



**TRAFFORD**  
**COUNCIL**

## **RESPONSE TO INSPECTOR'S NOTE 7**

**Implications of the consultation draft National  
Planning Policy Framework for the Trafford  
Core Strategy**

**05 September 2011**

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**TRAFFORD CORE STRATEGY****INSPECTOR'S NOTE 7****Draft National Planning Policy Framework (NPPF)**

You will no doubt be aware that the Government has recently issued the [consultation draft of the National Planning Policy Framework \(NPPF\)](#), together with its associated [consultation document](#), [Impact Assessment](#) and [media summary](#). The NPPF is intended to bring together Planning Policy Statements, Planning Policy Guidance Notes and some Circulars into a single consolidated document. Whilst it is a consultation document and subject to potential amendment, it nevertheless gives a clear indication of the Government's 'direction of travel' in planning policy.

I am therefore inviting your views as to how the substantive policy changes within the NPPF might affect the soundness of the Trafford Core Strategy and to the suggested changes that have been put forward to it by the Council and others.

Your views, if any, should be sent to Yvonne Parker, the Programme Officer, by 12 noon on 5 September 2011. Any submitted views will be taken into account in the scheduled September Hearings sessions and in my report.

*Shelagh Bussey*

Inspector

9 August 2011

## **Implications of the consultation draft National Planning Policy Framework for the Trafford Core Strategy.**

### **1.0 Introduction**

- 1.1 On 25 July 2011, the Government published the draft National Planning Policy Framework (NPPF) for consultation. The Framework aims to streamline national planning policy into a consolidated set of priorities to consider when planning for and deciding new development. The policies set out within the framework apply to the preparation of local and neighbourhood plans, and to development management decisions. The consultation on the framework will close on 17 October 2011.
- 1.2 The Trafford Core Strategy Examination Inspector issued her note number 7 on 9<sup>th</sup> August 2011. In this note she requested the Council's views as to how the substantive policy changes within the NPPF, particularly for housing and office development, might affect the soundness of the Trafford Core Strategy. The Council has taken the opportunity to review and reflect on the proposals set out in the Government's consultation draft NPPF and is now in a position to respond to Inspector's Note 7.
- 1.3 There are a number of areas covered by the draft document which will already be familiar through the proposed Localism Bill such as Neighbourhood Plans. In some instances the key objectives of the existing PPSs have been carried through into the draft document such as the 'town centres first' approach for retail and leisure development.
- 1.4 Whilst the NPPF is still a draft, and therefore subject to potential amendment, it gives a clear indication of the 'Government's 'direction of travel' in planning policy. The Planning Inspectorate has issued guidance that the draft NPPF is capable of being a material consideration, although the weight given to it will be a matter of planning judgement in each particular case.
- 1.5 It will be essential to ensure that the Trafford Core Strategy (CS) is in general conformity with the adopted NPPF. The Trafford Core Strategy is fundamentally about delivering sustainable development and most of the NPPF is based on existing planning guidance therefore the majority of the CS is in conformity with the draft NPPF.
- 1.6 Section 2 of this document sets out how the Trafford Core Strategy is consistent with the fundamental principles of the draft NPPF while section 3 addresses how changes in the NPPF may affect the proposed Trafford Core Strategy policies that deal with the key issues of housing, office development and green belt. Appendix A sets out in detail how individual core strategy policies are consistent with the draft NPPF.
- 1.7 This statement has been approved by the Corporate Director and the Executive Member for Economic Growth & Prosperity.

## **2.0 General conformity of the Trafford Core Strategy with the draft NPPF.**

2.1 This section gives a broad assessment of the Trafford Core Strategy's conformity with the fundamental principles of the NPPF.

### The presumption in favour of sustainable development

2.2 The principle of sustainable economic growth which was firmly established as the Coalition Government's priority in its March 2011 Budget Statement "Plan for Growth" permeates the draft document and states that planning must operate to encourage growth and not act as an impediment. The framework is clear that LPAs should plan positively for new development, and approve all individual proposals wherever possible. All plans should be based upon and contain the presumption in favour of sustainable development as their starting point, with clear policies that will guide how the presumption will be applied locally. The Government has clear expectations that local planning authorities should prioritise growth and jobs.

2.3 The Trafford Core Strategy sets out a long-term spatial vision, both strategic and place objectives, a planning and development strategy, policies and a monitoring and implementation framework. As such, the Plan represents a positive and flexible planning framework for future investment, development and regeneration that meets the borough's future economic, social and environmental needs in line with national objectives and planning principles. Key to the borough's future direction is recognising that economic performance and housing are intertwined, whilst at the same time ensuring appropriate and necessary environmental protections.

2.4 The spatial vision makes clear reference to creating sustainable communities. In addition, the Core Strategy has been appraised at every stage to ensure that it meets sustainability objectives. Therefore, the council is of the opinion that the Core Strategy is in line with this key principle of the draft NPPF.

### Local Plan Conformity

2.5 Development plans must aim to be consistent with the objectives, principles and policies set out within the framework. In the absence of an up to date and consistent plan, planning applications should be determined in accordance with the framework, including its presumption in favour of sustainable development. LPAs are encouraged to seek a certificate of conformity with the Framework. It is unclear whether this applies to already adopted Core Strategies or, as in Trafford's case, those currently under examination.

2.6 The Council is firmly committed to the timely adoption of the Trafford Core Strategy so that an up-to-date Development Plan exists to support delivery of new growth within Trafford, and to provide the framework for future planning documents. As detailed throughout the Hearing Sessions the Council considers that the Core Strategy, as presented, is based on the

most up-to-date evidence, particularly in terms of economic and housing growth.

