.
3. That the Executive approves the minor wording changes to the submitted Core Strategy, as set out in CD12.4.
4. That the Executive supports the continuation of the further work in relation to Davenport Green and that this work be the subject of a further report to the Executive in June.

Contact person for access to background papers and further information:

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Background Papers:

- Trafford Publication Core Strategy (September 2010)
- Trafford Submission Core Strategy (December 2010)
- Suggested Changes Schedule (Core Strategy Core Document CD12.4)
- Trafford Core Strategy further consultation documentation (April 2011) (CD 12.70, CD 12.71, CD 12.72)
- Responses to the Trafford Core Strategy further consultation documentation (May 2011)

## 1.0 Background

- 1.1 A report to the Executive on the 21 March 2011 detailed that, at the request of the Planning Inspector, the Council was undertaking additional work in relation to three areas of the Core Strategy. These were:
- The Regional Centre and Inner Areas Boundaries;
  - Policy L5 – Climate Change; and
  - The proposed inclusion of the Unitary Development Plan High Amenity Strategic Development Site, at Davenport Green, within the Green Belt.
- 1.2 At that meeting the Executive delegated authority for approving the contents of the consultation documentation to the Executive Member for Economic Growth and Prosperity. This was duly carried out and a period of consultation was held between 18<sup>th</sup> April and 9<sup>th</sup> May 2011.
- 1.3 All those who made representation on the Publication version of the Plan were written to, together with all Greater Manchester authorities and those that had previously commented on Policy L5 – Climate Change. A number of our recognised consultation methods were used, including:
- Providing documentation in all Trafford libraries and Trafford Direct offices;
  - publicity in the local media;
  - Documentation available on the Council's website;
- 1.4 A total of 12 responses were submitted during the consultation period. These responses are available to view on the Council's website at <http://www.trafford.gov.uk/environmentandplanning/strategicplanning/localdevelopmentframework/corestrategyexaminationinpublicdocuments/> and a list of all those who made representation is available to view as Appendix C.
- 1.5 Copies of all consultation documentation, together with the Suggested Changes Schedule (CD12.4) are available to view at: <http://www.trafford.gov.uk/environmentandplanning/strategicplanning/localdevelopmentframework/corestrategyexaminationinpublicdocuments/>. Hard copies of these documents are available upon request.

## **2.0 Summary of the Consultation Responses in relation to the Regional Centre and Inner Areas Boundaries**

- 2.1 At that Hearing Session the Inspector requested that the Council re-consider its approach, within the Core Strategy, to the Regional Centre and Inner Areas Boundaries within Trafford. This has been done by way of the consultation. In the consultation document the 2 options for the boundary of the Regional Centre and 4 options for the boundary of the Inner Areas were set out for consultation, including the identification of the Council's preferred options.
- 2.2 A total of three responses were received to the consultation. One statement in support of the Council's proposed position and two statements objecting to the proposed revision to the Inner Areas boundary.
- 2.3 The principal land owner within the Trafford Centre Rectangle (Peel Holdings) supports the proposed change to the alignment as detailed in the consultation document. It considers that the proposed boundary is the most appropriate and logical boundary for the Inner Area within Trafford. Peel supports the analysis set out in the Council's paper as regards the need for the selected boundary to include both areas of need and opportunity and to provide a realistic opportunity for there to be a significant increase in the residential population of these areas.
- 2.4 Conversely, the neighbouring authorities of Manchester and Salford detail that the Trafford Centre Rectangle should not be included within the Inner Areas as proposed by the change. They consider that such a boundary is not logical and would not reflect the regeneration priorities of the City Region. They express concern that it could weaken the focus of investment and intervention in the older areas of high deprivation at the heart of the conurbation. However, they do state that they are not opposed to the level of residential development proposed at the Trafford Centre Rectangle as detailed in the draft Core Strategy.
- 2.5 Whilst the proposed Regional Centre boundary is agreed by all parties, there remains disagreement in relation to the Inner Areas' boundary in Trafford. This disagreement clearly relates to the question as to whether sufficient justification exists, or not, to include the Trafford Centre Rectangle within the Inner Areas. There is no support for extending the Inner Areas within Trafford beyond this point to either Stretford or Urmston, as suggested by Options 3 and 4 of the consultation document.
- 2.6 In relation to the Inner Areas boundary Policy MCR2 of the Regional Spatial Strategy for the North West (September 2008) provides a clear steer as to the areas to be included within the Inner Areas, but leaves the identification of the actual boundary to the LDF process. It states that the Inner Areas surrounding the Regional Centre comprise of North Manchester, East Manchester and Central Manchester regeneration areas, Trafford Park, North Trafford and Central Salford.
- 2.7 Historically, the Inner Areas have been associated with the allocation of major regeneration funds, such as the Housing Market Renewal Area projects in both Manchester and Salford and have therefore tended to be associated with some of the City Region's most deprived and under-populated neighbourhoods close to the Regional Centre. In more recent years, however, particularly as a result of changes to funding regimes, the role of the City Region's Inner Areas has

