

Our ref:
Your ref:

173.

Mrs Lindsay Alder
LDF Manager
810
City Tower
Piccadilly Plaza
Manchester M1 4BE

Rachel Hiorns
Senior Planning Officer
Trafford Council
1st Floor Waterside House
Sale Waterside
SALE
M33 7ZF

Direct Line: 0161 930 5642
Fax: 0161 930 4453

12 April 2010

Dear Rachel

TRAFFORD CORE STRATEGY: FURTHER CONSULTATION RESPONSE

Thank you for the opportunity to undertake a review of Trafford MBC's Core Strategy: Further Consultation on the Vision, Strategic Objectives and Delivery Strategy document, as part of the emerging LDF.

The following comments relate specifically to the revised approach to the proposed strategic locations that are identified in the document, suggesting changes where appropriate to reflect the Agencies' concerns.

Policy SL1 - Pomona Island

The strategic proposal within the policy is for a new mixed-use commercial district which will complement the offers of the city centre and Salford Quays / Media City:uk. It will be a new destination for business and leisure users combining significant commercial and recreational development for communities in the city centre and Old Trafford areas.

Development Requirements

It is identified within the policy that improvements to the local highway network and public transport infrastructure will be required in order for development in this location to be acceptable. The Agency is satisfied that this level of transport intervention is acceptable for the proposed strategic site. The Agency therefore has no further comments regard this Policy.

Policy SL2 - Trafford Wharfside

The strategic proposal within the policy is for a major mixed-use area of regional and

international significance. The focus will be on opportunities for new economic, leisure and residential development.

Development Requirements

It is identified within the policy that a new high-frequency public transport system for the area will be required in order for development in this location to be acceptable. The Agency is happy for the level of involvement in the implementation plans at the moment with further works being identified for the SPD1. When looking towards the future works element of the Allocation Plans the Agency would like to see further ITB measures, such as Travel Planning to be clearly identified.

In addition, the Agency welcomes the aspiration for the 'provision of a new high-frequency public transport system for the area' within the policy, and the need to ensure a high-frequency public transport system for the area should be operational in order to influence the modal choices of people working, living or visiting the development at Trafford Wharfside'.

Policy SL3 - Lancashire County Cricket Club Quarter

The strategic proposal within the policy is for a major mixed-use development which will provide a high quality experience for visitors balanced with a new, high quality residential neighbourhood centred around an improved stadium at Lancashire County Cricket Club.

Implementation

It is not felt that the development proposals at this location will impact at the SRN. The Agency has no further comments to make with regard this policy.

Policy SL4 - Trafford Centre Rectangle

The strategic proposal within the policy is for a major mixed-use development providing a new residential neighbourhood, together with commercial, leisure and community facilities and substantial improvements to the public transport infrastructure.

Development Requirements

It is identified within the policy that significant improvements to public transport infrastructure will be required including 'an integrated, frequent public transit system'. In addition, a contribution towards transport mitigation to off set the impact of traffic generated by the development on the M60 will be required, along with the provision of the Western Gateway Infrastructure Scheme (WGIS). As these have been included within the 'Development Requirements' section of Policy SL4, the Agency are pleased that the transport impacts of the proposed development quantum have been identified

at this stage, and steps are being taken to identify the appropriate infrastructure.

As noted within the justification for the policy, the outcomes of the Greater Manchester Transport Modelling Assessment indicate that issues remain regarding the impact of this development on the SRN. In particular, as a result of the modelling up to 2026, journey times between Junctions 5 and 11 of the M60 were found to increase as a result of the development aspirations emerging within the Trafford LDF.

As such, Policy SL4 should explicitly state the following:

- Transport mitigation measures should be identified to offset the impact, of traffic generated by the development on the M60, in agreement with the Agency and GMPTE, with funding streams identified and obtained, and be operational in advance of the first occupation of the development quantum identified within Policy SL4’;

It is recommended that within the implementation plans the wording is amended from” Improvements to local Highway network and public transport provision” to “Local and strategic networks” to emphasise where HA involvement is necessary.

Policy SL5 - Carrington

The strategic proposal within the policy is for a major mixed-use development providing a new residential community, together with employment, educational, health and recreational facilities. This will be supported by substantial improvements to both public transport and road infrastructure.

Development Requirements

The Agency welcomes the requirement for significant improvements to public transport infrastructure by improving access to Partington, the Regional Centre and Altrincham with links to the Metrolink system. In order to ensure that this is effective however, the development requirements should acknowledge that the anticipated increase in Metrolink patronage over the plan period will have to be accompanied by increased capacity / frequency or viable public transport alternatives in order to ensure that these trips do not become private car trips. As such, Policy SL5 should explicitly state the following:

- ‘A mitigation measures should be identified to offset the impact, of traffic generated by the development on the M60, in agreement with the Agency and GMPTE, with funding streams identified and obtained, and be operational in advance of the first occupation of the development quantum identified within Policy SL5’; and
- It is suggested that the words ‘an integrated and frequent public transport system, serving the proposed developments at Carrington and Partington’ should

Policy L3 Regeneration and Reducing Inequalities

Three priority regeneration areas are identified within Policy L3:

- Old Trafford;
- Partington; and
- Sale West

The Agency welcomes the Council's intention to support appropriate development(s) within these regeneration areas that 'will secure regeneration benefits; creating sustainable communities; and make positive contributions to achieving the Plan's strategic objectives and relevant place objectives'.

General Comments

The need for public transport improvements and mitigation measures at the local and strategic road networks to support development at the Strategic Locations has been recognised within the policies and the need for a further joint study is recognised in the overview of the strategic objectives.

However, the overall development quantum has been shown in the Trafford LDF Modelling Report to have a number of impacts at the SRN, specifically increasing journey times in both directions between Junctions 5 and 11 of the M60. As such, it is the Agency's responsibility to guide the emerging Core Strategy to come forward sustainably, whilst minimising any impact at the SRN. Where there is likely to be an impact at the SRN, the Agency has recommended that appropriate and suitable mitigation measures be identified and details of funding, timing and phasing of developments and infrastructure will be a key output of the further study work mentioned above, to ensure nil detriment at the SRN.

In addition, the modelling outputs have shown an increase in CO₂ emissions of 16% between 2011 and 2026 within Trafford as a result of the emerging development aspirations through to 2026. Government policy encourages LDFs to come forward on a carbon neutral basis, and as such, the transport impacts of the proposed development quantum are in direct conflict with policy.

The further study will ensure a cumulative approach to mitigation and infrastructure measures and in addition, this work will examine the level of infrastructure required as a consequence of the emergence of the Strategic Locations, and as such will inform the Land Allocations DPD and Local Infrastructure Plan as they progress.

Given the commitments expressed within the policies to work with the Agency to explore appropriate public transport improvements to mitigate traffic impacts at the SRN

(and local road network), the Agency considers the Core Strategy to be in compliance with the concordat, subject to the minor changes included, however further work will be required to ensure the development sites are brought forward on a sustainable basis.

I hope the following comments are useful, please feel free to contact me if you wish to discuss any of the comments made.

Yours sincerely

Mrs Lindsay Alder
Strategic Planning Team North West
Email: lindsay.alder@highways.gsi.gov.uk

TRAFFORD CORE STRATEGY: FURTHER CONSULTATION ON THE VISION, STRATEGIC OBJECTIVES, AND DELIVERY STRATEGY (MARCH 2010)

REPRESENTATION ON BEHALF OF HOMESTAR INVESTMENTS LIMITED

I write on behalf of Homestar Investments Limited to submit an objection in respect of Policy R4: *Green Belt and Other Protected Open Land*. This submission is made further to those made in June 2009 in relation to the Strategic Housing Land Availability Assessment (SHLAA) Call for Sites.

It is considered that Policy R4 should allow for local detailed boundary changes where it would support development that meets a specific local need. Providing development close to existing urban areas and in areas of need is likely to prove to be the most sustainable way of achieving the Core Strategy's wider objectives and in supporting regeneration.

Regional Spatial Strategy for the North West allows Local Planning Authorities to examine the potential for local detailed boundary changes through their Local Development Frameworks (Policy RDF4).

The Preferred Options draft of the Core Strategy Spatial Strategy (June 2009) recognised that outside of the Regional Centre, Inner Area and a number of other locations, that: "... *new growth will be focused on meeting local needs, particularly for affordable housing ...*" (page 26) and it is noted within the Spatial Profile for the Sale area (including Ashton Upon Mersey) that "*The area is tightly constrained to the north and west by the Green Belt in the form of the Mersey valley and Carrington Moss.*" (page 15).

It is also noted in the Preferred Options consultation (June 2009) that the greater need for affordable housing falls within the Southern Housing Sub-Market (paragraph 7.9).

Allowing for Green Belt review in the Ashton Upon Mersey area for new housing development would help meet the increased housing development targets proposed for *Other South City Region Sites* in Table L1.

We note that the Council is identifying 11,860 units to 2025/26 in Table L1 compared with an RSS and Growth Point requirement of 11,450. This gives little margin for the potential uncertainties in delivery across the Borough over the next 16 years. Allowing Green Belt boundary changes (and allocating the Ashton Upon Mersey site) would give greater robustness to the identified housing land supply and could be justified under paragraph L1.7 of Policy L1 (within the current consultation document).

In order to meet local affordable housing need, it is considered essential that flexibility to amend the Green Belt boundary to allow for the development of new affordable housing is retained within the Core Strategy and other Local Development Framework documents. Development of affordable housing on sites of sufficient size is considered more likely to be successful in the current housing market than piecemeal provision on smaller sites.

19 APR 2010

Doc			
Auth			
By			
App			
Cont			

It is therefore requested that Policy R4 be amended to allow for local detailed Green Belt boundary changes in the Sale area (inc. Ashton Upon Mersey) to allow for the provision of development to meet specific local housing need.

Please also see a related representation previously made in respect of land off St Martin's Road, Ashton Upon Mersey, made in respect of the Trafford Strategic Housing Land Availability Assessment – 2009 Review.

