

17 March 2014

Delivered by email and post

Matthew Wansborough
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Dear Matthew

REPRESENTATIONS TO THE TRAFFORD LOCAL PLAN: LAND ALLOCATIONS CONSULTATION DRAFT

On behalf of our client, Peel Holdings (Management) Ltd ("Peel"), we have reviewed the Trafford Local Plan: Land Allocations Consultation Draft and have prepared a report of representations (enclosed).

Peel has previously submitted a response to the 'Trafford Local Plan: Land Allocations Plan Shaping the Plan' consultation and 'Call for Sites' in September 2012.

As one of the major landowners and developers within the Borough, the Peel Group has a significant role to play in bringing forward the major development identified in the Core Strategy to meet Trafford's housing, employment and other development needs. Accordingly Peel has a substantial interest in working with the Council to ensure that the Site Allocations document is prepared in a positive manner which encourages sustainable development which meets the needs of the local community. Peel therefore regards these representations as part of an ongoing dialogue and partnership with the Council and others to ensure that the right balance is achieved.

To this effect should you wish to discuss any part of the enclosed representations in more detail, please do not hesitate to contact me.

Yours sincerely

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Trafford Local Plan: Land Allocations Consultation Draft Comment Form – February to March 2014

Office Use Only	
Date	
Ref	
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 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
strategic.planning@trafford.gov.uk

Additional Comment Sheet

Please complete a separate comment sheet for each paragraph, policy, map or table you wish to comment on. You need only complete one copy of your full contact details if you are submitting all your comments at the same time, but please put your name on each additional sheet and indicate the total number of comment sheets being submitted on the contact details form.

What are you commenting on?			
Para and amendment	1.4	Policy	TCR2
Para and amendment	1.6		
Para and amendment	1.8	Para and amendment	5.14
Para and amendment	1.11	Para and amendment	5.16
Amendment	1.11	Para and amendment	5.17
Amendment	Introduction	Para and amendment	5.18
		Para and amendment	5.19
Policy	POM1 General comment	Para and amendment	5.20
Strategic Location Boundary	POM1 - Objection	Para and amendment	5.22
Policy	EM3	Para and amendment	5.23
Para and amendment	2.5	Policy	TCR3
Para and amendment	2.6	Para and amendment	5.24
Para and amendment	2.7		
Para and amendment	2.8		
Para and amendment	2.10		
Para and amendment	2.11		
Policy	WHA2	Policy	HO1
Para and amendment	3.5	Para and amendment	7.7
Para and amendment	3.9	Para and amendment	7.8
Para and amendment	3.10	Policy	TR4
		Omission	TR4
		Omission Proposals Map	TR4
Para and amendment	3.14	Para and amendment	10.58
		Para and amendment	10.68
		Policy	EM3
Para and amendment	3.15	Para and amendment	13.25
Para and amendment	3.16	Para and amendment	13.26
Para and amendment	3.17		
Para and amendment	3.18	Proposals Map	Canalside and Hall Lane Sites
Para and amendment	3.19	Proposals Map	Land off Central Road
Para and amendment	3.22	Proposals Map	Partington Priority Regeneration Area
Para and amendment	3.26	Proposals Map	Partington Local Centre
Policy	TCR1	Proposals Map	Trafford Retail Park
Omission	TCR1	Proposals Map (Omission)	Land at Barton Bridge
Para and amendment	5.1	Proposals Map (Omission)	Land to the south of the Manchester Ship Canal and west of Barton

**Trafford Local Plan: Land Allocations Consultation Draft
Comment Form – February to March 2014**

			Bridge, Davyhulme
Para and amendment	5.2	Proposals Map	
Para and amendment	5.3		
Para and amendment	5.4		
Para and amendment	5.6		
Para and amendment	5.8		
Para and amendment	5.10		
Para and amendment	5.11		
Para and amendment	5.12		
Para and amendment	5.13		

Document		Section	
Trafford Local Plan: Land Allocations – Consultation Draft	x	Page number	x
SA Report		Paragraph number	x
SA Appendices		Policy number	x
SA Options Report		Table/Figure reference	x
SA Flood Risk Sequential Test		Other (including omissions and suggestions for proposed amendments)	x
SA Scoping Report			
Topic Paper (please specify)			
HRA Scoping Report			
SHLAA (2013)			
Conservation Area Appraisal (please specify)			
Other document, (please specify)			

Trafford Site Allocations DPD

Representations to the Trafford Allocations
Plan (Preferred Options) on Behalf of Peel
Holdings (Management) Ltd

March 2014

Turley

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Contact

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Client

Peel Investments (North) Ltd

LPA reference

17 March 2014

1. Introduction

- 1.1 These representations have been prepared on behalf of Peel Holdings (Management) Limited acting on behalf of the Peel Group, one of the leading infrastructure, real estate and investment enterprises in the UK.
- 1.2 The Peel Group has a diverse network of businesses including commercial development, land, ports, airports, leisure and hotels and energy. Peel has major property interests in Trafford and, through its subsidiary companies, is owner and operator of the Manchester Ship Canal and Bridgewater Canal. It should be noted that Peel also has an interest in Intu Properties plc; the owners of The Trafford Centre, Barton Square and adjoining land within the Trafford Centre Rectangle. Separate representations will be submitted by Intu.
- 1.3 Peel has worked closely with Trafford Metropolitan Borough Council (TBC) in the production of the Trafford Core Strategy. Following the adoption of the Core Strategy in January 2012, TBC began work on its Site Allocations DPD. Peel has previously submitted a response to the 'Trafford Local Plan: Land Allocations Plan Shaping the Plan' consultation and 'Call for Sites' in September 2012.

Structure

- 1.4 This report sets out Peel's representations and is structured in the following way:
- Section 2 sets out Peel's general representations on the form and content of the Allocations DPD which are relevant to the way that the Plan details the proposals for specific locations and sites in Trafford
 - Section 3 sets out representations in relation to Pomona Strategic Location;
 - Section 4 sets out representations in relation to Trafford Wharfside Strategic Location;
 - Section 5 sets out representations in relation to Trafford Centre Rectangle Strategic Location;
 - Section 6 sets out the representation in relation to sites outside of Strategic Locations; and
 - Section 7 sets out the representation in relation to the Development Management Policies
- 1.5 Peel worked closely with the Council in the production of the Trafford Core Strategy and, as one of the major landowners and developers within the Borough, the Peel Group has a significant role to play in bringing forward the major development identified in the Core Strategy to meet Trafford's housing, employment and other development needs. Accordingly Peel has a substantial interest in working with the Council to ensure that the Site Allocations document is prepared in a positive manner which encourages sustainable development which meets the needs of the local community. Peel therefore

regards these representations as part of an ongoing dialogue and partnership with the Council and others to ensure that the right balance is achieved.

2. Representations on the General Form and Content of the Allocations DPD

- 2.1 Paragraph 1.4 of the consultation draft Allocations Plan states that the Trafford Local Plan: Core Strategy (CS) sets out the planning framework for development in Trafford up to 2026 and is the overarching policy document in Trafford's Local Plan As Paragraph 1.8 confirms it is necessary that the Allocations Plan must be in conformity with the Core Strategy. Peel notes and supports this statement of the need for conformity but has noted that the draft Allocations Plan does not demonstrate the necessary conformity with the CS in all respects. The comments made below in respect of individual sites and locations draws attention to a number of inconsistencies which will need to be resolved if the Plan is to be in full conformity with the CS.
- 2.2 Paragraph 1.6 explains that the objective of the Allocations Plan is to deliver the vision and objectives of the CS and to help ensure that Trafford is a thriving, diverse, prosperous and culturally vibrant place. At paragraph 1.11 it is explained that the Allocations Plan contains sites for development including for housing and employment and that it will provide "*increased certainty and guidance for developers and members of the public on both the location of development and the detailed design and sustainability principles that development must achieve*".
- 2.3 Peel supports the objective that the Allocations Plan should provide certainty to developers (and land owners) as to the location of development and to set out the design and sustainability principles which development brought forward on allocated sites will be expected to follow. However Peel would resist any suggestion that it is the role of the Allocations Plan to set out *detailed design principles* as suggested in paragraph 1.11. In Peel's view this incorrect approach which will both hinder the detailed design process that developers will need to pursue and will give other interest parties a false indication of the degree to which the Allocations Plan can be prescriptive with regard to detailed design matters. We therefore proposed that the wording in paragraph 1.11 be amended
- (i) Of greater importance is that to remove any possibility of ambiguity, the Allocations Plan must distinguish very clearly between what is the development capacity of individual sites or locations and the quantum of development which each site and location is expected to deliver in order to help the Council meet its anticipated development requirements over the Plan period to 2026. At present the draft document fails to make such a distinction and generally includes no acknowledgement of the realistic capacity of specific sites, quoting only the level of development expected over the Plan period. By adopting this approach the draft Plan: Fails in the important objective of providing developers with the certainty that they need in order to invest the time and resources to bring large sites forward for development.
 - (ii) Is potentially seriously misleading for members of the public and other interested parties who may interpret the figures quoted in the Plan as indicating the total quantum of development that might eventually be brought forward in any particular location or on an allocated site.

- 2.4 In connection with these observations Peel considers that it is not necessary for the Allocations DPD to repeatedly restate what is said in the CS about the contribution that each location or site is expected to make in meeting the Borough's identified housing and employment needs. Since this is already set out in the CS the contribution to meeting these needs could be summarised in short form at the end of each allocation. However, any figures quoted in this way should be restricted to those which appear in the Core Strategy and it should be made clear that these are minimum and not maximum figures.
- 2.5 In addition it is considered that there is rather too much detail in the written explanation of what each site is allocated for and that much of this is over prescriptive as to how the Council's design and sustainability principles and requirements might be achieved in the detailed master planning and design of development schemes. In Peel's view much of this written content could be usefully shortened and greatly simplified across all the Allocation policies.

