

## **TRAFFORD CORE STRATEGY EXAMINATION**

### ***WRITTEN STATEMENT PREPARED BY TURLEY ASSOCIATES ON BEHALF OF THE PEEL GROUP***

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

***UNIQUE REFERENCE NUMBER: 1045 - 2nd September 2011***

In her Note 7 the Inspector invited those parties who had made representations on the draft Core Strategy to submit their views as to whether the substantive changes set out within the recently published consultation draft National Planning Policy Framework (NPPF) might affect the soundness of Trafford's Core Strategy and to the suggested changes which have been put forward by the Council in the lead up to and course of the Examination in Public.

In response to this invitation the Peel Group do not consider that there is anything in the draft NPPF which calls into question the soundness of the Core Strategy. There are however two key points which support some of the changes already put forward and the Council's response to further changes suggested by other parties. These relate to the following matters.

#### ***Housing Need and Supply***

Amongst other things the draft NPPF sets out the requirement for Local Authorities to:

- use an evidence-base to ensure that their Local Plan meets the full requirements for market and affordable housing in the housing market area, including identifying key sites which are critical to the delivery of the housing strategy over the plan period
- identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. The supply should include an additional allowance of at least 20 per cent to ensure choice and competition in the market for land

As there is no new evidence base currently available to the Council to identify its housing development needs the Council's decision to continue to use the RSS figures is, in Peel's view, the correct approach and is supported by the NPPF requirement in this respect. More significant, however, is the need for the Local Plan (Core Strategy) to identify a deliverable forward supply of housing land including an additional allowance of 20% to ensure choice and competition.

In Peel's view this requirement makes it important that the changes that the Council has already put forward to clarify that the housing numbers listed in Table L1 and in respect of each of the Strategic Locations are minimum targets are carried forward into the adopted Core Strategy. The housing requirement figures which feed into Table L1 include a 20% uplift on the RSS requirement to reflect Trafford's participation in the New Growth Point initiative although this uplift applies only to 2018 and not over the full period of the plan.

The Council has previously proposed to an amendment that would allow this total requirement to be reduced in the event that the NGP funding which had been anticipated is not forthcoming but this was subsequently revised such that a reduction would only be made if there is clear evidence that a housing site identified in the Council's SHLAA is not being brought forward because it had been dependent on NGP funding which is no longer available. In view of the new requirement in the draft NPPF Peel consider it critical that the Core Strategy should continue to plan and provide for a level of new housing including the 20% uplift to 2018 and that this should not be diluted by any further amendment to Policy L1 or Table L1. It will also be necessary, on first review of the Core Strategy, for the council to update its evidence base as to the level of housing need and incorporate a new 20% uplift figure to ensure that the contingency allowance is built into the identified supply beyond 2018.

Accordingly Peel requests that the Inspector gives her support to the changes already put forward and finds that the plan, as amended by these changes, is sound with regard to the emerging NPPF requirements.

### ***Office Development and the Sequential Test***

A key implication of the draft NPPF is that the PPS4 sequential approach to site selection would no longer be applied to office development. Peel supports this proposed change as it recognises that there are wide ranging needs with regard to office accommodation to

support investment across all economic sectors and that these cannot sensibly all be met in town or city centre locations.

Peel also considers that this change is relevant to the representations put forward by Manchester and Salford City in respect of the draft Core Strategy which sought that a ceiling figure should be imposed within the Core Strategy in respect of the amount of office accommodation to be built within the Trafford Centre Rectangle and at Wharfside because of their fears that such development might be harmful to nearby town centres and the Regional Centres. Peel have submitted representations urging Trafford Council to resist those suggestions and the Council, in its formal response on this matter, has concluded that adequate controls already built into the wording of the policies relating to these Strategic Locations and that no further changes are justified.

The direction of travel in Government policy, as signalled in the draft NPPF, does in Peel's view fully support the Council's position and militate against any changes on the lines requested by Manchester and Salford Council's since the imposition of such limits would put the Core Strategy in conflict with emerging national policy. The Inspector is therefore urged to support the Council's response to the representations made by Manchester and Salford Councils and to find that the plan is sound without any further changes to these policies.

PNS 2<sup>nd</sup> September 2011