#### Duty to Co-operate

- 2.7 The framework states the importance for councils and other public bodies to work together across administrative boundaries. Local planning authorities will be expected to demonstrate evidence of having successfully co-operated, such as a memorandum of understanding of an agreed position.
- 2.8 The Council detailed in its response to the Inspector's Main Matters, Issues and Questions Note 1 and MMIQ 1.5, 4.8, 4.11 that the Core Strategy, as presented, has been the subject of significant cross-boundary working throughout its preparation.
- 2.9 This includes ensuring that the Core Strategy addresses matters with sub-regional impacts such as accommodating the appropriate level of Economic and Housing Growth, the approach to the identification of Strategic Housing Market Areas, ensuring the timely provision of strategic infrastructure, addressing Flood Risk and climate change and making provision for the delivery of the Housing Growth Point and airport related growth.
- 2.10 In addition, the new Greater Manchester Combined Authority came into effect on the 01 April 2011 and further strengthens cross-boundary working amongst Greater Manchester authorities, particularly in the fields of Economic Regeneration and Transport.
- 2.11 One specific issue is that in developing the evidence base for the policy, the Council did not work with the Local Enterprise Partnership (as required under the NPPF) as it was not in existence at the time. However, the Council considers that the CS evidence base is in general conformity with the NPPF as it did consult with the NWDA, AGMA and the Trafford Economic Alliance who represent similar interests to the GM LEP. The Core Strategy also reflects the economic objectives of the Greater Manchester Strategy (CD4.6.1) which has informed the initial approach of the GM LEP.
- 2.12 Given the above, and the original response to the Inspector's MMIQ's, it is considered that Trafford has demonstrated that it has engaged in ongoing constructive and active engagement with relevant neighbouring authorities on the preparation of the Core Strategy development plan document.
- 2.13 It is therefore considered that the fundamental principles identified by the Government in the draft NPPF are adequately reflected in the Trafford Core Strategy and it is, therefore, in general conformity with that aspect of the NPPF.

### **3.0 Detailed commentary on 3 key policy areas**

- 3.1 The inspector highlighted 2 key issues (housing and office development) where the impact of changes in the draft NPPF on the Core Strategy should

be considered. Detailed consideration has also been given to the implications for Green Belt policy in the Core Strategy, and the proposed, special designation of land at Davenport Green. The Council's proposed response on these 3 issues is set out below.

### Housing

- 3.2 Broadly speaking, the NPPF retains the emphasis of much of the existing planning policy framework in relation to housing. However there are some notable changes which could have an impact on the housing policies within the Trafford Core Strategy. These are as follows:
- Giving local councils the freedom to choose the most suitable locations for development by removing the national target for development of housing on previously developed land;
  - The objective to increase choice and competition in the market for housing land by requiring the identification of at least an extra 20% of sites against the housing target in the first five years;
  - Giving local councils the impetus to optimise the delivery of affordable housing according to local circumstances by removing the national site size threshold for requiring affordable housing to be delivered; and
  - The introduction of greater flexibility to respond to the need for affordable housing by the removal of "rural exception sites' policy".
- 3.3 The implications of these key changes for the Trafford Core Strategy are as follows.
- 3.4 Policy L1 sets an indicative 80% target for the use of previously developed land (PDL). This figure is not a centrally imposed figure; instead it originated through the regional planning process, and is supported by robust evidence based on local circumstances. Table L1 of the Core Strategy demonstrates that it is achievable.
- 3.5 Additionally the policy states that the Council will achieve the indicative target of 80% through the release of previously developed land and sustainable urban area green-field land, in the following order of priority:
- Firstly, land within the Regional Centre and Inner Areas;
  - Secondly, land that can be shown to contribute significantly to the achievement of the regeneration priorities set out in Policy L3 and/or strengthen and support Trafford's 4 town centres, and,
  - Thirdly land that can be shown to be of benefit to the achievement of the wider Plan objectives set out in Chapters 4 and 5 of the Core Strategy.
- 3.6 Given these facts, i.e. that the target is based on robust local evidence and is achievable, it is considered to be entirely consistent with the NPPF to retain the PDL target as proposed within the Submitted Trafford Core Strategy.
- 3.7 Policy L1 sets the overall housing land requirements for the Borough over the life time of the Plan and is based on the robust evidence presented to the RSS Examination together with such documents as the Trafford HMA, 2006 (CD 8.8.12), the SHLAA (CD 8.8.6) and the SHMA (CD 4.1.1). It

proposes the release of sufficient land to accommodate a minimum of 11,800 dwellings through to 2026. This figure represents a significant uplift on the Revised UDP target of 270/310 pa net/gross of clearance and as such is considered to be consistent with one of the main objectives of the NPPF, to increase significantly the delivery of new homes.

- 3.8 For the 10 years up to 2018 the requirement within Policy L1 includes a 20% uplift on the basic target of 578 units pa, taking the annualised target to 694 through to 2018. This uplift reflected the former Housing Growth Point Status of the Borough. The following table indicates that the Council's SHLAA demonstrates that ample supply exists over the first five year period to meet not only the basic Core Strategy minimum requirement of 578 units pa and the 694 units pa (the former Housing Growth Point requirement), but also to meet the additional 20% supply proposed by the NPPF.