16 April 2009

2. Site Details

In this section please provide details of the site you are putting forward for the Council to consider for residential use. Please provide as much information as possible and include a location plan in order for the Council to clearly identify the site. Please Note: The Council will be unable to accept site suggestions which are not accompanied by a location plan

Site Address:	LAND OFF ST. MARTIN'S ROAD ASHTON WYON MERSEY			
Size of site: (If Known)	6.42 HECTARES			
Please indicate whether the site is:	Greenfield <input checked="" type="checkbox"/>	Brownfield <input type="checkbox"/>	Mixed <input type="checkbox"/>	Unknown <input type="checkbox"/>

What is the current use of the land? (e.g. retail, employment, recreation, vacant)	UNDEVELOPED / HORSE GRAZING
What are the predominant surrounding land uses?	THE SITE LIES ON THE NORTHERN EDGE OF THE BUILT-UP AREA OF ASHTON UPON MERSEY BETWEEN RESIDENTIAL PROPERTIES ALONG ST. MARTIN'S ROAD AND THE A6144 (M).
Please describe the character of the surrounding area	URBAN TO THE SOUTH MAJOR HIGHWAY TO THE NORTH AND WEST. WAR MEMORIAL / ASHTON OLD HALL FARM AND GOLF COURSE TO THE EAST.
Please provide any other information relating to the site	PLEASE SEE PREVIOUS MPSL SUBMISSION (FEB 2008) - AS ATTACHED.

Please provide an estimation of when you think the site would be available for residential development

0-5 years	6-10 years	11-15 years	16 years plus
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide reasons for your answer:

PLEASE SEE PREVIOUS MPSL SUBMISSION (FEB 2008) AND ATTACHED PAPERS.

Have there been any Planning Applications on the site (please give as much detail as possible)	N/A.
---	------

Please provide details of the number of residential units that you consider could be accommodated on the site (please give reasons)	230 UNITS PLUS (THIS WOULD EQUATE TO A GROSS DEVELOPMENT DENSITY OF 35 DWELLINGS PER HECTARE, ENABLING THE PROVISION OF OPEN SPACE AND SITE BUFFERS AS AN INTRINSIC ELEMENT WITHIN THE SCHEME).
Please provide any additional information:	PLEASE SEE PREVIOUS NPSL SUBMISSION (FEB 2008). THE SITE COULD BE DEVELOPED WITH HOUSING TO MEET LOCAL/AFFORDABLE NEED - SEE ALSO ATTACHED PAPERS.

3. Site Constraints

In this section please provide details of any known constraints associated with the site which may impact on the site being brought forward for residential development

	Yes	No	Unknown
Access/ Infrastructure constraints		✓	
Ground conditions		✓	
Flood Risk		✓	
Hazardous Risks		✓	
Pollution or Contamination		✓	
Impact on landscape features (protected trees, planting of amenity value)		✓	
Is the site within a Conservation Area?		✓	
Impact on Listed Buildings (other buildings with historic or local importance)		✓	
Topographical constraints		✓	
Negative impacts on prospective residents		✓	
Known planning constraints	✓		

Where there are known constraints what action do you consider could be undertaken in order to overcome them? (e.g. investment, new infrastructure, environmental improvement, removal of policy constraint)

PROMOTION OF LOCAL DETAILED GREEN BELT AMENDMENT AND/OR JUSTIFICATION OF SPECIAL CIRCUMSTANCES. CAREFUL LANDSCAPING OF ANY PROPOSED DEVELOPMENT.

Please provide details of any other known constraints not included above which may impact on the site being brought forward for residential development:

PLEASE SEE PREVIOUS MPSL SUBMISSION (FEB 2008).

4. Site Ownership

In this section please provide details of the ownership of the site. This section is particularly important in assessing whether the site is considered to be available for development.

	Yes	No
Do you or your organisation own the site?		✓
If you do not own the site do you know who the owner is?	✓	
Please could you provide the following details for the landowner(s)		
Name:		Name:
Organisation:	HOMESTAR INVESTMENTS LTD	Organisation:
Address:	C/O MPSL PLANNING & DESIGN LTD.	Address:
Email:		Email:
Telephone:		Telephone:
To your knowledge are there any ownership issues with the site (e.g. ransom strips, legal, tenancies or operational requirements)		
No.		
Please provide any additional information in order to support the suggested site and help the Council to assess the land in question.		
PLEASE SEE ATTACHED PAPERS FOR FURTHER INFORMATION.		

Please continue on a separate sheet if necessary

**TRAFFORD STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT – 2009
REVIEW (JUNE 2009)**

SITE SUBMISSION – LAND OFF ST MARTIN’S ROAD, ASHTON UPON MERSEY

ADDITIONAL INFORMATION

I write on behalf of Homestar Investments Limited and further to submissions made to your Council by MPSL Planning and Design in February 2008 in relation to land off St Martin’s Road, Ashton Upon Mersey.

It is noted that land off St Martin’s Road, Ashton Upon Mersey has not been included within the above assessment.

It is also noted that this site (your reference LA73) was discounted from the assessment in 2008 as it comprises “*Open land designated as Green Belt and Protection of Landscape Character Area.*” (Strategic Housing Land Availability Assessment Draft Report, July 2008, page 41).

However, it is considered that this site should be developed within the next 5 years for housing to specifically meet local and/or affordable housing need and that this use would have an important role in addressing short term housing and regeneration need in the south of Trafford’s Borough. RSS allows for local detailed boundary changes through the Local Development Framework process and a related submission is made in respect of your Council’s proposed Green Belt - Policy R4 within the Further Consultation on the Preferred Option (June 2009).

It is considered that an affordable housing scheme on this site has potential to deliver housing in the short term in the current housing market and in this respect both support housing delivery within the Borough and meet specific needs within the Ashton Upon Mersey area.

The site is located immediately adjacent to the existing urban area and has defendable boundaries which could form a logical future green belt boundary enabling a potential local detailed Green Belt boundary amendment based upon policy that might be adopted within the Local Development Framework. The site is considered to be sustainable and we ask that it’s potential to contribute to Trafford’s housing land supply and need be reconsidered within the Strategic Housing Land Availability Assessment and other forthcoming Local Development Framework documents.

For further information on this proposed residential development site, please find attached a copy of the submission previously made by MPSL Planning and Design (February 2008) and a completed Site Suggestion Form.

**LAND OFF ST.
MARTIN'S
ROAD, ASHTON
ON MERSEY**

**SUPPORTING
DOCUMENT ON
BEHALF OF
HOMESTAR
INVESTMENTS LTD**

**MPSL PLANNING AND
DESIGN**



SITE PROFORMA

Site Address	Ashton-on-Mersey	Site Size (ha)	6.42
		Previously Developed	No
		Existing Use	Undeveloped
		Proposed Use of Site	Residential
		Alternatively suitable for:	
		Ownership & Availability	Homestar Investments Ltd Available immediately
Description of Site & Context			
<p>The site lies on the northern edge of the built-up area of Ashton-on-Mersey, between properties along St. Martin's Road and the A6144(M). Hawthorn Lane gives access to the western boundary of the site and can provide vehicular access into the land.</p> <p>To the west of the site and on the opposite side of Hawthorn Lane, there is a public playing field whilst there is a graveyard and the grounds of St Mary's Church. Some of the former farm buildings at Ashton Hall Farm to the north of the church have been converted to residential use.</p> <p>The site is currently used for horse grazing. It falls slightly in level towards the A6144(M) from south to north. Much of the site boundary is marked by a screen of hedgerows and trees. This cover provides a high degree of screening from the Mersey Valley to the north.</p>			
Accessibility			
Public transport	A number of bus services run close to the site linking Ashton-on-Mersey with Carrington, Altrincham and Manchester city centre.		
Cycling	There are no dedicated cycle routes in the immediate vicinity of the site although the area is flat and roads are suitable for cycling.		
Car	The site is close to main routes which provide good vehicle access to the strategic road network, including nearby motorway junctions (M60 – J8 & J7)		
By foot	The vehicular accesses have adjacent footpaths and link the site with the nearby local centre.		
Suitability			
Contamination	The site is not previously developed and is therefore not expected to contain ground contamination.		
Flood risk/drainage	The site is within Flood Zone 1, as confirmed by the Environment Agency's mapping service.		
Infrastructure (non-transport)	There are no known infrastructure constraints which would constrain development of the site.		
Adjacent uses	Residential, open space/open countryside, recreation		
Other constraints			
Viability			
Site Viability	The site has not yet been marketed.		
Market Interest			

Sustainability Appraisal	
Sufficient supply of all types and tenure of housing in the right places at the right time.	The delivery of a mix of housing on the site can contribute to meeting this objective.
Reduce the need to travel by car.	The site is within walking distance of a number of bus routes.
Reduce the fear and incidence of crime.	This can be improved by incorporating Secure by Design principles to ensure natural surveillance and minimise the potential for crime.
Address deprivation.	Housing is a deprivation indicator and hence additional high quality housing can improve the socio-economic profile of the area.
Create sustainable communities.	The site is well related to local jobs, shops and public transport. Residential development within the site will also support local services.
Public involvement and participation in decision making.	If the site is taken forward as an allocation, Trafford MBC will consult widely on it, as a key site in the Borough.
Minimise the skills shortage.	The use of local labour as part of any development on the site will provide employment opportunities with the potential to link to training programmes.
Protect and enhance the environment of local communities.	The allocation of the site for residential use could assist in protecting other, more important landscapes and sensitive areas from urban encroachment.
Provide an integrated transport network.	The site is within walking distance of a number of bus routes.
Conserve and enhance the built environment.	The site would create a new built environment, which would need to be of a high quality.
Conserve and enhance the natural environment particularly biodiversity.	Any proposals would need to maintain the significant treed boundaries and seek to mitigate and enhance the biodiversity role of the site.
Protect, conserve and enhance the historic environment.	The setting of the adjacent Conservation Area will need to be carefully considered as part of the detail of any future development proposal.
Increase the access to and provision of areas of natural habitat and open space.	Open space could be provided within a residential development on this site and there is also potential to provide enhancements to the quality of natural habitat.
Increase energy efficiency and renewable energy.	Development will be compliant with development plan policy.
Increase sustainable waste management.	There is the opportunity for development to link into existing and future sustainable waste management activities.
Consider the impacts of flooding and flood risk.	The site is in Flood Zone 1, any future development will require a Flood Risk Assessment.
Ensure that both Trafford and the NW achieve their true economic potential.	The provision of quality housing can assist in attracting valuable workers to Trafford and the region.
Maintain and enhance the vitality and viability of our town centres.	Additional population can assist in underpinning nearby centres including Ashton-on-Mersey, Altrincham and Sale.
Improve usage of public transport.	The site is within walking distance of a number of bus routes.
Promote the re-use of land and minimise the take up of Greenfield land.	The site is a greenfield site.

