



Trafford Council

Civic Quarter AAP
Viability Consultation Response

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TRAFFORD
COUNCIL

Inspiring Built
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1. Introduction

Continuum have been instructed on behalf of Trafford Council to undertake an area wide viability assessment to inform the Civic Quarter Area Action Plan (CQ AAP). The purpose of the study was to determine the appropriate level of affordable housing and infrastructure contributions to ensure that the plan is deliverable but also mitigates the impact of development on physical and social infrastructure, whilst meeting the housing needs of the Borough. Continuum produced a detailed area wide viability assessment of the Civic Quarter area in January 2021 that tested the ability of the proposed development, following the FCB Studios Masterplan, to be able to viably accommodate the policies of the Civic Quarter AAP and to fix developer contributions (as set out in Policy CQ11) at an appropriate level.

The CQ AAP once adopted will be part of the statutory development plan for Trafford Council, sitting alongside the adopted Core Strategy (2012) and saved policies of the Unitary Development Plan (2006). Trafford Council are in the process of preparing a new Local Plan which will replace the existing development plan documents when adopted. However this is at a less advanced stage than the Civic Quarter AAP, having been through Regulation 18 consultation in February / March 2021.

At a sub-regional level, the “Places for Everyone” Joint Development Plan Document was published for consultation (Regulation 19) in August 2021. This document will set the overarching policies for 9 Greater Manchester Local Authorities including Trafford.

This report is twofold:

- Firstly, outlining the consultation events undertaken by Continuum on the CQ AAP with stakeholders to date; and
- Responding to consultation comments provided by stakeholders during the second consultation event on viability inputs undertaken on 12th July 2021.

This report should be read in conjunction with and alongside the Schedule of Trafford Council’s responses to the main issues raised at Regulation 19 stage.

1.1. Initial Consultation Event – September 2020

As part of the area wide viability assessment, Continuum undertook an initial consultation event with stakeholders, as required by the PPG on Viability (2019). This consultation took place on 15th September 2020 and allowed landowners, developers and infrastructure and affordable housing providers to engage in the plan making process.

The initial consultation event focused on the proposed methodology that Continuum have used in the area wide viability assessment and referred to the high-level assumptions that have been made in the appraisals. Provision was also made for stakeholders to provide data on costs and values to add further accuracy to the viability appraisals. The purpose of this was to remove/reduce the requirement for further viability assessments at the decision-making stage, following the provisions of the PPG (2019). During the initial consultation Continuum did not receive any “input data” from stakeholders but there were some comments on methodology. Following the consultation event and reflection upon the responses received, Continuum retained the same proposed methodology that was supported by the majority of consultees.

1.2. Second Consultation Event – July 2021

After the completion of the area wide viability assessment in January 2021, Trafford Council published the consultation draft of the CQ AAP (regulation 19) in January 2021. Views were sought on the CQ AAP over a six-week period closing in March 2021.

In response to representations received (see Council's Schedule of Responses for full list) Continuum retained their proposed methodology as it was considered to be compliant with the PPG on viability (2019). However, it was deemed appropriate to carry out a further consultation event to seek specific 'input data' from stakeholders, to cross check that assumptions made on inputs accorded with real world data from stakeholders.

Trafford Council and Continuum invited stakeholders to attend a second viability consultation event on 12th July 2021. As part of this consultation event, Continuum provided a further opportunity for stakeholders to respond to requests for information on viability inputs. A viability input excel spreadsheet was sent to stakeholders to complete.

The second consultation event was attended by 4 stakeholders:

- Adam Johnson (Highways England);
- Mark Aylward (Aylward Planning);
- Matthew Hard (WSP); and
- Stephen Miles (Cushman & Wakefield).

During the consultation event Continuum presented the inputs and methodology used in the CQ AAP area wide viability assessment and invited the stakeholders to provide their opinion on inputs.

Overall, the stakeholders who attended the consultation event supported the methodology and inputs used in the CQ AAP area wide viability assessment. Continuum did not receive any completed viability input spreadsheets from stakeholders but did receive two responses as follows:

- Matthew Hard (WSP on behalf of Forum 1 Ltd); and
- Mark Aylward (Aylward Planning on behalf of the Derwent Group).

