



**TRAFFORD
COUNCIL**

**Further Changes to Policy W1 in response
to draft NPPF September 2011**

9th September 2011

Introduction

Following the submission of proposed wording changes to Policy W1 in July 2011, the Government published the NPPF for consultation. In order to reflect the change in emphasis in national policy, expressed in the NPPF, the Council proposed in its submission to the Examination on 5th September 2011, further changes to Policy W1 (please see CD12.97.14).

The key difference between PPS4 and the NPPF that will impact on Policy W1 is that B1 office uses are effectively not regarded as town centre type uses anymore as the NPPF only requires retail and leisure uses to be assessed in terms of the sequential and impact tests;

The justification for Policy W1.5 is partly based on the Regional Centre (Pomona and Wharfside) and the town centres being preferred locations for B1 office development in PPS4 terms. Notwithstanding the fact that office uses are not regarded as town centre uses within the NPPF, it is still considered appropriate to focus B1 office development on the Pomona and Wharfside Strategic Locations and the town centres as these areas represent the best opportunities in Trafford to create the clusters or networks of knowledge driven, creative or high technology industries referred to in the NPPF given the diversity and proximity of existing knowledge, creative and high technology industries in these areas and/or the City Centre;

However it is appropriate to remove reference(s) to PPS4 and to revise the second sentence of Policy W1.5 to acknowledge that office development is, in general, appropriate in other locations such as Trafford Park Core, Carrington, Trafford Centre Rectangle and Broadheath and it is not appropriate to limit office development in these locations, providing that it is consistent with all the relevant criteria in NPPF and that it is in a location that is accessible by sustainable transport modes;

Consequent changes to Policies W1.6 to W1.10 are proposed to reflect the general appropriateness of B1 office uses in these locations;

In addition, Policy W1.11 is proposed to be amended to reflect that non-employment development will only be allowed where there are market signals or an overriding need for a particular land use;

Changes are also proposed to the Justification for this policy to remove references to PPS4 testing for B1 office and to reflect the NPPF guidance.

As a result of these, the Council considers that it is necessary to propose a number of changes to Policy W1 as set out below. These proposed changes will be added to the Schedule of Proposed Changes (CD 12.4) at S300.55 and will supersede SC41 and 200.32. These proposed changes will not supersede those included in S.300.52 and S.300.53.

POLICY W1: ECONOMY

Supporting Growth

W1.1 In order to encourage the development of clusters of economic activity the Council will identify a range of sites for a variety of employment uses, with the appropriate infrastructure to attract key economic growth sectors to Trafford. Employment uses within this policy refers to B1 business/office, B2 general industry and B8 storage or distribution and similar appropriate uses.

W1.2 The Council recognises the significant contribution that existing successful manufacturing industries make to the economy of the Borough and will continue to support these industries where appropriate within the context of the Development Plan for Trafford.

Distribution

W1.3 The Council will focus employment uses in the following places:

- Pomona Island;
- Trafford Wharfside;
- Trafford Park Core;
- Trafford Centre Rectangle;
- Carrington;
- Broadheath; and,
- Town Centres.

W1.4 Table W1 sets out an indicative minimum figure for the amount of land proposed for a range of employment development, by place, over the plan period. The land supply figures in Table W1 include the recycling of existing employment land and buildings and land that is being brought into employment use for the first time.

W1.5 B1 office uses will be focused in the Regional Centre (Pomona and Wharfside), and the town centres. ~~Some~~ B1 office development will be appropriate within Trafford Park Core, Carrington, Broadheath and at Trafford Centre Rectangle where it is accessible by sustainable transport modes and meets other relevant criteria in national planning guidance~~supports existing employment uses and employment regeneration initiatives.~~

W1.6 Trafford Park Core will be a key location for industry and business activity within the Manchester City Region Inner Area and will be the principal location for employment development in the Borough. The focus will be on the provision of modern industrial, storage and distribution and office development ~~which is ancillary to existing or proposed employment uses~~ with residential development not normally supported. Improvements to public transport infrastructure to provide an integrated, frequent public transit system linking the location with surrounding residential and commercial areas will be required.

W1.7 Carrington has significant potential to accommodate large-scale employment development, particularly for general industrial, storage and distribution uses ~~and with~~

office development ~~which is ancillary to existing or proposed employment uses~~, in order to complement the offer in Trafford Park. Part of the former Shell site at Carrington is proposed for employment development as part of the creation of a new mixed-use neighbourhood. Further details are set out in Location SL5.

W1.8 Broadheath will be retained and supported as a principal employment location in the south of the Borough, ~~primarily for B2 and B8 uses~~.

W1.9 Employment development in the other places identified will be detailed in Policy W2 or through each individual Strategic Location.

W1.10 Outside of these places and any smaller sites identified within the Land Allocations DPD, the Council will only permit employment uses (including development proposed to support economic activity associated with Manchester Airport) provided that it is in accordance with other policies in the Development Plan for Trafford and that:

- It will contribute significantly to the Plan's overall objectives, including the economic growth of the City Region;
- It will contribute significantly to the achievement of the regeneration priorities set out in Policy L3;
- It promotes the use of derelict, vacant or under-used previously developed land and;
- The sites will be accessible by a range of alternative modes other than the private car.