Summary appraisal	
<p>The site is greenfield land located immediately adjacent to the urban boundary of a sustainable urban location, close to public transport routes and retail/employment areas. The A6144 to the north provides a logical barrier to development on the northern / western boundary, and indeed performs this role west of the site. The St. Mary's Church area could perform a more permanent boundary in the long term.</p>	
<p>The site is within the Green Belt, as defined in the adopted UDP, and PPG2 advises that Green Belt boundaries should only be altered in exceptional circumstances. RSS recognises that there will be scope</p>	

for small scale exceptional Green Belt boundary changes through the LDF process.

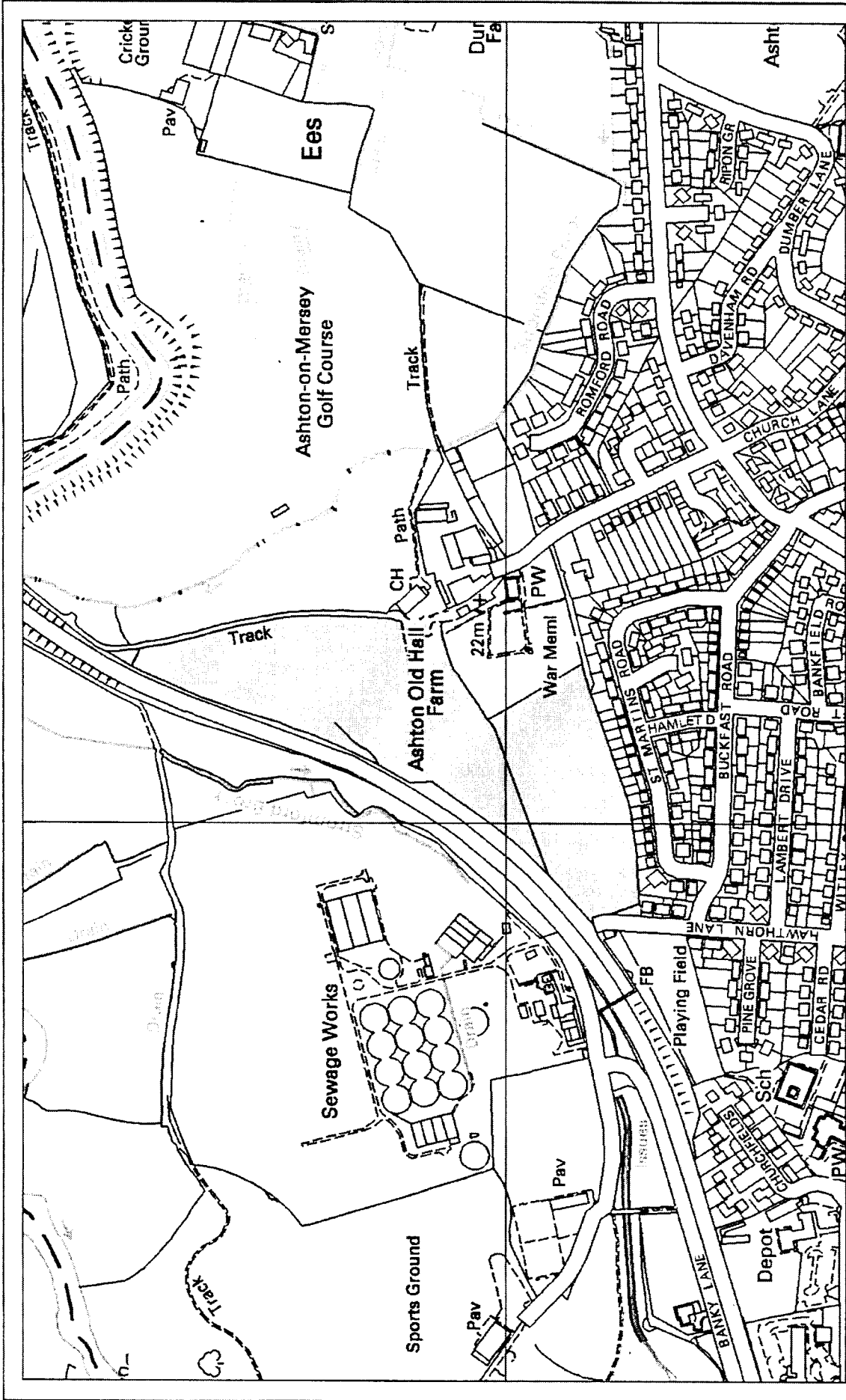
The extent to which Trafford will be reliant upon small scale Green Belt changes through the Allocations DPD is at present unclear. If there is a clear need for additional Allocations, which cannot be met in the urban area and upon more sustainable sites, this site represents a potentially sustainable location for a small urban extension (either as the whole site or a smaller parcel).

The development of this land would not cause any significant degree of harm to the Green Belt, given that the wider more important landscape setting to the north is protected by the A6144; hence this site could form a more permanent urban boundary in the longer term.

The site is potentially suitable for over 230 units.

It is therefore proposed that the site be allocated for residential purposes.

Additional Information Required	None
Site Plan	Yes




 Ordnance Survey

 The information has been reproduced from
 the Ordnance Survey digital file 2004 at 1:50,000
 scale. The Ordnance Survey name and logo are
 registered trademarks of Ordnance Survey.
 © Crown Copyright 2004. Licence No. 100018323

Ashton Upon Mersey

Scale: 1:5000

**Edmund
Kirby**

1085

NATIONS HOUSE
EDMUND STREET
LIVERPOOL L3 9NY
TEL 0151 236 4552
FAX 0151 236 4024
information@edmundkirby.co.uk
www.edmundkirby.co.uk

Our Ref: EL/COL/41293

Mr D Smith
Head of Strategic Planning & Housing Strategy
Trafford Council
c/o Strategic Planning & Developments
1st floor, Waterside House
Sale Waterside
Sale
M33 7ZF

STRATEGIC PLANNING AND DEVELOPMENTS			
16 MAR 2010			
Rec			
Action by			
Ans			
Copies			

15 March 2010

Dear Mr Smith

TRAFFORD CORE STRATEGY : FURTHER CONSULTATION ON THE VISION, STRATEGIC OBJECTIVES AND DELIVERY STRATEGY

I am in receipt of your email communication of 8 March 2010 inviting consultation responses to the City Council's recently published Core Strategy : Further Consultation on the Vision, Strategic Objectives and Delivery Strategy.

I act on behalf of J Davidson (Broadheath) Limited and previously submitted comments relating to the Preferred Option stage for the Core Strategy and the Strategic Housing Land Availability Assessment (SHLAA) on 22 August 2008.

Background

J Davidson (Broadheath) Limited is a long established family run business specialising in the recycling and processing of ferrous and non-ferrous metals. The business is based in Broadheath, and currently operates from three sites at Viaduct Road, Atlantic Street and Craven Road in Altrincham. The business provides an important recycling service as well as a significant employment for the local area.

In June 2009, the business had to relinquish 50% of its Viaduct Road site, which was held on leasehold interest. To ensure of continuity of trade and to maintain a business base in Broadheath, a new site at Craven Road was identified as providing an opportunity to relocate part of the business displaced from Viaduct Road. Planning permission under reference H71701 was secured, subject to completion of a Section 106 Agreement to relocate part of its existing business operations to Craven Road including secure storage for the Company's large transport fleet, decommissioning of end-of-life vehicles, and office accommodation. The Craven Road site is a mixed use area with industrial and residential uses in close proximity. On account of the proximity of some residential properties, all processing and recycling of scrap metal will continue to be carried out at the Viaduct Road site. These operations including dismantling, scrap handling and crushing and shredding of metals/vehicles by a compression shear.



Regulated by PROPERTY CONSULTANTS • TOWN PLANNING • BUILDING CONSULTANTS

Partners C C Hubbard FRICS G R Smith FRICS D Jones MRICS N R Lovell-Kennedy MRICS E I Landor MRTPI
Senior Associate J Davies MRICS Associates R H Lowe MRICS C McCartney MRICS C P Hennessy MRICS



Viaduct Road is a self-contained industrial area bounded by railway arches on the north side and a concentration of bad neighbour industries on the south side. It is an ideal location for my client's business. The railway arches are all occupied as workshops and warehouse units, and provide an important resource in terms of local employment and start up business premises. As a no through road, heavy goods traffic generated by local business users does not cause conflict with adjacent land uses. Furthermore, the former railway viaduct and canal provides a physical and visual barrier from established housing areas.

Housing Potential

The Council has identified Viaduct Road as a potential housing site. The south side of Viaduct Road, which includes my client's site is identified in the SHLAA as Site LA89 and part of the Council's 5 year housing supply requirement. It is identified as having potential for up to 65 dwellings with the land to be released in 5-10 years time.

While industrial sites may provide suitable opportunities for residential development, it is difficult to understand why the Council wishes to pursue a residential option in this location, which would displace existing employment, particularly in the current economic circumstances.

Any partial residential development of the Viaduct Road site would inevitably result in conflict with existing industrial uses.

Trafford Core Strategy : Vision, Strategic Objectives and Delivery Strategy

With regard to the publication of the above document in 2010, I would make the following comments and observations.

The Core Strategy identifies a housing requirement equivalent to 10,400 units over the plan period in line with RSS 2021 requirements. Table L1 : Net New Housing Development Proposals 2008/2009 – 2025/2026 details that a significant proportion of the RSS housing requirement will be delivered in five strategic locations referred to as SL1 – Pomona Island, SL2 – Trafford Wharf side, SL3 – Lancashire County Cricket Club, SL4 – Trafford Centre and SL5 – Carrington.