<b>Provision within SHLAA (total potential land supply that is deliverable within 5 years)</b>	<b>Required five year supply</b>	<b>Excess/ Shortfall of provision</b>	<b>Required five year supply plus 20%</b>	<b>Excess/ Shortfall of provision including 20% flexibility</b>
4695 dwellings	2890 (578 units pa)	8.1yrs (+62%)	3470 (694 units pa)	6.8yrs (+35%)
4695 dwellings	3470 (694 units pa)	6.8yrs (+35%)	4164 (833 units pa)	5.6yrs (+13%)

- 3.9 The Council therefore considers that the minimum housing land requirements set out in Policy L1 are consistent with the NPPF.
- 3.10 Policy L2 of the Submitted Core Strategy addresses housing need within the Borough. This Policy sets out the size and types of dwellings required to meet the needs of the Borough. Again this policy is supported by a robust evidence base, particularly in the form of CD8.8.12 and CD 8.8.14 (the Trafford Housing Strategy 2009).
- 3.11 The Affordable Housing targets included within this policy are supported by robust evidence, including the Trafford Economic Viability Study (CD 8.8.22). Policy L2 is entirely consistent with the emphasis within the NPPF on locally set targets and thresholds, which reflect local circumstances. Policy L2 proposes differentiated affordable housing targets reflecting the different levels of viability across the Borough. Similarly differentiated site size thresholds are proposed to reflect different levels of viability and to reflect the fact that in the Borough's more economically viable areas, there is a higher dependence on smaller sites.
- 3.12 Notwithstanding the NPPF proposal to remove the "rural exception sites' policy", the Council considers that it remains appropriate to wash over the village settlements of Warburton, Dunham Town and Dunham Woodhouses.



As set out in the Justification text of Policy R4 of the Core Strategy, the scope for further in-filling development in these settlements is in effect exhausted and that further development other than in very limited circumstances would adversely affect the character of these settlements. For this reason, reflecting the Revised Trafford UDP, it was not considered appropriate for the Core Strategy to include a rural exceptions policy. The Council does not consider that the situation in this regard has altered and therefore considers that both the housing policies of the Core Strategy and Policy R4 are in conformity with the NPPF.

Supporting economic development

- 3.13 It is considered Policy W1 is broadly consistent with the NPPF in that it is very positive in its promotion of economic development, is based on sound evidence as to economic requirements and a suitable amount and type of employment land has been identified to meet the identified need.
- 3.14 The key difference between PPS4 and the NPPF that will impact on Policy W1 is that B1 office uses are effectively not regarded as town centre type uses anymore as the NPPF only requires retail and leisure uses to be assessed in terms of the sequential and impact tests;
- 3.15 The justification for Policy W1.5 is partly based on the Regional Centre (Pomona and Wharfside) and the town centres being preferred locations for B1 office development in PPS4 terms. Notwithstanding the fact that office uses are not regarded as town centre uses within the NPPF, it is still considered appropriate to focus B1 office development on the Pomona and Wharfside Strategic Locations and the town centres as these areas represent the best opportunities in Trafford to create the clusters or networks of knowledge driven, creative or high technology industries referred to in the NPPF given the diversity and proximity of existing knowledge, creative and high technology industries in these areas and/or the City Centre;
- 3.16 However it would be appropriate to remove reference(s) to PPS4 and to revise the second sentence of Policy W1.5 to acknowledge that office development is, in general, appropriate in other locations such as Trafford Park Core, Carrington, Trafford Centre Rectangle and Broadheath and it is not appropriate to limit office development in these locations, providing that it is consistent with all the relevant criteria in NPPF and that it is in a location that is accessible by sustainable transport modes;
- 3.17 Consequent changes to Policies W1.6 to W1.10 will be made to reflect the general appropriateness of B1 office uses in these locations;
- 3.18 In addition, Policy W1.11 will be amended to reflect that non-employment development will only be allowed where there are market signals or an overriding need for a particular land use;
- 3.19 Changes are also required to the Justification for this policy to remove references to PPS4 testing for B1 office and to reflect the NPPF guidance.

- 3.20 Suggested changes to Policy W1 in response to the draft NPPF are set out in Appendix B.

Green Belt, Countryside and Other Protected Open Land

- 3.21 Broadly speaking, the NPPF retains the emphasis of much of the existing planning policy framework in relation to Green Belt and other protected open land, in particular the five purposes of Green Belt remain unaltered with their essential characteristics being their openness and their permanence and therefore the Council considers that Policy R4 of the Core Strategy is in broad conformity with the NPPF.
- 3.22 In relation to the changes proposed in respect of appropriate development within the Green Belt, the Council considers that it would be more appropriate to deal with this through the development management process, as currently anticipated within the Core Strategy policy. It will however be necessary to amend any references to PPG2 to “national planning policy” to reflect the anticipated adoption of the NPPF.
- 3.23 The Council considers that the proposal to protect the Countryside Land outside the Green Belt, at Davenport Green, which has been the subject of recent consultation, is broadly in conformity with the thrust of the NPPF in terms of securing sustainable economic growth, identifying sites for inward investment and, in particular, demonstrating flexibility to accommodate requirements or new sectors not anticipated in the plan to allow a rapid response to changes in economic circumstances. It is however acknowledged that it would be more appropriate to amend the 4<sup>th</sup> bullet point of this section to make it clear that the proposal must be in conformity with national planning policy, i.e. removing specific reference to PPS4.

#### **4.0 Conclusion**

- 4.1 The consultation draft NPPF sets out the Government’s intentions for future planning policy, however it may be subject to further amendment before it is published as the final NPPF. The council has prepared the Core Strategy DPD in line with current legislative and procedural requirements and considers that it is in line with the Government’s intentions as set out in the draft NPPF.
- 4.2 However, this is subject to some suggested changes to Policy W1 to reflect the proposal in the NPPF that B1 office uses should no longer be regarded as town centre type uses. In addition, consequential changes are required to replace specific references to existing PPGs or PPSs to general references to national planning policy.

