

Representations on behalf of Redrow Homes Ltd  
Trafford Local Development Framework: Core Strategy DPD

**RESPONSE TO INSPECTOR'S NOTE 5: BUDGET 2011 -  
PLANNING FOR GROWTH**

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## 1. INTRODUCTION

1.1 The Government announced on 23<sup>rd</sup> March 2001 (within their Budget statement) an intention to introduce changes to planning policy. The relevant documents in which both the justification for changes to planning policy and its intended future direction were outlined as follows:

- The Plan for Growth – HM Treasury and Department for Business Innovation and Skills
- Planning for Growth – DCLG
- Statement: Eric Pickles – Secretary of State at DCLG
- Statement: Greg Clark – Minister for Decentralisation at DCLG
- Statement: Grant Shapps – Minister for Housing at DCLG

1.2 In recognition of the great significance attached by the Government to these policy changes, the Inspector issued a note that was circulated to all previous participants (Inspector's Note 5) inviting further comment as to degree to which these changes may have a bearing on the soundness of the Core Strategy.

1.3 We have submitted representations on behalf of Redrow Homes Ltd in respect of the following policies:

- Policy L1: Land for New Homes;
- Policy L3: Regeneration and reducing inequalities; and
- Policy R4 - Green Belt and other protected open land.

1.4 This statement sets out our views on the soundness of the Core Strategy specifically in light of the Government's proposed changes to planning policy as set out in the Budget, and the related Ministerial Statements.

## 2. PLANNING FOR GROWTH

2.1 The background to the Ministerial Statements was the Chancellor of the Exchequer's budget delivered to Parliament on 22<sup>nd</sup> March. Under the title of 'Planning Reforms' he said in relation to planning:-

*"1.82 The planning system has held back investment and created distortions in the way that businesses compete, deterring development and growth."*

2.2 He went on to state that to address this the Government will:-

- *".....introduce a new presumption in favour of sustainable development, so that the default answer to development is 'yes';*
- *localise choice about the use of previously developed land, removing nationally imposed targets while retaining existing controls on greenbelt land;*
- *introduce a number of measures to streamline the planning applications and related consents regimes removing bureaucracy from the system and speeding it up....."*

2.3 The Chancellor and Secretary of State for Business, Innovation and Skills set out their proposals for a "Plan for Growth". This repeated the budget's key commitment in the sphere of planning of:-

- a presumption in favour of sustainable development;
- more land to be made available for development whilst protecting Green Belt etc.

2.4 At para 2.9 the document states:-

*"The government is committed to ensuring that the planning system does everything it can to support growth. This statement of government policy is capable of becoming a material consideration in local planning decisions with immediate effect and local authorities should press ahead and put in place development plans that are pro-growth".*

2.5 Further, it set out that the new National Planning Policy Framework is promised to be inherently pro-growth.

2.6 As part of its programme for stimulating economic growth, the Department of Communities and Local Government on 24<sup>th</sup> March also published a list of the next generation of enterprise zones. Four vanguard areas have been chosen, one of which has been confirmed as Manchester Airport. The new enterprise zones are seen as having real potential to create new businesses and jobs with wider economic benefits and they offer the best opportunities to stimulate growth and create successful enterprises.

2.7 Mr Greg Clark's statement of 23<sup>rd</sup> March refers to the Chancellor's ambitious set of proposals to help rebuild Britain's economy and the key role the planning system has to play in helping to secure a swift return to economic growth by ensuring that the sustainable development needed to support the economy is able to proceed as early as possible. In his statement Mr Greg Clark set out that:-

*"The Government's top priority in reforming the planning system is to promote sustainable economic growth and jobs. Government's clear expectation is that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy."*

2.8 He went on to state that:-

*"Local planning authorities should therefore press ahead without delay in preparing up-to-date development plans, and should use the opportunity to be pro-active in driving and supporting the growth that this country needs. They should make every effort to identify and meet the housing, business and other development needs for their areas, and respond positively to wider opportunities for growth, taking full account of relevant economic signals such as land prices."*

2.9 He also gave very specific advice as to the approach councils are now expected to take to planning applications:-

*"When deciding whether to grant planning permission, local planning authorities should support enterprise and facilitate housing, economic and other forms of sustainable development. Where relevant – and consistent with their statutory obligations – they should therefore:-*