The Strategic Housing Sites are identified as providing 4,410 leaving a balance of 5,990 units to be provided elsewhere on sites like Viaduct Road. It is my client's view that it is inappropriate to develop sites like Viaduct Road for residential development. My client objected to the inclusion of Viaduct Road as a potential housing site in the SHLAA. It is our view that the Council needs to identify site specific allocations for residential development, which will reduce and eliminate any requirement to develop viable employment areas.

The current strategy will displace jobs and eliminate sites such as Viaduct Road, which are best suited for industrial and employment use because of its isolation from residential areas.

Mr D Smith
Trafford Council
15.03.10

-3-

The legal use of my client's site falls into Class B2 Use. Any housing schemes, which were developed on Viaduct Road would inevitably result in complaints and pressures on the Council, possibly leading to Abatement Orders or other actions by the Council, which would prejudice my client's business. Any residential development in this location would be completely incompatible given the nature of business operations in this location. The area is first and foremost a business location.

I would be grateful if you could take into account the above representations in defining the Vision and Strategic Objectives for the Core Strategy. I would request to be notified regarding the production of any other documents connected with the Local Development Framework or indeed any Examination-in-Public of the Core Strategy.

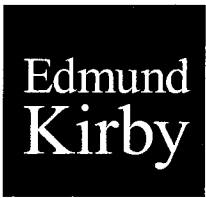
I thank you for your consideration of the above comments.

Yours sincerely

EDWARD LANDOR – MRTPI Partner

For and on behalf of Edmund Kirby

email: edwardlandor@edmundkirby.co.uk



1085

NATIONS HOUSE
EDMUND STREET
LIVERPOOL L3 9NY
TEL 0151 236 4552
FAX 0151 236 4024
information@edmundkirby.co.uk
www.edmundkirby.co.uk

Mr D Smith
Head of Strategic Planning & Housing Strategy
Trafford Council
c/o Strategic Planning & Developments
1st floor, Waterside House
Sale Waterside
Sale
M33 7ZF

Our Ref: EL/COL/41293

STRATEGIC PLANNING AND DEVELOPMENTS			
19 MAR 2010			
Re:			
Action by:			
Ans:			
Copied to:			

18 March 2010

Dear Mr Smith

TRAFFORD CORE STRATEGY : FURTHER CONSULTATION ON THE VISION, STRATEGIC OBJECTIVES AND DELIVERY STRATEGY

I refer to my letter of 15 March 2010 with comments on the City Council's recently published Core Strategy : Further Consultation on the Vision, Strategic Objectives and Delivery Strategy.

I act on behalf of J Davidson (Broadheath) Limited, which is a long established family run business specialising in the recycling and processing of ferrous and non-ferrous metals. The business is based in Broadheath, and currently operates from three sites at Viaduct Road, Atlantic Street and Craven Road in Altrincham.

Metal and recycling businesses meet a vital need in urban areas and this business operates in an ideal location for this type of activity. The suitability of the Viaduct Road site for my client's business is set out in some detail in my letter of 18 March 2010.

The focus of my representations relates to their Viaduct Road site, which is identified in the SHLAA for residential development and forms part of the Council's identified 5 year housing supply. I wish to emphasise that it is inconceivable that there can be any residential development on Viaduct Road adjacent to a busy operational scrap and metal business. My client has no intentions of disposing of their site at Viaduct Road, which is crucial to the operation of their business.

The option for residential development in this location could only be secured by a Compulsory Purchase Order. This would mean extinguishment of my client's business as there is no suitable alternative site to which processing operations could be transferred.

As explained in my letter of 15 March 2010, my clients recently secured the Craven Road site in order to transfer part of their existing business operations from Viaduct Road. This did not include the processing and recycling aspects of the business. The business is profitable and makes in excess of £1 million per year. The cost of acquisition would therefore be significant, possibly in excess of £5 million.

1085
L1
Chen

Mr D Smith
Trafford Council
18.03.10

-2-

I would be grateful if you could take into account the above additional representations together with those previously submitted by letter of 15 March 2010.

I would be pleased to receive an acknowledgment in respect of the above matter.

Yours sincerely

EDWARD LANDOR – MRTPI Partner

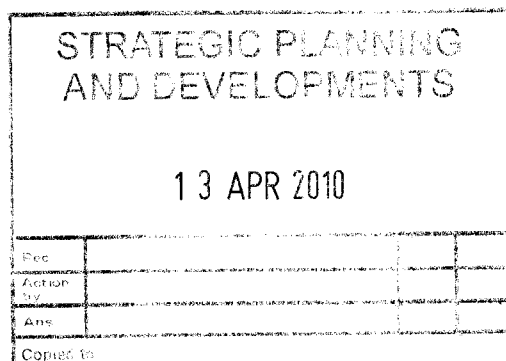
For and on behalf of Edmund Kirby

email: edwardlandor@edmundkirby.co.uk

c.c. Mr H Gibson, J Davidson (Broadheath) Limited
Mr A Thompson, Mace & Jones
Mr C C Hubbard, Edmund Kirby

1036

LDF Team
c/o Strategic Planning and Developments
Trafford Council
1st Floor, Waterside House
Sale
M33 7ZF



12 April 2010
Our Ref: PG/066598

Dear Sir / Madam

Trafford Core Strategy – Further Consultation on the Vision, Strategic Objectives, and Delivery Strategy Land at Woodfield Road, Broadheath, Altrincham

On behalf of our client, L&M Limited, we are writing to provide our comments on Trafford Council's *Core Strategy Further Consultation on the Vision, Strategic Objectives and Delivery Strategy* paper, which was published in March 2010.

This letter should be read in conjunction with the comments we have previously provided to the Council on behalf of L&M Limited in response to the consultations undertaken on the following versions of the Core Strategy:

- February 2009 – Core Strategy Key Strategic Site Assessment;
- August 2009 – Core Strategy Further Consultation on the Preferred Option Paper; and
- December 2009 – Core Strategy: Call for Additional Information.

L&M Limited own a parcel of land to the west of Woodfield House off Woodfield Road in Broadheath, Altrincham, which is approximately 5 hectares in size. The site is located between the Bridgewater Canal and Norman Road, and is currently occupied by the L&M works and other light industrial units.

Our comments on the current consultation document are provided as follows:

The Vision for Trafford

The "Vision for Trafford" that is set out in Section 2 of the consultation document states that the focus for economic and housing growth in Trafford will be within the urban area, primarily the north east of the Borough and the principal town centre (Altrincham).

This part of the document then goes on to list five key objectives that will need to be met in order to

Drivers Jonas Deloitte

achieve this element of the Vision, which include the following:

“Attractive, sustainable communities, with good access to jobs, services and green infrastructure/multi functional green space will be established across Trafford with a range of housing types and tenures (including affordable housing).”

L&M Limited considers that this objective should be revised to refer specifically to the locations where significant new housing developments are likely to be delivered, including the Woodfield Road site in Broadheath, which was previously identified as a Strategic Location within the *Core Strategy: Further Consultation on the Preferred Option* document (published in June 2009). This approach would be consistent with the other key objectives listed within the Vision that make reference to important sites which, like the land at Woodfield Road, were previously identified as Strategic Locations in the emerging Core Strategy and continue to represent significant development opportunities within the Borough such as Old Trafford, Partington, Sale West and Trafford Park Core.

The land off Woodfield Road, including the parcel of land that falls within the ownership of L&M Limited, is a highly sustainable and accessible site which has significant potential to accommodate new residential development comprising a range of housing types, which would make a substantial contribution towards helping to meet the key objective set out above.

Strategic Objectives and Place Objectives

Section 3 of the consultation document sets out a series of Strategic Objectives that are intended to set the framework for the preparation of the Core Strategy. These Strategic Objectives apply to the whole of the Borough. Strategic Objective ref. SO1, which relates to meeting overall housing need within the Borough, highlights the requirement to:

“Promote sufficient housing in sustainable locations, of a size, density and tenure needed to meet the Borough’s needs and contribute towards those of the City Region.”

This section of the consultation document also contains a number of Place Objectives that relate to the locally distinctive areas that make up Trafford Borough. Several Place Objectives relate to a locally distinctive area defined as “Altrincham and Neighbouring Communities”, which includes Broadheath and the Woodfield Road site. Place Objectives AL01 – AL06 relate to the “Altrincham and Neighbouring Communities” area and are linked to the delivery of Strategic Objective ref. SO1. L&M Limited considers that an additional objective should be incorporated within this set of Place Objectives which specifically highlights the need to maximise the potential of the Woodfield Road site to meet Trafford’s housing needs and create a high quality sustainable residential-led mixed use development in this location. This would be appropriate on the basis that the site’s suitability for significant development of this nature is well-established (reflected in its allocation for mixed housing and employment in the Adopted Trafford Unitary Development Plan under Policy H3) and also in view of the recognition by the Council in paragraphs 8.5 – 8.7 of the *Technical Note on Strategic Locations & Sites Selection* document that although Woodfield Road is no longer identified as a Strategic Location within the Core Strategy, it nevertheless remains an important development priority for the Borough.

Drivers Jonas Deloitte

Strategic Locations

Section 4 of the consultation document provides details of the 5 Strategic Locations that the Council proposes to include within the Core Strategy. Paragraph 4.7 defines Strategic Locations as being:

- (a) An important element in the achievement of the Core Strategy;
- (b) Supported by information of what is being provided, when it will be provided, who will provide it, how it will be delivered and what the general costs and funding sources will be, all of which should be agreed in principle by the delivery partners; and
- (c) Programmed for delivery through the Land Allocations Plan.