## Appendix A – Summary of Policy Assessments

Core Strategy Policy	Summary of Consistency	Potential Changes to CS
<b>SL1 – Pomona</b>	<ul style="list-style-type: none"> <li>The proposals for Pomona are consistent with the draft NPPF in that they have the potential to create a mixed residential and commercial development in a sustainable location, supported by appropriate infrastructure that will contribute to housing and economic growth.</li> <li>It is considered that the location should remain a focus for office development given its accessible location and proximity to Salford Quays and the City Centre.</li> </ul>	<ul style="list-style-type: none"> <li>No changes proposed</li> </ul>
<b>SL2- Wharfside</b>	<ul style="list-style-type: none"> <li>The proposals for Wharfside are consistent with the draft NPPF in that they have the potential to create a mixed residential and commercial neighbourhood in a sustainable location, supported by appropriate infrastructure that will contribute to housing and economic growth.</li> <li>It is considered that the location should remain a focus for office development given its accessible location and its potential role within Mediacity UK to accommodate further knowledge, creative and high technology industries.</li> </ul>	<ul style="list-style-type: none"> <li>No changes proposed</li> </ul>
<b>SL3 – LCCC Area</b>	<ul style="list-style-type: none"> <li>The proposals for the Lancashire County Cricket Club Area will boost housing growth in a location that will help support regeneration in more deprived areas nearby and will support some key tourism, commercial and civic facilities which will play a significant role in boosting economic growth in Trafford.</li> <li>The proposal is therefore in general conformity with the NPPF.</li> </ul>	<ul style="list-style-type: none"> <li>No changes proposed</li> </ul>
<b>SL4 – Trafford Centre Rectangle</b>	<ul style="list-style-type: none"> <li>The proposals for Trafford Centre Rectangle are consistent with the draft NPPF in that they have the potential to create a mixed residential and commercial neighbourhood in a sustainable location, supported by appropriate infrastructure that will contribute to housing and economic growth.</li> <li>It is considered that the policy is consistent with the guidance on office development in the draft NPPF given its accessible location.</li> </ul>	<ul style="list-style-type: none"> <li>No changes proposed</li> </ul>
<b>SL5 – Carrington</b>	<ul style="list-style-type: none"> <li>Carrington has been identified as a location which can deliver a large-scale mixed use development on PDL. Policy SL5 details the quantum and phasing of housing to be developed in Carrington with the majority for family accommodation. The scale of economic</li> </ul>	<ul style="list-style-type: none"> <li>No changes proposed</li> </ul>

	<p>development is detailed in the policy, the economic element may include office developments under the term 'employment activities' in line with the amendment proposed for Policy W1, where sustainable modes of transport are established.</p> <ul style="list-style-type: none"> <li>• The development requirements for Policy SL5 are in line with the NPPF, they specify the need for new road infrastructure, improvements to public transport and the locating of community facilities within the location of Carrington and improving access to open space and countryside, promoting accessibility through the development of mixed use developments, the development must demonstrate high standard of sustainable urban design and the protection and enhancement of nature conservation sites, with an environmental assessment required to determine the impact of the development on such sites.</li> <li>• The Carrington Area Action Plan has been identified to deliver the mixed use development, it will detail the specific infrastructure requirements to establish Carrington as a sustainable location.</li> <li>• Policy SL5 is deemed consistent with the NPPF on the above key policy areas.</li> </ul>	
<b>L1 – New Homes</b>	<ul style="list-style-type: none"> <li>• Policy L1 promotes the delivery of a mixed housing stock. It is based on the findings of robust evidence including, amongst others, the Greater Manchester and Trafford Strategic Housing Market Assessments (CD 4.1.1 and CD 8.8.12).</li> <li>• Further commentary on how the Core Strategy relates to housing policies in the NPPF is provided in Section 3 of this note.</li> <li>• It is considered that policy L1 is consistent with the draft NPPF.</li> </ul>	<ul style="list-style-type: none"> <li>• No changes proposed</li> </ul>
<b>L2 – Housing Needs</b>	<ul style="list-style-type: none"> <li>• Policy L2 conforms with the NPPF in terms of setting out the mix of housing required, target split of market:affordable housing, dwelling type and size, thresholds and targets for affordable housing based upon market locations and the delivery of affordable housing on site.</li> <li>• Further guidance on the delivery of affordable housing is set out within the Planning Obligations SPD.</li> <li>• Further commentary on how the Core Strategy relates to housing policies in the NPPF is provided in Section 3 of this note.</li> <li>• It is considered that Policy L2 adequately covers all of the aspects of the NPPF.</li> </ul>	<ul style="list-style-type: none"> <li>• No changes proposed</li> </ul>
<b>L3 - Regeneration</b>	<ul style="list-style-type: none"> <li>• The policy identifies key regeneration areas within the Borough and is in line with the NPPF position. In particular, the policy details the need to improve accessibility between these areas and employment/training opportunities by a range of modes of transport, improve</li> </ul>	<ul style="list-style-type: none"> <li>• No changes proposed.</li> </ul>

