



**TRAFFORD**  
**COUNCIL**

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

**MAIN MATTER 4**

**JULY 2011**

**TOPIC PAPER**

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## **INTRODUCTION**

The Council originally responded to the Inspector's Main Matters Issues and Questions (MMIQs) in relation to Main Matter 4 in February 2011 (see CD12.35.4).

The purpose of this note is to update the Inspector and the Examination with the current position being presented by the Council, following the additional work that has been carried out since the Hearing sessions were adjourned. Specifically this work relates to the land at Davenport Green and the changes to national policy by way of the Budget Statement "Plan for Growth".

As a result of the policy statement "Plan for Growth", and the subsequent proposed changes to Policy R4, as set out in the Council's further response to the Inspector's Note 5 CD12.67.1.1, the Council has revisited each of the Inspector's original MMIQs. The following sections detail any additional information that is relevant to these questions and that the Council considers should be put to the Examination.

### **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.**

4.4.1 The Council has nothing further to add in relation to this MMIQ.

#### **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?**

4.2.1 Although the Council considers that its original response to MMIQ 4 remains valid, since that response was submitted the HM Treasury published 'A Plan for Growth' on the 23 March 2011.

4.2.2 Following the publication of the Budget Statement the Council detailed to the Planning Inspector that further work was being undertaken to assess the implications of the GM Enterprise Zone for Trafford, and Davenport Green. This further work involved engagement with key stakeholders to assess the implications of the Airport City Enterprise Zone and the emerging University Hospital of South Manchester (UHSM) Medipark proposals.

- 4.2.3 The Council has now had time to review this work and as a result it better understands the implications for Trafford of the recent national policy changes. Although the Council remains of the opinion that its approach, set out in the Submitted Core Strategy, will provide sufficient choice of land and sites for developers to compete with regional, national and international alternative, it considers that there are currently sufficient uncertainties in relation to the new initiatives associated with the Enterprise Zone to warrant the reconsideration of its position in relation to the land at Davenport Green.
- 4.2.4 As a direct result of the uncertainties that now exist, the Council is proposing to amend the designation of this land as Countryside, in PPS7 terms, with strict criteria. In so doing, this would provide the protection required for this important site, but also an element of flexibility should the need to accommodate currently unspecified employment uses (or a need generated by a significant change to the economic context of the region) that may arise in relation to the future expansion of Airport City or the MediPark at the University Hospital South Manchester. By identifying this land for such a use, together with maintaining the approach of recycling existing employment land, the Council is confident that sufficient choice of land and sites will come forward for developers to compete with regional, national and international alternatives.

### **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?**

- 4.3.1 The assumptions upon which the economic strategy were based were set out clearly in CD12.35.4 and these remain valid. Similarly, the Council remains convinced that both its economic and housing strategies are linked closely to and complement those of its adjoining AGMA authorities and that promoting growth in the way that it has in the Submitted Core Strategy, will contribute to more sustainable patterns of travel in the future.
- 4.3.2 The Council does not consider that the introduction of a locally distinctive designation, specific to the land at Davenport Green will compromise this conclusion. Policy L4 of the Core Strategy will ensure that development proposals within less sustainable locations throughout the Borough, will deliver, or significantly contribute towards the delivery of, measures to secure infrastructure and services to improve access to more sustainable transport choices.

4.3.3 By introducing strict criteria to Policy R4 this reflects the changing policy framework in Greater Manchester including the emerging Enterprise Zone initiative. The Council considers that such an approach would complement Manchester City Council's Manchester Airport City Development and Infrastructure Framework which will set the planning context for the development of the Airport City Strategic Site, as identified within the Manchester Core Strategy. This approach would also enable the City Region to be responsive to currently unidentified opportunities for substantial new employment associated with these initiatives, whilst not undermining the wider strategies of the sub region.

#### **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?**

4.4.1 The Council has nothing further to add in relation to this MMIQ.

#### **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?**

4.5.1 The Council's original response to Main Matter 4.5 detailed the evidence to support the selection of foci for office development listed in W1.5 in terms of quantity, quality and choice of B1 sites. The Council considers that this response remains valid. It should be noted however that the Council has recently resolved to protect the land at Davenport Green as Countryside, in PPS7 terms, with strict criteria. In doing so, this would provide the protection required for this important site, but also an element of flexibility should the need to accommodate currently unspecified employment uses (or a need generated by a significant change to the economic context of the region) that may arise in relation to the future expansion of Airport City or the MediPark at the University Hospital South Manchester.

#### **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?**

4.6.1 Since submitting its original response to MMIQ 4.6, the Council is proposing to amend Policy R4 to provide a clearer framework so that development at Davenport Green can be considered only when it is associated with the delivery of substantial new investment and employment linked to the expansion of Airport City or the Medipark,

where a sequentially preferable site cannot be found to deliver these benefits. In applying such strict criteria the Council considers that this revised position would be entirely consistent with Policy W1 of the Core Strategy and PPS4.