Proposed Amendments to Introduction

- 2.6 Following on from the above comments Peel suggests that there is a need for sections of the Introductory paragraph to be re-written to explain that in allocating sites for development the Plan is intended to provide a level of certainty as to the type and overall scale of development which is expected to be appropriate in that location or on the specific site as well as to set out clear sustainability and design principles and requirements which should be addressed in the detailed proposals which are subsequently brought forward on individual sites. The text should also explain that a number of the large sites have a development capacity which means that they are likely to be developed over a period which extends beyond the Plan period of the Core Strategy and the Allocations Plan but that the summary table under each site specific Policy does identify the quantum of development envisaged over the plan period to help meet Trafford's strategic development needs to 2026.
- 2.7 In Peel's view these amendments and the simplification of the written policy sections as proposed would add clarity to the Plan and help to make it a more user friendly document.

3. Representations on Pomona Island Strategic Location

Location and Site Description

- 3.1 Pomona Island is identified in the Core Strategy as one of Trafford's Strategic Locations for development. It occupies a key location relative to Manchester city centre and existing major employment areas at Salford Quays and Trafford Park and to both long established and emerging residential neighbourhoods within Trafford, Salford and Manchester.
- 3.2 Pomona Island is within the defined Regional Centre of the Manchester City Region and within the Old Trafford Priority Regeneration Area. It is a long, narrow piece of flat land between Manchester Ship Canal and the Bridgewater Canal. Metrolink passes along the length of the site and the site is served via both the Cornrook and Pomona stations. Road access and other infrastructure are largely in place, although some height and width restrictions for access exist due to viaducts and bridges.
- 3.3 At 22 acres, Pomona Island is one of the largest vacant sites in the Regional Centre. The site has been unused for many years since the former docks were closed but it has since been fully remediated and utilities installed.
- 3.4 Part of the site is subject to an extant planning permission, granted 4 May 2007, for the erection of residential development comprising 5 blocks (varying from 8 to 16 storeys height) to provide 546 apartments with ancillary car parking, landscaping and amenity areas (app ref: H/58948). Peel has implemented this planning permission and documented this fact with Trafford Council.

Core Strategy Context

- 3.5 Within the Core Strategy this area is identified as a key part of the Regional Centre. The area is designated as a Strategic Location and, under CS Policy SL1 (Pomona Island), is identified as being suitable to deliver a new mixed-use commercial and residential district. It is proposed as a new destination for business, residential and leisure uses combining significant commercial and recreational development for people living in the Location and for communities in Manchester city centre and Old Trafford areas.
- 3.6 CS Policy SL1 proposes that, over the plan period to 2026, this site should deliver:
- 10 Ha of employment development;
 - 800 residential units (including the 546 for which planning permission has already been granted);
 - New commercial leisure facilities, including a hotel;
 - Small scale ancillary retail and bar/restaurant uses;

- Appropriate new community facilities to support those people using the development;
- A substantial new area of open space for informal recreation; and,
- New and improved pedestrian links.

3.7 CS Policy SL1 states that residential development in Pomona Island will largely comprise apartments, appropriate to its Regional Centre Location. However, a proportion of the residential development should be suitable for families, having regard to Policy L2.

3.8 CS Policy SL1 sets out phasing for the suggested amount of development in this location, as shown in the table below.

Phasing					
	2008/9 - 2010/11	2011/12 - 2015/16	2016/7 - 2020/1	2021/2 - 2025/26	TOTAL
Residential	0	350	450	0	800
Employment	0	4	4	2	10

Residential – expressed in terms of units
Employment – expressed in terms of hectares

General Comments

3.9 The current wording of POM1 is an example of where repeated and detailed references to the quantum of development expected in this location are in danger of appearing to state a clear position as to the overall development capacity of the site which is directly contrary to Peel’s own assessment of the site’s potential and to the level of development previously demonstrated in a site master plan which was required by a S106 Agreement for the approved scheme on part of the site and then endorsed by the Council. In addition some of the detail set out in the policy is unnecessarily prescriptive as to how certain development requirements should be met within the development. Peel therefore seeks a number of amendments to the wording of POM1 and its supporting text as set out below.

Strategic Location Boundary

3.10 The proposed red line boundary for the Pomona Island Strategic Location as shown on the draft proposals map excludes that part of Pomona which forms part of Peel’s proposed Cornbrook Triangle development and hence indicates a reduction in the boundary of the Pomona Strategic location from that which has previously been included within the designation. Peel objects to the proposed boundary for that reason and proposes that the Pomona Strategic location Boundary be amended accordingly

Site specific allocations

3.11 Peel had previously proposed two sites for specific allocation within the Pomona Strategic Location: the main Pomona site and the Cornbrook site. The draft plan does

not reflect this suggestion because it excludes the Cornbrook site from the Pomona Island Strategic Location and treats Cornbrook as a Local Employment Area under Policy EM3. In Peel’s view such a designation gives insufficient recognition to the importance of the Cornbrook site as part of the larger Cornbrook Triangle proposal (which includes land within the Manchester City Council boundary). Peel therefore requests that the Cornbrook site be allocated as a site specific allocation (POM3) under POM1 alongside the main Pomona site allocation.

3.12 Following on from the above comments Peel proposes that the main Pomona Island site should be expressly identified as a specific site allocation under a new POM2 within the Strategic Location identified under Policy POM1 of the Land Allocations – Consultation Draft and should be shown as such on the draft proposals map.

3.13 The table below provides a summary of Peel’s more detailed comments:

Paragraph	Comment
2.5	<p>Peel considers that the Pomona Strategic Site could accommodate in excess of 2,500 dwellings in the high density form which is recognised as being appropriate for this location and that this capacity should be recognised in the site allocation policy. This capacity has previously been acknowledged by the Council through its endorsement of the master plan for the Pomona site. An appropriate change to the wording is therefore required.</p> <p>The current consultation document sets out that a minimum of 1,100 residential units will be delivered at Pomona Island in this Plan period. Peel questions the need to insert this figure in the main body of the proposal (see our comments in Section 2 above) and also considers the figure to be incorrect as there is no recognition of any likely contribution from the site in the period 2021/2 – 2025/6. Whilst this is in conformity with the table included in CS Policy SL1 the assessment that informed that policy reflected an assumed maximum site capacity for residential development which was based on a flood risk assessment which has subsequently be shown to be inaccurate. If the Policy is to state the expected number of dwellings to be developed on the site (and Peel would prefer that, if included, this should be in the form of a summary table at the end of the policy wording) the appropriate figure should be 1500 dwellings with 700 of these being in the final 5 year phase of the plan period.</p>
2.6	<p>Peel has previously suggested that 7 ha of land at Pomona Island could be developed for employment activity whereas the draft policy makes reference to a figure of only 2 ha. This should be corrected and the figure of 20,000 sq m of office floorspace (which is a plan period contribution rather than an indication of capacity) should be moved to a summary table at the end of the policy. Hence the wording in 2.6 should be amended to recognise the location’s suitability to provide for high quality office and commercial floorspace on between 2 - 7ha of land.</p>
2.7	<p>Peel objects to the reference to “a new hotel” and its implication that only</p>

one would be permitted on the site.

Peel supports the proposed wording which states that a mix of retail, commercial, leisure and community facilities of an appropriate scale to serve the needs of the proposed development would be permitted.

2.8 Peel objects to the specific quantum of new open space/green infrastructure, including the requirement to provide a neighbourhood park being prescribed in the policy as this is both overly and unnecessarily prescriptive.

It is appropriate for the Plan to set out a requirement that there should be public open space provision at a level appropriate for the scale of development to be brought forward on the site but there are numerous ways that this could be delivered, possibly including through a financial contribution to offsite provision if appropriate or through alternative and innovative design solutions on site. The potential of the extensive water areas should also be referred to.

In addition, in the absence any advanced designs for the development of this area at present, there can be no certainty as to the eventual number and mix of residential units to be provided. As a result, it is inappropriate to be so specific as to the amount and type of open space to be provided on site. This is simply too prescriptive a requirement for the purposes of a Local Plan allocation.

Moreover, whilst there may be a deficit in local open space provision now, this position could change over the plan period, in terms of both the extent of the deficit and the types of open space which the area is deficient in..

A more flexible approach is required which reflects these points. This would involve setting out the expectation that the provision of an appropriate level of public open space will be required, commensurate with the type and number of residential units provided and having regard to existing provision within the local area, but not prescribing the amount or type to be delivered.

In addition, it is unduly restrictive to stipulate within paragraph 2.8 that car parking provision should be in the form of undercroft or basement provision. Accordingly Peel objects to the wording of this paragraph and proposes that it be amended (see below).

Peel seeks the following changes to the wording of Policy POM1:

Paragraph 2.8 – Open space/green infrastructure

- *On site public open space or, if deemed appropriate, off site provision or a financial contribution to provision or enhancement of existing off site public open space, will be provided at a scale and of a type appropriate to the number and mix of residential units and*
-

having regard to identified local deficiencies in provision

- *Development will maximise the benefits of its position on the Ship Canal and Bridgewater Canal by preserving and enhancing the existing canalside walkways, improving public access to these routes and their role within the active travel route network and utilising the opportunities for views over open water*
- *Appropriate levels of high quality amenity space will be provided between the development blocks and an appropriate level of car parking will also be provided.*

2.10 There is no reason why the Plan should “acknowledge” that the form of development at Pomona will be high density as if it were necessary to apologise for this. This form of development is agreed to be appropriate in the Regional Centre and indeed to represent an efficient and effective use of land in such a location.

2.11 The wording should be amended to reflect Peel's assessment of overall site capacity and the expected numbers of dwellings to be provided over the Plan period. The latter parts of 2.11 also imply that there would need to be a special justification for a rate of delivery at Pomona which exceeds the rate assumed in CS Policies SL1 and L1. Peel is not aware of the basis for this approach given that all housing numbers in SL Policy L1 are expressed as minima. This wording should therefore be deleted.