	<p>access and provision of community facilities including cultural and recreational along with enhancing community safety and reducing crime.</p> <ul style="list-style-type: none"> <li>• The Core Strategy deals with that part of the NPPF which promotes the development of communities, including the support of local facilities such as schools, through, as appropriate, specific references within the development requirements within the Strategic Location policies.</li> <li>• The reference in the NPPF to engaging with the community of these areas is at the heart of Trafford Partnership's SCS and set out in Trafford's Statement of Community Involvement and the CS Vision and Objectives.</li> <li>• It is considered that Policy L3 is consistent with the guidance in the draft NPPF.</li> </ul>	
<b>L4 – Sustainable Transport</b>	<ul style="list-style-type: none"> <li>• Policy L4 sets out the requirements for transport, which will broadly help to facilitate sustainable economic growth, reduce congestion and its adverse impact on the environment, and promote accessibility by offering a choice of modes of transport. Sites and routes critical in developing infrastructure to widen transport choice will be identified and included within the Land Allocations DPD.</li> <li>• In terms of parking standards, the Council has set out maximum parking standards for broad classes of development to be used as part of a package of measures to promote sustainable transport choices, to encourage linked-trips and to tackle congestion, amongst other things. These parking standards are based broadly on those set out in Regional Spatial Strategy and its associated evidence base, with a few additional categories to address local needs. They are, therefore, locally based and justified by robust evidence.</li> <li>• This policy is in general conformity with NPPF.</li> </ul>	<ul style="list-style-type: none"> <li>• No changes proposed.</li> </ul>
<b>L5 – Climate Change</b>	<ul style="list-style-type: none"> <li>• The policy (as currently proposed by the Council) is considered to be in conformity with national guidance, stating the need to apply the national objectives along with active support of energy efficiency measures. The policy details support for identifying opportunities for energy supply infrastructure and developments to connect to.</li> <li>• The NPPF guidance on flood risk is less detailed than is currently set out in PPS25, particularly in terms of the vulnerability of particular uses, their acceptability in different locations and the Exception Test. However, it is considered that Policy L5 is consistent in principle with the condensed guidance in the draft NPPF and that the approach to proposed development within areas that may be at risk of flooding (in certain Strategic Locations for example) is also consistent with the principles set out in the draft NPPF.</li> <li>• The Core Strategy policy supports Government objectives to reduce greenhouse gas emissions and applies an energy efficiency hierarchy prior to infrastructure measures. Where local opportunities exist higher emission reduction targets are required. The policy provides</li> </ul>	<ul style="list-style-type: none"> <li>• No changes proposed.</li> </ul>

	<p>guidance on community and commercial infrastructure as they can play a role in reducing gas emissions.</p> <ul style="list-style-type: none"> <li>• The Core Strategy policy on water is consistent with the thrust of the NPPF.</li> <li>• The Land Allocations DPD will identify infrastructure opportunity areas to facilitate new developments achieve the higher local emission reduction targets.</li> <li>• The policy sets out a broad framework for controlling pollution to air, light, water and land which is consistent with the guidance in the NPPF.</li> </ul>	
<b>L6 - Waste</b>	<ul style="list-style-type: none"> <li>• The draft National Planning Policy Framework (NPPF) does not cover waste issues as these will be dealt with in a revised Planning Policy Statement on Sustainable Waste Management, which will be annexed to the National Waste Management Plan for England.</li> <li>• Until the National Waste Management Plan is finalised the existing PPS10 remains in force.</li> <li>• In the Council's response to Inspector's note 6, a minor amendment was proposed to Policy L6 (Waste) as it relates to the waste management hierarchy in order to bring it in line fully with the updated PPS10 which was published in March 2011 (SC300.43).</li> <li>• Policy L6 (Waste) is, therefore, fully consistent with existing policy as set out in PPS10. In terms of the Greater Manchester Joint Waste Development Plan Document, the Examination Inspector for that Plan has invited comments separately on the potential implications of the draft NPPF. Any observations are likely to be dealt with at the final Hearing session for the Waste Plan which is scheduled for the 22<sup>nd</sup> September.</li> </ul>	<ul style="list-style-type: none"> <li>• No changes proposed</li> </ul>
<b>L7 - Design</b>	<ul style="list-style-type: none"> <li>• The Core Strategy Design policy provides guidance in line with the NPPF Design policy, providing guidance on design quality, functionality, protecting amenity, security and accessibility.</li> <li>• The use of design codes will be produced for specific developments such as the major mixed use development at Carrington and be included within the Area Action Plan.</li> </ul>	<ul style="list-style-type: none"> <li>• No changes proposed</li> </ul>
<b>L8 – Planning Obligations</b>	<ul style="list-style-type: none"> <li>• The Core Strategy has been prepared in consultation with key consultees, other authorities and providers to ensure that future growth is sustainable, that there is a reasonable prospect that planned infrastructure is deliverable, and the scale of obligations is appropriate and does not threaten development viability.</li> <li>• It is locally-based and properly justified and is therefore consistent with the draft NPPF.</li> </ul>	<ul style="list-style-type: none"> <li>• No changes proposed.</li> </ul>
<b>W1 – Economy</b>	<ul style="list-style-type: none"> <li>• It is considered Policy W1 is broadly consistent with the NPPF in that it is very positive in its promotion of economic development, is based on sound evidence as to economic requirements and a suitable amount and type of employment land has been identified to</li> </ul>	<ul style="list-style-type: none"> <li>• See Appendix 2</li> </ul>

