

TRAFFORD CORE STRATEGY EXAMINATION

**WRITTEN STATEMENT PREPARED BY TURLEY ASSOCIATES ON BEHALF OF THE
PEEL GROUP
RESPONSE TO INSPECTOR'S NOTE 5.**

UNIQUE REFERENCE NUMBER: 1045

9TH May 2011

In her Note 5 the Inspector invited those who had made representations on the Draft Core Strategy to comment on whether the recent policy changes announced by the Coalition Government in the Ministerial Statement and the "Plan for Growth" Statement have any implications for the representations made to the Core Strategy or for its soundness. Peel is pleased to comment briefly as follows but these comments should be read alongside our more detailed submission in response to the Council's further consultation documents CD 12.70 and CD 12.71.

Presumption in Favour of Sustainable Development / Priority for Growth and Jobs

The commitment to the introduction of a powerful presumption in favour of sustainable development is of significance in relation to a number of policies in the plan. In Peel's view this commitment to a change in national policy renders the climate change components of draft Policy L5 inappropriate and unjustified for the reasons set out in our detailed submission to the further consultation on that policy. This is a further reason why that part of Policy L5 should be deleted.

The presumption, and the related commitment given in the ministerial statement that the Government will set clear expectations that local planning authorities and other bodies involved in granting development consents should prioritise growth and jobs, also supports Peel's representations that the housing and employment land figures in the Core Strategy should not be applied as maximum or ceiling figures and that it would not be appropriate to set arbitrary ceiling figures for, for example, the amount of commercial floorspace to be developed within the Trafford Centre Rectangle Strategic Location (since other controls are available to ensure that development here does not harm or prejudice

investment in the town centres or Regional Centre). These representations have already been taken on board in the various changes already proposed by the Council and its decision not to make any further changes to Policy SL4 in response to the representations made by Salford and Manchester Councils; these decisions are, in our view, reinforced by the Government's statement and need to be carried forward in the Core Strategy if it is to be compliant with national policy.

Local Choice about the Use of Previously Developed Land

Whilst it expects that a very significant proportion of development will continue to take place on previously developed land the Government has decided to remove nationally imposed targets for this proportion and to leave it to local authorities to determine what the appropriate balance is for their areas.

At present the Core Strategy adopts the target of 80% of new housing to be developed on previously developed land (L1.7) which was set in RSS and this has informed its approach to the distribution of new development. However in Peel's view the objective of achieving this percentage, both over the plan period as a whole and on a rolling annual basis, has also resulted in the Council taking a more cautious approach to the quantum of development assumed, for example at Trafford Quays and in Partington.

As discussed at Session 3 of the Hearing, although the majority of the Trafford Quays site does not comprise land that is previously developed, it does not, in Peel's view represent a "greenfield" site as this term is commonly understood by the public or in the sense of the types of greenfield sites that the original national policy in PPG3 was seeking to protect from unnecessary development. However the Council has consistently treated the site as greenfield and this has coloured both its approach to the site's allocation for development (because of the additional justification that has been felt to be necessary) and the scale of housing development envisaged over the plan period (in order not to impact too greatly on the balance between greenfield and brownfield development). In Peel's view the changes now introduced by the Government should remove any outstanding concerns as to the appropriateness of Trafford Quays as residential led mixed use development site and enable the council to introduce further flexibility for a large number of dwellings to be constructed on the site over the plan period should the market support an increased rate of development.

In respect of Partington there are very few brownfield opportunities available but there is

an acknowledged need to diversify the current housing mix and to push forward much needed regeneration. Whilst this will be achieved to a certain degree through the development to which Peel is already committed and which is provided for in Table L1 (as amended), sustaining the regeneration initiative over the longer term could be supported by additional housing development but the requirement to work within the 80% target has made it difficult for the Council to lend support to that. Given the change now made by Government there could in Peel's view be some scope to indicate a bit more flexibility with regard to future development in Partington. However as stated in the Session 8 Hearing any future development permitted should be required to provide for wider regeneration benefits and be phased so as not to undermine the programme of development and infrastructure improvements / regeneration works which have already been secure through the planning permissions that Peel has obtained on the Canal Side site and the shopping precinct.