W1.11 In determining applications for the redevelopment of ~~unallocated~~ employment sites for non employment uses, developers will be required to provide a statement to the satisfaction of the Local Planning Authority, demonstrating that:

- There is no need for the site to be retained for employment purposes and it is therefore redundant;
- There is a clear need for the proposed land use(s) in this locality;
- There are no suitable alternative sites, within the locality, to meet the identified need for the proposed development;
- The proposed redevelopment would not compromise the primary function of the locality or the operations of neighbouring users, and,
- The proposed redevelopment is in accordance with other policies in the Development Plan for Trafford.

Hazardous Installations

W1.12 The Council will only permit the development of hazardous or bad neighbour industries where it can be demonstrated that it will not:

- Increase the risk for residents and members of the public, unless suitable measures can be agreed to mitigate risk;
- Compromise the primary function of the employment locality or the operations of neighbouring users;
- Compromise the potential for economic regeneration of the wider area;

- Bring about a significant deterioration in the quality of the environment of the surrounding areas, and,
- Be contrary to other policies in the Development Plan for Trafford.

Scale

W1.13 The Council will identify sufficient quantity and choice of land to deliver the new employment provision. The distribution of this employment development is shown in Table W1 below.

Table W1: The Supply of Land for New Employment Development 2008/9 to 2025/6

	Up to 2015/6	2016/7 to 2020/1	2021/2 to 2025/6	Total Land Supply for B Use (Hectares)
Pomona Island	4	4	2	10
Trafford Wharfside	3	3	4	10
Trafford Park Core	18	22	15	55
Trafford Centre Rectangle	2	6	7	15
Carrington	25	25	25	75
Broadheath	3	3	4	10
Town Centres	1	2	2	5
Elsewhere	3	3	4	10
Policy W1 Allocation Total	59	68	63	190

IMPLEMENTATION

Implementation Mechanisms

Implementation will be through development at the Strategic Locations identified in this Core Strategy. These and other significant sites elsewhere in the Borough will be allocated in a Land Allocations DPD and Area Action Plan(s). Other sites will be identified through the planning application decision making process.

Delivery Agent

Private Sector

Timescales

This will be ongoing throughout the plan period. The Land Allocations DPD is scheduled to be adopted in 2012. Phasing for the development of the identified employment areas is set out in detail in Table W1. This phasing reflects the likely availability of funding and programme of works anticipated at this time.

Funding

Funding will generally be through public and private sector investment.

Justification

- 18.2 Policy W1 seeks to guide economic regeneration and development across the Borough to achieve the aims, objectives and spatial development requirements of the Trafford Sustainable Community Strategy and the Trafford Economic Development Plan.
- 18.3 Trafford is a fundamentally important part of the City Region economy and a location where the development of significant clusters of economic activity in key economic growth sectors, supported by appropriate infrastructure, will be essential for the Borough to diversify and grow its employment base to properly contribute to the city region, maintaining and improving its competitiveness and developing into one of Europe's premier city regions.
- 18.4 The key economic growth sectors the policy is seeking to foster and allow to develop are those that have been identified by the NWDA, the Greater Manchester Forecasting Model and the Trafford Economic Development Plan. The key economic growth sectors are:
- financial and business services;
 - distribution;
 - cultural, creative and media industries;

- advanced engineering, and,
 - other personnel services.
- 18.5 Other key growth sectors such as retail, commercial leisure and hotels and waste management facilities are covered in Policies L6, W2 and R6.
- 18.6 The findings of the Trafford Employment Land Study of May 2009 indicate that a sufficient supply of suitable and developable employment sites exists to meet the Borough's contribution to the requirement suggested in the Greater Manchester Employment Land Position Statement of August 2009 (170 hectares of land plus or minus 10% up to 2026) without the need to retain the historic but unimplemented UDP allocation for a high amenity employment site at Davenport Green.
- 18.7 The new employment land development proposals set out in Table W1 take account of the site by site findings of the Trafford Employment Land Study, current (April 2010) known development commitments and expectations for the recycling/re-use of currently developed land to provide accommodation to meet the changing needs of business. The amount of land proposed for new employment development in this policy is set as a global total supply to accommodate all the types of development required to meet the Borough's needs over the Plan period, allowing flexibility to accommodate inevitable changes in the requirements of businesses over time as they seek to respond to changing economic circumstances. Detailed proposals, disaggregated by broad employment use (B1 office, B2 industry and B8 warehousing) will be included in the Land Allocations DPD.
- 18.8 An indicative minimum land supply figure provides the flexibility for the employment locations to deliver more or less development in line with the strategy and all other policies of the CS. However, any development proposals that vary the amount of land from the indicative target number will be determined in the light of on-going monitoring work and compliance with the relevant Location development requirements and other policies in the Core Strategy.
- 18.9 The historic development and current (April 2010) land supply data used to compile Table W1 indicates an overall 85:15% split between industry/warehousing and office development. The Council expects that this ratio will be maintained over the Plan period, albeit that there may be geographical variations dependant upon the characteristics of those areas.
- 18.10 The strategic development locations identified in Policy W1 are key proposals intended to secure the revival, modernisation and development of a diversity of industrial, commercial, warehousing/distribution, service and support activities. The range of activities to be prioritised and encouraged in each of the Strategic Locations is set out in greater detail in Strategic Locations section of the Plan, detailed employment allocations will be identified in the Land Allocations DPD.
- 18.11 Outside the Strategic Locations and those identified within the LADPD, development and redevelopment for economic purposes will be supported in a measured way commensurate with the need for the development, the availability or otherwise of suitable alternative development locations and their effect on environment and amenity of surrounding land uses.
- 18.12 All proposals for the development of any industrial, commercial, warehousing and storage uses associated with Manchester Airport will be subject to very careful