	<p>meet the identified need.</p> <ul style="list-style-type: none"> <li>• However some revisions are necessary to reflect the NPPF with regard to B1 office uses no longer being regarded as town centre type uses.</li> <li>• See Section 3 and Appendix 2 for more detail.</li> </ul>	
<b>W2 – Town Centres &amp; Retail</b>	<ul style="list-style-type: none"> <li>• It is considered Policy W2 is consistent with the NPPF in that it clearly puts town centres first, recognises their role in the community, is based on sound evidence as to retail and leisure requirements and a suitable amount and type of land has been identified to meet the identified need.</li> <li>• In addition, it sets out a clear network and hierarchy of centres of the principal town centre (Altrincham), other town centres, district centres and local centres with an appropriate and complementary role for each type of centre. It also recognises the role of residential development within centres and sets a framework for the consideration of retail or leisure development outside of centres.</li> <li>• Policy W2 does not define town centre boundaries, primary shopping areas or allocate sites for retail and leisure uses. This will be done in the Land Allocations DPD.</li> </ul>	<ul style="list-style-type: none"> <li>• No changes proposed.</li> </ul>
<b>W3 – Minerals</b>	<ul style="list-style-type: none"> <li>• Policy W3 (Minerals) of the Trafford Core Strategy sets out a broad framework for securing the sustainable management of minerals resources, making an appropriate contribution, in partnership with other Greater Manchester Districts, towards meeting aggregates provision for the sub-region and assessing individual proposals.</li> <li>• Policy W3 (Minerals) is, therefore, consistent with the key thrusts of the NPPF as it relates to minerals. In terms of the Greater Manchester Joint Minerals Development Plan Document, consideration is currently being given as to how the removal of comprehensive detailed policy and guidance at the national level will impact on that Plan.</li> </ul>	<ul style="list-style-type: none"> <li>• No changes proposed.</li> </ul>
<b>R1 – Historic Environment</b>	<ul style="list-style-type: none"> <li>• It is considered in the most part the NPPF replaces much of PPS5 and therefore that Policy R1 is broadly consistent with the NPPF.</li> </ul>	<ul style="list-style-type: none"> <li>• No changes proposed.</li> </ul>
<b>R2 – Natural Environment</b>	<ul style="list-style-type: none"> <li>• It is considered Policy R2 covers the principles of NPPF.</li> <li>• The Development Management Application Validation Checklist will include the details developers will need to provide for the LPA to judge how development proposals could affect the identified assets listed in R2.3.</li> </ul>	<ul style="list-style-type: none"> <li>• No changes proposed.</li> </ul>
<b>R3 – Green Infrastructure</b>	<ul style="list-style-type: none"> <li>• It is considered Policy R3 covers the principles of NPPF.</li> <li>• The Land Allocations Plan will identify the hierarchy of protected sites and areas to enhance</li> </ul>	<ul style="list-style-type: none"> <li>• No changes proposed.</li> </ul>

	as part of the Green Infrastructure Plan.	
<b>R4 – Green Belt</b>	<ul style="list-style-type: none"> <li>For detailed commentary see Section 3</li> </ul>	<ul style="list-style-type: none"> <li>No changes proposed.</li> </ul>
<b>R5 – Recreation</b>	<ul style="list-style-type: none"> <li>R5 covers the requirement of NPPF.</li> <li>The policy sets the overall spatial framework through which sufficient open space areas can be provided to meet the needs of the community. Site specific aspects of the NPPF, such as the potential to allocate new Local Green Space, will be undertaken by way of the Land Allocations' DPD.</li> </ul>	<ul style="list-style-type: none"> <li>No changes proposed.</li> </ul>
<b>R6 – Culture &amp; Tourism</b>	<ul style="list-style-type: none"> <li>The Core Strategy Culture &amp; Tourism policy is in compliance with the NPPF, as it clearly states a position of support for visitor attractions along with improvements to the cultural setting to be sought via planning obligations.</li> </ul>	<ul style="list-style-type: none"> <li>No changes proposed.</li> </ul>
<b>Other Issues</b>		
<b>Communications Infrastructure</b>	<ul style="list-style-type: none"> <li>Requirement for development to be satisfactorily served in terms of telecommunications is set out in Policy L7 paragraph L7.2. This policy is in general conformity with NPPF.</li> </ul>	<ul style="list-style-type: none"> <li>No changes proposed.</li> </ul>
<b>Health</b>	<ul style="list-style-type: none"> <li>Policies R3 and R5 seek to improve health and well-being, including the need to raise and sustain awareness of health and other benefits of leisure pursuits. The Local Infrastructure Plan identifies health requirements to support planned growth and these are set out within the implementation tables in each of the Strategy Location policies. These policies are in general conformity with NPPF.</li> </ul>	<ul style="list-style-type: none"> <li>No changes proposed.</li> </ul>
<b>National Security</b>	<ul style="list-style-type: none"> <li>The Ministry of Defence (and the Ministry of Justice) have been consulted during the production of the core strategy and any comments received have been taken on board during the preparation of the plan. This is in general conformity with NPPF.</li> </ul>	<ul style="list-style-type: none"> <li>No changes proposed.</li> </ul>



## Appendix B – Suggested Changes to Policy W1

**PLEASE NOTE: The version of Policy W1 used in this appendix includes all current suggested changes to the Publication text. Only new suggested changes in response to the draft NPPF are highlighted here. Please refer to CD12.4 to see the other suggested changes to Policy W1.**

### **POLICY W1: ECONOMY**

#### **Supporting Growth**

W1.1 In order to encourage the development of clusters of economic activity the Council will identify a range of sites for a variety of employment uses, with the appropriate infrastructure to attract key economic growth sectors to Trafford. Employment uses within this policy refers to B1 business/office, B2 general industry and B8 storage or distribution and similar appropriate uses.

W1.2 The Council recognises the significant contribution that existing successful manufacturing industries make to the economy of the Borough and will continue to support these industries where appropriate within the context of the Development Plan for Trafford.

#### **Distribution**

W1.3 The Council will focus employment uses in the following places:

- Pomona Island;
- Trafford Wharfside;
- Trafford Park Core;
- Trafford Centre Rectangle;
- Carrington;
- Broadheath; and,
- Town Centres.

W1.4 Table W1 sets out an indicative minimum figure for the amount of land proposed for a range of employment development, by place, over the plan period. The land supply figures in Table W1 include the recycling of existing employment land and buildings and land that is being brought into employment use for the first time.

