

21517/A3/MH

17th March 2014

**TRAFFORD COUNCIL: LAND ALLOCATIONS – CONSULTATION DRAFT (JANUARY 2014)
REPRESENTATION ON BEHALF OF MALONEVIEW (SALE) LTD**

Introduction & Background

1. We act on behalf of Maloneview (Sale) Limited (“Maloneview”) and have been instructed to submit the following representation in response to the Land Allocations Consultation Draft (January 2014). This representation relates specifically to Policy SAL1 – Sale Town Centre Action Areas and The Square Shopping Centre (SAL1.1) (“The Square”).
2. You will be aware that Maloneview is the freehold owner and manager of The Square. Maloneview is also currently formulating a proposed extension and enhancement of The Square Shopping Centre in Sale Town Centre. This is an important opportunity to enhance the physical environment of The Square, provide significant qualitative improvements in retail offer and enhance the vitality and viability of the wider Town Centre.

Representation

3. Maloneview support the objectives of Policy SAL1.1 as this establishes an up-to-date and positive policy framework for the area in accordance with the NPPF and PPG.
4. Maloneview also support the identification of land adjacent to The Square which will be potentially required to accommodate the scheme. This land is in part under Maloneview’s control together with Trafford Council and Trafford Housing Trust and so can be delivered within a reasonable time period in accordance with the NPPF and PPG. The allocation is also consistent with the Trafford Core Strategy (Policies W2 and W2.4) and is therefore justified.
5. In accordance with the NPPF, it is however essential that the Policy is deliverable and there is sufficient flexibility in its wording to ensure delivery over the Plan period. On this basis, we consider that there is scope to introduce greater flexibility in the policy wording to cover the following:
 - Potential Uses;
 - Provision of comparison retail floorspace;
 - Provision of a Hotel;
 - Quantum of Residential Units; and
 - Future of Acre House.
6. The reasons for this are outlined overleaf.

Potential Uses

7. As presently drafted, the policy implies that the listed uses are those which should be definitely provided and there is no potential to introduce wider uses. We do not believe this is what is intended.
8. Given the importance of The Square to the future viability of the Town Centre, it is essential that any policy framework for its growth is designed with flexibility to encourage a wide range of uses. This will ensure that any scheme which proceeds (based on the commercial demand at that time) is acceptable in policy terms. Given the wide range of uses which are acceptable in a Town Centre location such as this (under the terms of the NPPF and Core Strategy), the policy should be consequently designed with sufficient flexibility. This will also ensure the policy allocation can respond to relevant market signals in accordance with the PPG.
9. Against this background, we recommend introducing reference to a wider range of uses and making a slight amendment to the policy to ensure that the uses listed are not definitive requirements. This can be achieved by introducing '*could include*' into the introductory section of the policy. This will continue to provide the necessary support for the key uses (such as convenience retail) whilst still allowing Maloneview the opportunity to consider other uses as part of its scheme. We refer to other potential uses below.

Provision of Comparison Retail Floorspace

10. The Trafford Retail Study identifies capacity for 3,500 sq.m of comparison goods floorspace growth in Sale Town Centre by 2021. This is reflected in Core Strategy Policy W2.5 which identifies Sale as a location for new retail floorspace (not restricted to comparison or convenience) to consolidate and improve the Town Centre. To plan positively for growth in the Town Centre in line with the NPPF, it is essential that potential growth locations are not restricted to certain retail categories.
11. The Square is identified as a location for convenience goods growth. The Square also represents an appropriate location to accommodate a proportion of the identified comparison goods growth given its Town Centre location and the potential for it to expand onto adjoining land to provide new and additional floorspace. This could be achieved by the provision of comparison goods floorspace within, for example, an anchor Retail Store and extended / reconfigured retail units.
12. Against this background, it is entirely appropriate to include reference in Policy SAL1.1 to the provision of comparison goods floorspace to avoid restricting any scheme to new convenience floorspace only.

Provision of a Hotel

13. Maloneview is reviewing a range of potential options for the scheme, one of which includes the potential provision of a Hotel. This could be a new build hotel or conversion of accommodation within the site such as Acre House.
14. The provision of a Hotel within the scheme (subject to occupier demand) would offer a

qualitative enhancement for The Square by providing a new and alternative footfall generator. It would then offer a wider benefit to the Town Centre by providing a use which can attract and retain visitors to the area encouraging them to use immediate businesses and services during their stay. As a Hotel is a Town Centre use under the terms of the NPPF, it is entirely appropriate to plan for its position within the scheme. Policy SAL1.1 should be widened accordingly.

Quantum of Residential Units

15. Maloneview supports the principle of providing additional residential units within any scheme. This will offer significant benefits for The Square and the wider Town Centre as increasing the local population will lead to greater footfall, enhanced natural surveillance and support local business and services.
16. We note the policy includes a provision for 70 units. It is unclear where this specific quantum has been identified. Indeed the Core Strategy (Policy W2.5) sets a target for 100 units. There is no evidence to suggest that The Square should provide the majority of this target. In order to provide sufficient flexibility for a future scheme, we recommended this target is instead removed. This will then allow Maloneview to deliver a quantum of residential that can suit local housing market requirements without being bound to a figure that is otherwise potentially unachievable.
17. Against this background, the reference to 70 units should be removed.

Future of Acre House

18. We note that supporting paragraph 15.8 assumes that the Six Acre office block (also known as Acre House) will be demolished.
19. Maloneview is yet to make a decision on the future of Acre House as part of the scheme. There are two options available: 1. Demolition to allow for reconfigured retail units; or 2. Retention and a change of use to a Hotel, Residential and / or Offices with remodelling on the ground level to accommodate reconfigured / extended units and the anchor store. The latter option could then potentially include external improvements to the building's elevations to enhance its appearance whilst providing valuable capacity to introduce new uses into the Town Centre.
20. In the absence of any specific evidence supporting the building's demolition and given the status of Maloneview's scheme, we recommended the reference to Acre House's demolition is removed. This will ensure that Maloneview has sufficient flexibility and there is no policy requirement for its removal which is otherwise unjustified.

Recommended Policy Changes

21. Against this background, we recommend the following amendments to Policy SAL1.1 (new text in **bold** and deleted text ~~struck through~~):

As defined on the Policies Map Inset, the Council will support the redevelopment of Sale

*Square Shopping Centre site, together with adjacent buildings ~~to provide~~ **which could include:***

- *New convenience retail floorspace,*
- ***New comparison retail floorspace,***
- *Commercial office accommodation,*
- ***Hotel,***
- *Community and leisure facilities, and*
- *Residential accommodation (~~70 Units~~).*

22. Consequential changes then need to be made to paragraph 15.8:

*The Square Shopping Centre is recognised as being central to the economic health of Sale Town Centre. Its redevelopment will incorporate the provision of new convenience **and comparison** retail floorspace; the remodelling of retail units; the redevelopment **or reconfiguration / enhancement** of the Six Acre office block; ~~approximately 70~~ new residential units and improvements to the public realm. It will not only secure much needed redevelopment of this part of the town centre, but it will enhance the vitality and viability of the town centre as a whole.*

23. We look forward to receiving acknowledgement of this representation marked for the attention of Mark Harris / Emma Lisa-Shiells (mark.harris@bartonwillmore.co.uk / emma-lisa.shiells@bartonwillmore.co.uk). We would also be grateful if you could continue to keep us notified of the Plan's progress.