been evolving. These areas represent a marriage of need and opportunity - large scale residential development can attract people to locations from which the Regional Centre is easily accessible and can also regenerate local communities.

- 2.8 Whilst it is clear that the conclusions reached in relation to “north Trafford” presented in the consultation document are accepted, it is the issue as to what constitutes “Trafford Park” which remains a contentious issue, together with the impact that including a commercially successful area, such as the Trafford Centre Rectangle, could have on delivering the regeneration of the City Region’s Inner Areas.
- 2.9 As stated within the consultation documentation, it has been long established that Trafford Park is made up of three distinct zones: Wharfside; the core industrial area; and the Trafford Centre Rectangle.
- 2.10 It is considered that sufficient safeguards exist to ensure that development within the Trafford Centre Rectangle would be complementary to that proposed elsewhere in the City Region. Therefore whilst the concerns raised by Manchester and Salford are acknowledged, it is not considered that sufficient evidence has been provided to cast doubt on this conclusion.
- 2.11 In light of the evidence base underpinning the Core Strategy (including the Sustainability Appraisal), the evidence provided by the Council in identifying the proposed boundary, the responses to the consultation and given that It is considered sufficient safeguards exist to ensure that development within the Trafford Centre Rectangle would be complementary to that proposed elsewhere in the City Region it is proposed that no changes are made to the Council’s Preferred Option and that the Executive approves the additional wording and detailed boundaries related to the Regional Centre and Inner Areas as outlined in Appendix A of this report.
- 2.12 This boundary supports the growth of the Regional Centre, and the location of residential development at the Trafford Centre Rectangle, close to two key sources of economic development, the Regional Centre and Trafford Park, and is supported by the definition for the Inner Areas, as detailed in the Regional Spatial Strategy.

### **3.0 Summary of the Consultation Responses in relation to Policy L5 – Climate Change**

- 3.1 Appendix B details the proposed changes to the Plan in relation to this matter; a total of four responses were received to these proposed changes by way of the consultation.
- 3.2 The main changes proposed included:
- The policy text relating to the national timeline to achieve zero carbon new buildings being removed;
  - The CO2 reduction targets will only apply within the Trafford Low Carbon Study areas, with the baseline for the targets being national Building Regulations Part L 2006;
  - The Policy being simplified to detail two CO2 reduction targets:

