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<b>STRATEGIC PLANNING AND DEVELOPMENTS</b>			
21 OCT 2011			
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19885/A3/GG/ac

19<sup>th</sup> October 2011

Dear Ms Parker,

**TRAFFORD COUNCIL CORE STRATEGY EXAMINATION  
CONSULTATION ON SUGGESTED CHANGES SCHEDULE – LIVING DOCUMENT (CD 12.4)  
COMMENTS REGARDING SUGGESTED CHANGE REFERENCE S300.27**

We write on behalf of the Crown Estate, land owners of the Altrincham Retail Park, regarding the above consultation and specifically in relation to Suggested Change Reference S300.27.

We object to deleting of the word 'normally' from Core Policy W2: Town Centres & Retail at paragraph W2.14. The submission version of the Core Strategy at paragraph W2.14 states:

**"Proposals to expand any of the three existing retail warehouse parks (White City, Trafford and Altrincham) should be justified against the tests set out in PPS4. Further development within the retail warehouse parks should normally be limited to the sale of bulky comparison goods only."** (Our emphasis)

It is noted document CD 12.58.1 (Council Response to Inspector's Matters Arising from Hearing Session 4A Policy W2 and R6) identifies that at Hearing Session 4A of the Trafford Core Strategy Examination, the Inspector suggested that further consideration should be given to changes to Policy W2, and the Inspectors point 2 suggests that:

**"For clarity should the word 'normally' in W2.14 be deleted?"**

The Council's response to point 2 set out in document CD 12.58.1 'agrees' that the word normally be deleted because it is confusing and unnecessary and was originally included to give some flexibility in exceptional circumstances. The Council also identify in the 'Reason for Change' in document CD 12.4 that it is to ensure the soundness of the Plan.

We disagree with the proposed change to Policy W2.14 for the following reasons:

1. The Inspector has not asked for the word 'normally' to be deleted from Policy W2.14, but suggests reviewing whether the word 'normally' should be deleted for clarity. The Council's review of the use of the word 'normally' confirms that it was 'put in to give some flexibility in exceptional circumstances'. We agree with the Council's original approach.

Certificate No. FS 29637



2. We disagree with the Council's comment at document CD 12.58.1 that the use of the word 'normally' is confusing and unnecessary. The Council themselves included 'normally' to give some flexibility in exceptional circumstances. Otherwise the policy would be too prescriptive.
3. We do not consider that it is necessary to delete the word 'normally' to ensure the soundness of the Plan. We consider that the Plan can be found to be sound with the inclusion of the word 'normally' at Core Policy W2.14, which would provide an element of flexibility.
4. PPS12 confirms at paragraph 4.52 that to be sound a core strategy should be justified, effective and consistent with national policy. Paragraph 4.44 of PPS12 clarifies that in terms of 'effective' this means Core Strategies must be deliverable, flexible and able to be monitored.

Flexibility in Local Plans is supported in the draft National Planning Policy Framework (NPPF) at paragraph 14 which states that

**"At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. Local planning authorities should plan positively for new development, and approve all individual proposals where ever possible. Local planning authorities should prepare Local Plans on the basis that objectively assessed development needs should be met and with sufficient flexibility to respond to rapid shifts in demand and other economic changes..."** (Our emphasis)

5. Paragraph 73 of the draft NPPF identifies that investment in business should not be overburdened by the combined requirements of planning policy expectations and that planning policies should recognise and seek to address potential barriers to investment and set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth.

For the above reasons we would ask the word 'normally' is retained in Core Policy W2.14.

In the meantime if you require any clarification of this matter please do not hesitate to contact either Gavin Gallagher or myself.

Yours sincerely

*pp.*   
**MARK SITCH**  
Senior Partner