

## Response on Behalf of RLAM (Representor 1211)

### Trafford Core Strategy: Inspector's Note 5

#### Written Ministerial Statement: Planning for Growth, 23/3/11

##### *Application to Soundness and Changes, Summary*

In brief RLAM see the Ministerial Statement as reinforcement of their case that the Delivery Strategy of the Core Strategy is unsound, firstly in being incapable of delivering the vision and objectives, especially those relating to economic development and the closely related issues of regeneration and employment need (CD 6.2.1, SO's 2 and 3), and secondly in the lack of consideration of an alternative strategy in the SA, more specifically:

1. "Immediate effect", top "priority.....sustainable economic growth": the key implication for TBC is that the CS should be reviewed immediately and the probability is that changes will be required to support "a swift return to economic growth".
2. The call to "respond positively to wider opportunities for growth" should be reflected in greater weight being attached to economic growth, for example in the interpretation of the results of the SA of the Core Strategy, including that of Davenport Green.
3. "A swift return to economic growth" in a *national* ministerial statement means that growth should be net additional, at least at the level of the sub-region; the allocation of Davenport Green as a strategic site for employment would address the unsoundness of the delivery strategy in this respect.
4. "Taking full account of relevant economic signals" should be reflected in consideration by TBC of an alternative strategy which includes strategic development for employment in the south of the Borough; the Core Strategy in relation to economic development currently focuses too much on market failure, i.e. regeneration areas, and too little on areas in which market signals indicate a demand for development, such as the south around the Airport; examination of a strategy including development in the south would address also the lack of consideration of alternative strategies in the SA.
5. "the need to maintain a flexible and responsive supply of land for key sectors" should be reflected in the allocation of Davenport Green as a strategic site for employment to meet the demand from sectors around the Airport which are recognised in TBC's Economic Development Plan, 2005 (CD 8.3.8)
6. The opportunity to exploit the potential agglomeration economies in the development corridor extending north and west of the Airport (and including Davenport Green) is enhanced by the Minister's exhortation to authorities to "work together"; an alternative strategy (as in para4 above) should include an express commitment to work with Manchester CC in exploiting the potential for the benefit of the city region and the Borough.
7. "Ensure that they do not impose unnecessary burdens on development" opens the door to a more focused approach to the conditions (planning brief, planning conditions, s.106 obligations) that might attach to development proposals at Davenport Green; this endorses RLAM's proposed Policy SS1 as a measure to restore soundness to the CS.

(Other “quotations” in this note are from the Statement, unless otherwise stated.)

### *High Growth and Flexible and Responsive Land Supply*

Specifically in relation to Trafford, which is one of the three leading Districts for economic development in Greater Manchester (along with Manchester and Salford), there is a strong inference that there should be a high priority to growth in both development control and development planning in order to achieve higher rates of growth. RLAM have asserted with evidence that the supply of land in the Trafford CS does not represent “a flexible and responsive supply of land for key sectors”. Specifically the supply is almost entirely dependent on previously developed land, much of it in vast areas such as Trafford Park and Carrington where changing the market’s perception of the area and its competitive role will take more years yet. The Government (Plan for Growth, HM Treasury, March 2011) is removing the national minimum target for the amount of development that should take place on previously developed land. Any targets now need to be locally determined and justified.

This enables Trafford BC to adopt a more flexible approach to land supply in order to address the requirements of growth. Davenport Green **may** take the Council a few hectares over its estimated land requirement but the gain in terms of extending the choice of land available to occupiers that could bring real net additional growth to the conurbation and significant “indirect benefits” is highly significant; RLAM believe furthermore there will be no detriment as a result of any small oversupply because of the spin-off development and jobs that Trafford could generate as a result. RLAM suggest that the changed emphasis in relation to land supply needs to be reflected in the SA of the Core Strategy, most notably in the amendment of SA Objective E6, conserve land resources and reduce land contamination, which could either be amended with the addition of “whilst providing a flexible and responsive supply of land for development” or complemented with an additional objective in the same terms.

### *Economic Signals and the South of the Conurbation*

RLAM see Davenport Green as a unique “response to wider opportunities for growth, taking full account of relevant economic signals such as land prices”. The current focus (by agencies other than TBC) of economic development on the south of the conurbation (alongside the city centre and the key regeneration areas) is recognition of the “fact that local economies are subject to change” which needs a “positive approach to development”. The Plan for Growth also introduces a new generation of Enterprise Zones, one of which has been identified in South Manchester. The significance of these for the Trafford spatial strategy is that they endorse the notion, advocated by RLAM, that closing the gap in GVA between regions is best achieved by promoting development in the most favoured parts of the underdeveloped regions and then working to maximise the beneficial economic effects (spin-off) of such development for a wider area within the sub-regional economy. The Trafford CS needs to reflect this approach by the inclusion of a site in the south of the Borough, as proposed by RLAM in SS1.

### *Planning Restrictions*

RLAM have already proposed (Proposal SS1 in November Reps) that the restrictions imposed on the now expired planning permissions for development at Davenport Green be eased for any future development. The modification of existing s.106 obligations is a specific measure that is endorsed in the Statement. However RLAM have a shared interest with the Council in maximising the economic

benefits of the proposal and the environmental quality of the development and its surroundings, including the Rural Park; appropriate parameters have been included in SS1.

### ***Authorities Working Together***

The opportunities for agglomeration economies in the development corridors radiating from the airport call for the “authorities to work together” to deliver the benefits of a linked series of economic developments and the development of “strategic infrastructure to support growth”. The Government has already paved the way for cross-boundary working (proposed to become a statutory duty, Plan for Growth) with the “creation of Local Enterprise Partnerships...based on real economic geographies instead of false administrative boundaries” (Plan for Growth)

### ***Davenport Green the Key to Higher Growth in Trafford and Greater Manchester***

The continued allocation of Davenport Green is an entirely appropriate response to the unsoundness of the Core Strategy, unsoundness which is reinforced by the “call to action on growth”; what is needed is for SS1 to be adopted as a change to the Core Strategy and for the Council to proceed to adoption of the CS as soon as possible in order to have “without delay...an up to date development plan”.