#### **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?**

- 4.7.1 As set out in the Council's further response to MMIQ 4.2, above, the Council remains convinced that its approach, in the Submitted Core Strategy, will provide sufficient choice of land and sites for developers to compete with regional, national and international alternatives.
- 4.7.2 Having examined the additional work undertaken by RLAM since the adjournment of the Hearing sessions in March 2011, together with the independent analysis undertaken by DTZ, the Council remains of the opinion that insufficient evidence exists to justify the development of the land at Davenport Green for B1 office development as presented by RLAM.
- 4.7.3 Davenport Green was originally removed from the Green Belt to respond to a specific market opportunity, namely the proposed creation of a high amenity business location for a global occupier who required proximity to the Airport and the City Centre. In accordance with this, planning permission was secured in 1998 for 0.5 million sq ft of office, which did not expire until 2009. The site, however, attracted little interest, even during a period of sustained economic growth. It is widely acknowledged that this was largely due to the very tight restrictions set by the UDP Policy, therefore giving support to the view that rolling forward the UDP Policy was not a realistic, or deliverable option.
- 4.7.4 Through the Trafford Core Strategy process, and in the context of National Guidance, a Strategic Site has been defined as:
- Central to the achievement of the Core Strategy;
  - Supported by information of what is being provided, when it will be provided, who will provide it, how it will be delivered and what will happen if elements are not provided. This information must be detailed, agreed by all delivery partners, with specific costs and funding sources identified. A timetable for the delivery of the Site must also be agreed; and
  - Programmed for delivery through the Core Strategy.
- 4.7.5 For the site to be viewed as central to the achievement of the Core Strategy it is considered that there should be very significant demonstrable benefits, to Trafford and the City Region. It is also necessary to be able to demonstrate the deliverability of a proposal for

it to be designated as a strategic site. It is not considered that the proposal submitted by RLAM within SS1, meets the criteria referred to above and which must be satisfied for it to be designated as a Strategic Site.

- 4.7.6 Notwithstanding its conclusion in relation to the scheme currently being proposed by RLAM by way of “Strategic Site SSI”, the Council has concluded that there is currently uncertainty in relation to the level of need for office space either directly or indirectly to support the future expansion of Airport City or the MediPark proposals at the University Hospital South Manchester or generated by a significant change to the economic context of the region as a result of either the growth of Airport City or the MediPark. As a direct result of this conclusion, the Council is proposing to introduce a locally distinctive designation, specific to this piece of land, which will enable the Council to continue to retain a high level of protection, whilst recognising the changing policy landscape and the current uncertainties around development proposals at the Airport and will ensure that opportunities to deliver substantial new investment and employment to the sub-region will not be lost if a sequentially preferable site cannot be found.

#### **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?**

- 4.8.1 The Council’s original response to this MMIQ stated the circumstances under which the land at Davenport Green was released for development in the UDP.
- 4.8.2 Whilst it has been widely recognised that this scheme is no longer a deliverable proposal and therefore it would not be appropriate to roll the UDP proposal forward, there is currently sufficient uncertainty in relation to the future expansion of Airport City or the MediPark proposals to warrant the introduction of a locally distinctive designation at Davenport Green. This designation will enable the Council to continue to retain a high level of protection, whilst retaining sufficient flexibility to adapt to the changing policy landscape and the current uncertainties around development proposals at the Airport.
- 4.8.3 The Council considers that such an approach would complement Manchester City Council’s Manchester Airport City Development and Infrastructure Framework which will set the planning context for the development of the Airport City Strategic Site, as identified within the Manchester Core Strategy and would not undermine other strategies within the sub region.

## **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?**

4.9.1 In addition to the Council's original response to the MMIQ, which remains valid, the Council does not consider that Policy W1.6 would result in an unnecessary level of burden being placed on developers. As such the policy would be consistent with changes to national planning policy including "Plan for Growth".

## **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 Original Response**

4.10.1 The Council's original response to this MMIQ detailed that the Core Strategy seeks to promote sustainable development that supports the priorities for Trafford. It also concluded that growth at Manchester Airport should not be achieved at the expense of other sustainability factors. The criteria in Policy W1.10 are still considered necessary and reasonable to achieve this balance.

4.10.2 Notwithstanding the continued appropriateness of the criteria within W1.10, in the light of the conclusion reached in relation to the land at Davenport Green, it is considered that consequential changes will be necessary to W1.9 and W1.10 as shown below.

### **Suggested Change**

W1.9 Employment development in the other places identified will be detailed in Policy W2 [or R4](#) or through each individual Strategic Location.

W1.10 Outside of these places and ~~or~~ 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 [other than development which accords with Policy R4](#)) 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.

#### **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?**

4.11.1 The Council's original response to this MMIQ reflected policy at the time that the Plan was submitted for independent Examination. However since that time it is recognised that changes in policy have raised a degree of uncertainty in relation to development potential associated with Manchester Airport and the MediPark proposals.

4.11.2 As stated previously in this document, the Council has concluded that in light of these uncertainties, a locally distinctive designation should be introduced for the land at Davenport Green. This designation will enable the Council to continue to retain a high level of protection, whilst introducing an appropriate level of flexibility to accommodate unidentified needs associated with these proposals.

4.11.3 In so doing the Council considers that its approach to development associated with the Airport will be more consistent with Trafford's neighbours emerging strategies, in particular the Manchester Airport City Development and Infrastructure Framework and the Manchester Core Strategy.

#### **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?**

4.12.1 The Council has nothing further to add in relation to this MMIQ.

#### **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?**

4.13.1 The Council has nothing further to add in relation to this MMIQ.