4. Trafford Wharfside Strategic Location

Location and Site Description

- 4.1 Wharfside lies in the north of the borough, in the eastern part of Trafford Park. The site forms part of the Regional Centre and lies on the opposite side of the Manchester Ship Canal to Salford Quays.
- 4.2 The site mainly comprises a mixture of commercial and industrial uses, although recent developments, especially on land fronting the Manchester Ship Canal have included other uses including large scale offices, the Imperial War Museum and the ITV studios and Coronation Street set.
- 4.3 The recently completed ITV development represents a significant extension of Peel's MediaCityUK development onto land on the south side of the Ship Canal and into Trafford Borough in accordance with the adopted MediaCityUK SPD and demonstrates the substantial potential of this part of the Wharfside Strategic Location, between the Ship Canal and Trafford Wharf Road, to contribute to economic growth in the Regional Centre.

Core Strategy Context

- 4.4 Proposed Policy WHA 1 confirms the designation of Trafford Wharfside, including that part which lies within MediaCityUK, as a Strategic Location in line with Policy SL 2 of the adopted Core Strategy.
- 4.5 The Strategic Location is identified within CS Policy SL2 (Trafford Wharfside) as having great potential as part of MediaCityUK for new economic and residential development. SL2 places focus upon delivering the area for major mixed-use development of regional and international significance, with the focus upon opportunities for new economic, leisure and residential development.
- 4.6 The Core Strategy sets out that over the plan period Trafford Wharfside can deliver:
- In the Mediacity:uk area:
 - 10 hectares of mainly B1 office and light industrial uses
 - leisure - including hotels
 - residential development (900 units) and
 - an appropriate scale of supporting retail and community uses;
 - Trafford Wharfside eastern gateway area:
 - residential apartments;
 - commercial office accommodation; hotel accommodation; and

- ancillary leisure and retail accommodation
- In the Manchester United stadium area:
 - development that supports the existing football stadium and associated hospitality, conference, retail and visitor facilities.

4.7 CS Policy SL2 states that the majority of residential dwellings in this area will be apartments, with a proportion being suitable for family housing.

4.8 Phasing of the identified development is set out as follows:

Phasing					
	2008/9 - 2010/11	2011/12 - 2015/16	2016/7 - 2020/1	2021/2 - 2025/26	TOTAL
Residential	0	400	300	200	900
Employment	0	3	3	4	10

Residential – expressed in terms of units
Employment – expressed in terms of hectares

4.9 A number of development requirements are set out in the CS policy. These include the siting of uses identified in national guidance as being more vulnerable to flooding such as residential, certain leisure uses, healthcare and educational facilities outside of Flood Zone 3.

4.10 In principle, Peel supports both the proposal and the proposed boundary of the Trafford Wharfside Strategic Location.

4.11 There is however a need for the Policies Map to also define the boundary of MediaCityUK within Trafford Borough. Peel assumes that the lack of any such boundary is an unintentional omission from the Policies Map, since paragraph 3.14 of WHA2 starts by stating “*Within the MediacityUK Area defined on the Policies Map...*”

4.12 Peel considers that elements of the detailed proposals set out under WHA1 and WHA2 are overly prescriptive and are not consistent with the adopted Statutory higher order policies and objectives set out in the Core Strategy. These inconsistencies are noted in the detailed comments set out below.

Policy WHA2 (Trafford Wharfside - MediaCityUK Area)

4.13 Peel supports the principle of allocating the MediaCityUK area within this location as a Strategic Site.

4.14 The detailed wording of Policy WHA 2, relating to the MediaCityUK area of Trafford Wharfside, is not consistent with CS Policy SL 2 and, critically, does not accurately convey the significant regeneration potential of this location and its contribution to the Regional Centre’s continued economic growth.

- 4.15 The Core Strategy supports the long standing objectives of the Greater Manchester conurbation around the regeneration and growth of the Regional Centre. Paragraph 2.11 of the Core Strategy describes the Regional Centre as:

Paragraph	Comment
3.5	Peel supports the proposal to extend Metrolink through Wharfside and in principle agrees that Trafford Wharf Road is the appropriate route. However, there remains considerable uncertainty over the approach to and location of the provision of new stations along this section of the proposed route. In these circumstances, Peel cannot conclude one way or the other whether the wording of paragraph 3.5 is appropriate and must reserve its position accordingly
3.9	It is unduly restrictive to stipulate within paragraph 3.9 that car parking provision should be in the form of undercroft or basement provision. Accordingly Peel objects to the wording of this paragraph and proposes that it be amended to read that an appropriate level of car parking will be provided.
3.10	Paragraph 3.10 stipulates that new development within Wharfside will protect and where possible enhance views of the Imperial War Museum and Manchester United FC Stadium, particularly from the Manchester Ship Canal. This requirement is inconsistent with the need for MediaCityUK to provide high quality, high density mixed use development along the southern side of the Ship Canal and should therefore be deleted.
3.14 - 3.18	It is critical that Policy WHA 2, including the development principles referred to in paragraph 3.15 should reflect the Core Strategy's aspirations for MediaCityUK including the Trafford Wharfside component, and should support development which will enable MediaCityUK to fulfil its key role within the Regional Centre. As currently worded draft Policy WHA2 and its development principles do not do this. Rather they identify the part of the MediaCityUK area which falls within Trafford principally as a business and residential location. In doing so they suggest that the quantum of B1 office floorspace should only be in the region of 25,000 sq. m. This figure is not sourced from the Core Strategy and there is no evidence base to support it. It should therefore be deleted.
	These uses are likely to form an important part of the mixed used development and this wording fails to reflect MediaCityUK's growing attractiveness as a hub for business, education, visitor and tourist uses and facilities and the development that is required to build on and sustain this role.
	In addition the wording would also have the effect of constraining the ability of Trafford element of MediaCityUK to perform this role by stipulating that A2, A3, A4, A5, D1 and D2 uses will be provided <i>at a</i>

scale to serve the needs of the proposed communities (business and residential) (Paragraph 3.18 – second bullet). This stipulation is contrary to the intention and objectives of CS Policy SL2 and needs to be amended accordingly.

Peel seeks the following changes to the wording of Policy WHA2:

Paragraph 3.14 – Within the MediaCityUK area defined on the proposals map, the Council will grant planning permission for a mix of employment (Use Class B1 and B8), leisure and tourism uses (Use Classes A2-A5, D1 and D2), hotels (Use Class C1) and residential (Use Class C3) uses to support existing facilities and the creation of a high-tech creative, educational and tourism hub of international significance which attracts a broad range of digital, creative, media, educational, leisure, tourism and related businesses in line with Core Strategy Policy SL2.2. The Council will support the provision of retail (Class A1) and community uses at an appropriate scale to support the existing and new residential, business, tourism and leisure uses in this location.

Consistent with our comments in relation to the office floorspace Peel considers that the references in paragraph 3.16 to the number of residential units expected to be developed at Wharfside in the Plan period should also be deleted from this text and put in a summary table at the end of the policy so as not to create the impression that these figures indicate a maximum volume of development which would be achievable in this location.

Peel also objects to the suggestion within the development principles of WHA2 that two thirds of the residential units should be suitable for families. This is not considered to be either realistic or reasonable and the reference should be deleted.

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- 3.18 It is accepted that the location and distribution of retail uses which serve a greater than localised role within the Regional Centre need to be carefully managed. However this should not apply to use class A (such as food and drink outlets) or to D1 and D2 uses (such as cinemas or art galleries) or to hotels, all of which are appropriate uses for a Strategic Location within the Regional Centre. Hence the current wording of paragraph 3.18 (third bullet) is also inappropriate in that it seeks to impose limitations which could prevent MediaCityUK from realising its potential to develop as a major mixed use area of regional and international significance and this also requires amendment.

The draft policy is also inconsistent with CS Policy SL2 in that it implies that only one hotel should be developed in this location. The wording should be amended to reflect the CS Policy SL2 designation which expressly lists “hotels and visitor attractions” as examples of the major leisure development which will be encouraged at Trafford Wharfside. There is a need for flexibility to allow hotel provision which can meet

growing needs in terms of the bedroom numbers and different grades of hotel.

Peel proposes that draft Policy WHA 2 be amended to ensure that it provides sufficient flexibility with regard to the future use and development of this key part of MediaCityUK whilst still controlling the scale of A1 retail and community uses as intended by CS Policy SL 2.

Peel seeks the following changes to the wording of Policy WHA2:

Paragraph 3.18 – Mixed commercial development and community facilities

- *A mix of uses which will further the area's role as a tourist and leisure destination including new hotels (Class C1), food and drink uses (Use Classes A3, A4 and A5) and visitor attractions (including appropriate uses within Use Classes D1 and D2) will be provided*
- *A range of retail, financial and professional services uses (Use Class A1 and A2) will be supported at a scale to serve the needs of the proposed communities (business and residential) within the Strategic Location*
- *Development proposals for A1 and A2 uses of a scale that will serve a wider community than the business, tourism, leisure and residential communities within the Strategic Location should be consistent with other policies within the Local Plan and national planning guidance, as appropriate*
- *Commercial and/or community uses should help to create active frontages as part of residential, employment or other development types where possible by being well-related to and accessible from adjacent streets and open spaces.*

3.19 Peel objects to the requirement that 2.3 ha of new open space/green infrastructure, including a neighbourhood park, be provided within the WHA 2 area. Whilst it is accepted that public open space will need to be incorporated into any future residential development scheme, there are numerous ways that this could be delivered, including potentially through a financial contribution to offsite provision if appropriate or through alternative and innovative design solutions on site. The potential of the extensive water areas should also be referred to.

In addition, in the absence any advanced designs for the development of the WHA 2 area at present, there can be no certainty as to the eventual number and mix of residential units to be provided. As a result, it is inappropriate and premature to specify the amount and type of open space to be provided on site. This is simply too prescriptive a

requirement for the purposes of a Local Plan allocation.