The Woodfield Road site is no longer identified as a Strategic Location in the current consultation document. Paragraphs 7.51 – 7.53 of the *Technical Note on Strategic Locations & Sites Selection* indicate that it was no longer possible to identify the site as a Strategic Location on the basis of three considerations. These three considerations are set out below, followed in turn by L&M Limited's response:

- *“the scale of the development proposals that could be delivered on the Woodfield Road site are limited and therefore are not central to the Core Strategy and only important within the wider Altrincham area”* – L&M Limited considers that it is inappropriate to suggest that a development of only “limited” scale and local importance could be delivered on the Woodfield Road site. On the contrary, the site has the potential to accommodate a significant residential-led development that would make an important contribution towards achieving the housing targets which apply to the whole of the Borough. Evidence of this is provided by Trafford's *Strategic Housing Land Availability Assessment: 2009 Review*, which confirms that the Woodfield Road site could accommodate 478 new residential units, including 243 on the land owned by L&M Limited. This quantum of development would meet c. 30% of Trafford's emerging housing target between 2008/09 and 2010/11 (during which period, draft Policy L1.2 indicates a total of 1,600 new dwellings will be required) or c. 12% of the emerging target between 2011/12 and 2015/16 (during which period, draft Policy L1.2 indicates a total of 4,000 new dwellings will be required). The Council has acknowledged the significant development potential of the Woodfield Road site in correspondence with L&M Limited dated 30 March 2010 in which it recognises that “there is scope for large scale redevelopment” of the land that falls within our client's ownership.
- *“the site does not meet the requirements of criterion (b) above as there are no clear details of how development here will be delivered or any timescale for development”* – whilst it is not possible at this stage to provide a firm indication of the precise form of development that is likely to come forward on in this location, it should be noted that L&M Limited is currently in negotiations with a number of prospective developers who have expressed an interest in acquiring the land at on the Woodfield Road site in its ownership with a view to progressing residential-led development proposals here. The total number of housing units, scale and nature of other uses and the timescales for redevelopment will be determined by the requirements of whichever developer ultimately purchases the site.
- *“there are also some infrastructure issues such as highways access which need to be resolved”* – L&M Limited is not aware of any infrastructure constraints within the Woodfield Road site that would need to be addressed in order to ensure the delivery of a viable, attractive and sustainable

Drivers Jonas Deloitte

development in this location. Furthermore, the Highways Agency has confirmed its support for the proposed redevelopment of the Woodfield Road site on the basis of the site's location and accessibility in its letter to Trafford Council dated 7 August 2009 in respect of the emerging Core Strategy (*Further Consultation on the Preferred Option*). With this in mind, we would be grateful if the Council could confirm to us precisely what highways and other infrastructure issues still need to be resolved, as no issues have been raised with us during the discussions we have held to date with the Council in respect of the site.

Overall, L&M Limited consider that, in the event that the Council continues to take the view that the Woodfield Road site does not fall within the definition of a Strategic Location, steps should be taken to ensure that subsequent versions of the Core Strategy refer more explicitly to the site and its significant potential to accommodate a large scale residential-led development, as demonstrated by the information set out above, and in the representations submitted in response to the consultation exercises that have been undertaken in respect of earlier versions of the Core Strategy.

Land for New Homes

Section 11 of the consultation document sets out the Council's draft Core Strategy policies on new housing development within Trafford.

Draft Policy L1 (and the associated Table L1) provides guidance on the scale of new housing that is required within the Borough and the locations/sites where significant residential development is to be directed over the Plan period. Table L1 indicates that a total of 5,850 new housing units will be provided by new development on "Other South City Region Sites". Paragraph 4.15 of the consultation document indicates that the Woodfield Road location constitutes one of these "Other South City Region Sites", however this is not made explicitly clear within the text of Policy L1 or Table L1 in their current drafted form. L&M Limited considers that draft Policy L1 and Table L1 should both be revised to refer specifically to the Woodfield Road location as being one of the "Other South City Region Sites". This is necessary to reflect the fact that although Woodfield Road is no longer identified as a Strategic Location within the Core Strategy, it nevertheless remains an important priority for the Borough, as recognised by the Council in paragraphs 8.5 – 8.7 of the *Technical Note on Strategic Locations & Sites Selection* document.

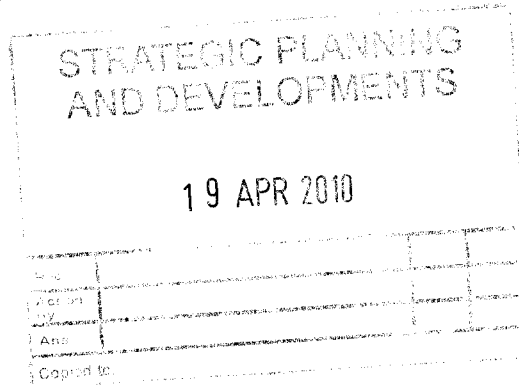
If you have any queries or require any further information with regard to these comments, please do not hesitate to contact me.

Yours sincerely

Philip Grant
for Deloitte LLP trading as Drivers Jonas Deloitte

Cc: M Barrett – L&M Limited

Strategic Planning and Developments
Trafford Council
First Floor
Sale Waterside
Sale
M33 7ZF



16 April 2010
Our Ref: PG/071478

Dear Sir/Madam

Trafford Core Strategy – Further Consultation on the Vision, Strategic Objectives and Delivery Strategy Comments on Behalf of Lancashire County Cricket Club and Tesco Stores Ltd

On behalf of Lancashire County Cricket Club (LCCC) and Tesco Stores Ltd (Tesco), we are writing to provide our comments on Trafford Council's *Core Strategy Further Consultation on the Vision, Strategic Objectives and Delivery Strategy* paper, which was published in March 2010.

LCCC and Tesco jointly submitted a planning application to Trafford Council on 17 November 2009 (ref. 74393/FULL/2009) for the following proposal:

"Part Full/Part Outline Planning Application for redevelopment of Old Trafford Cricket Ground and erection of food superstore. Full consent sought for the erection of a Class A1 food superstore (measuring 15,500 sqm gross internal area) incorporating car parking plus associated petrol filling station, landscaping and infrastructure; creation of pedestrian link between Talbot Road and Chester Road; demolition and replacement of existing Old Trafford Cricket Ground stands and other associated buildings/structures to create a new cricket stadium (Class D2) with new media players and education building, extension to existing cricket school, reconfigured and extended members pavilion, spectator seating, hospitality and ancillary facilities including food and non food retail units, replay/scoreboard screens, sightscreens, 6 no. 60m high floodlighting columns and other associated cricket ground equipment. Outline consent sought for extension to Trafford Lodge Hotel (Class C1) including the creation of a maximum of 82 no. additional hotel rooms, a new fitness suite and a brasserie with details sought for means of access and layout with all other matters reserved for subsequent consideration."

The application was reported to Trafford Council's Planning Committee on 11 March 2010 who resolved to grant planning permission subject to receiving confirmation from the Secretary of State that it will not be "called-in" for determination and completing a Section 106 Agreement.

Our comments on the current consultation document, which are set out below, should be considered in the context of these planning application proposals.

Drivers Jonas Deloitte

The Vision for Trafford

Section 2 of the consultation document sets out the overall “Core Strategy Vision” which provides the planning framework for new development within Trafford. We welcome the specific reference that is made within this section to the Lancashire County Cricket Club Quarter, which is identified as one of the 5 Strategic Locations within Trafford that are promoted as areas for change.

Strategic Objectives and Place Objectives

We support Place Objective OTO11, which seeks to maximise the potential of Lancashire County Cricket Club as a visitor attraction and its potential to lead major regeneration in the Old Trafford area, and agree that this will make an important contribution towards meeting the overall employment objectives for Trafford over the plan period, as set out in Strategic Objective SO3.

Place Objective OTO11 should also be linked to the delivery of Strategic Objective SO2, which relates to the need to regenerate the physical, environmental and social fabric of the most disadvantaged communities within the Borough to reduce inequalities and improve prosperity. Such a linkage would be appropriate given the significant contribution that the redevelopment of the Lancashire County Cricket Club Quarter, and indeed the current planning application proposals alone, are likely to have in this regard.

In Paragraph 128 of the Committee Report, Trafford Council identified the following overall regeneration and employment benefits of the current planning application proposals:

- create a stadium recognised as one of the leading venues for both international and domestic cricket;
- contribute significantly to the strategic priorities for the area and stimulate regeneration within an area that suffers from severe levels of deprivation;
- create new employment opportunities, reduce levels of economic inactivity, and tackle long term unemployment;
- attract additional visitors and related expenditure into the local economy with a net gain in visitor spending estimated at £1million per annum in Trafford; £0.8million per annum in Greater Manchester; and £0.7million per annum in the North West;
- create a platform for ongoing commercial development and investment;
- improve the external and internal perceptions of the area as a place to live and work and also reinforce its reputation as an internationally significant visitor destination;
- support elite and grass roots sports development through state of the art facilities; and
- enhance community sport education and participation by providing the opportunity for LCCC to expand its sports education programmes.

Lancashire County Cricket Club Quarter

Section 7 of the consultation document focuses specifically on the Lancashire County Cricket Club Quarter. Within this Section, Policy SL3 sets out a Strategic Proposal and the Development Requirements for the Lancashire County Cricket Club Quarter. Our comments on these two components of the draft policy are set out in turn below.

Strategic Proposal

LCCC and Tesco consider that the Strategic Proposal should be amended to reflect the requirement for

Drivers Jonas Deloitte

the redevelopment of Old Trafford Cricket Ground to be cross-funded by the provision of a new superstore on vacant land off Chester Road, as is proposed by the current planning application.

Old Trafford Cricket Ground is the only venue in North West England where international-standard cricket matches can be played. These matches provide significant income to LCCC and the wide regional/local economy as well as considerable profile to Trafford, Greater Manchester and the North West Region. However, the Cricket Ground has fallen below the standards required to host Test Matches. As a result, urgent action and considerable investment is needed to upgrade and modernise facilities to ensure Old Trafford regains its Test Match status and profile as one of the world's great cricketing venues.

In resolving to approve the planning application submitted by LCCC and Tesco, Trafford Council has accepted that the investment required to deliver the redevelopment of the Cricket Ground to ensure it regains Test Match status and the sporting, community and cultural benefits flowing from this, will only come forward by way of a cross-subsidy to LCCC, which will be released by Trafford Council following the sale of the vacant land off Chester Road to Tesco for the development of the superstore proposal that is the subject of the current planning application. The Council has also accepted that the identified need for a large superstore in the Old Trafford area can be met through the Tesco proposed for the land off Chester Road.

The Strategic Proposal set out in Policy SL3 should therefore be extended to specify that development in the Lancashire County Cricket Club Quarter should deliver, inter alia, the following:

"a large superstore on the vacant land off Chester Road in order both to meet the recognised retail need in the Old Trafford area and also to cross-fund the redevelopment of Old Trafford Cricket Ground."