- 40% for major development, located in the Low Carbon Growth Areas; and
    - 30% for all major development outside of these areas.
  - A CO<sub>2</sub> reduction target no longer being required for minor developments; and
  - The policy being revised to acknowledge the impact of all required planning obligations on scheme viability, and the need to demonstrate flexibility.
- 3.3 As detailed above the Policy has been substantially rewritten since Submission to the Examination but text relating to the Pollution and Water sections of the Policy has not been altered by way of these changes. The original Submitted Policy L5 can be viewed in the Core Strategy: Publication document (CD 6.2.1 in the Core Document library).
- 3.4 A summary of the main issues raised by consultees include:
- The additional targets above Building Regulations are not justified;
  - The need for this policy has been further reduced by the Government's 'Plan for Growth' statement;
  - The policy is short term, as it will be superseded by Building Regulations in 2016.;
  - It is not considered that the benefits sought in the Policy warrant the additional targets;
  - Specific emission reduction targets or Climate Change related planning obligation requirements should be included within a separate Supplementary Planning Document (SPD); and
  - Continued concern relating to the deliverability of the Policy including matters relating to viability.
- 3.5 The re-worded policy has the potential to deliver a number of significant sustainability benefits including reducing both contributions to and the effects of climate change and reducing the environmental impacts of consumption and production. Evidence supporting the policy demonstrates that the CO<sub>2</sub> reduction targets are deliverable and will not impact upon the supply or pace of housing delivery set out in the Council's housing trajectory.
- 3.6 It is not considered that the representations have raised any new substantive information other than that which has already been provided to the Inspector. Nor do the representations provide sufficient evidence to justify amending the Policy further or removing the carbon reduction targets from the Policy, in advance of the changes to Building Regulations in 2016.
- 3.7 The Government's 'Plan for Growth' statement has introduced a presumption in favour of sustainable development and it is considered that Policy L5 retains a legitimate role in achieving this. It also provides the framework for delivering the objectives of the Local Strategic Partnership's Sustainable Community Strategy and the Council's Sustainability Strategy. It is not considered that the implementation of the Policy will have an adverse impact on the deliverability of development in the Borough.
- 3.8 To defer the identification of targets to a lower level document such as a SPD, as suggested, is considered procedurally inappropriate in planning terms.

3.9 Therefore it is proposed that the Executive approves the wording changes to Policy L5 – Climate Change, as outlined in Appendix B.

#### **4.0 Summary of the Consultation Responses in relation to the proposed inclusion of the Unitary Development Plan High Amenity Strategic Development Site, at Davenport Green, within the Green Belt.**

4.1 Following representations to the Inspector by interested parties before and during the Hearing Sessions, the Core Strategy Examination Inspector agreed to postpone both the Sessions relating to Policy R4 (Green Belt and other Protected Open Land) and Policy W1 (The Economy) to enable the Council to undertake further work relating to the proposal to return the land at Davenport Green to the Green Belt.

4.2 This work was carried out and covered the following matters:

- Clarification of the stages undertaken in the Sustainability Appraisal (SA) process with particular emphasis on the Council's conclusion in relation to land at Davenport Green;
- Reappraisal of the February SA of Davenport Green using all the information submitted by Royal London Asset Management (RLAM), incorporating a more detailed commentary to address concerns raised by RLAM in their November submission and their response to the February SA consultation;
- Reappraisal of the SA of Policy R4 - Green Belt and Other Protected Open Land, taking into account impacts of returning Davenport Green to the Green Belt;
- Clarification of the chronology of decisions made in relation to Davenport Green with regard to the evolution of the Core Strategy Options;

4.3 This work was consulted upon and a total of three responses were received. One in support of continuing the Council's position of returning the land at Davenport Green to Green Belt and one from the land owners of Davenport Green (RLAM) restating their view that the process undertaken relating to returning this land to the Green Belt is fundamentally flawed. RLAM continue to request that the land be identified as a Strategic Site within the Core Strategy.

4.4 The remaining representation restated a request to remove the Wyevale Garden Centre on Green Lane, Altrincham from the Green Belt and is therefore not directly related to this matter and will be dealt with separately by the Inspector through the Examination process.

4.5 An additional factor that has arisen since the Hearing Sessions and the 21 March Executive Meeting is that the HM Treasury has published 'A Plan for Growth' on the 23 March 2011. That paper outlines the Government's economic policy objective to achieve strong, sustainable and balanced growth across the country. It makes it clear that the Government expects local planning authorities to take action immediately on this matter, detailing that the statement should be a material consideration in planning decisions with immediate effect. Of specific relevance to the Council is the identification of a Greater Manchester Enterprise Zone.