Moreover, whilst there may be a deficit in local open space provision at this moment in time, this position could change over the plan period, in terms of both the extent of quantitative deficiency and the typologies of open space which the area is deficient in. The requirement for onsite open space could therefore also change over time.

A more flexible approach is required which reflects these points. This would involve setting out the expectation that the provision of an appropriate level of public open space will be required, commensurate with the type and number of residential units provided and having regard to existing provision within the local area, but not prescribing the amount or type to be delivered.

Peel seeks the following changes to the wording of Policy WHA2:

Paragraph 3.19 – Open space/green infrastructure

- *On site public open space or, if deemed appropriate, off site provision or a financial contribution to provision or enhancement of existing off site public open space, will be provided at a scale and of a type appropriate to the number and mix of residential units and having regard to identified local deficiencies in provision*
- *The existing Promenade Park will be improved up to a Neighbourhood Park standard, specifically in terms of the provision of play space, informal recreation areas, green infrastructure, public art and a potential water taxi station, whilst not compromising its active travel function (see LA Policy OS2);*
- *The existing linear landscaped areas along Trafford Wharf Road and Wharfside Way will be improved to create a ‘green corridor’*

3.22 This paragraph adds nothing of value to the draft policy and should be deleted as it could be prejudicial to applications for residential development alongside the Ship Canal which are completely consistent with the objectives of the Core Strategy which led to the designation of the Strategic Location and the formulation of CS Policy SL1.

3.26 Peel seeks the following changes to the wording of Policy WHA2:

Paragraph 3.26 – MediaCityUK lies within an area which is currently deficient in accessible open space that, combined with the new housing proposed, generates the need for new open space. Given the limited amount of land available to deliver the required provision, an innovative approach will be required for the delivery of open space in this location if it is to be provided on site and as part of future development schemes. This could include introducing elements of a Neighbourhood Park to the existing Wharfside

Walkway, such as play space, informal recreation and green infrastructure, whilst ensuring that its function as active travel infrastructure is not compromised. The Wharfside Walkway Neighbourhood Park will, where possible, incorporate suitable links to the wider Irwell River Park; the Strategic Processional Route; and open space at Pomona Island (See LA Policy POM01)

- 4.16 The Core Strategy supports the long standing objectives of the Greater Manchester conurbation around the regeneration and growth of the Regional Centre. Paragraph 2.11 of the Core Strategy describes the Regional Centre as:

“...the primary economic driver of the Manchester City Region, ensuring that the Regional Centre continues to provide the main focus for business, retail, leisure, cultural and tourism development in the City Region. In Trafford, Pomona, Wharfside (including MediaCityUK and the Manchester United stadium) all play a significant role in one or more of these types of development and provide opportunities for growth in these sectors.”

- 4.17 The Core Strategy notes that the Regional Centre is primarily a business, leisure, visitor and retail location and that, whilst residential uses are an important part of the mix of uses within the Regional Centre, they perform a secondary function. The wider Salford Quays/MediaCityUK area, which includes the WHA 2 allocation, is no different in this respect, providing a wide range of business and educational uses, alongside destination leisure, cultural and retail uses and residential accommodation. The uses already established in this area, together with the further development envisaged over the Plan period and beyond will ensure that this area will be of increasing strategic importance within the Regional Centre context.

- 4.18 This is reflected in CS Policy SL2.1 which, states that:

“The Council will identify and promote land for development within this location to create a major mixed-use area of regional and international significance.(our emphasis) The focus will be on opportunities for new economic (particularly digital and media industries), leisure (hotels and visitor attractions) and residential development.” (Policy 2.1)

- 4.19 With specific reference to the MediaCityUK area, CS Policy SL2.2 identifies that the area is suitable for:

“...high quality mixed-use development for employment activity (10 ha of mainly B1 office and light industrial uses), leisure (including hotels), residential development (900 units) and an appropriate scale of supporting retail and community uses.”

The reference to “an appropriate scale” in this wording applies only to the retail and community uses which are likely to be needed to support the new office, light industrial, leisure and residential development envisaged within the MediaCityUK part of Trafford Wharfside. CS Policy SL2 does not limit the scale of the commercial, leisure or

residential development, since such a limitation would directly conflict with the wording in SL2.1.

4.20 The table below provides a summary of detailed comments:

Paragraph	Comment
3.5	Peel supports the proposal to extend Metrolink through Wharfside and in principle agrees that Trafford Wharf Road is the appropriate route. However, there remains considerable uncertainty over the approach to and location of the provision of new stations along this section of the proposed route. In these circumstances, Peel cannot conclude one way or the other whether the wording of paragraph 3.5 is appropriate and must reserve its position accordingly
3.9	It is unduly restrictive to stipulate within paragraph 3.9 that car parking provision should be in the form of undercroft or basement provision. Accordingly Peel objects to the wording of this paragraph and proposes that it be amended to read that an appropriate level of car parking will be provided.
3.10	Paragraph 3.10 stipulates that new development within Wharfside will protect and where possible enhance views of the Imperial War Museum and Manchester United FC Stadium, particularly from the Manchester Ship Canal. This requirement is inconsistent with the need for MediaCityUK to provide high quality, high density mixed use development along the southern side of the Ship Canal and should therefore be deleted.
3.14 - 3.18	It is critical that Policy WHA 2, including the development principles referred to in paragraph 3.15 should reflect the Core Strategy's aspirations for MediaCityUK including the Trafford Wharfside component, and should support development which will enable MediaCityUK to fulfil its key role within the Regional Centre. As currently worded draft Policy WHA2 and its development principles do not do this. Rather they identify the part of the MediaCityUK area which falls within Trafford principally as a business and residential location. In doing so they suggest that the quantum of B1 office floorspace should only be in the region of 25,000 sq. m. This figure is not sourced from the Core Strategy and there is no evidence base to support it. It should therefore be deleted.
	These uses are likely to form an important part of the mixed used development and this wording fails to reflect MediaCityUK's growing attractiveness as a hub for business, education, visitor and tourist uses and facilities and the development that is required to build on and sustain this role.
	In addition the wording would also have the effect of constraining the ability of Trafford element of MediaCityUK to perform this role by stipulating that A2, A3, A4, A5, D1 and D2 uses will be provided <i>at a scale to serve the needs of the proposed communities</i> (business and residential) (Paragraph 3.18 – second bullet). This stipulation is contrary to the intention and objectives of CS Policy SL2 and needs to be amended accordingly.

Peel seeks the following changes to the wording of Policy WHA2:

Paragraph 3.14 – Within the MediaCityUK area defined on the proposals map, the Council will grant planning permission for a mix of employment (Use Class B1 and B8), leisure and tourism uses (Use Classes A2-A5, D1 and D2), hotels (Use Class C1) and residential (Use Class C3) uses to support existing facilities and the creation of a high-tech creative, educational and tourism hub of international significance which attracts a broad range of digital, creative, media, educational, leisure, tourism and related businesses in line with Core Strategy Policy SL2.2. The Council will support the provision of retail (Class A1) and community uses at an appropriate scale to support the existing and new residential, business, tourism and leisure uses in this location.

Consistent with our comments in relation to the office floorspace Peel considers that the references in paragraph 3.16 to the number of residential units expected to be developed at Wharfside in the Plan period should also be deleted from this text and put in a summary table at the end of the policy so as not to create the impression that these figures indicate a maximum volume of development which would be achievable in this location.

Peel also objects to the suggestion within the development principles of WHA2 that two thirds of the residential units should be suitable for families. This is not considered to be either realistic or reasonable and the reference should be deleted.

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- 3.18 It is accepted that the location and distribution of retail uses which serve a greater than localised role within the Regional Centre need to be carefully managed. However this should not apply to use class A (such as food and drink outlets) or to D1 and D2 uses (such as cinemas or art galleries) or to hotels, all of which are appropriate uses for a Strategic Location within the Regional Centre. Hence the current wording of paragraph 3.18 (third bullet) is also inappropriate in that it seeks to impose limitations which could prevent MediaCityUK from realising its potential to develop as a major mixed use area of regional and international significance and this also requires amendment.

The draft policy is also inconsistent with CS Policy SL2 in that it implies that only one hotel should be developed in this location. The wording should be amended to reflect the CS Policy SL2 designation which expressly lists “hotels and visitor attractions” as examples of the major leisure development which will be encouraged at Trafford Wharfside. There is a need for flexibility to allow hotel provision which can meet growing needs in terms of the bedroom numbers and different grades of hotel.

Peel proposes that draft Policy WHA 2 be amended to ensure that it provides sufficient flexibility with regard to the future use and development of this key part of MediaCityUK whilst still controlling the scale of A1 retail and community uses as intended by CS Policy SL 2.

Peel seeks the following changes to the wording of Policy WHA2:

Paragraph 3.18 – Mixed commercial development and community facilities

-
- *A mix of uses which will further the area's role as a tourist and leisure destination including new hotels (Class C1), food and drink uses (Use Classes A3, A4 and A5) and visitor attractions (including appropriate uses within Use Classes D1 and D2) will be provided*
 - *A range of retail, and financial and professional services uses (Use Class A1 and A2) will be supported at a scale to serve the needs of the proposed communities (business and residential) within the Strategic Location*
 - *Development proposals for A1 and A2 uses of a scale that will serve a wider community than the business, tourism, leisure and residential communities within the Strategic Location should be consistent with other policies within the Local Plan and national planning guidance, as appropriate*
 - *Commercial and/or community uses should help to create active frontages as part of residential, employment or other development types where possible by being well-related to and accessible from adjacent streets and open spaces.*

3.19 Peel objects to the requirement that 2.3 ha of new open space/green infrastructure, including a neighbourhood park, be provided within the WHA 2 area. Whilst it is accepted that public open space will need to be incorporated into any future residential development scheme, there are numerous ways that this could be delivered, including potentially through a financial contribution to offsite provision if appropriate or through alternative and innovative design solutions on site. In addition, in the absence any advanced designs for the development of the WHA 2 area at present, there can be no certainty as to the eventual number and mix of residential units to be provided. As a result, it is inappropriate and premature to specify the amount and type of open space to be provided on site. This is simply too prescriptive a requirement for the purposes of a Local Plan allocation.