Development Requirements

The first development requirement set out in this section of the consultation document highlights the need for "a new superstore on Chester Road which is limited to a scale that will address any outstanding deficiencies within the Old Trafford area". The Strategic Proposal component of Policy SL3 should be revised to make reference to the need for a new superstore at Old Trafford in the manner described above, in which case it will not be necessary to retain this text within the Development Requirements section.

The second development requirement is for "a contribution to the provision of a strategic processional route with a high quality public realm area incorporating green infrastructure along Warwick Road and Brian Statham Way to enhance visitor experience and to link to existing and future public transport improvements." The planning application submitted by LCCC and Tesco which Trafford Council has resolved to approve incorporates a proposal to create a new pedestrian linkage between the redeveloped Cricket Ground and the new superstore, alongside Trafford Town Hall, which would inherently improve pedestrian permeability between Chester Road and Talbot Toad that is currently lacking. Three distinct spaces are proposed along this pedestrian route which would promote movement, taking reference from and building upon the existing character of the area in a carefully planned landscaping strategy. LCCC and Tesco consider that this second development requirement should be revised to prioritise the delivery of the pedestrian linkage that is the subject of the current planning application as opposed a strategic processional route along Warwick Road and Brian Statham Way, for which a need and delivery strategy has not yet been identified.

Drivers Jonas Deloitte

If you have any queries or require any further information with regard to these comments, please do not hesitate to contact me. In the meantime, we would be grateful if you could confirm receipt of this submission.

Yours sincerely

Philip Grant
for Deloitte LLP (trading as Drivers Jonas Deloitte)

SL/TRA/LDF/Further Con
Direct Line: 0161 489 5828
Direct Fax: 0161 489 3812
sarah.lee@manairport.co.uk

22nd April 2010

LDF Team
Strategic Planning & Developments
1st Floor
Waterside House
Sale waterside
Sale
M33 7ZF

1064

Dear Sirs

RE: TRAFFORD CORE STRATEGY: FURTHER CONSULTATION ON THE VISION, STRATEGIC OBJECTIVES, AND DELIVERY STRATEGY

As advised, we now submit our views on the recent further consultation.

As stated in our response to the further Consultation in November 2009, our main concerns relate to the lack of flexibility in the proposed policy to allow for the prospect of economic development that forms part of the wider sub-regional, or even regional objectives.

The 8 sites identified under policy W1 – Economy, have been derived to meet the local employment needs of Trafford and Trafford only. And while W1.4 addresses employment proposals outside the identified employment sites, this does not go far enough to realise the aspirations of the wider City Region and North West Region in terms of growing a strong and vibrant regional economy. As a result, the Core Strategy is very inward looking and does not reflect emerging thinking from the Manchester City Region and the case for sustainable economic growth arising out of such work as the Manchester Independent Economic Review (MIER). Both of these see the Airport as one of the major assets of Greater Manchester; with considerable potential to stimulate and attract economic activity, which is an important consideration given the current economic conditions.

The Manchester Airport Master Plan to 2030, which was published in November 2007, identified the challenges, the opportunities and the actions that need to take place in order to grow the Airport to the Government's envisaged level of throughput. One of the key aspects of the Airport Master Plan is to define our land requirements to support future activity and to set out



the policy framework to guide and deliver sustainable growth. While the Master Plan identifies proposed extensions to the Airport Operational Area (AOA), it should be noted that the Master Plan does not propose any extensions to the AOA within the borough of Trafford. It does however recognise that in order to meet the envisaged level of throughput, not all airport business activities and land uses will be located in the AOA, but will still require a location in close proximity to Manchester Airport.

The Master Plan and ideas emerging from the “Airport City” work both identify a significant opportunity for the development of a major airfreight logistics operation that is focused on the Airport, to be located on an adjacent or ‘near’ airport development site. It is therefore for the LDF process to consider the opportunities to capitalise on the Airport’s economic impact and the suitability of land, premises, transport links and skills to match. However, for an airfreight logistics operation to take full advantage of the range of facilities and activities such an opportunity would bring, proximity and accessibility to the Airport is essential.

The Wythenshawe Strategic Regeneration Framework (2004) first established the idea of development corridors (East and West), in order to incorporate *“the new retail / service centre proposal at Baguley, Roundthorn Industrial Estate, Wythenshawe Hospital and any future development at Davenport Green”*.

The Airport Master Plan to 2030 reflects this arc of development extending from Roundthorn Industrial Estate in the west, via Wythenshawe Hospital and Davenport Green to the Airport and beyond in the east, and is designed to maximise the opportunities for Wythenshawe residents and others to benefit from access to employment opportunities both on and off the Airport site

Policy W1 as it is currently drafted focuses on the need for sites to *“be accessible by a range of alternative modes other than the private car”*. In order to serve these development corridors, we suggested that the protected alignment for Metrolink identified in Policy T11 of the UDP and Policy L4 of the Core Strategy, should be retained and designated ‘transport corridor’. This would acknowledge its status as an approved route, and provide an opportunity to connect to the Airport and motorway network from the west (including Wythenshawe Hospital) and as part of improved orbital links to the Airport as set out in our Ground Transport Strategy. Improvements to both road and public transport along the Altrincham – Airport - Stockport corridor would greatly improve accessibility to southern parts of Trafford, including Davenport Green, which was removed from the Core Strategy because of perceived accessibility issues.

The public transport element of this corridor could be Metrolink, bus or light transit system and give access within & through the wider area and link to the extensive transport connections at the Airport itself.

In light of all of this, we feel it is premature to exclude land at Davenport Green from consideration. There is ongoing work at regional and sub regional level looking at strategic locations for economic activity. We suggest that this work should inform the Core Strategy along with further assessments of sustainable transport and regeneration opportunities in the area.

We would very much like to discuss these ideas with you as part of the ongoing Local Development Framework process.

Yours faithfully

John Twigg
Group Planning Director

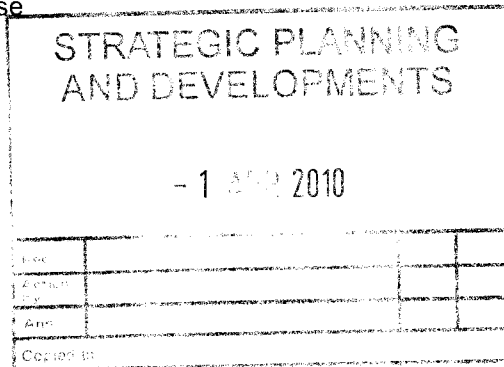
1097

Strategic Planning & Developments
Trafford Metropolitan borough Council
1st Floor Waterside House
Sale Waterside House
Sale
M33 7ZF

Les Morris
Land and Development Team
Town Planner
Leslie.morris@uk.ngrid.com
Direct tel +44 (0)1926 653172
Direct fax +44 (0)1926 656574

1 April 2010

Dear Sir / Madam



www.nationalgrid.com

Trafford Metropolitan Borough Council
Core Strategy - Further Consultation on the Vision, Strategic Objectives and Delivery Strategy

Thank you for your email dated 8 March 2010 regarding the above. Having reviewed the document we would like to make the following general and specific comments and also take this opportunity to emphasise the role of National Grid and to highlight areas and issues where we feel consultation with National Grid would be appropriate in future Development Plan Documents (DPDs).

Overview – National Grid

National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below.

Electricity Transmission

National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity.

National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is the key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses.

To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply.

Gas Transmission

National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances.

New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.

Gas Distribution

National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London – almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.

National Grid and Local Development Plan Documents

The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:

- An expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations).
- New forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).

Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.

We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues:

- Any policies relating to overhead transmission lines, underground cables or gas pipeline installations
- Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines
- Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations
- Any policies relating to the diverting or undergrounding of overhead transmission lines
- Other policies relating to infrastructure or utility provision
- Policies relating to development in the countryside
- Landscape policies
- Waste and mineral plans

In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.

National Grid infrastructure within Trafford Metropolitan Borough Council's administrative area

Electricity Transmission

National Grid's high voltage electricity overhead transmission lines / underground cables within Trafford Council's administrative area that form an essential part of the electricity transmission network in England and Wales include the following:

- ZQ line - 400kV route goes from Daines substation to Tottington Tee
- ZZN line - 275kV route from Daines substation in Trafford to South Manchester substation in Trafford
- ZE line - 400kV route from Carrington substation in Trafford to Drakelow substation in South Derbyshire.
- ZO line- 400kV route from Carrington substation to Deeside substation

The following substations are also located within the administrative area of Trafford Council:

- South Manchester substation - 275kV
- Daines substation - 400kV
- Carrington substation - 275kV

National Grid has provided information in relation to electricity transmission assets via the following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW>

Gas Transmission

National Grid has the following gas transmission assets located within the administrative area of Trafford Council:

Pipeline	Feeder Detail
1030	4 Feeder Plumley / Warburton
1031	21 Feeder Warburton / Pickmere
1032	4 Feeder Warburton / Partington
1039	15 Feeder Warrington / Warburton
2616	21 Feeder Warburton Fenceline / Warburton
2617	21 Feeder Warrington / Warburton Fenceline

National Grid has provided information in relation to gas transmission assets via the following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW>

Gas Distribution

National Grid Gas Distribution owns and operates the local gas distribution network in the Trafford Council area. If you require site specific advice relating to our local gas distribution network then information should be sought from:

National Grid Plant Protection
National Grid, Block 1, Floor 2

Brick Kiln Street
Hinckley
LE10 0NA
plantprotection@uk.ngrid.com

Specific Comments

The following Strategic Location identified in the consultation document within close proximity to National Grid's electricity and gas transmission assets in the Trafford area:

- SL8 - Carrington

Electricity Transmission

The Carrington Strategic Location is situated within the vicinity of National Grid's Carrington substation.

While National Grid does not object to future redevelopment in this area, we would like to take this opportunity to highlight that substations are vital to the efficient operation of our electricity transmission network for switching circuits or transforming voltage. Carrington substation is an essential part of the transmission network and has an important role to play in maintaining the supply of electricity to the local distribution network operator and therefore ultimately to homes and businesses throughout Greater Manchester and the wider area. The site is therefore "Operational Land" and, for the reasons outlined above, there may need to be further essential utility development at the site in the future.