The next section of this report outlines the responses and provides Continuum's answers to the points raised.

2. Responses from Stakeholders

2.1. Matthew Hard (WSP on Behalf of Forum 1 Ltd)

An email response from Matthew Hard following the consultation event was received on 15th July 2021. WSP are the planning agent acting on behalf of Forum 1 Ltd who are pursuing the planning application (100400/OUT/20) pursuant to the Former B&Q site in the Civic Quarter Area. Matthew Hand states:

“However as the work that has been done to date by continuum has taken account of the FVA submitted with the planning application associated with the proposed redevelopment of the former B&Q, we have nothing further to provide.”

Continuum welcome Matthew Hard’s/WSP’s response that they are content with the inputs and methodology used in the CQ AAP area wide viability assessment.

2.2. Mark Aylward (Aylward Planning on behalf of the Derwent Group)

A detailed letter response from Aylward Planning following the consultation event was received on 26th July 2021. Aylward Planning are a planning consultant acting on behalf of the Derwent Group who have numerous land interests in the Civic Quarter area. These land interests comprise of the following:

- 39 Talbot Road;
- 17-19 Talbot Road (tyre depot);
- 601 Chester Rd (Bingo 3000 site); and
- White City Retail Park.

Aylward Planning state that the purpose of their response:

“is to highlight some specific instances where there are abnormal costs that require consideration, as well as some more generic matters which will require further analysis given other changes in the policy arena (local and national) which will impact upon a robust viability analysis by the point in time where the future AAP is under Examination.” (pg. 1).

Continuum’s response will deal with each of the headlines in Aylward Planning’s letter.

2.2.1. Generic Considerations

Aylward Planning highlight some general planning considerations. They state that they envisage that future planning applications would have regard to both the AAP and emerging Local Plan.

Aylward Planning argue that there:

“are a number of additional obligations that will fall upon development proposals by way of the Local Plan and the national policy agenda which have not been incorporated into the viability analysis that underpins the AAP. This therefore places some doubt in terms of the realism of the ‘roof tax’ that is proposed to be levied or indeed aspirations in terms of affordable housing provision in the AAP area.” (pg. 2).

Aylward Planning believe that these additional obligations will have an adverse impact upon scheme viability, but they are not in a position to precisely quantify the cost implications. Overall, they think it is important to highlight these issues, so Continuum and the Council have an opportunity to consider them prior to Examination.

The generic issues that Aylward Planning highlight from the emerging Trafford Local Plan (regulation 18) that they argue do not align with the CQ AAP area wide viability assessment are as follows:

- Development mix (Policy HN1);
- Inclusive Places (Policies IP1 and IP4);
- Affordable Housing (Policy HO2 and Policy HN2);
- Self-Build (Policy HN5);
- Sustainable Travel (Policies ST3 and ST6); and
- Open Space (Policies OS1, OS2 and OS3).

The Civic Quarter AAP is at a more advanced stage than the emerging Trafford Local Plan. The Local Plan has not yet been subject to viability testing. It is for the viability assessment for the Local Plan to ensure that the proposed Civic Quarter obligations do not make the Local Plan unviable.

Development Mix (Policy HN1)

Aylward Planning state that Policy HN1 of the emerging Local Plan:

“sets out requirements in terms of type and tenure that are simply inapplicable to apartment development which will underpin delivery in the Civic Quarter in the context of the stated aspiration for most of these units to provide at least 3 bedrooms” (pg. 2).

Aylward Planning argue that most apartment accommodation that will be developed in the Civic Quarter area will be 1 and 2 beds and that placing a notional requirement for 50% of units to have 3 bedrooms will prejudice delivery.

Aylward Planning state that this creates conflict between the emerging CQ AAP and emerging Local Plan. They conclude:

“the aspiration set by the Local Plan policy needs to be adjusted, but otherwise there will be a requirement to adjust the scheme proposed by the AAP and its Viability Assessment to reflect this mix dominated by larger family apartments which do not appear to reflect market requirements.” (pg. 2).