Moreover, whilst there may be a deficit in local open space provision at this moment in time, this position could change over the plan period, in terms of both the extent of quantitative deficiency and the typologies of open space which the area is deficient in. The requirement for onsite open space could therefore also change over time.

A more flexible approach is required which reflects these points. This would involve setting out the expectation that the provision of an appropriate level of public open space will be required, commensurate with the type and number of residential units provided and having regard to existing provision within the local area, but not prescribing the amount or type to be delivered.

Peel seeks the following changes to the wording of Policy WHA2:

Paragraph 3.19 – Open space/green infrastructure

- *On site public open space or, if deemed appropriate, off site provision or a financial contribution to provision or enhancement of existing off site public open space, will be provided at a scale and of a type appropriate to the number and mix of residential units and having regard to identified local*
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deficiencies in provision

- *The existing Promenade Park will be improved up to a Neighbourhood Park standard, specifically in terms of the provision of play space, informal recreation areas, green infrastructure, public art and a potential water taxi station, whilst not compromising its active travel function (see LA Policy OS2);*
- *The existing linear landscaped areas along Trafford Wharf Road and Wharfside Way will be improved to create a 'green corridor'*

3.22 This paragraph adds nothing of value to the draft policy and should be deleted as it could be prejudicial to applications for residential development alongside the Ship Canal which are completely consistent with the objectives of the Core Strategy which led to the designation of the Strategic Location and the formulation of CS Policy SL1.

3.26 Peel seeks the following changes to the wording of Policy WHA2:

Paragraph 3.26 – MediaCityUK lies within an area which is currently deficient in accessible open space that, combined with the new housing proposed, generates the need for new open space. Given the limited amount of land available to deliver the required provision, an innovative approach will be required for the delivery of open space in this location if it is to be provided on site and as part of future development schemes. This could include introducing elements of a Neighbourhood Park to the existing Wharfside Walkway, such as play space, informal recreation and green infrastructure, whilst ensuring that its function as active travel infrastructure is not compromised. The Wharfside Walkway Neighbourhood Park will, where possible, incorporate suitable links to the wider Irwell River Park; the Strategic Processional Route; and open space at Pomona Island (See LA Policy POM01)

Future town centre designation

- 4.21 Trafford Council will be aware that at Salford Quays, Salford City Council proposed to designate a new town centre to include the built phases of MediaCityUK through its Publication Core Strategy (January 2012). This incorporated a proposed Primary Retail Area which included the Lowry Outlet Mall, the built phases of MediaCityUK within Salford, part of the land subject to future phases of MediaCityUK and land in between these areas. The proposed town centre designation is shown at Figure 1 below.

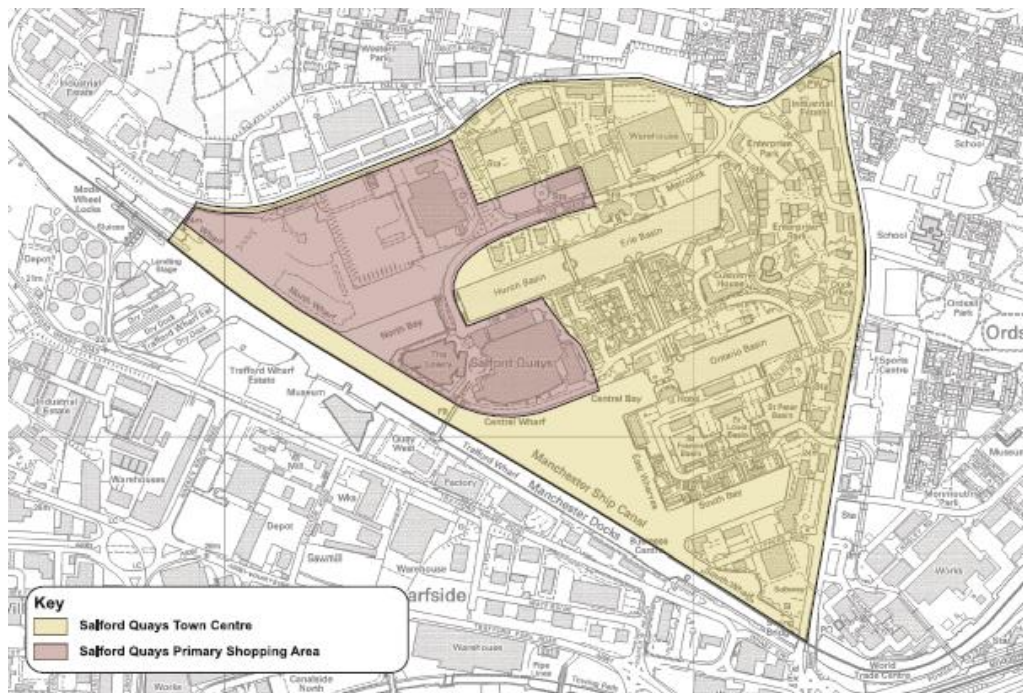


Figure 3.2: Salford Publication Core Strategy proposed town centre designation

- 4.22 Peel supported the designation of the Town Centre through its representations to the Salford Core Strategy but considered that the boundary of the Primary Shopping Area should be drawn slightly differently to the above.
- 4.23 The Core Strategy was withdrawn in November 2012 following the appointed Inspector's findings that the Council was not planning for a sufficient level of residential and employment development over the plan period. The Council's proposal to designate Salford Quays as a town centre and the emphasis given to Salford Quays as a priority area for growth, had no bearing on the Inspector's ruling regarding the Core Strategy's soundness. It should also be noted as a matter of fact that, ultimately, Trafford Council decided not to object to the proposed designation of a town centre at Salford Quays.
- 4.24 Salford City Council's new Local Plan is at an early stage of preparation and is not expected to be adopted until 2016. However, Salford's proposals will emerge well in advance of 2016 and, given the proposal set out in the Core Strategy, there is a strong likelihood that the Council will again propose the creation of a new town centre at Salford Quays through the Local Plan. This proposal will be fully supported by Peel.
- 4.25 It is imperative that Trafford's policy treatment of the WHA 2 area is consistent with and complements the policy proposals for those parts of Salford Quays and MediaCityUK located within Salford given that, together, they form a single, cohesive and functional

economic sub-area of the Regional Centre. To this end, since Salford Council's proposals will be emerging during the period within which this Land Allocations document is proceeding through its approval process, it would be appropriate, to propose that the WHA 2 area be designated as an additional element of the town centre proposed previously during the Salford Core Strategy process.

- 4.26 Moreover, in contrast to some locations within the wider Salford Quays/MediaCityUK area, the WHA 2 area is located close to the emerging cluster of leisure and visitor facilities in this location, including the Lowry Theatre and Lowry Outlet Mall and bars and restaurants provided as part of the first phases of MediaCityUK. The WHA 2 area is well connected to these facilities via existing footbridges. Furthermore, one of the area's major visitor destinations, the Imperial War Museum, is located within the WHA 2 area and Old Trafford football and cricket grounds lie within easy reach to the south. Given this physical context, it is entirely appropriate to identify the WHA 2 area as location for development which furthers the wider area's established and growing role as a leisure and visitor destination. This would be achieved by providing general support for the development of A2-A5 and D1 and D2 uses of a scale commensurate with its role as a visitor destination within the Regional Centre rather than restricting such uses to a scale whereby they perform only an ancillary role to a primary business and residential function.

5. Trafford Centre Rectangle Strategic Location

Location and Site Description

- 5.1 Trafford Centre Rectangle is located in the north of the Borough and is centred on The Trafford Centre, in the western area of Trafford Park. The area is designated as a Strategic Location in the Core Strategy (Policy SL4).
- 5.2 The area is roughly rectangular in shape and is bounded by the M60 to the south, Bridgewater Canal to the north, Manchester Ship Canal to the west and Parkway (road) to the east.
- 5.3 The Trafford Centre (including Barton Square) and Trafford Quays Leisure Village are both well-established and regionally significant complexes in this location and the presence of these major destination facilities and the extensive area from which they draw visitors has been a significant catalyst in encouraging other investment and development in the Rectangle. There are a number of prime development sites remaining within this location.
- 5.4 There are a number of extant permissions and pending planning applications within the proposed Strategic Location boundary which demonstrate the development potential of this area. These applications include the following:
- Erection of a 230 bed hotel on land at J 9 of the M60, approved September 2010 (74564/FULL/2010);
 - Development of a Grade A office building (maximum 12,100 sqm GIA) on land at J 10 of the M60, approved February 2011 (74815/O/2010);
 - Outline planning permission for demolition of existing buildings and erection of a new 10,000 square metre office building, approved May 2008 (H/OUT/66496);
 - Resolution to grant planning permissions subject to the signing of S106 agreements for the first phases of residential development and commercial development at Trafford Quays. These comprise Phase 1A for 27,870 sq m of BCO Grade A office development and 1,000 sq. m. of ancillary commercial accommodation (75931/OUT/2010) and for Phase 1B comprising 250 dwellings and 1,000 ancillary commercial accommodation (75931/ OUT/2010) Note a s106 Unilateral Undertaking for application 75930/OUT/2010 was completed on 5th March 2014 and the permission is due to be issued.
 - Resolution to grant planning permission subject to the signing of a s106 agreement for 27,870 sqm of Grade A offices and 150 bedroom hotel at the former Kratos site (80470/O/2013).
 - Resolution to grant planning permission subject to the signing of a s106 agreement for a 200 bedroom hotel on the former Kratos site

(82046/FULL/2013). This would replace the 150 bedroom hotel on the earlier application 80470/O/2013.