In addition, a number of National Grid's high voltage overhead electricity transmission lines routed via Carrington substation pass through this area.

National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.

National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.

'A Sense of Place' is available from National Grid and can be viewed at:
www.nationalgrid.com/uk/senseofplace

Further information regarding development near overhead lines and substations is available here:
http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm

Gas Transmission

National Grid also has high pressure underground gas transmission pipelines located within the vicinity of the Carrington Strategic Location.

Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE. In order to enable Local Authorities to discharge this duty and also to ensure that National Grid's pipelines are protected from uncontrolled development in the vicinity of the pipeline please read the following guidance:

- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties
http://www.nationalgrid.com/NR/rdonlyres/50ACAC0A-ED26-41A7-91FA-83163A98270F/23790/TSPSSW22_J537_Rev0807.pdf
- Gas Transmission Underground Pipelines – Guidance
http://www.nationalgrid.com/NR/rdonlyres/446009BF-ABB5-42E1-B9FE-44E90D577DD5/18653/APTGasGuidance_2_.pdf

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from our web site or by contacting the team below:

- National Grid Electricity Transmission plc, Electricity Act 1989 – Schedule 9 Statement, preservation of amenity
- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations – Requirements for Third Parties
- A sense of place – Design guidelines for development near high voltage overhead lines

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

National Grid
Land & Development Stakeholder and Policy Manager
Land & Development Team
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6TG

Tel: 0800 7312961
www.nationalgrid.com/uk/landanddevelopment

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours sincerely,

[via email]

Les Morris
Land and Development Team
Town and Country Planner

Date: 12 April 2010
Our ref: JFB/NW.09/10.
Your ref:



LDF Team
Strategic Planning and Developments
Trafford Council
1st Floor, Waterside House
Sale Waterside
Sale
M33 7ZF

1037

Regional Advocacy &
Partnerships (NW)
3rd Floor
Bridgewater House
Whitworth street
Manchester
M1 6LT

Sent by email to strategic.planning@trafford.gov.uk

Dear Sirs,

**TRAFFORD CORE STRATEGY
FURTHER CONSULTATION ON THE VISION, STRATEGIC OBJECTIVES AND DELIVERY
STRATEGY**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. We are working towards the delivery of four strategic outcomes:

- A healthy natural environment;
- People are inspired to value and conserve the natural environment;
- Sustainable use of the natural environment;
- A secure environmental future.

Thank you for your consultation letter and CD concerning the above dated 5th March 2010, which was received by Natural England on 12 March 2010.

Natural England wishes to see the policy wording expanded to go beyond assessing and mitigating any potential loss to biodiversity to see a policy where biodiversity interests are both conserved and enhanced.

Please use this address for any future consultations: Natural England, Crewe Office, Electra Way, Crewe, Cheshire CW1 6GJ and email address nwplanning@naturalengland.org.uk

This concludes our comments at this stage. We should be pleased to offer any further assistance or information if required. Once again thank you for the opportunity to comment, should you have any questions do not hesitate to contact us.

Yours faithfully,

Mrs Janet Belfield
Regional Planning & Advocacy Team (North West)

0300 060 1774

10:31

Taylor-Russell, Clare

From: Taylor-Russell, Clare
Sent: 23 April 2010 10:26
To: 'Belfield, Janet (NE)'
Cc: Franklin, Lesley
Subject: RE: Trafford Core Strategy Further Consultation response

Janet

Thanks for this.

For information, this Further Consultation document does not include all the proposed Core Policies, instead only with those that have been affected by the revised Vision, Objectives and Delivery Strategy. You may recall that in June 2009 we conducted a consultation on the Trafford Core Strategy Preferred Option which presented the complete suite of Core Policies. Within that document was Policy R2 – Natural Environment which deals more fully with the matter of biodiversity.

Whilst representations were submitted in relation to this policy, we did not consider that any raised matters that would require an interim consultation stage before the Publication version, unlike those in relation to the Strategic Sites and Locations. Therefore, as stated on page 46 of the March 2010 consultation document, the Council will incorporate any changes that need to be made to these policies in the light of comments received as part of the June 2009 consultation, at Publication stage.

I hope that this has clarified matters and to conclude therefore, I will record your representation at this stage as relating to Policy R3.

Regards

Clare

Clare Taylor-Russell
Senior Regeneration Officer

Tel: 0161 912 4496

Trafford Council is a well-performing, low-cost council working with Trafford Partnership to make Trafford a great place to live, learn, work and relax. You can find out more about us by visiting www.trafford.gov.uk

Please don't print this unless you really need to.

From: Belfield, Janet (NE) [mailto:Janet.Belfield@naturalengland.org.uk]
Sent: 22 April 2010 17:32
To: Taylor-Russell, Clare
Subject: RE: Trafford Core Strategy Further Consultation response

Clare,

Thanks for your call today. My comments can and do relate to R3, but there seemed to be a lack of a general biodiversity interest policy outside the R3, green infrastructure, which is why I did not give explicit reference to R3. Can you confirm to me that there is such a policy to conserve and enhance broad biodiversity interests, for both sites and species in the Core Strategy, or do you consider that it's in existing PPS and not required here? I was afraid that I might have missed it.

23/04/2010

Regards,
Janet

Janet Belfield
Planning Specialist
Regional Advocacy and Partnerships (North West)
Natural England
3rd Floor, Bridgewater House, Whitworth Street, Manchester, M1 6LT
Telephone: 07900 608281 / 0300 060 1774
Fax: 0300 060 1791

Natural England is here to conserve and enhance the natural environment, for its intrinsic value, the well-being and enjoyment of people and the economic prosperity that it brings.

From: NW Planning (NE)
Sent: 22 April 2010 11:29
To: Belfield, Janet (NE)
Subject: FW: Trafford Core Strategy Further Consultation response
Importance: High

Janet

This email is from the planning mailbox.

Regards

James

From: Taylor-Russell, Clare [mailto:Clare.Taylor-Russell@trafford.gov.uk]
Sent: 22 April 2010 11:20
To: NW Planning (NE)
Subject: Trafford Core Strategy Further Consultation response

Janet

I refer to your representation on the above document, dated 12 April 2010.
You make a request for one of the policies to be expanded beyond assessing and mitigating any potential loss of biodiversity to one where biodiversity interests are both conserved and enhanced.

I would be grateful if you could confirm that the policy you are seeking such a change to is Policy R3.

Regards
Clare

Clare Taylor-Russell
Senior Regeneration Officer
Strategic Planning and Developments
First Floor, Waterside House, Sale Waterside, Sale, M33 7ZF
Tel: 0161 912 4496
Fax: 0161 912 3128
email: clare.taylor-russell@trafford.gov.uk

Trafford Council is a well-performing, low-cost council working with Trafford Partnership to make Trafford a great place to live, learn, work and relax. You can find out more about us by visiting www.trafford.gov.uk

Please don't print this unless you really need to.

23/04/2010



Northwest
REGIONAL DEVELOPMENT AGENCY

1047



Steven Broomhead
Chief Executive

Mr Dennis Smith
Head of Strategic Planning & Housing Services
Trafford Council
1st Floor
Waterside House
Sale Waterside
Sale
M33 7ZF

SB/JL/2231
14 April 2010

Dear Mr Smith

Trafford LDF Core Strategy: Further consultation on the Vision, strategic objectives and delivery strategy

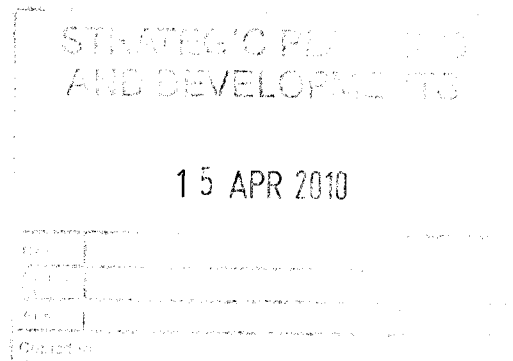
Thank you for your letter dated 5 March 2010 inviting comments on the above. The Northwest Regional Development Agency welcomes the opportunity to respond.

Our comments on these latest revisions are attached. These latest revisions raise no fundamental concerns from NWDA's perspective and our comments relate, in the main, to the detail of specific policies.

This response has been prepared in accordance with the NWDA's consultation policy by the Planning, Transport and Housing Team. If you have any queries or wish to discuss this matter further, please contact Ian Wray, Chief Planner, (e-mail ian.Wray@nwda.co.uk).

Yours sincerely

Steven Broomhead
Chief Executive



Encs.

Northwest Regional Development Agency
Renaissance House,
Centre Park, Warrington,
WA1 1QN

Telephone: +44 (0)1925 400100
Fax: +44 (0)1925 400400
E-mail: information@nwda.co.uk
www.nwda.co.uk

INVESTING IN
englandsnorthwest

Trafford LDF Core Strategy: Further consultation on the Vision, strategic objectives and delivery strategy
Comments from the Northwest Regional Development Agency

The Vision

We have no fundamental concerns regarding the revised draft Vision. It is broadly compatible with objectives outlined in the recently issued framework document for the 'Atlantic Gateway' (March 2010). Whilst this is a non-statutory document, it has the support of a group of local authorities, including Trafford Council, across the Manchester and Liverpool City Regions.

Strategic Objectives

A number of detailed amendments have been made to the draft strategic objectives. These are generally welcome, in particular:

- the reference to Trafford contributing to the growth of the sub-region in Strategic Objective SO1;
- the references to sustainable construction and adapting to climate change in SO7; and
- the change to SO8, which now explicitly recognises the historic environment's contribution to the attractiveness and distinctiveness of the Borough.

Strategic Locations

Previously, the draft LDF Core Strategy identified 13 strategic locations and 5 strategic sites. These have undergone substantial revision. The amended Strategy now proposes 5 strategic locations at Pomona Island; Trafford Wharfside; Lancashire County Cricket Club; Trafford Centre Rectangle; and Carrington. It is no longer proposed to allocate strategic sites within the Core Strategy.