- 4.6 Greater Manchester was identified as one of four vanguard areas where an early decision could be made on the location of the Enterprise Zone. It will be one of 21 new Enterprise Zones which the Government proposes to establish across the UK. These locations will benefit from superfast broadband, lower taxes and low levels of regulation and planning controls and will be developed with the new Local Enterprise Partnerships. All business rates will be held locally.
- 4.7 The Inspector, through her Note 5, requested the Council submit representations detailing what, if any, implications for the Trafford Core Strategy there would be arising out of the Government's 'A Plan for Growth' Statement.
- 4.8 Following this announcement time has been taken to review the emerging information alongside key partners to better understand the implications for Trafford.
- 4.9 The status of the Enterprise Zone is new, and the Leadership of the Council has specifically requested that officers engage with the main stakeholders to assess the implications of the Airport City Enterprise Zone and the emerging University Hospital of South Manchester (UHSM) Medipark proposals in a positive and inclusive manner. The Council has written to RLAM, the promoters of Davenport Green, and asked them to provide the Council with their specific views on what the neighbouring opportunities of the MediPark, and the proposals for the Airport City Enterprise Zone would have in relation to the economic case for identifying land at Davenport Green for development.
- 4.10 Manchester Airport Group has retained consultants KPMG to undertake an independent analysis of the options for the full extent of the Enterprise Zone which will include consultation with relevant local authorities and landowners. This work aims to identify how to maximise the economic impact of the Zone for Greater Manchester, directly through growth in the Zone and indirectly through the use of increased business rate revenues to support further growth.
- 4.11 The analysis will consider the benefits and costs of including within the Enterprise Zone a range of additional sites including Davenport Green, Medipark (UHSM), Roundthorn Industrial Estate, land on the Airport estate and other smaller sites within this broad area. In total these considerably exceed the scale of the Zone indicated by Government and therefore choices will need to be made about the potential areas to include.
- 4.12 In addition, Manchester City Council (MCC) is consulting on a Manchester Airport City Development and Infrastructure Framework to set the planning context for the development of the Airport City Strategic Site. A response endorsed by the Executive Member for Economic Growth and Prosperity will be provided separately to MCC on this issue by their deadline of the 03 June, once there has been an opportunity to review the emerging information and establish a better understanding of the implications for Trafford.
- 4.13 Although at this point in time it is considered that the proposal put forward in the Core Strategy to return Davenport Green to Green Belt is correct in relation to the planning context for Trafford, the Executive needs to be fully cognisant of the impacts that the proposed designation of an Enterprise Zone at Manchester Airport would have on both Trafford and the wider area, before these matters are discussed at the Hearing sessions.

- 4.14 Given the status of this work, the Inspector has been informed that it is not yet possible to take a view with regard to the benefits (or disbenefits) that these proposals could make to the Council's economic strategy and economic regeneration within Trafford and therefore to the soundness, or otherwise, of the Core Strategy. This work is ongoing but until the outcome of this separate work is known it is considered premature to form a final view on the impact of Government's 'A Plan for Growth' announcements. It is proposed that a final statement will be brought back to Executive in June.
- 4.15 The Council will need to have a greater understanding of what is being proposed in relation to the Enterprise Zone, and by Royal London Asset Management at Davenport Green in response to the proposed Enterprise Zone, and the extent to which these may impact on the current proposals for Davenport Green within the Core Strategy and on Trafford. The ongoing engagement with stakeholders will establish whether or not the proposals significantly change the planning context for the area and justify a review of the status of Davenport Green.

## **5.0 Additional Minor Further Changes to the Plan**

- 5.1 Members will recall that agreement was sought to delegate responsibility to the Executive Member for Economic Growth and Prosperity for approval of minor wording changes to be agreed as necessary at the Examination. This process resulted in a number of minor changes to the Core Strategy being approved by the Executive Member following discussions at the Examination Hearing Sessions.
- 5.2 These minor changes were incorporated into one Suggested Changes Schedule (CD12.4), which the Inspector requested be subject to consultation at the same time as the matters above. This document is available to view at: <http://www.trafford.gov.uk/environmentandplanning/strategicplanning/localdevelopmentframework/corestrategyexaminationinpublicdocuments/documents/Suggested-changes-schedule.pdf>.
- 5.3 Two responses were received to these proposed changes by way of the consultation. These comments did not raise any substantive new information and therefore it is proposed that in addition to the changes identified above, the Executive approves the wording changes as set out in CD 12.4.