Core Strategy Context

- 5.5 The Trafford Centre Rectangle Strategic Location is subject to Policy SL4, which states that major mixed use development will be delivered in this area with an expected level of development over the plan period which would include:
- 1,050 residential units (at Trafford Quays);
 - 15 hectares of land for employment activity, a proportion of which is suitable for high quality commercial (B1) development;
 - New community facilities; and
 - A high quality (4* minimum) hotel and conference facility, in the region of 200 bed spaces located close to Junction 9 of the M60.
- 5.6 CS Policy SL4 proposes that the majority of the residential units in this area will be suitable for family housing.
- 5.7 The policy identifies a number of requirements necessary in order to render the development acceptable including the provision of the Western Gateway Infrastructure Scheme (WGIS) and that development of certain vulnerable uses should be located outside of Flood Zone 3.
- 5.8 The phasing of development in this area is also set out in this policy, as shown in the table below:

Phasing					
	2008/9 - 2010/11	2011/12 - 2015/16	2016/7 - 2020/1	2021/2 - 2025/26	TOTAL
Residential	0	250	250	550	1050
Employment	0	2	6	7	15

Residential – expressed in terms of units
Employment – expressed in terms of hectares

Strategic Location Boundary

- 5.9 Peel supports the proposed boundary of the Strategic Location which is in line with Peel's previous representations on this matter.

Strategic Sites

- 5.10 The draft Allocations Plan proposes that Trafford Quays and the Trafford Quays Leisure Village should be allocated as Strategic Sites within the Strategic Location. Again this is

line with Peel's previous representations and Peel supports the principle of both of these allocations.

General comments

- 5.11 In relation to the Trafford Centre Rectangle Strategic Location, the repeated references in the text of the consultation draft to the quantum of development that is anticipated to be provided over the Plan period is particularly misleading and unhelpful. This is both because these figures represent a scale of development which is substantially below the known capacity of key sites (Trafford Quays) and because the Rectangle includes a number of other potential sites for which no detailed assessment of capacity has yet been carried out. Hence the proposed revision, whereby the quantum of development assumed over the plan period is stated only in a summary form at the end of the text dealing with each Strategic Location or site, would add clarity to this part of the draft Plan.

As with the other Strategic Locations in which it has an interest Peel is also concerned that a number of the references in this part of the Plan are unnecessarily prescriptive and suggests that these need to be revised.

Policy TCR1 Comments

- 5.12 The table below provides detailed comments on draft Policy TCR1.

Paragraph	Comment
5.1	Peel suggests that this paragraph should be reworded to read <i>'The Trafford Centre Rectangle is a mixed use area including a Regional Shopping Centre and leisure/ visitor attractions which are of regional importance as well as a range of employment uses. It is designated in Policy SL4 of the Core Strategy as a Strategic Location for Trafford that offers significant opportunities to contribute to both local and sub-regional priorities over the Plan period and beyond'</i> .
5.2	Peel suggests that this paragraph is deleted and that policy guidance in relation to development in the TCR is addressed within the Policy rather than in the introduction.
5.3	This section should be reworded to read <i>'The Council will support proposals brought forward within this Strategic Location which will help it to realise the significant opportunities which the Location presents to contribute to the Borough's housing, leisure and employment needs during and beyond the Plan period.'</i>
5.4	The reference to the 40,000 sqm of office development the Core Strategy anticipates will be delivered within the TCR should be deleted entirely for reasons outlined below. Any reference to the amount of employment development land which is expected to be developed in the TCR over the Plan period should be limited to the 15ha identified in the Core Strategy. Paragraph 5.4 should then be reworded to give support to proposals

within this Location which can provide high quality office and other commercial floorspace in accordance with the other policies of the Core Strategy and Allocations Local Plan.

It is particularly important that a specific figure for the quantum of B1 floorspace likely to be developed within the TCR is neither set out nor implied in the wording of this policy as this could be interpreted as a setting a maximum figure which has no basis in an assessment of need or capacity. The 40,000 sq. set out in this paragraph is based on the PPS4 Assessment for B1 Office Floorspace in Trafford (although the document actually identifies demand for 48,500 sq.) which is now out of date as it was prepared in 2010 during the height of the recession and therefore is pessimistic. AGMA is preparing an up to date position on employment land supply and demand which is due to be publicly available by the end of 2014. Any future applications on the site would therefore need to be assessed against the most up to date data on the need and demand for the kind of accommodation being proposed and not on some out of date and therefore artificial figure carried forward from the Core Strategy.

Peel will provide further evidence of the capacity of the Trafford Quays site for office/ commercial floorspace in the planning application which it intends to submit to the Council shortly. It should be noted that there are other potential sites in the TCR that could be developed for office and commercial floorspace if there is a demand for such accommodation and that this can be promoted in line with national and other local planning policy. Both the office and residential development proposed on the Trafford Quays site is expected to be built out over a period extending beyond 2026.

5.6 Peel supports the proposal to extend Metrolink through the Trafford Centre Rectangle. However, there remains uncertainty over the precise route and provision of new stations along this section of the proposed route. In these circumstances, Peel cannot conclude one way or the other whether the wording of paragraph 5.6 is appropriate and must reserve its position accordingly

5.8 The first part of this paragraph should be reworded to say "*Development at this Strategic Location should seek to maximise the benefits of...*"

5.10 The reference to Policy SL4 is incorrect. It should be reworded to state that the Strategic Location is assumed in the CS to provide a **minimum** of 1,050 homes and a **minimum** of 15 hectares of employment land over the Plan period but has capacity for development which is substantially in excess of these figures.

Also, the reference to "*a hotel and conference facility*" should be reworded to '*leisure and visitor provision including hotel and conference facilities*'.

In connection with this proposed revision the Council accepted, in the Committee report for the recent Kratos application (80470/O/2013),

	that there is a specific need associated with the growth of the TCR which means that more than one hotel should be accommodated with the TCR.
5.11	This paragraph should be reworded to delete reference to “15 hectares of employment land” or to make it clear that this is the minimum area that is expected to be developed in the TCR over the Plan period.
5.12	<p>The Study referred to in this paragraph confirmed that office development in the TCR is acceptable in terms of impact and the sequential approach. However, as set out above, it is based on an out of date evidence document that will be superseded by the AGMA document at the end of 2014 and relates only to the Study’s estimation of need over the Plan period, not to the level of office accommodation that could reasonably be provided in the TCR.</p> <p>Whilst it may be appropriate for the paragraph to set out the level of need which was identified in that study it should also recognise that the study is out of date.</p>
5.13	<p>Peel’s comments are as in relation to paragraph 5.4 above with regard to the target of 40,000 sq. of office floorspace. An amendment to the wording is therefore sought which makes it clear that this level is that which was assessed for the Plan period by an outdated study.</p> <p>Peel does not consider it appropriate that the Plan should seek to utilise as a target a quantum of floorspace simply because it matches the existing commitments. This text should therefore be deleted from the Plan.</p>
Omission 1	This policy should highlight that the TCR will deliver a sustainable urban neighbourhood at Trafford Quays that will contribute to the mixed use character of this area. It should refer to Policy TCR2 for detailed guidance in relation to the site.
Omission 2	Core Strategy Policy SL4 highlights that the detailed phasing of infrastructure requirements will be addressed through the Land Allocations DPD. This policy does not address these and does not provide reference to where these will be addressed within the document.

Trafford Quays – Policy TCR2

- 5.13 Peel supports the proposed allocation of Trafford Quays and the suggested red line boundary.
- 5.14 The table below provides details comments on draft Policy TCR2:

Paragraph	Comment
5.14	<p>This paragraph should highlight that Trafford Quays will deliver development both within and beyond the Plan period.</p> <p>Peel also suggest that the description of the development be amended from ‘New residential and business neighbourhood’ to ‘New urban</p>

	neighbourhood' to accord with the proposed planning application submission.
5.16	<p>Peel suggests that bullet point 1 is deleted from this paragraph and moved to a summary table at the end of the policy.</p> <p>The third bullet point should be amended to make it clear that the requirement to ensure that two thirds of the residential accommodation delivered is suitable for family housing, relates only to the minimum number of units (1,050) envisaged in the CS Policy SL4. Any development above and beyond this minimum should provide an appropriate mix of dwellings, including those suitable for families.</p> <p>Peel propose that the fourth bullet point is reworded as follows: 'There will be a mix of housing densities and building heights appropriate to the context of different parts of the site, including the Bridgewater Canal and Conservation Area'. This will allow flexibility in the density and height of buildings, subject to a detailed justification. The last two bullet points could then be deleted.</p>
5.17	<p>The 28,000 sq. m requirement reflects the existing commitment on this site and is not sourced from the Core Strategy. It should therefore be deleted from this text.</p> <p>Peel suggests that the comment in relation to amenity space is removed and that open space requirements are addressed in the Open Space/Green Infrastructure part of the Policy.</p> <p>The reference in the final bullet point to "<i>secure undercroft or basement parking</i>" should be deleted and the bullet reworded to say that '<i>A combination of on-street and off-street parking will be provided</i>'. This is to allow flexibility in the design of parking solutions.</p>
5.18	<p>Peel objects to the specific quantum of new open space/green infrastructure, including the requirement for this to be provided largely in the form of new neighbourhood park, being prescribed in the policy as this is both overly and unnecessarily prescriptive.</p> <p>It is appropriate for the Plan to set out a requirement for public open space provision at a level appropriate for the scale of development to be brought forward on the site but there are numerous ways that this could be delivered, including through a financial contribution to offsite provision if appropriate or through alternative and innovative design solutions on site.</p> <p>In addition, in the absence of any advanced designs for the development of this area at present, there can be no certainty as to the eventual number and mix of residential units to be provided. As a result, it is inappropriate to be so specific as to the amount and type of open space to be provided on site. This is simply too prescriptive a requirement for</p>

the purposes of a Local Plan allocation.

Moreover, whilst there may be a deficit in local open space provision at this moment in time, this position could change over the plan period, in terms of both the extent of the deficit and the types of open space which the area is deficient in. The requirement for onsite open space could change over time.

