

Draft National Planning Policy Framework (DNPPF)

Response by Royal London Asset Management to Inspector’s Note 7

Relevant References and Key Words from DNPPF (paragraph numbers)	Implications for Trafford Draft Core Strategy (RLAM’s Response)
<p>1. Support for Economic Development planning for prosperity (an economic role) – use the planning system to build a strong, responsive and competitive economy (10) The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth.....Therefore, significant weight should be placed on the need to support economic growth through the planning system. (13) 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 or other economic changes (14) Every effort should be made to identify and meet the housing, business, and other development needs of an area, and respond positively to wider opportunities for growth.(19) there is an urgent need to restructure the economy (71) plan proactively to meet the development needs of business and support an economy fit for the 21st century (72) set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth (73) identify and plan for new or emerging sectors likely to locate in their area (73) positively plan for the location, promotion and expansion of clusters or</p>	<p>The Council has examined the wider opportunities for economic growth that have emerged in the south of the conurbation – the planned Enterprise Zone and the Medipark – but, as RLAM have set out in their response to CD12.95, the Council’s proposals to address those opportunities lack the urgency, the proactive and positive approach, the responsiveness, the “every effort should be made” that are recurring themes in DNPPF in relation to sustainable economic growth.</p>

<p>networks of knowledge driven, creative or high technology industries (73)</p>	
<p>2. Cross-boundary Issues Public bodies have a duty to cooperate on planning issues that cross administrative boundaries (44) ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans (45) Local planning authorities will be expected to demonstrate evidence of having successfully cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or (46)</p>	<p>The Council have recognised the issues that cross the boundary with Manchester City around the Airport and Wythenshawe, but there is no clear reflection of this recognition in plans or proposals in the Core Strategy. As RLAM have indicated in their response to CD12.95, the Council’s revised proposals for Davenport Green lack the clarity and certainty that is required to flow from examination of cross-boundary issues.</p>
<p>3. Evidence Base Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. (27)</p>	<p>The Council has not taken account of two related pieces of evidence that indicate a need for a particular type and quality of development in the south of the conurbation:</p> <ul style="list-style-type: none"> • Its own Economic Development Plan which identifies a potential growth sector of airport-related business activity • The Large Employment Sites Study led by the GM Business Leadership Council which identified “a critical weakness in the Greater Manchester offering for global mobile investment which required access to international connectivity” (reported in KPMG Consultation Document on GM’s Enterprise Zone, 12th August 2011, para 3.3). <p>As a result the Core Strategy makes inadequate provision to meet the needs of this type of strategic development.</p>
<p>4. Presumption in Favour of SD & Role of Local Plans in Identifying Sites Decision-takers at every level should assume that the default answer to development proposals is “yes”, except where this would compromise the key sustainable development principles set out in this Framework (19) These plans should be kept up to date and should provide a practical</p>	<p>The Council have shown in their Sustainability Appraisals attached to CD12.95 that economic development at Davenport Green does not offend any of the key sustainable development principles set out in DNPPF; there should therefore be a presumption in favour of the development and not a series of further tests that inhibit the certainty, efficiency and clarity that the</p>

<p>framework within which decisions on planning applications can be made with a high degree of certainty and efficiency (19)</p> <p>Local Plans should set out the opportunities for development and clear guidance on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. (22)</p> <p>Crucially, Local Plans should:</p> <ul style="list-style-type: none"> • indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map • allocate sites to promote development and flexible use of land, providing detail on form, scale, access and quantum of development where appropriate (24) <p>In drawing up Local Plans, local planning authorities should ensure that they:</p> <ul style="list-style-type: none"> • set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated requirements over the plan period (73) 	<p>Government expect from Local Plans in the identification of sites for development.</p>
<p>5. Planning Obligations</p> <p>To enable a plan to be deliverable, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. (39)</p> <p>the cumulative impact of these standards and policies should not put implementation of the development plan at serious risk, and should facilitate development throughout the economic cycle.(41)</p> <p>Investment in business should not be over-burdened by the combined requirements of planning policy expectations.(73)</p> <p>Policies should be flexible enough to accommodate requirements not anticipated in the plan and to allow a rapid response to changes in economic circumstances (73)</p>	<p>DNPPF provides a very clear recognition of the dangers to sustainable economic development of excessive development obligations, such as inhibited the proposals contained in the Unitary Development Plan. The risks are twofold: that the development may not be viable throughout the economic cycle and that it may be so hedged with conditions that the proposals are incapable of responding rapidly to changing economic circumstances. RLAM have argued in their response to CD 12.95 that the proposals for Davenport Green should be less inhibiting in these respects.</p>
<p>6. Sequential Test</p> <p>DNPPF requires no sequential test for office development; paras 77-80 apply only to retail and leisure development.</p>	<p>There is no need for the sequential test to be applied to the proposals for Davenport Green.</p>

<p>7. Design Paras 114-123 refer only to good design and to high quality and inclusive design</p>	<p>There is no justification for the Core Strategy to require an exceptionally high quality of design at Davenport Green.</p>
<p>8. Green Belt essential characteristics of Green Belt are their openness and their permanence (133); once established, Green Belt boundaries should only be altered in exceptional circumstances (137)</p>	<p>DNPPF provides no support for the development site at Davenport Green being returned to the Green Belt.</p>

Ian McDonald
SPA
22/08/11