- i) consider fully the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession*
- ii) take into account the need to maintain a flexible and responsive supply of land for key sectors including housing*
- iii) consider the range of likely economic, environmental and social benefits of proposals; including long term or indirect benefits such as increased consumer choice, more viable communities and more robust local economies (which may, where relevant, include matters such as job creation and business productivity)*
- iv) be sensitive to the fact that local economies are subject to change and so take a positive approach to development when new economic data suggest that prior assessments of needs are no longer up-to-date*
- v) ensure that they do not impose unnecessary burdens on development."*

2.10 The removal of the nationally imposed target in respect of previously developed land is emphasised in the summary of the proposal announced by the Chancellor (DCLG, March 2011), which sets out that the centrally imposed target has had perverse outcomes, resulting in imbalances in provision in the housing market, for example between flats and family houses.

### **3. IMPLICATIONS FOR THE CORE STRATEGY**

#### **Policy L1: Land for New Homes**

##### **The housing requirement**

- 3.1 Our original representations set our concerns that the Core Strategy would be unsound in that the housing requirement is not justified by the evidence base, and would fail to meet identified housing need.
- 3.2 The recent Secretary of State appeal decision in Fylde (ref: APP/M2325/A/10/2127459) is also of pertinence to the case. The Secretary of State agreed with the Inspector that there are significant change factors which justify giving only limited weight now to the evidence base which informed the RSS (paragraph 10). In that instance, the Inspector considered that the RSS evidence base had been overtaken by more recent population projections which show a significant decrease in the anticipated level of population growth in the area.
- 3.3 In the case of Trafford, the 2003 based household projections which informed the RSS requirement indicated an increase of 790 net additional households per annum (2004-2026). As set out in our further statement to Matter 6, the latest 2008 based projections indicate that the number of households in Trafford is set to grow from 97,000 in 2013 to 114,000 in 2028. This equates to growth over the 15 year period of some 17,000 households, or 1,133 net additional households per annum- some 43% higher than the 2003 household projections.
- 3.4 On that basis, significant weight should be given to a higher requirement, as justified by the evidence set out in our previous representations.
- 3.5 This position is emphasised by the Plan for Growth, which sets out that local authorities should press ahead and put in place development plans that are pro-growth. Greg Clark's Ministerial Statement clearly identifies that local authorities should make every effort to identify and meet the housing, business and other development needs for their areas, and respond positively to wider opportunities for growth, taking full account of relevant economic signals such as land prices.

##### **Previously developed land target**

- 3.6 Our previous representations set out our view that the target should be revised downwards. We also identified that if our objections to the housing requirement, distribution and/or mix are accepted, the previously developed land target should be reconsidered.

- 3.7 In view of the Government's decision to remove nationally imposed targets and localise choice about the use of previously developed land, we consider that this is further evidence to revise the target downwards. This change in policy supersedes the RSS targets for the amount of housing to be developed on previously developed land, and as such these can now only be given limited weight.
- 3.8 The Core Strategy requires the flexibility to deliver growth. Given that the SHLAA indicates that only 82% of the total housing land supply identified comprises previously developed land, the proposed target of 80% is inflexible and could hinder the delivery of the housing requirement.
- 3.9 It is unrealistic to assume that all of the sites identified within the SHLAA will be delivered within the 0-15 year period. For example, a number of the council's key strategic housing sites are constrained (i.e. through land contamination, existing uses etc). It would not be in accordance with the Governments latest policy position to rely solely on the delivery of these sites without sufficient contingencies in place should there be a failure to deliver the housing requirement whilst also meeting the proposed 80% previously developed land target.
- 3.10 In view of the above, we also object to the proposed additions to the text at paragraph L1.8. These additions in our view add unnecessary policy triggers which if implemented would prioritise the previously developed land target ahead of meeting the overall housing requirement. The same applies to the text at L1.9, specifically the sentence that states that greenfield land outside of the urban area will only be considered favourably "*where it can be demonstrated that the development of that land will not compromise the Council's achievement of its brown-field land target*". This approach is not in accordance with national guidance or the Ministerial Statement, and is therefore unsound.
- 3.11 In order to make the Core Strategy sound, we consider that paragraphs L1.8 and L1.9 should be amended as follows:

*L1.8 The proposed scale and phasing of development set out in policy table L1 assumes the operation of normal market conditions throughout. Should regular monitoring reveal a significant (in excess of 20%) under-performance in the delivery of development as proposed in Table L1, the Council will seek to determine the reasons for the under-performance and take development management action to augment the supply of deliverable sites to improve performance. In circumstances where market conditions are perceived to have changed significantly, a review of the housing delivery proposals of the policy will be considered. Where the regular monitoring reveals a significant (in excess of 10%) under-performance against the indicative previously developed brown-field land use target set in L1.7 above, the Council similarly will seek to determine the reasons for the underperformance **and if necessary undertake a review of the policy.** ~~take development management action to accelerate the delivery of development, firstly on previously~~*

~~developed sites with planning permission or allocated for development, to raise performance. Until such time as monitoring evidence indicates that the previously developed land use under performance has been reduced to an acceptable level by the measures taken, the Council may reject applications for the development of green-field sites where the overall delivery of new housing is not jeopardised.~~

~~L1.9 The development of green-field land outside the urban area will only be considered favourably where it can be demonstrated that the proposed development will be capable of creating sustainable communities; will contribute significantly to the Plan's overall objectives, including the economic growth of the City Region and the provision of affordable housing; and where it can be demonstrated that the development of that land will not compromise the Council's achievement of its brown-field land target over the Plan period and that without its release, the Council's 5 year housing land supply target could not be delivered.~~ **and the release of the site would contribute to the council meeting its overall housing requirement and/or identifiable local housing needs.**

- 3.12 To conclude, in view of the Budget Plan for Growth and the accompanying Ministerial Statements, we consider that Policy L1 should be supportive of greenfield sites coming forward alongside of brownfield sites where this can bring about economic benefits, for example ensuring a continuous deliverable supply of housing and to meet regeneration needs and objectives.

### **Policy L3: Regeneration and reducing inequalities**

#### **Partington**

- 3.13 Our previous representations set out our view that there is a need for at least 2,286 net additional dwellings in Partington to 2026 (127 per annum), over the plan period (2008 - 2026). We also set out that within the policy that any housing target given for the priority regeneration areas should not be treated as a maximum. In order to achieve the requisite quantum of development to regenerate Partington, it may be necessary to release other land for development.
- 3.14 As with the overall housing requirement for the borough, our case is clearly supported by the Plan for Growth which sets out that local authorities should press ahead and put in place development plans that are pro-growth. Greg Clark's Ministerial Statement identifies that local authorities should make every effort to identify and meet the housing, business and other development needs for their areas, and respond positively to wider opportunities for growth, taking full account of relevant economic signals such as land prices.



- 3.15 As it currently stands, the Core Strategy would not meet the identified housing needs in Partington, and would not sufficiently stimulate economic regeneration. It is therefore unsound.
- 3.16 In view of the above, we consider that the safeguarded land at Warburton should be allocated in order to achieve the large scale development that is necessary to bring about the regeneration required in Partington. This would be directly in accordance with the Government's commitment to delivering the economic growth required to help re-build Britain's economy, and is particularly pertinent in an area of severe economic deprivation.

## **Policy R4 - Green Belt and other protected open land**

### **Land in Warburton (immediately to the south of Partington)**

- 3.17 As set out above, we consider that the Government's objectives for the planning system set out in the Plan for Growth and the Ministerial Statements emphasise our case that the council's approach to the development of greenfield land is both restrictive and inflexible. It also adds significant weight to our case that additional housing development is required in Partington to stimulate economic growth in the area and to meet identified regeneration objectives.
- 3.18 In order to provide the necessary flexibility in the plan and to meet identified needs in Partington, we consider that the area of other protected land at Birch Farm should be allocated for residential use. The land at Birch Farm is considered appropriate for this purpose due to its exclusion from the Green Belt and its close relationship with Partington.
- 3.19 The site is deliverable during the plan period in accordance with PPS3, in that it is available, suitable and achievable. The principle of the development of the land to meet long term regeneration needs has previously been established through the UDP. The development of the site would be an efficient use of land, well integrated with existing development, and well related to public transport and other existing and planned infrastructure, so promoting sustainable development. Crucially, its development would stimulate economic growth through the delivery of housing, and pertinently the economic benefits for Partington.
- 3.20 Furthermore, the allocation of this site would not harm any local or national policy objectives. The Planning for Growth Statement sets out that the Government's clear expectation is that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy.

3.21 Notwithstanding the above submissions, our representations that the policy as drafted is not sufficiently flexible to enable safeguarded land to be brought forward for development if other sites fail are also emphasised further by the Plan for Growth and the Ministerial Statements. The restrictive approach proposed by the policy is contrary to the Government's stated objectives of realising economic growth, is an unnecessary burden on development and will not address the housing need.