- W1.5 B1 office uses will be focused in the Regional Centre (Pomona and Wharfside), and the town centres. ~~Some~~ B1 office development will be appropriate within Trafford Park Core, Carrington, Broadheath and at Trafford Centre Rectangle where it is accessible by sustainable transport modes and meets other relevant criteria in national planning guidance~~supports existing employment uses and employment regeneration initiatives.~~
- W1.6 Trafford Park Core will be a key location for industry and business activity within the Manchester City Region Inner Area and will be the principal location for employment development in the Borough. The focus will be on the provision of modern industrial, storage and distribution and office development ~~which is ancillary to existing or proposed employment uses~~ with residential development not normally supported. Improvements to public transport infrastructure to provide an integrated, frequent public transit system linking the location with surrounding residential and commercial areas will be required.
- W1.7 Carrington has significant potential to accommodate large-scale employment development, particularly for general industrial, storage and distribution uses and with office development ~~which is ancillary to existing or proposed employment uses~~, in order to complement the offer in Trafford Park. Part of the former Shell site at Carrington is proposed for employment development as part of the creation of a new mixed-use neighbourhood. Further details are set out in Location SL5.
- W1.8 Broadheath will be retained and supported as a principal employment location in the south of the Borough, ~~primarily for B2 and B8 uses.~~
- W1.9 Employment development in the other places identified will be detailed in Policy W2 or through each individual Strategic Location.
- W1.10 Outside of these places and any smaller sites identified within the Land Allocations DPD, the Council will only permit employment uses (including development proposed to support economic activity associated with Manchester Airport) provided that it is in accordance with other policies in the Development Plan for Trafford and that:
- It will contribute significantly to the Plan's overall objectives, including the economic growth of the City Region;
  - It will contribute significantly to the achievement of the regeneration priorities set out in Policy L3;
  - It promotes the use of derelict, vacant or under-used previously developed land and;
  - The sites will be accessible by a range of alternative modes other than the private car.
- W1.11 In determining applications for the redevelopment of ~~unallocated~~ employment sites for non employment uses, developers will be required to provide a statement to the satisfaction of the Local Planning Authority, demonstrating that:
- There is no need for the site to be retained for employment purposes and it is therefore redundant;
  - There is a clear need for the proposed land use(s) in this locality;
  - There are no suitable alternative sites, within the locality, to meet the identified need for the proposed development;

- The proposed redevelopment would not compromise the primary function of the locality or the operations of neighbouring users, and,
- The proposed redevelopment is in accordance with other policies in the Development Plan for Trafford.

### **Hazardous Installations**

W1.12 The Council will only permit the development of hazardous or bad neighbour industries where it can be demonstrated that it will not:

- Increase the risk for residents and members of the public, unless suitable measures can be agreed to mitigate risk;
- Compromise the primary function of the employment locality or the operations of neighbouring users;
- Compromise the potential for economic regeneration of the wider area;
- Bring about a significant deterioration in the quality of the environment of the surrounding areas, and,
- Be contrary to other policies in the Development Plan for Trafford.

### **Scale**

W1.13 The Council will identify sufficient quantity and choice of land to deliver the new employment provision. The distribution of this employment development is shown in Table W1 below.

**Table W1: The Supply of Land for New Employment Development 2008/9 to 2025/6**

	Up to 2015/6	to 2016/7 to 2020/1	2021/2 to 2025/6	Total Land Supply for B Use (Hectares)
Pomona Island	4	4	2	10
Trafford Wharfside	3	3	4	10
Trafford Park Core	18	22	15	55
Trafford Centre Rectangle	2	6	7	15
Carrington	25	25	25	75
Broadheath	3	3	4	10
Town Centres	1	2	2	5
Elsewhere	3	3	4	10
Policy W1 Allocation Total	59	68	63	190

## IMPLEMENTATION

### Implementation Mechanisms

Implementation will be through development at the Strategic Locations identified in this Core Strategy. These and other significant sites elsewhere in the Borough will be allocated in a Land Allocations DPD and Area Action Plan(s). Other sites will be identified through the planning application decision making process.

### Delivery Agent

Private Sector

### Timescales

This will be ongoing throughout the plan period. The Land Allocations DPD is scheduled to be adopted in 2012. Phasing for the development of the identified employment areas is set out in detail in Table W1. This phasing reflects the likely availability of funding and programme of works anticipated at this time.

### Funding

Funding will generally be through public and private sector investment.

## Justification

- 18.2 Policy W1 seeks to guide economic regeneration and development across the Borough to achieve the aims, objectives and spatial development requirements of the Trafford Sustainable Community Strategy and the Trafford Economic Development Plan.
- 18.3 Trafford is a fundamentally important part of the City Region economy and a location where the development of significant clusters of economic activity in key economic growth sectors, supported by appropriate infrastructure, will be essential for the Borough to diversify and grow its employment base to properly contribute to the city region, maintaining and improving its competitiveness and developing into one of Europe's premier city regions.
- 18.4 The key economic growth sectors the policy is seeking to foster and allow to develop are those that have been identified by the NWDA, the Greater Manchester Forecasting Model and the Trafford Economic Development Plan. The key economic growth sectors are:
- financial and business services;
  - distribution;
  - cultural, creative and media industries;
  - advanced engineering, and,
  - other personnel services.
- 18.5 Other key growth sectors such as retail, commercial leisure and hotels and waste management facilities are covered in Policies L6, W2 and R6.
- 18.6 The findings of the Trafford Employment Land Study of May 2009 indicate that a sufficient supply of suitable and developable employment sites exists to meet the Borough's contribution to the requirement suggested in the Greater Manchester Employment Land Position Statement of August 2009 (170 hectares of land plus or minus 10% up to 2026) without the need to retain the historic but unimplemented UDP allocation for a high amenity employment site at Davenport Green.
- 18.7 The new employment land development proposals set out in Table W1 take account of the site by site findings of the Trafford Employment Land Study, current (April 2010) known development commitments and expectations for the recycling/re-use of currently developed land to provide accommodation to meet the changing needs of business. The amount of land proposed for new employment development in this policy is set as a global total supply to accommodate all the types of development required to meet the Borough's needs over the Plan period, allowing flexibility to accommodate inevitable changes in the requirements of businesses over time as they seek to respond to changing economic circumstances. Detailed proposals, disaggregated by broad employment use (B1 office, B2 industry and B8 warehousing) will be included in the Land Allocations DPD.
- 18.8 An indicative minimum land supply figure provides the flexibility for the employment locations to deliver more or less development in line with the strategy and all other policies of the CS. However, any development proposals that vary the amount of

land from the indicative target number will be determined in the light of on-going monitoring work and compliance with the relevant Location development requirements and other policies in the Core Strategy.

