

Trafford Core Strategy Examination

REPRESENTATIONS ON TBC DOCUMENTS CD.12.100 – COUNCIL RESPONSE TO RLAM COMMENTS ON SA AND SL6, 16 SEPTEMBER AND CD.12.100.1 - FURTHER SUGGESTED CHANGES TO POLICY W1 AND R4, 23 SEPTEMBER 2011

ROYAL LONDON ASSET MANAGEMENT

- 1 We cannot accept the Council's reasons given for rejecting RLAM's proposals for policy SL6. We do not accept the reasons given for not identifying Davenport Green (DG) in SL6. The basis of the Council's approach is not supported by any rational approach to the evidence, and indeed is contrary to the evidence base, for reasons set out in detail in our representations in response to CD12.95. It remains RLAM's contention that the evidence base supports proposed Policy SL6. The Council has not addressed the evidence put forward by RLAM made against, and supported by, the Council's own evidence base.
- 2 Development at DG is supported by the current development plan in policies saved by the Council without qualification. The reasons for the development not proceeding earlier are accepted as being related to the inappropriately restrictive policy wording. The merits of the site as adding a unique and valuable element to the portfolio of sites available are likewise not controversial being attested to by DTZ. The need for additional B1 floor space beyond what can be provided in the TC's is admitted and there is a powerful national imperative to promote economic development in a market which is driven by opportunities as DTZ accept.
- 3 With regard to the Sustainability Appraisal (SA), it is more important that the CS is sound and supported by a robust SA, albeit that this process may take longer, than it is for the CS to be adopted quickly at all costs, but vulnerable to challenge by judicial review. Whilst we appreciate that the effect of allocating Davenport Green as SL6 may have as a consequence a further SA and possibly further consultation, this is the sound and preferred route which should be adopted. In any event the Council needs in our view to undertake further SA work in order for the CS to be sound and legally compliant.
- 4 We note the Council's approach to amending their wording of Policies R4 and W1. We have not seen any response to the policy wording put forward on behalf of RLAM in our response to CD12.95 of 5 September. In particular, there is no attempt to explain why the RLAM wording is not satisfactory, particularly since those policy proposals are measured against, and supported by, the Council's own evidence base. We ask that the Council provides reasoning for the rejection of the wording put forward by RLAM.

26 September 2011