Continuum have not been involved in the preparation emerging Local Plan and no area wide viability assessment has been undertaken in respect of the emerging Local Plan.

In the viability assessment undertaken by Continuum pursuant to the CQ AAP, the proposed percentage of 3 bedroom properties is 13% of the overall mix. This was based on a masterplan exercise undertaken by FCB Studios. This assumption reflects current apartment blocks being delivered in the Civic Quarter area and wider Trafford market. The 50% requirement in the Local Plan is a Borough wide target rather than one to be delivered on a site by site basis. It is expected that much of the development in the emerging Carrington and Timperley PFE allocations will be housing rather than apartment led.

Inclusive Places (Policies IP1 and IP4)

Aylward Planning state:

“The comment re Policy IP1 is hopefully straightforward and just a typographical error insofar that the target date for carbon neutrality should be 2038. Clearly if that obligation is front-loaded then this will have viability implications which need to be resolved line-by-line.”

Aylward Planning highlights issues they have with policy IP4 (especially IP4.7 to 10) in the emerging Local Plan and that the viability implications need to be appraised for both the Local Plan and CQ AAP. Policy IP4 relates to education and skills. Policy IP4.7 states:

“The cumulative impact of residential developments of less than 50 units, and the pressure they place on education provision in Trafford, will be considered through the development management process and where necessary financial contributions may be required to mitigate these impacts.”

The CQ AAP “roof tax” S106 contribution for residential development includes education S106 contributions. The cost of Policy IP4.7 has been tested in the CQ AAP through the “roof tax” assessment. The education contribution for all of the residential units was estimated based on the Department of Education rate per pupil formula.

Policy IP4.8 to 10 relates to skills and how development proposals will include provision to help improve skills and offer training to local residents. The above policies are already undertaken by many developers in Trafford and the cost related to IP4.8 to 10 are small and should be accounted for in company overheads and professional fees.

Affordable Housing (Policy HO2 and HN2)

Aylward Planning state that Policies HO2 and HN2 set out an ambition to achieve 40% affordable housing boroughwide, with a mechanism to consider viability on a case-by-case basis.

They go on to argue that this conflicts with the CQ AAP viability assessment which suggest a 25% affordable housing provisions. Aylward Planning also argue that 25% affordable housing appears to be optimistic given the appraisal inputs used which they state include both sale values that represent a mature market and suppressed development costs.

Aylward Planning have not provided any evidence to support this statement, although they were invited to provide their own inputs data. The sales values used in the CQ AAP viability assessment were based on the most up to date new build market comparables in the Old Trafford area as well as Continuum’s extensive knowledge of the Trafford market. The sale values assumed are lower than the best new build comparable which is No. 1 Old Trafford. The development costs have been based on cost plans provided by developers during site specific viability negotiations and the BCIS cost database. The cost base has been robustly justified and Aylward Planning have not provided any alternative cost inputs. The 25% affordable housing set through the CQ AAP viability assessment is not optimistic, includes viability buffers and has been tested through sensitivity analysis.

Aylward Planning conclude:

“Rather than “baking in” the need for viability assessments for all apartment development across the borough, it would be much more effective to simply identify a target figure that was actually achievable based upon the evidence. We think that ultimately this will be the key outcome from discussion on the viability evidence that underpins the AAP at a future Examination. Derwent reserves the right to provide specialist evidence at the Examination if that is necessary to do so.” (pg. 3).

The CQ AAP viability assessment tested the amount of affordable housing residential developments in the Civic Quarter area could viably accommodate. The methodology adopted follows the requirements of the PPG on Viability (2019) and the evidence base is robust and reflective of local market conditions. The viability evidence is clear that developments can viably support 25% affordable housing while a sufficient viability buffer is maintained.