- 18.9 The historic development and current (April 2010) land supply data used to compile Table W1 indicates an overall 85:15% split between industry/warehousing and office development. The Council expects that this ratio will be maintained over the Plan period, albeit that there may be geographical variations dependant upon the characteristics of those areas.
- 18.10 The strategic development locations identified in Policy W1 are key proposals intended to secure the revival, modernisation and development of a diversity of industrial, commercial, warehousing/distribution, service and support activities. The range of activities to be prioritised and encouraged in each of the Strategic Locations is set out in greater detail in Strategic Locations section of the Plan, detailed employment allocations will be identified in the Land Allocations DPD.
- 18.11 Outside the Strategic Locations and those identified within the LADPD, development and redevelopment for economic purposes will be supported in a measured way commensurate with the need for the development, the availability or otherwise of suitable alternative development locations and their effect on environment and amenity of surrounding land uses.
- 18.12 All proposals for the development of any industrial, commercial, warehousing and storage uses associated with Manchester Airport will be subject to very careful assessment in consultation with Manchester Airport Plc and other appropriate agencies to determine the appropriateness of the proposal.
- 18.13 Insofar as the development of new hazardous installations is concerned all such proposals will be subject to very careful assessment in consultation with the Health and Safety Executive to determine the scale of risk both to the prospective workforce and the occupiers of adjacent developments before any planning consent for development is granted.

### **PPS4 Testing**

~~18.14 18.13 The Council has undertaken a study of other main town centre uses including B1 office. As part of this study B1 uses were subject to the tests outlined in paragraph EC5.1 of PPS4. The study concluded that, in order to meet the identified need for office uses, due to a low number of suitable and available sites in town centre locations, even if the Altair planning permission is implemented, it may be necessary to consider further sites situated in regeneration areas of the Borough (in accordance with PPS4) where offices could form part of mixed-use developments, or are ancillary to other forms of economic development~~

~~The Council has assessed the need for the development of further B1 office accommodation in the borough in the period to 2026. The analysis undertaken concludes that significant growth in the demand for B1 office accommodation can be expected in the plan period. This is due to a predicted significant growth in financial, business services and intensive knowledge based industries. The need identified ranges from 143,000-181,000 sq metres (gross).~~

~~18.15 The key considerations for determining whether office development is appropriate in out-of-centre locations are set out in paragraph EC5.1e. of PPS4. These are:~~

- ~~The physical regeneration benefits of developing on previously developed sites;~~
- ~~Employment opportunities;~~
- ~~Increased investment in an area;~~
- ~~Social inclusion~~

~~The Council has assessed the potential to accommodate some or all of this need on sites within or on the edge of the Borough's four town centres. The analysis has shown that town centre sites / edge of centre sites are capable of accommodating c.27,000 sq metres of accommodation.~~

~~18.16 Outside of existing town centres, the main areas identified for additional office development in the Core Strategy are Pomona and Wharfside. Development in both of these areas will result in the development of previously developed land (in Pomona's case a long standing derelict site), will provide significant employment opportunities (in Wharfside's case in particular, it will support the expansion of Mediacity:uk), will allow for increased investment in the area and will support social inclusion as they are closely linked to the deprived areas of Old Trafford and Ordsall in Salford. These two Locations are also within the Regional Centre which is a focus for office development.~~

~~This means that in order for the borough to realise its economic regeneration objectives, land outside of town centres must be released for B1 Office development. A range of sites have been identified and assessed having regard to Planning Policy Statement 4.~~

~~18.17 Some office development in Trafford Park Core, Carrington, Broadheath and Trafford Centre Rectangle is appropriate as it will involve previously developed land, can be linked to existing employment uses and to varying degrees can promote social inclusion by providing greater access to jobs for people in neighbouring deprived areas.~~

~~Outside town centres, the main areas identified for additional office development in the Core Strategy are Pomona and Wharfside. Development in both of these areas will result of the development of previously developed land (in Pomona's case a long standing derelict site), will provide significant employment opportunities (in Wharfside's case in particular, it will support the expansion of Mediacity:uk), will allow for increased investment in the area and will support social inclusion as they are closely linked to the deprived areas of Old Trafford and Ordsall in Salford. These two locations are also within the Regional Centre which is a key focus for office development.~~

~~18.17 Some office development in Trafford Park Core, the Trafford Centre Rectangle, Carrington and Broadheath is appropriate as it will involve previously developed land, can be linked to existing employment uses and, to varying degrees, can promote social inclusion.~~

<b>Which Objective(s) delivered by this Strategic Location/Policy</b>	<b>Reference Number(s)</b>
Key Objective(s) of the SCS	SE1, SE2, SE3, SE4, SE5, SE7, SE10,

	SE13
Strategic Objective(s)	SO2, SO3, SO4 & SO6
Place Objective(s)	TPO3, TPO8, TPO14 OTO8, OTO10 STO8, STO17 SAO4, SAO11 ALO12, ALO14, ALO23 CAO9, CAO10, CAO17