assessment in consultation with Manchester Airport Plc and other appropriate agencies to determine the appropriateness of the proposal.

18.13 Insofar as the development of new hazardous installations is concerned all such proposals will be subject to very careful assessment in consultation with the Health and Safety Executive to determine the scale of risk both to the prospective workforce and the occupiers of adjacent developments before any planning consent for development is granted.

PPS4 Testing

~~18.14 18.13 The Council has undertaken a study of other main town centre uses including B1 office. As part of this study B1 uses were subject to the tests outlined in paragraph EC5.1 of PPS4. The study concluded that, in order to meet the identified need for office uses, due to a low number of suitable and available sites in town centre locations, even if the Altair planning permission is implemented, it may be necessary to consider further sites situated in regeneration areas of the Borough (in accordance with PPS4) where offices could form part of mixed-use developments, or are ancillary to other forms of economic development~~

~~The Council has assessed the need for the development of further B1 office accommodation in the borough in the period to 2026. The analysis undertaken concludes that significant growth in the demand for B1 office accommodation can be expected in the plan period. This is due to a predicted significant growth in financial, business services and intensive knowledge based industries. The need identified ranges from 143,000-181,000 sq metres (gross).~~

~~18.15 The key considerations for determining whether office development is appropriate in out-of-centre locations are set out in paragraph EC5.1e. of PPS4. These are:~~

- ~~● The physical regeneration benefits of developing on previously developed sites;~~
- ~~● Employment opportunities;~~
- ~~● Increased investment in an area;~~
- ~~● Social inclusion~~

~~The Council has assessed the potential to accommodate some or all of this need on sites within or on the edge of the Borough's four town centres. The analysis has shown that town centre sites / edge of centre sites are capable of accommodating c.27,000 sq metres of accommodation.~~

~~18.16 Outside of existing town centres, the main areas identified for additional office development in the Core Strategy are Pomona and Wharfside. Development in both of these areas will result in the development of previously developed land (in Pomona's case a long standing derelict site), will provide significant employment opportunities (in Wharfside's case in particular, it will support the expansion of Mediacity:uk), will allow for increased investment in the area and will support social inclusion as they are closely linked to the deprived areas of Old Trafford and Ordsall in Salford. These two Locations are also within the Regional Centre which is a focus for office development.~~

~~This means that in order for the borough to realise its economic regeneration objectives, land outside of town centres must be released for B1 Office development. A range of sites have been identified and assessed having regard to Planning Policy Statement 4.~~

~~18.17 Some office development in Trafford Park Core, Carrington, Broadheath and Trafford Centre Rectangle is appropriate as it will involve previously developed land, can be linked to existing employment uses and to varying degrees can promote social inclusion by providing greater access to jobs for people in neighbouring deprived areas.~~

~~Outside town centres, the main areas identified for additional office development in the Core Strategy are Pomona and Wharfside. Development in both of these areas will result of the development of previously developed land (in Pomona's case a long standing derelict site), will provide significant employment opportunities (in Wharfside's case in particular, it will support the expansion of Mediacity:uk), will allow for increased investment in the area and will support social inclusion as they are closely linked to the deprived areas of Old Trafford and Ordsall in Salford. These two locations are also within the Regional Centre which is a key focus for office development.~~

~~18.17 Some office development in Trafford Park Core, the Trafford Centre Rectangle, Carrington and Broadheath is appropriate as it will involve previously developed land, can be linked to existing employment uses and, to varying degrees, can promote social inclusion.~~

Which Objective(s) delivered by this Strategic Location/Policy	Reference Number(s)
Key Objective(s) of the SCS	SE1, SE2, SE3, SE4, SE5, SE7, SE10, SE13
Strategic Objective(s)	SO2, SO3, SO4 & SO6
Place Objective(s)	TPO3, TPO8, TPO14 OTO8, OTO10 STO8, STO17 SAO4, SAO11 ALO12, ALO14, ALO23 CAO9, CAO10, CAO17