

TRAFFORD CORE STRATEGY

Comments on Trafford Council response to RLAM – further suggested changes to Policy W1 and R4 - September 2011

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Background

These comments are provided in response to the submission of Trafford Council's document CD12.100.1 on 23 September 2011.

Discussion

On unnumbered page 2 of CD 12.100.1, Trafford Council say, "The Council does not consider that the changes presented in this document would alter the overall thrust of the Council's policy position. It does not therefore consider that, should these further revisions to the Plan be accepted by the Inspector, there would be significant procedural implications following the completion of the Examination Hearing sessions on the 28th, 29th and 30th September."

Whilst the statement above may be thought by some, at first sight, to be relatively benign, the changes presented alter the overall thrust of the Council's policy position in a number of important respects. First, it will be apparent to the Inspector that the overall thrust of the Council's policy position in relation to land comprising the "Timperley Wedge" has changed radically in the space of six months. The position outlined by Mr Smith (Trafford Council's Head of Strategic Planning & Housing Services) on 24 March 2011 with regard to the Manchester Core Strategy Proposed Policy MA 1 Manchester Airport Strategic Site (Manchester Core Strategy Comment ID 181) made it quite clear that Trafford Council is well aware of pressure for development of the Timperley Wedge, but this concern is not evident to any great extent in Trafford Council submission CD 12.100.1.

In his submission regarding Manchester City Council's proposed changes to the Green Belt in the vicinity of Manchester Airport, Mr Smith makes it clear that any such changes would cause Trafford Council, "to have significant concerns should this proposed amendment to the Green Belt boundary result in an

increase in such development pressure, which ultimately could seek to undermine the Timperley Wedge”.

Now, just six months later, Trafford Council, apparently, does not have any of the same concerns regarding the Timperley Wedge and is more than happy to consider the inclusion of text of the sort that reads as follows:-

“18.10 The identification of land at Davenport Green as having potential for an exemplar, very high quality B1 business / office development in order to support growth at Manchester Airport City and/or Medipark reflects the unique status of Davenport Green in Policy R4 as a Countryside designation outside of the Green Belt, protected from development until such time that strict criteria are met.”

as outlined in suggested changes schedule (CD12.4) and elsewhere (systematically, and at length).

Not only will it be apparent to the Inspector that the thrust of the Council’s position has changed significantly in just six months, but also that there is a significant change of argument and emphasis. The changes in CD12.100.1 show that, not only is there an implicit proposed change of land use, but that this has not been represented properly, discussed with, or communicated effectively to the residents of Trafford Borough.

The changes proposed in CD 12.100.1 depict multiple composite changes of land use, and it should be noted by the Inspector that these have all been created within the space of just a few months, without proper public reference or any consultation, with the suggestion that they are but minor changes.

The current permitted use of land at Davenport Green is as a, “Strategic High Amenity Employment Site”, for which, apparently, there were, in the ‘90s, “exceptional circumstances”, thereby allowing its release from the Green Belt. This permitted use was captured in Policy E13 in the 1996 UDP and the criteria remain explicit in Policy E14 of the Revised Adopted UDP of June 2006 i.e., if applied, they would be for the “development of high quality, prestige sites for modern, major international headquarter business activities” (CD 12.18, p.64).

Now, in the proposed changes (CD 12.4) we have statements to the effect that:-

“R4.4 Development on this land will only be permitted where it can be demonstrated that:

- It is in accordance with other policies in the Development Plan for Trafford;
- There is a need for such development to support the future expansion growth of Airport City or the MediPark proposals at the University Hospital South Manchester, or that a need has been 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;

W1.10 In addition to the employment development shown in Table W1, land at Davenport Green is identified in Policy R4 as having potential for an exemplar, very high quality B1 business / office development in order to support growth at Manchester Airport City and/or Medipark.

18.11 The identification of land at Davenport Green as having potential for an exemplar, very high quality B1 business / office development in order to support growth at Manchester Airport City and/or Medipark reflects the unique status of Davenport Green in Policy R4 as a Countryside designation outside of the Green Belt, protected from development until such time that strict criteria are met.”

and so on.

It is apparent, therefore, that Trafford Council has not only reversed its position of six months ago regarding the return of land at Davenport Green to the Green Belt, but has, without any proper, prior, public consultation or examination, significantly changed the permitted use of land at Davenport Green.

Conclusions

The uses above show that land use proposed by Trafford Council, as at 23 September 2011, at Davenport Green is for the Airport City and Manchester City Council, not the residents and Council Tax payers of Trafford and is inconsistent with the current Planning Inspectorate permitted use.

The overall thrust of the Council's policy position is not only radically different to the position it adopted as recently as 24 March 2011 in relation to the Timperley Wedge, but the proposed uses of land at Davenport Green are no longer for the principal benefit of the residents of Trafford Borough; they are not properly evidence-based and they have not been subject to proper public scrutiny. These proposed changes are therefore unsound.

J.C. Williams
25 September 2011