

## Frontloading Visit Trafford

1 & 5 December 2008

Present: R Yuille (PINS) D Smith. R Haslam C Taylor Russell (Trafford)

### 1. Strategic Sites.

- *How should these be dealt with in the CS?* As I understand it the CS will identify a limited number of strategic sites which it considers to be central to the achievement of the strategy. Clearly the reasons why these sites are considered to be strategic would need to be spelt out as would the way in which they are to be subsequently handled – will they be backed up by an AAP or an SPD master plan? Whatever the approach taken, questions of deliverability cannot simply be devolved down to those other documents.
- The CS, or its supporting evidence, must indicate how much development is proposed, what the mix of land uses will be, what the main constraints to development are, how these are to be overcome, what the necessary infrastructure will be, who will deliver it, when it will be delivered and what is the anticipated phasing of development. The earlier the phasing the more detailed the evidence would be expected to be.
- *Is the absence of key evidence on Flooding and Transportation sufficient reason to delay publication of the CS?* Delaying the publication of the CS is not something to contemplate lightly. Nonetheless, the CS must be founded on a robust and credible evidence base. It is not always practical to assemble a perfect evidence base and there will be occasions when decisions have to be made on the basis of the best evidence available.
- However, if the evidence indicates that a number of the strategic sites, sites which are central to the delivery of the strategy, are at risk from flooding and that their development is likely to cause problems on the local motorways but does not go on to indicate how these constraints will be overcome then I suspect the alarm bells would start ringing in the mind of an Inspector!

### 2. North v South.

- *Is there a need to explore contingency plans in the event of the strategic sites, predominantly in the north of the Borough, do not deliver at the anticipated rate?* In line with the RSS the CS will focus development on the northern part of the Borough: that being where the Regional Centre and the Inner Areas of the Manchester City Region in the Borough are located. The southern part of the Borough, while it is an area of high demand for housing, will be given lower priority as a location for development.
- It is to be anticipated that there will be those representatives who will argue that the CS is placing too many eggs in too few baskets and that there is a risk that the strategic sites it identifies will not deliver the required levels of housing growth. These representatives may be able to point to smaller, less constrained greenfield sites in the south of the Borough and argue that they should play a part in the CS.
- PPS 12 (para 4.46) stresses the need for the CS to be flexible and to be able to deal with changing circumstances. Has the Council prepared a contingency plan to show how the CS would cope if, for whatever reason, the strategic sites failed to deliver as anticipated? If you decide there is a need for such a contingency plan then you would also need to establish its trigger point or points.

### 3. Evidence Base

- *In general terms what level of evidence is appropriate?* It is often the case that the evidence provided is too detailed. Inspectors will, generally delve deeply into the evidence only when they have reason to believe it is

flawed, unreliable or outdated. Keep it simple. Keep it short. I attach a



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copy of a PINS presentation on this point.