## **6.0 Timetable**

- 6.1 In respect of the Regional Centre and Inner Areas boundaries, Policy L5 – Climate Change and the Suggested Changes Schedule (CD12.4) it is possible to make a firm decision in the light of the consultation responses. This involves the proposed amendments as set out in Appendix A and Appendix B and those contained in CD12.4.
- 6.2 It is therefore considered possible to deal with these matters at the resumed Hearing Session on 25<sup>th</sup> May 2011, as currently programmed.
- 6.3 In respect of the Davenport Green issue it is not, however, possible to make a firm decision until the outcomes of the additional work detailed above are known. In light of this on going work Officers, in consultation with the



Leadership, have written to the Inspector to request a deferment of the Hearing Sessions into Matters 4 and 5 currently scheduled for 26 May.

- 6.4 A report will be brought back to Executive in June detailing the outcome of this work enabling the Council to reach a final conclusion on this matter.
- 6.5 It is not anticipated that a deferment of the Examination in this way would have a significant effect on the Inspector's reporting timetable. Therefore there should be a minimal impact on the timetable for the adoption of the Core Strategy. It should be noted, however, that should the outcome of this further work identify a requirement to propose Davenport Green as a strategic site, there would be significant time implications for the delivery of the Core Strategy. These would be further detailed to Members within the report to the Executive in June if necessary.

## **7.0 Other Options**

- 7.1 The Core Strategy is a key document within the Local Development Framework, setting the spatial vision and development strategy until 2026. It is a document that is specifically required by the Planning and Compulsory Purchase Act (2004).
- 7.2 Upon adoption, the Core Strategy and forthcoming Development Plan Documents (DPD) will replace parts of the Council's adopted Unitary Development Plan. A full list of the Unitary Development Plan policies to be replaced by the Core Strategy is detailed in the Core Strategy.
- 7.3 If the Council were not to make any changes in respect of the Inner Areas boundary, Policy L5 and the minor changes proposed in CD 12.4, there is a risk that the Core Strategy would be found unsound and the Council would not be able to adopt it as programmed in the Local Development Scheme.
- 7.4 If the Council were to proceed with making a decision in relation to Davenport Green at this point in time, there is a risk that the Inspector would consider that insufficient certainty exists in relation to the implications of the Enterprise Zone on Trafford's Core Strategy. She could, in turn, recommend a further delay to proceedings to enable the findings of this work to be considered. Clearly such an approach is likely to result in further delays to the adoption of the Core Strategy, than those outlined in section 6 above. Such a scenario is also likely to result in further negative implications for the management of new development within the Borough.

## **8.0 Reason for Recommendation**

- 8.1 To secure the Executive's approval to the changes to the Inner Areas boundary, Policy L5 and the Suggested Changes Schedule (CD12.4) and in relation to the proposed way forward in relation to land at Davenport Green, ahead of the resumed Examination Hearing sessions on 25<sup>th</sup> May 2011.

### **Key Decision**

This is a key decision currently on the Forward Plan: **Yes**

**Finance Officer Clearance: PH**

Legal Officer Clearance: JL

CORPORATE DIRECTOR'S SIGNATURE (electronic)



To confirm that the Financial and Legal Implications have been considered and the Executive Member has cleared the report.

Implications:

Relationship to Policy Framework/Corporate Priorities	The document has been developed to be the Spatial representation of the Trafford Partnership's Sustainable Community Strategy.
Financial	The preparation of the Core Strategy is being funded from the existing Strategic Planning & Developments budget within the EGP Directorate's overall budget.
Legal Implications:	The Core Strategy is being developed in line with the requirements of the Planning and Compulsory Purchase Act 2004 and subsequent amendments.
Equality/Diversity Implications	The Core Strategy has been subjected to EIA assessment to ensure that equality issues have been considered as part of the preparation.
Sustainability Implications	The Core Strategy has been subjected to independent sustainability appraisal throughout its preparation.
Staffing/E-Government/Asset Management Implications	Consultees have been able to make electronic submissions to the Core Strategy consultations on line and all the documents are available to access through the Local Development Framework web page.
Risk Management Implications	The timetable for producing the Core Strategy is set out in the Local Development Scheme.
Health and Safety Implications	None.