

TRAFFORD CORE STRATEGY EXAMINATION

INSPECTOR'S NOTE 1 – Clarification of Some Factual Matters and Initial Matters Concerning the Soundness of the DPD

Following from my early appraisal of the Core Strategy the following information and clarification is requested from the Council to assist my examination of its soundness. I stress that at this stage I have not read all of the evidence base or representations. In my Matters, Issues and Questions papers (MIQs), which I shall issue in due course, several other matters and detailed questions will be raised, upon which I shall request the response of the Council. However, to minimise these, the Council's full answers to the matters listed below are requested ASAP and by 31 December 2010 at the latest.

This note, together with the Council's responses, should be allocated CD numbers, added to the Examination Library list and displayed on the Council's LDF website.

If the Council wishes to suggest any changes to the Core Strategy in response to these matters they should be set out in a schedule, which should also be allocated a CD number, added to the Examination Library list and displayed on the Council's LDF website.

The suggested changes schedule will be a 'living' document for the duration of the Core Strategy examination. For transparency, the stages at which changes are suggested and indication of whether they go to the heart of the soundness of the DPD or are desirable to 'improve' the plan should be clarified in their individual referencing. I suggest that any changes suggested in response to this note are pre-fixed 100.XX, any suggested in response to my MIQs are pre-fixed 200.XX and those suggested during the Hearing sessions are pre-fixed 300.XX. Those that are necessary for soundness should be additionally pre-fixed S. Thus a change suggested in response to one of my questions 5-8 below may be referenced S100.01.

Factual Matters

- 1 To assist my examination of the justification for and the soundness of the policies and proposals of the Core Strategy, with reference to the CD Examination List, please can a schedule of the evidence source for each of the policies and proposals be provided. This is particularly important for the policies and proposals for the five strategic locations.
- 2 A housing trajectory similar to that contained in the Annual Monitoring Record (AMR) is required that extends to 2026, in order to clarify the requirements of policy L1. It is also a requirement of PPS3 that this is provided in a DPD.
- 3 Further clarification is required of what land makes up the employment land supply set out in Table W1, in terms of

commitments, allocated employment sites carried forward from the UDP and new greenfield or other land that will be allocated to make up the Core Strategy employment land portfolio.

- 4 With reference to CD 6.1.2, which contains the Council's pre-submission changes and which I accept as forming part of the submission DPD, the following clarification is required.
 - i The reference AL07 for a suggested additional objective for Altringham already exists. Should this be AL29?
 - ii Is there a typo in the suggested change to paragraph 8.79 where the words 'to assess' are repeated?

Matters Concerning the Soundness of the DPD

- 5 With particular reference to, but not limited to the policies and proposals for the strategic locations, more detail is required of the essential infrastructure requirements and their development trigger points associated with all of the policies and proposals of the Core Strategy. To demonstrate the feasibility of delivery, the approximate costs of essential infrastructure requirements, together with details of any secured funding sources are required. In addition, an indication of commitment of stakeholders to delivery of the policies and proposals is necessary to demonstrate that there is a strong likelihood that they will be implemented and that the Core strategy vision and objectives will be achieved. Any potential 'show stopping' infrastructure requirements should be identified.
- 6 In order to properly monitor the success of the Core Strategy in achieving its vision and objectives, appropriate targets should be added to Table 3, which sets out the Core Strategy Monitoring Proposals. Whilst it may not be desirable to repeat in the DPD the monitoring provisions of the AMR, the AMR does not seem to provide this necessary information either.
- 7 It is not sufficiently clear how the policies and proposals of the Core Strategy will provide necessary flexibility to ensure delivery of intended development if one or more of the strategic locations fails to deliver in accordance with its intended scale and phasing. I am not satisfied that the proposed contingency for several of the policies that would rely on review of the DPD in the event of slow or non-delivery demonstrates sound, flexible contingency arrangements.
- 8 It is not clear that the Sustainability Appraisal (SA) of the Davenport Green site is sufficiently robust and therefore if the proposals concerning it are justified and sound. Clarification of the audit trail for the SA of this site and the chronology of decisions taken regarding its proposed addition to the Green Belt and its de-allocation as an employment site are required. Clarification is also required as to why its SA was undertaken on the basis of it being a Green Belt site, when in fact it is not within the Green Belt. If the Council now

considers that this approach was flawed further SA of this site should be undertaken taking into account its current policy context to transparently and robustly demonstrate the soundness or otherwise of the Core Strategy policies towards the Davenport Green site.

Shelagh Bussey

Inspector
14 December 2010