The emerging Local Plan affordable housing policy is currently based on a needs assessment and no Local Plan viability assessment has been undertaken. The emerging Local Plan is clear that:

“An economic viability assessment will be prepared for the next stage of the Local Plan process to confirm the extent to which market-led development can support affordable housing delivery and whether the 40% target across Trafford as a whole remains reasonable and proportionate. All parts of this policy will be amended and reviewed in light of this assessment.” (pg. 74 to 75).

Self-Build (Policy HN5)

Aylward Planning state:

“In the context of Policy HN5, it should be self-evident but for absolute clarity we note that it must be the case that requirements for self-build cannot apply to apartment development given the nature of the housing product. We suggest that the policy be reworded to highlight that it does not apply to apartment development.” (pg.3).

This comment is about policies in the emerging Local Plan which are out of the scope of this document.

Sustainable Travel (Policies ST3 and ST6)

Aylward Planning highlight issues they have with Policy ST3, especially ST3.13 which supports a new rail station at White City. This comment relates to policies in the emerging Local Plan which are outside the scope of this document.

Aylward Planning also provide the following comment upon Policy ST6, stating:

“there is an opaque support for electric vehicle charging points that is not quantified. If this were to later translate into a quantitative requirement for development management proposals this will have viability implications and this will need to form part of a robust “policy on” assessment to ensure that it would not impact on the delivery of viable development in the District across the Plan period.” (pg. 3).

The cost of electric vehicle charging points is circa £250 to £350 per unit. The masterplan produced and emerging policies for the CQ AAP look to minimise the usage of cars and thus the requirement for charging points. The masterplan did also include a multi storey car park (MSCP) which would provide parking spaces to residential blocks. The cost of the MSCP includes an allowance to account for electric vehicle charging points. Electric vehicle charging points are seen as an abnormal costs/ site-specific infrastructure cost by most developers and this cost should be reflected in the Benchmark Land Value (BLV). Overall, due to the relatively low cost of the electric vehicle charging points and the viability buffer produced in the viability assessment, Continuum are confident that the developments can support the cost of electric vehicle charging points. The Council is already seeking EVC in developments coming forward through planning applications with no apparent impact on viability.

Open Space (Policies OS1, OS2 and OS3).

Aylward Planning comment upon open space policies in the emerging Local Plan and argue that it is unclear how they can be applied on a plot-by-plot basis within the CQ AAP.

Aylward then argue:

“It may be the case that the AAP needs to clarify that open space requirements are met on a strategic basis and that this in essence forms a component of “infrastructure”. We would envisage that in the prism of the Civic Quarter AAP that any such obligation or ambition is being addressed at the AAP level and that suitable provision is provided either on-site or off-site and that the viability work needs to consider the implications of both scenarios for any applicable “roof tax” projections.”

Continuum would highlight that the CQ AAP “roof tax” S106 includes a contribution towards public open space based on Trafford Council’s current SPDs.

As discussed, regarding other comments made in relation to the emerging Local Plan this is outside the scope of this document.

2.2.2. National Planning Policy Considerations

The Government has recently introduced changes to the planning system which include new concepts such as First Homes and Biodiversity Net Gain. Aylward Planning do explain that these changes had not been implemented at the point where Continuum completed its viability assessment in January 2021.

As the aforementioned changes had not been made when Continuum undertook the CQ AAP viability assessment the new national policy was not tested. This was why Continuum included viability buffers in their assessment and undertook sensitivity analysis looking at cost increases over time to help mitigate against future national policy costs.

First Homes

Aylward Planning state:

“Initial evidence from other local planning authorities is that the implementation of First Homes will require detailed consideration by the marketplace and the viability implications on deliverability needs to be properly considered. We would encourage Continuum to consider the extent to which First Homes can be delivered here and any likely viability implications arising both in terms of scheme finances and to ensure yield to achieve the anticipated Local Plan trajectory.”

National policies on First Homes were adopted in May 2021 through a PPG. The PPG (2021) states:

“As set out in the First Homes Written Ministerial Statement of 24 May 2021, local plans and neighbourhood plans that have reached advanced stages of preparation will benefit from transitional arrangements. Local plans and neighbourhood plans submitted for examination before 28 June 2021, or that have reached publication stage** by 28 June 2021 and subsequently submitted for examination* by 28 December 2021, will not be required to reflect the First Homes policy requirement.”*

The CQ AAP will therefore benefit from the transitional arrangement.