A more flexible approach is required which reflects these points. This would involve setting out the expectation that the provision of an appropriate level of public open space will be required, commensurate with the type and number of residential units provided and having regard to existing provision within the local area, but not prescribing the amount or type to be delivered.

The potential of the extensive water areas should also be referred to.

Peel seeks the following changes to the wording of Policy TCR2:

Paragraph 5.19 – Open space/green infrastructure

- *On site public open space or, if deemed appropriate, off site provision or a financial contribution to provision or enhancement of existing off site public open space, will be provided at a scale and of a type appropriate to the number and mix of residential units and having regard to identified local deficiencies in provision*
- *Any open spaces will relate well to the new communities which they are to serve and to the provision of Green Infrastructure elsewhere in the Trafford Centre Rectangle Location*
- *The benefits of the site's canalside location will be maximized through the provision of open space(s) that is well-related to it.*

5.19 Peel proposes that the first and second bullet points should be replaced with: *'Other complementary uses including retail, leisure and community uses will be provided at a scale to meet the needs of the existing community, planned community and other users of the area. It is acknowledged that development in this area will take place beyond the Plan period and that the scale and timescales for the delivery of these uses will reflect this'*.

Peel suggests that the third bullet point is rephrased to read *'Other complementary uses should be integrated into proposed residential and commercial development and be accessible to users of the wider TCR'*.

5.20 The first bullet point should reference Core Strategy Policy SL4, which requires the pedestrian link.

5.22 Peel proposes that the second sentence of this paragraph be reworded to

read:

“it is anticipated that a minimum of 1,050 dwellings will be developed in the Plan period but the site is expected to continue to provide new housing and employment opportunities beyond that date.”

- 5.23 Peel proposes that the first bullet point should be rephrased to state only that ‘due consideration should be given to the setting of the Grade I listed All Saints Church and Barton upon Irwell Conservation Area in the design of the development’.

Whilst reduced density may form part of the master planning for this part of the site it is not appropriate for the Local Plan to prescribe that this should be the only solution to achieving an acceptable setting for the listed assets.

The third bullet point should just require high quality development without making any reference to the Venus building. Again this is unnecessarily prescriptive.

Trafford Quays Leisure Village – Policy TCR3

- 5.15 Peel supports the proposed allocation of the Trafford Quays Leisure Village site and the suggested red line boundary.
- 5.16 The table below provides details comments on the draft allocation:

Paragraph	Comment
5.24	The justification for this policy should highlight the close proximity/accessibility of the Trafford Quays Leisure Village to the emerging Trafford Quays urban neighbourhood and the wider TCR, in order to emphasise the interlinked nature of this area.

6. Sites outside of Strategic Locations

- 6.1 The section sets out Peel's representations with regards to sites which lie outside of the Core Strategy defined Strategic Locations, but which Peel consider to be important development sites which would contribute significantly towards the Core Strategy's development requirements and key objectives.
- 6.2 Peel has previously submitted representations in relation to all of these sites during the previous round of consultation on the Land Allocations DPD.

Partington

Core Strategy Context

- 6.3 The Core Strategy identifies Partington as a Priority Regeneration Area and, as such, proposals for development in this area are subject to Policy L3. This policy states that development will be supported which will provide for the delivery of approximately 850 residential dwellings in Partington; a redeveloped local shopping centre; and improvements to open space and amenity areas including the provision of a 'green loop'.
- 6.4 Policy L3 is also clear that part of the area's housing requirements should be provided on a substantially vacant/unused 16 hectare greenfield site abutting the Manchester Ship Canal (i.e. the Canalside and Hall Lane sites – see below).
- 6.5 The policy states that development which is considered to be 'more vulnerable' to flooding is required to be located outside of Flood Zone 3, unless the relevant national policy tests can be met.

Canalside and Hall Lane Sites

- 6.6 Peel supports the combined allocation of these two sites for residential development and are in agreement with the proposed red line boundary shown on the draft Proposals Map.

Land off Central Road

- 6.7 Peel supports the allocation of this site for residential development and are in agreement with the proposed red line boundary shown on the draft Proposals Map

Partington Priority Regeneration Area Boundary

- 6.8 Peel supports the allocation of this Priority Regeneration Area and is in agreement with the proposed red line boundary shown on the draft Proposals Map.

Partington Local Centre Boundary

- 6.9 Peel supports the allocation of this site as a 'Local Hub' and is in agreement with the proposed red line boundary shown on the draft Proposals Map.

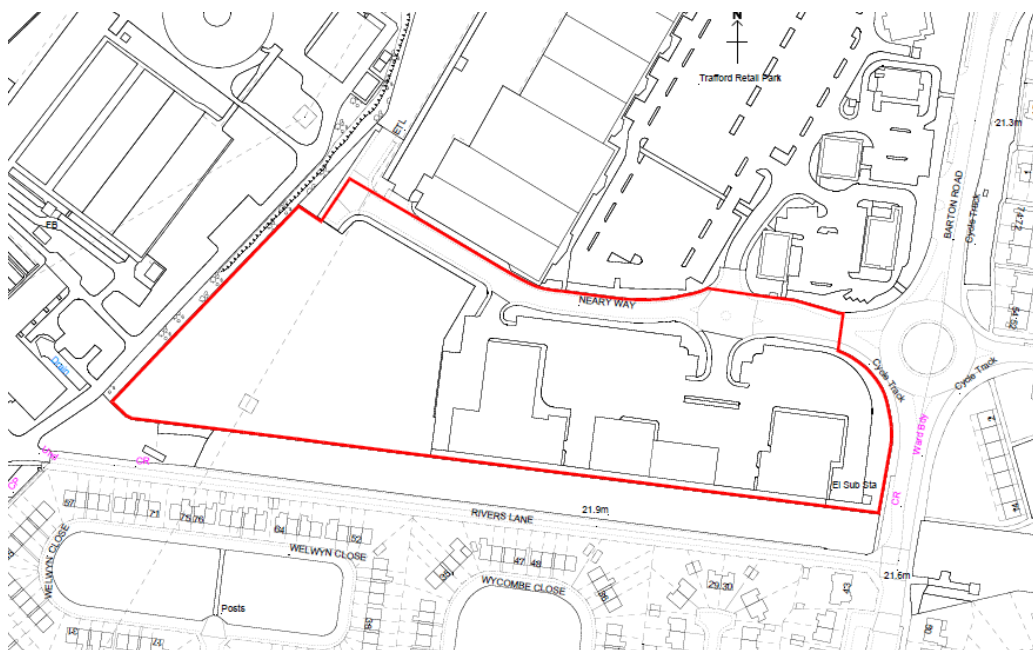
Trafford Retail Park

- 6.10 Peel generally supports Policy OR1 that identifies retail warehouse parks in Trafford, However, we have the following objection/comments to Policy OR1 and its supporting commentary.

- 6.11 For clarity and to be consistent with the Framework, the policy should be amended to make it clear that a site can only be sequentially preferable if it is available within a reasonable period, suitable and viable for the proposal in question.
- 6.12 Part of the proposed Trafford Retail Park allocation (phase 2) benefits from planning permission (dated 17th May 2012, LPA ref. H/OUT/71053, PINS ref. APP/Q4245/A/11/2158689) for the erection an A1 foodstore development. In the consideration of the appeal, the Independent Planning Inspectorate stated in paragraph 54 of the decision notice that:

“In relation to the National Planning Policy Framework, it is agreed that there is no sequentially preferable site and the evidence demonstrates satisfactorily that there would be no significant adverse impact on the vitality and viability of, in particular, Urmston or Stretford town centres, or on investment in them. Accordingly, there is no policy objection to what is proposed”

- 6.13 Given that the A1 foodstore was found to accord with the Framework and is an acceptable land use in this location, paragraph 20.4 should be amended to reflect the planning position of the site of planning permission H/OUT/71053, or alternatively the area which benefits from this planning permission should be simply allocated for convenience retailing uses in addition to bulky comparison goods retailing (as per the plan below).



- 6.14 As far as other main town centre uses are concerned, it is well accepted throughout the country that food and drink uses are part and parcel of the offer of and support the functioning of, retail park destinations. Such uses therefore serve a market driven principally by the operation of the retail park on which they sit. Further proposals for such uses (Use classes A3-A5) should not therefore be subject to the tests embodied within the first, second and third bullet points of paragraph 20.4.

6.15 Peel therefore suggests the site of planning permission H/OUT/71053 be defined on the policies map as TRP Phase 2 and that the start of paragraph 20.4 be amended to read *“With the exception of phase 2 of Trafford Retail Park as defined on the Policies Map, within the defined Retail Warehouse Parks....”* A further amendment to paragraph 20.4 should clarify that alternative sites can only be preferable if they are available within a reasonable period, suitable and viable for the proposal in question.

6.16 An additional two paragraphs should then be introduced, after the amended paragraph 20.4 to read:

“Within the defined Trafford Retail Park phase 2, the Council will grant planning permission for new retail development to be used for the sale of bulky comparison goods or for convenience retailing (up to 3,000 sq.m (net)), or for development to be used for food and drink purposes (use classes A3-A5) where such development is in accordance with other policies within the Trafford Local Plan and national guidance.”

