

TRAFFORD CORE STRATEGY

Further Sustainability Appraisal of the Davenport Green Site

Comments submitted for consideration by the Inspector prior to closure of the formal Hearing sessions – in accordance with CD.12.37.1

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Introduction

These comments are presented in the same way that the “Further Sustainability Appraisal of the Davenport Green Site” (CD 12.37.2) has been created by Urban Vision and in a similar fashion to those presented by Royal London Asset Management (CD 12.36.2) and Trafford Council (CD 12.35.4, Main Matter 4.7; CD 12.35.5, Main Matters 5.1, 5.4 and 5.5).

For Trafford’s Core Strategy to be found to be sound it must have been subject to Sustainability Appraisal, have regard to national policy, conform generally to the Regional Spatial Strategy (RSS) and have regard to the sustainable community strategy. It has to be founded on a robust and credible evidence base and the most appropriate strategy when considered against reasonable alternatives, to be deliverable, flexible, able to be monitored and consistent with national policy.

Specific Comments

1. Following the Unitary Development Plan (UDP) Public Inquiry in 1992/93 (CD 12.1), there never has been any ambiguity about the designation of the site at Davenport Green and its possible role as a Major High Amenity Employment Site. This was enshrined 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).
2. As has been reported by Trafford Council (CD 12.35.5, Main Matter 5.4) over 1300 objections (1314 representations) were received in relation to the proposed release of this site from the Green Belt and the matter was resolved by the Inspector at the Public Inquiry who judged that there were, in his opinion, at that time, “exceptional circumstances” justifying removal of this large piece of land from the Green Belt.

3. As can be imagined, there was, and remains, much disquiet in the affected communities on both sides of the land at Davenport Green about the seemingly arbitrary manner in which this matter was finally resolved, but many of those who disagreed with the conclusions drawn resigned themselves to the outcome on a purely procedural basis and thought that the UDP Policy E14 which emerged in 2006 made it clear what the basis of this decision was and what development, if any were to be brought forward, would be.
4. Following straightforward matters of procedure, it should be clear that the land is no longer in the Green Belt and that the very specific and narrow use to which it might be put has been made abundantly clear.
5. Bearing in mind the strictures placed on any possible land-use at Davenport Green, it is of very great concern that discussions should have cropped up during preparations for the Public Examination of Trafford's Core Strategy indicating that consideration had been given, amongst other things, to, *"3 Spatial Options (which) include the proposals for the development of Davenport Green which were submitted in the form of representations at the Issues & Options Stage. These comprise a high amenity employment site or a mixed use development incorporating housing for workers at Wythenshawe Hospital and Manchester Airport. Under all 3 proposed Spatial Options, this area would revert to Green Belt in the Core Strategy"* (CD 12.35.5, para 5.1.4). The current permitted use is clear. It is for a Major High Amenity Employment site, as defined in the UDP, with a series of strict planning conditions which must be satisfied by any applicant.
6. As the site was removed from the Green Belt exclusively for a possible Major High Amenity Employment site, it is necessary, in my opinion, to demonstrate what the "exceptional circumstances" are, whichever direction this might ultimately drive any future land-use, as well as to consult widely. I am assuming that the Core Strategy is intended to achieve both purposes.
7. As has been observed by Urban Vision (CD 12.37.2, para E1, p. 67), *"the site is presently not well served by public transport and is located in close proximity to the motorway network"*. Consequently, I would agree with Urban Vision that, *"the proposals have the potential to result in unsustainable patterns of travel and augment congestion"*. For example, in TMBC's judgement, using TRICS data in 1994, some *"85.7% of journeys to the site would be by car"* (CD 12.1, para 3.87).

8. Also, as observed by Urban Vision, *“the development of the site would lead to the permanent loss of a substantial greenfield area”* (CD 12.37.2, Section 5) and, *“irrespective of whether Davenport Green is within the Green Belt or not, the site still comprises entirely of greenfield land and, as such, the development proposals for the site would have a significant negative impact on the objective of conserving land resources”* (CD 12.37.2, Section 7).
9. As stated in its Revised UDP of June 2006, *“The Council is not prepared to release this high quality green-field site for development for anything other than the uses specified in this Proposal”*, (CD 12.18, Chapter 8, para 4, p.65) so, if the site were to remain outside the Green Belt, anything other than these proposed uses would not be acceptable to Trafford Council.
10. Basically, any development at Davenport Green would be detrimental and this has been apparent to the local community for almost 20 years.
11. No publicly-available development proposal that is fully compliant with the strict criteria applied by the 1992/93 Public Inquiry’s Inspector has emerged so far, so it is clear that the *“exceptional circumstances”* which were used as an argument to remove the site from the Green Belt in the first place do not, in fact, exist and the land should, as proposed by Trafford Council (CD 12.35.5, para 5.5.2), be returned to full Green Belt protection.

Conclusions

I find that the Core Strategy is sound with respect to proposed land use at Davenport Green. It has been subject to Sustainability Appraisal, has regard to national policy, conforms generally to the Regional Spatial Strategy (RSS) and has regard to the sustainable community strategy. It is deliverable, able to be monitored, consistent with national policy and has been founded on a robust and credible evidence base. It is also the most appropriate strategy when considered against reasonable alternatives.

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