- *Can PINS be of assistance to the GM authorities in the difficulties they are having with key stakeholders?* PPS12 encourages local authorities to engage with delivery stakeholders. PINS is aware of the difficulties encountered by local authorities in obtaining the necessary evidence from such stakeholders in the necessary time frame. It has expressed its concern on these matters to the stakeholders in question and will continue to do so.
  - *Are the current joint working arrangements adequate?* If the CS has policies or proposals which have an effect on neighbouring planning authorities then evidence of joint working with them will be essential. The "Joint Project Board" with Manchester, Salford, Trafford and other stakeholders appears to be a promising example of such joint working. The possibility that one stakeholder will not agree with one outcome of the Joint Project Board does not necessarily invalidate the work done. Joint working will not always lead to complete unanimity. The important thing is that the position taken in the CS can be justified.
  - If a neighbouring local planning authority or a key stakeholder is unwilling to engage in joint working it cannot be forced to. There would need to be evidence that Trafford has made determined attempts to discuss matters of joint interest with these bodies.
  - *The role to be played by the Local Infrastructure Plan?* The CS should be supported by evidence of who will provide the infrastructure needed to enable the development proposed and when it will be delivered. The Local Infrastructure Plan will be a key piece of evidence in this regard.
  - *The need to establish the economic viability of affordable housing targets and other likely requirements such as open space.* Following the *Blyth Valley* judgements it is essential that any affordable housing targets are underpinned by an assessment of their economic viability. It may be that this will be based on 'normal' rather than current market conditions in which case you would need to say so and any policy would need to be qualified by a reference for the need for an individual viability assessment for each site. It would also be desirable to establish the viability of other requirements such as public open space.
4. **Housing Growth Point.**
- *Is there a need to re-consult?* The Growth Point, which will involve a 20% increase in the housing figures in the RSS emerged late in the day and its implications were not fully considered at the Preferred Options stage. Consequently it is proposed to carry out a pre publication consultation on this matter. This appears to be consistent with advice in PPS12 (para 4.26) which points out that the level of consultation required will differ according to circumstances.
  - *Should the additional 20% be added into 5 and 10 year calculations for the purposes of PPS3?* PPS3 (paras 54-57) requires the identification of a 5 year supply of deliverable sites over the first five years of the CS and the identification of a five year supply of developable sites over the next five years. If the CS envisages housing growth taking place at a rate 20% above the minimum figures in the RSS then this figure must, logically, be taken into account when calculating 5 and 10 year supply.
  - I understand that Trafford is concerned that this increased housing figure is contingent on Growth Point funding for the provision of infrastructure and so on and it is not yet certain that this will be available. If that is still

the situation when the CS is submitted then this will have to be made clear in the document.

- *What level of detail will be required when making these 5 and 10 year calculations?* In making the 5 year calculation it will be necessary to demonstrate that the site is suitable, that it is available and that the infrastructure necessary for its delivery is or will be in place. It may be that in current market conditions it cannot be demonstrated that the site is achievable in the sense that anyone is likely to start developing it. If that is so you need to demonstrate that all the other factors necessary for its delivery are in place and it would be achievable in normal market conditions.
- As to the 10 year calculation you will need to demonstrate that specific sites are in suitable locations and that there is a reasonable prospect that they will, or would under normal market conditions, be available at the anticipated time. The level of detail about what infrastructure will be needed, who will provide it and when may well be less than is available when making the 5 year calculation.

#### **5. Gypsies and Travellers**

- *The implications of the partial Review of the RSS in relation to Gypsies and Travellers.* The CS should as a minimum contain a criteria based policy for the location of gypsy and traveller sites. If it is possible to go on to allocate sites in the CS then this should be done. In this instance this may be difficult as the partial Review of the RSS will be considering the number of pitches which need to be provided in the Borough. Ultimately, however, this number will need to be translated into specific site allocations in one of your DPDs (Circular 01/2006 paragraphs 30-31).

#### **6. Joint Evidence Base and Pool of Inspectors**

- *Will PINS appoint a pool of Inspectors to examine the soundness of the various CSs in the Greater Manchester area and will they hold joint sessions to examine various pieces of evidence that have been prepared on a Greater Manchester wide basis?* PINS is willing to look at any ideas that will lead to effective examinations. If, and I would suggest it is a big if, all or many of the CSs in Greater Manchester are submitted close together then a pool of Inspectors is an idea that would be looked at.
- Under these circumstances the possibility of joint sessions would also be looked at with a view to cutting out repetition, ensuring consistency and covering points of common concern.
- The idea of jointly examining the various pieces of common evidence at the outset could, however, be problematic. It is not the role of the Inspector to declare a particular piece of evidence sound or unsound in isolation; rather, that Inspector will be examining whether the evidence supports a particular set of policies or proposals. It is not unknown for CSs using a common evidence base to arrive at different strategies
- However, such a joint approach could be useful if a group of authorities have come up with very similar policies and proposals based on the same evidence. The conduct of any examination is of course a matter to be decided by the appointed Inspector.