Biodiversity Net Gain

Aylward Planning state:

“With regard to Biodiversity Net Gain (BNG), it is important to note that this AAP is promoting strategically significant new residential-led development in what is a highly urbanised plot that will demand an efficient higher density approach. If the BNG approach is to be adopted then it would appear inevitable that there should be an initial recognition that the base biodiversity position is likely to be low but also that any substantive net gain is unlikely to be met on-site on a plot-by-plot basis within the AAP area.

It may be the case that the AAP needs to clarify that BNG requirements are met on a strategic basis and that this in essence forms a component of “infrastructure”. We would envisage that in the prism of the Civic Quarter AAP that any ambition for Biodiversity Net Gain is addressed at the AAP level and it would be helpful if it explicitly recognised that the majority of any suitable provision is most likely to be provided outside the

AAP area. The cost implications of this are not known, but if BNG is to be adopted then the viability work will need to consider the implications for any applicable “roof tax” projections.” (pg. 4).

It is Continuum’s understanding that mandatory biodiversity net gain (BNG) as set out in the Environment Bill will only apply in England when the Town & Country Planning Act (TCPA) (1990) is amended which is anticipated to be 2023. Due to this, BNG has not been assessed by Continuum. However, Continuum have applied sensitivity analysis and viability buffer to mitigate against future costs that may arise.

2.2.3. CQ AAP Considerations

Aylward Planning state:

“The Viability Statement which underpins the AAP takes on a generic approach and does not necessarily have consideration of issues which would have differential viability impacts on a site-by-site basis.”

The PPG on Viability (2019) states that a typology approach should be followed when undertaking the plan making process to ensure that policies are created that are deliverable based on the sites that will come forward through the life of the plan. Continuum’s viability assessment was undertaken based on assessing the viability of a masterplan produced by FCB Studios which included typologies that would be delivered in the Civic Quarter area.

It is considered that the PPG (2019) (paragraph 12) places the obligation with promoters of the individual sites within the Civic Quarter Area to identify at the plan making stage where there are potential site-specific issues such as significant potential abnormal costs, poor ground conditions, and high demolition costs. This will serve to add a further degree of precision to the viability appraisals to be undertaken to inform the CQ AAP, reducing the potential for inaccuracy when making assumptions. To date, no site-specific information (apart from Aylward Planning on the White City Site and 39 Talbot Road) has been provided to inform the viability assessment, even though this data was requested during both consultation events.

Car Parking Requirements, Phasing and Multi Storey Car Parks (MSCP)

Aylward Planning explain that CQ AAP Policy CQ10 sets out an ambition to reduce the extent of surface parking across the CQ AAP and that parking should be focused on key nodes which would be predicated on MSCPs.

To summarise, Aylward Planning on behalf of the Derwent Group explain that the MSCP that would be required at the White City site. They also highlight the need for early delivery of the MSCP which could have an effect on viability. They also point out that this is delivering infrastructure for the CQ AAP area through an MSCP which will be used by other residential developments. This is an example of promoters of individual sites within the Civic Quarter Area identifying at the plan making stage where there are potential site-specific issues, as required by the PPG (para. 12) (2019). It is also an example of a particular circumstance that justifies the need for a viability assessment at the application stage. The effects of the MSCP, its early delivery and that it is infrastructure being used by the wider CQ AAP area will be taken into consideration at the decision-making stage and could potentially reduce the S106 “roof tax” as the site is delivering on site strategic infrastructure. This matter will however be dealt with during the decision-making stage, but Trafford Council and Continuum will make note of this point.

Benchmark Land Values (BLVs)

Aylward Planning state that consideration of various sites within the Civic Quarter AAP area do highlight that the existing valuations of the land parcels show marked disparity and this needs to be recognised. They give an example of White City Retail Park against a cleared site that has no income. They argue that:

“It cannot be reasonable to assume that the “EUV plus” assessment for a successful and well-let retail park will be the same as other parcels within the AAP area.” (pg. 6).