“Within the defined Retail Trafford Retail Park (Phase 2) under OR1.2, the Council will grant planning permission for non-bulky comparison retail development where the proposal

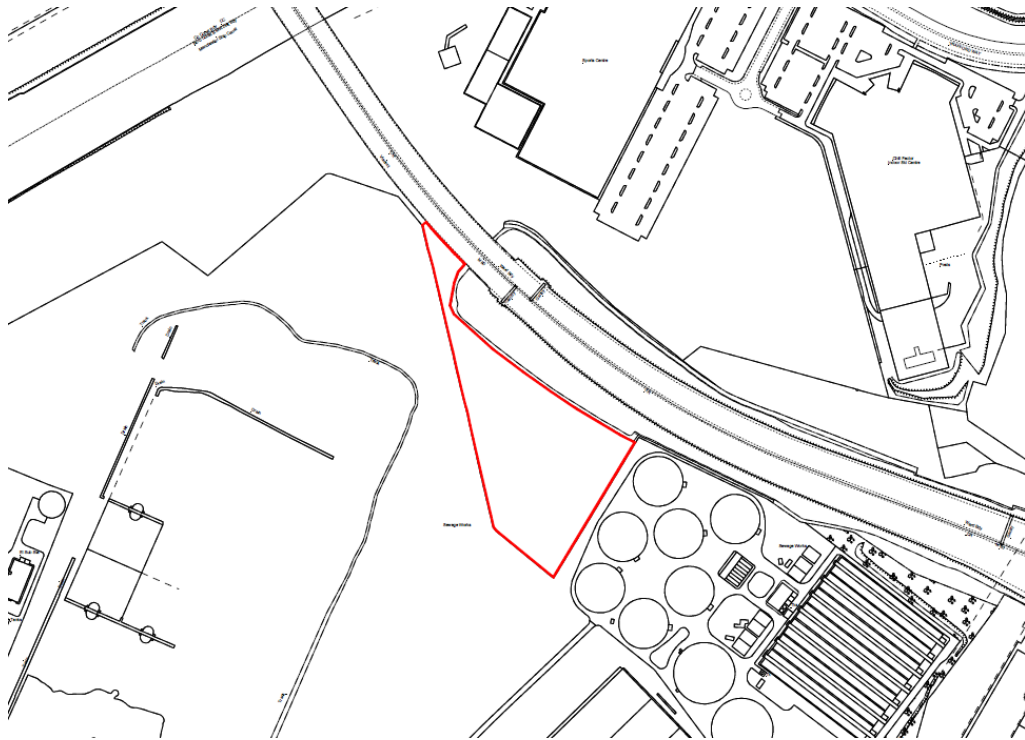
- *Will not prejudice the primary function of the Retail Warehouse Parks as facilities for the retail of bulky comparison goods;*
- *Cannot be accommodated on a sequentially-preferable site (a sequentially preferable site is one which is available within a reasonable period, suitable and viable for the proposal in question);*
- *Will not result in a significant adverse impact on any defined town centre within the catchment area of the proposal; and*
- *Is in accordance with other policies within the Trafford Local Plan, and national guidance, as appropriate”.*

6.17 Peel is in agreement with the proposed red line boundary shown on the draft Proposals Map.

Land at Barton Bridge

6.18 Peel previously proposed that this site be allocated for employment use in the Allocations DPD.

6.19 The following site boundary was proposed.

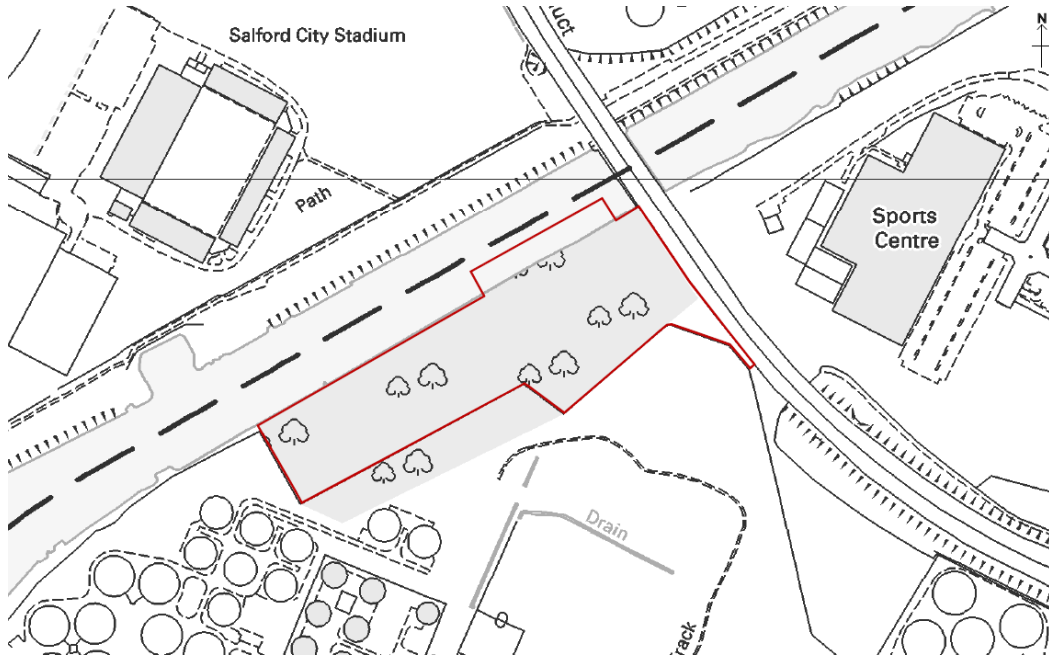


- 6.20 In the Council's response to Peel's previous representation, the Council stated that this site is not suitable for allocation for employment uses as it lies outside of the employment areas identified in the Core Strategy Policy W1.3.
- 6.21 Peel objects to the omission of this site from the Allocations Plan and to the Council's assessment of the site and reasons for not proposing this site for allocation.
- 6.22 Whilst the Council is correct in that Core Strategy Policy W1.3 seeks to focus employment uses in identified locations, it is important to note that the Policy does not preclude new employment development elsewhere in the borough. Indeed, Policy W1.11 states that smaller employment sites (i.e. those outside of the strategic locations) will also be identified in the Land Allocations DPD.
- 6.23 The Barton Bridge site is located in the Davyhulme area of Trafford, on land immediately south of the M60 motorway. The Strategic Location of the Trafford Centre Rectangle lies immediately north east of the site in the opposite side of the M60. Existing employment uses surround the site to the south east and south west; with vacant previously developed land to the north west. The site comprises previously developed land and currently lies vacant.
- 6.24 Peel considers that this 4.16 acre site would make a significant contribution towards the overall employment land supply in the Borough and that this site represents a sustainable location for B2/B8 development. In addition, there are no technical reasons why this site could not be brought forward for employment development within the Plan period.
- 6.25 Peel therefore proposes this site for allocation for B2/B8 employment use.

Land to the south of the Manchester Ship Canal and west of Barton Bridge, Davyhulme

6.26 Peel previously proposed that this site be allocated for employment use in the Allocations DPD.

6.27 The following site boundary was proposed:



6.28 In its consideration of Peel's previous representation, the Council acknowledged that whilst the site had planning permission for a renewable energy plant. However as that decision was at that time subject to an application for judicial review it would be premature to allocate the site for the proposed use.

6.29 Since the Council's original assessment of the proposed allocation and publication of the current Land Allocation consultation document, the Council's application for judicial review of the decision has been dismissed by the High Court and the permission therefore stands. As such, the Council's sole reason for not taking the proposed allocation of this site forward has been removed.

6.30 Peel therefore requests that this site be allocated for renewable energy generation. Specific reference should be made to the extant planning permission for the Barton Renewable Energy Plant: a 20MW biomass-fired power station on land owned by Peel adjacent to the Manchester Ship Canal. The power plant would be designed to have an operational life of at least 25 years and would provide renewable energy for up to 37,000 homes – equivalent to more than one-third of the homes in Trafford.

6.31 The plant would utilise the latest technology and would be fuelled primarily by recycled wood, virgin timber, energy crops, and agricultural residues. It is proposed that a small element of solid recovered fuel is also utilised to maintain fuel flexibility. The biomass element of the fuel would exceed 90%. About 200,000 tonnes of biomass would be consumed annually.

6.32 The proposed project would make a key contribution to the delivery of sustainable energy infrastructure in Trafford and should be included in the allocations plan.

7. Development Management Policies

- 7.1 This section provides comments of the Council's draft development management policies contained within the consultation Land Allocations DPD.

Housing

Policy HO1

- 7.2 The table below provides details comments on the draft policy:

Paragraph	Comment
7.7 & 7.8	It should be made clear that the density assumptions are indicative only. Sufficient flexibility should be allowed to reflect the different scale and types of development proposed across the different market areas.

Transport

Policy TR4

- 7.3 The table below provides details comments on the draft policy:

Paragraph	Comment
10.58	Peel supports the inclusion of this policy as it is important that the freight transport network within Trafford is protected from development which would prejudice the integrity and operation of the network. In addition, Peel also fully supports the promotion and development of inland waterways and associated freight transport infrastructure.
10.60	Peel support specific reference to the promotion and protection of the Manchester Ship Canal as a sustainable transport route.
Omission	Peel suggest that specific reference should also be made to the Bridgewater Canal; making it clear that the use of this freight transport route will be supported and that this route will be protected from development which could impact upon the operation of this route (as per the Manchester Ship Canal - 10.60).
Omission (Proposals Map)	Peel considers that in order to reinforce the protection of both the Manchester Ship Canal and Bridgewater Canal, these transport routes should be identified on the Land Allocations Proposals Map. This would provide a more stringent backdrop to preventing development proposals that may prejudice the integrity of the Ship Canal

Employment

Policy EM3

- 7.4 Peel supports the allocation of the Cornbrook site for employment purposes in line with the draft Masterplan and Framework for the larger Cornbrook Triangle site. However

Peel considers that this site should be identified as an Strategic Site within the Pomona Island Strategic Location and that this allocation should therefore be moved to a new policy POM3 in that part of the Local Plan.

Paragraph	Comment
13.25	Subject to the above comments Peel supports a policy for this sites which sets out that the Council will permit the development of offices (Use Class B1) and small-scale ancillary commercial/community uses (Use Classes A1, A2, A3, D1 and D2) within Local Employment Areas as defined on the proposals map.
13.26 bullet (i)	Peel consider that the requirement to demonstrate that office buildings are “proving difficult to let” when considering applications for the change of use or redevelopment of redundant office buildings, lacks clarity. Peel suggests that this policy should be reworded to provide clarity and certainty to developers.

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