

Comments on the Council's Response (CD 12.97.14) to Inspector's Note 7 relating to Draft National Planning Policy Framework

Royal London Asset Management

Specifically in relation to the sequential test for offices (dropped in Draft NPPF), TBC acknowledge that the test has no place in the Core Strategy. TBC assert, however without evidence, that their locations for offices (para 3.15, Pomona, Wharfside and town centres) remain the best locations for office development for clusters, creatives, high technologies etc.

TBC, by a proposed re-wording of the relevant W1 policies, make Trafford Park Core, Carrington, Trafford Centre Rectangle and Broadheath suitable for office development generally, not only offices ancillary to existing or proposed employment uses (Appendix B, Proposed Changes to Policies W1.6, 1.7 and 1.8). No evidence is provided for this change, which also allows for unlimited office development in the identified locations, thus undermining the Council's case that office development at Davenport Green would result in an oversupply.

Having re-considered the above locations for office development in the light of the dropping of the sequential test, the Council fail to reconsider Davenport Green. This is in spite of Davenport Green being the only site considered in the test (CD 8.3.6) to be ineligible and eliminated from consideration for office development on this count (para 6.23) and in spite of the very positive outcome for Davenport Green in the SA's attached to the Council's CD 12.95. RLAM have criticised CD 8.3.6 in their Representations on CD 12.95 (CD 12.95.15).

RLAM therefore suggest that the Council's proposed changes to Policy W1 in the light of the Draft NPPF are unsound and that office development at Davenport Green should be re-considered in the light of Draft NPPF and the evidence provided by the Council indicating the appropriateness of Davenport Green as a Strategic Location..