Aylward Planning argue that:

“The first preference here is that the Viability Assessment should seek to review development costs on a site-by-site basis to understand whether the assessment of “EUV plus” or any abnormal costs warrant a move away from the generic typical inputs because this would ensure that the need for viability assessment is not unnecessarily “baked in” to the policy. Failing that, the policy should ideally be rewritten to ensure that it allows for viability testing and would not prevent otherwise acceptable and positive development from being implemented.” (pg. 6).

The Existing Use Value (EUV) was assessed based on a typology assessment which is supported by the PPG (2019). It was assumed in the viability assessment that the EUV of the land, irrespective of the buildings on the site, will be less than the value of land should planning permission be granted for change of use. The reason for this core principle is that should sites come forward where the existing use is greater than the value established through change of use then the development by its nature will be unviable.

Those sites with existing buildings will normally have the highest EUV, as value is not only being attributed to the land on which the buildings sit, but also the buildings themselves. The higher the EUV the greater the potential viability challenge. Those opportunities with high EUV's due to the presence of economically viable buildings on site (such as White City), may need to be considered for years 6- 15 of the Plan, or beyond the plan period, when buildings on site have become economically unviable, so as to meet the 3 criteria of availability, suitability and likely economic viability set out in para 68 of the NPPF (2021). In the case of White City, a developer would not purchase and redevelop a retail park which is well-let and successful into residential use, nor is it likely that the Local Authority would allow the loss of a successful commercial use to residential.

It is recognised that there are sites in the AAP which would have high EUVs and if they came forward now would fall outside of the methodology in the Continuum viability appraisal and would require site specific viability appraisal. However, it is not anticipated that these sites will come forward immediately, and the capacity of the AAP area (4000 units) against the number of units expected to come forward in plan period (c. 2500 units) is such that the sites the Council is relying on to meet the housing need are of the usual typology.

Overall, Continuum believe Aylward Planning comments do not warrant a change to their methodology on BLV which is PPG (2019) and NPPF (2021) compliant.

Abnormal Costs

Aylward Planning have identified some site-specific abnormal costs that their Client, Derwent Group, may incur on sites within the Civic Quarter area. This is an example of promoters of individual sites identifying, at the plan making stage, where there are potential site-specific issues, as is recommended by the PPG (para. 12) (2019).

Examples of site-specific abnormal costs provided by Aylward Planning include:

- White City – early delivery of MSCP (as previously discussed); and
- 39 Talbot Road – legacy railway tunnel impact upon development costs.

The site-specific abnormal costs identified will be taken into consideration at the decision-making stage as costs are unknown, but Trafford Council and Continuum will make note of these two points.

Services for Local Residents

Aylward Planning state:

“The AAP suggests that any future retail use would simply meet localised needs falling within the F2 Use Class. Taking that at face value, a redeveloped White City Retail Park was redeveloped would not even allow a store akin to a Tesco Express.

Such a limited retail offer would simply fail to meet the shopping needs of new residents in the AAP area (circa 4000 new homes) and push residents towards car-borne choices further afield. Rather than the unintended consequence which would be pressure for further out-of-centre retail development to replace the existing stores (such as Simply Food and Aldi) that is also dependent upon a risk profile (having to assume occupier interest, developer intent and planning approval) this policy intent needs to be fundamentally reconsidered. It may in practice be preferable to retain an offer that can genuinely meet shopping needs, but this will inevitably impact upon residential yield and that will have viability implications that will need to be considered.”

The White City Retail Park allocation in the UDP is not being superseded, so for the life of the retail park it will be subject to this policy. The AAP shows how the retail park *might* come forward if it were redeveloped for residential, but the Council is not relying on this site to meet its housing need during the plan period. Aylward Planning Summary

Aylward planning conclude:

“Derwent is supportive in principle of the proposed redevelopment within the AAP area including White City Retail Park. We have set out that in the context of White City Retail Park that Derwent supports the ambition but is clear that any full redevelopment decision requires considerable market testing and that there is potential that such redevelopment would need to be phased. This will need to ensure that the retained retail uses can be effectively serviced and accessed by customers. This is absolutely crucial to our support of these proposals.

We have also flagged concerns in respect of potential MSCP solutions from a viability perspective. In addition, we have highlighted that the Local Plan and national policy are introducing new ambitions that will have viability implications that need to be tested to deliver a credible “policy on” assessment of the implications upon deliverability of new homes in the AAP area. We have also highlighted an unintended consequence of identifying a restriction to “small scale” F2 shopping facilities which will not meet shopping needs and create pressure for larger format uses and reliance on the private car.” (pg. 7).

Continuum welcome that Derwent Group and Aylward Planning are supportive in principle of the approach taken to the CQ AAP including the area wide viability assessment. It is Continuum’s opinion that the response by Derwent Group and Aylward Planning does not have an effect on the CQ APP viability assessment, its methodology, inputs or conclusion.

The site-specific issues outlined regarding White City and 39 Talbot Road have been noted by Trafford Council and Continuum and will be dealt with at the decision-making stage, as required by the PPG (2019).

In terms of the emerging national planning ambitions, namely BNG and First Homes, these directives were not published when the CQ AAP viability assessment was undertaken, that said, a viability buffer and sensitivity analysis was included within the CQ AAP viability assessment which has allowed for potential cost increases to be accounted for.

3. Conclusion

This report first sets out the two consultation events that have been undertaken in regard of the financial viability assessments prepared to support the CQ AAP. The consultation events sought comment and the provision of site specific information from stakeholders with the ultimate aim of ensuring the viability assessment undertaken did not compromise sustainable development and ensured all policies are realistic and would not undermine the deliverability of the CQ AAP.

Following the second consultation event, Continuum invited commentary on specific viability inputs and received 2 no. responses. Both are set out in detail in this report. The response from Matthew Hard of WSP was brief and noted that as the Continuum assessment took into account the viability assessment submitted in support of the planning application at the Former B&Q (ref: 100400/OUT/20) that no further information would be forthcoming from WSP on behalf of Forum 1 Ltd. The second response from Aylward Planning provided substantial detail over three broad topics areas; Generic Planning Considerations, National Planning Considerations and CQ AAP Specific Considerations. This report provides responses to each of the points raised by Aylward Planning in turn. The overall conclusion made by Continuum is that none of the comments made are considered to substantiate a change in methodology or amendments to the inputs used.

To clarify, though stakeholders were invited to provide detailed site specific and input information, the only comments received by Continuum were provided by Aylward Planning who referenced abnormal costs associated with the following sites:

- White City – early delivery of MSCP; and
- 39 Talbot Road – legacy railway tunnel impact upon development costs.

Continuum do not anticipate any of the sites included with the CQ AAP, (save for the two identified by Aylward Planning that are set out above), to have site specific viability cases submitted in support of their planning applications, this is as a result of stakeholders being provided with sufficient opportunities to identify site specific viability information via the consultation process for the CQ AAP. For clarity, with the exception of Aylward Planning Continuum are not in receipt of any site specific information that would identify a potential future need for development specific viability assessment.

One of the key principles of the PPG on viability (2019) is to promote collaboration between Local Authorities, their advisors, and key stakeholders such as landowners and site promoters. It is considered that the consultation events undertaken by Continuum and Trafford Council have enabled the opportunity for collaboration between parties, which in turn have sought to ensure realistic and deliverable policies are included within the CQ AAP.

Paragraph 7 of the PPG on viability (2019) sets out the “particular circumstances” that allow for assessment of viability at the decision taking stage. It is considered that by following the methodology as set out by Continuum and ensuring sufficient consultation, that the “particular circumstances” for viability assessment have been accounted for, and that as set out in the PPG (2019) the primary function of viability assessment for the CQ AAP has been undertaken at the plan making stage.