As you will be aware, last year the Agency designated the Salford Quays/Irwell Corridor Area as a strategic regional site. Our Board Members identified the following draft purposes for the strategic regional site:

The Salford Quays/Irwell Corridor area provides the opportunity to expand and integrate the area with the regional centre of Manchester through a mixed use framework. The development will:

- *Take advantage of outstanding regional rail and Metrolink access;*
- *Build outwards from the strengths of Manchester City Centre and Salford Quays (including Media City);*
- *Strengthen public transport connections between Salford Quays, the regional rail network and Manchester City Centre; and*
- *Bring back into use derelict and under used land.*

The draft purposes and a detailed site boundary are currently the subject of discussions with the relevant local authorities and Central Salford URC. However, we would anticipate that the strategic regional site will take in land on the Trafford side of the Manchester Ship Canal, including Pomona Island and part of Trafford Wharfside. It may be helpful to refer to the designation of the strategic regional site within the supporting text.

Pomona Island (SL1)

Paragraph 5.2 suggests that this vacant site will be redeveloped into a high quality mixed-use community. Since housing is not one of the uses proposed for this site, it may be more appropriate to say it will be redeveloped 'for a mix of high quality employment and ancillary uses'.

Trafford Wharfside (SL2)

Whilst we have no major concerns with the policy as drafted, it would be helpful to provide further detail regarding the requirement to provide a 'strategic processional route' linking Mediacity:UK through to Lancashire County Cricket Club. As drafted, it is not clear whether this will be a vehicular or pedestrian route.

Lancashire County Cricket Club Quarter (SL3)

We have no specific concerns with the draft policy. As you will be aware, NWDA has committed £2.67m of grant aid funding towards the first phase of improvements to facilities at the cricket ground, including improvements to pitch drainage, floodlighting, scoreboard and a new hospitality and events grandstand with 2,250 seats. The Agency has also agreed to provide further grant aid of £7.2m towards the second 'main scheme' phase, provided that the balance of the funding required for that phase can be secured. This would see further improvements including reorientation of the pitch, new permanent and temporary seating for up to 25,000, and two new grandstands with ancillary facilities.

Carrington (SL5)

The Agency notes the proposal to provide up to 75 hectares of land for employment, as part of a larger mixed-use development, at Carrington. This could potentially make a substantial contribution towards employment land requirements in Trafford and the wider Greater Manchester sub-region.

Core Policies

Land for New Homes (L1)

In our response to the June 2009 Preferred Options consultation we:

- suggested that the supporting text is amended to explain that additional provision to take account of clearance would be considered as part of the monitoring process;
- questioned whether the sequential approach outlined at L1.6 reflected the role of Trafford's 4 main town centres in accommodating future housing growth; and
- pointed out that the approach to greenfield housing development made no specific reference to the proposed greenfield allocations at the Trafford Centre Rectangle and Partington.

Paragraph 11.10 deals with the last of these points. However, the first two issues do not appear to have been addressed.

Regeneration and Reducing Inequalities (L3)

We are pleased to note that, as suggested in our response to the June 2009 consultation, this policy has been substantially revised. At this stage the only additional point we would make is that the 'other regeneration areas' to which paragraph L3.8 refers, are named within the policy

Economy (W1)

We note that paragraph W1.3 says the Trafford Park Core '*will be the principal location for employment development in the Borough*'. On a point of detail, this is not borne out by Table W1 which shows Carrington providing the greatest proportion of allocated employment land in the Borough. We therefore presume that the figures exclude redevelopment/intensification of sites currently in use within Trafford Park.

Green Belt and other Protected Open Land (R4)

Paragraph R4.4 proposes that the high amenity employment site at Davenport Green (which is allocated in the current UDP) is returned to the Green Belt. The supporting text at paragraph 16.14 acknowledges Davenport Green's 'demotion' from NWDA's list of strategic regional sites. However, as drafted, it implies that this was merely a reflection of 'the current position'. We suggest it is amended to read:

Additionally, following NWDA's review of its strategic regional sites, Davenport Green has been removed from the list of designated sites. This reflects a refocusing of NWDA priorities taking account of the changing policy and market context, and consideration of the criteria for ERDF funding under the North West Operational Programme.

The Chancery
58 Spring Gardens
Manchester
M2 1EW

T: 0161 831 1300
F: 0161 831 1301

www.turleyassociates.co.uk

16 April 2010

Sent by Email

1045

Mr D Smith
Head of Strategic Planning and Housing Services
Trafford Council
Waterside House
Sale Waterside
Trafford

Our ref: PEEM2002

E: mworcester@turleyassociates.co.uk

Dear Mr Smith,

REPRESENTATIONS ON THE TRAFFORD COUNCIL DRAFT CORE STRATEGY FURTHER CONSULTATION (MARCH 2010)

Please find enclosed representations on the March 2010 edition of the Trafford Council Draft Core Strategy Further Consultation which have been prepared on behalf of the Peel Group.

As you will be aware, the Peel Group has significant and outstanding concerns regarding the conclusions of the Strategic Flood Risk Assessment, the assumptions contained therein and the implications for the provisions of the Sustainability Appraisal Sequential and Exceptions Test Documents and the Draft Core Strategy.

Some of their site specific concerns are referenced in the enclosed document. A fuller and more detailed response regarding flood risk issues will be provided on or before the 30th April in line with your letter of agreement dated 14th April.

Please do call either Paul Singleton or myself should you wish to discuss matters further.

Yours sincerely

Mark Worcester
Associate Director

cc: P Nears
D Thompson

Peel
Peel

STRATEGIC PLANNING AND DEVELOPMENTS			
19 APR 2010			
Date			
Author			
Appr			
Actd			
Copies to			

PEEL GROUP

TRAFFORD CORE STRATEGY

**REPRESENTATIONS ON THE FURTHER
CONSULTATION EDITION (MARCH 2010)**

APRIL 2010



TURLEY ASSOCIATES

CONTENTS

1.	Introduction	1
2.	Representations	2

TA Ref:

LPA Ref:

Office Address: The Chancery
58 Spring Gardens
Manchester
M2 1EW

Telephone 0161 831 1300

Date of Issue: April 2010

1. Introduction

- 1.1 These representations to the Trafford Core Strategy Further Consultation document (March 2010) have been prepared by Turley Associates on behalf of the Peel Group (Peel) with support from the Traffic, Transport and Highway Consultancy (TTHC).
- 1.2 The representations address the provisions of a number of draft policies as follows:
- SL1 – Pomona Island
 - SL 2 - Wharfside
 - SL4 – Trafford Centre Rectangle
 - SL5 – Carrington
 - W1 – Economy
 - W2 – Town Centres and Retail
 - L1 – Land for New Homes
- 1.3 Representations are also made in respect of some Strategic Objectives, the Place Objectives for Trafford Park and Urmston and the Key Diagram.
- 1.4 The Peel Group, which includes, inter alia, the Manchester Ship Canal Company and the Bridgewater Canal Company Limited, will be submitting a further set of representations in respect of the Strategic Flood Risk Assessment (SFRA) and those planning and policy decisions taken relating to it, or which have been influenced by it. These comments will consider matters covered in the “Further Consultation on the Vision, Strategic Objectives and Delivery Strategy’ and the Key Diagram, and also the “Sustainability Appraisal Report and PPS25 Flood Risk Exception Test” and “PPS25 Flood Risk Sequential Test of Proposed Strategic Locations and other Development Areas” documents, both dated March 2010 (albeit we note at paragraph 4.29 that decisions in the former document were based upon versions of the latter documents dated February 2010). Accordingly, and for the avoidance of doubt, the representations by Peel in this document should not be construed as constituting an acceptance of the whole or part of any of the evidence base relating to flooding issues on which the Council relies.

2. Representations

Strategic Location 1 – Pomona Island

Residential Component:

- 2.1 It is noted that that Policy SL1 no longer makes an allowance for this Strategic Location to contribute towards the Council's housing land target.
- 2.2 Peel has fundamental concerns with this approach and wishes to challenge it for two reasons. Before these are set out it should be noted that a fuller and separate response will be made in respect of flood risk issues. Peel does not agree with the flood risk zonings attributed in the Core Strategy and associated evidence base documents; on going technical analysis will determine whether or not Peel has to take the view that the evidence base is unsound. However, for the purposes of this initial objection Peel comments in respect of the Council's figures, whereas the figures may themselves change, subject to Peel's discussions with the Environment Agency. The reasons for objection are as follows:
- Firstly, Policy SL1 fails to recognise that there is an extant planning permission for 546 residential units at Pomona which Peel fully intends to implement in due course. To support this development Peel has commissioned further work to demonstrate how the site can be protected from flood risk. Such measures may also enable additional areas of the site to be developed for residential purposes.

The Council's PPS25 Flood Risk Sequential Test Document (March 2010) indicates that 49% of the site is located within either Flood Zone 1 or Flood Zone 2. PPS25 makes it clear that whilst residential uses fall within the 'more vulnerable' category of land uses they can, nevertheless, be accommodated in such zones subject to the completion of a Flood Risk Assessment, without triggering a requirement for the requirements of the exceptions test to be met.

PPS25 also reveals that the other main land uses proposed for Pomona Island in the Core Strategy (employment, leisure, retail, restaurants, and open space) fall within the 'less vulnerable' category and as such are capable of being sited on those parts of Pomona Island which lie within Flood Zone 3, subject to a Flood Risk Assessment, without triggering a requirement for the requirements of the exceptions test to be met.

In view of the above Peel requests that Policy SL1 be revised such that, at the very least, reference is made to the extant consent and a allowance of at least 546 and potentially up to 800 residential units (if not more dependent on the outcome of the further flood risk work) be reinstated.

- Secondly, the PPS25 exceptions testing which has been undertaken and which has informed the Council's decision to withdraw the housing allowance for Pomona appears to have been predicated on an assumption that the extant planning permission for 546 residential units at Pomona would expire in June 2010 and that Peel no longer intended to implement the consent. Our assumption that this was the basis on which the exceptions test exercise was undertaken stems from the fact that the version of the Core Strategy appended to the Executive Committee report in February 2010 stated that these were the Council's assumptions

When Peel raised concerns regarding these statements the Core Strategy was subsequently amended to correct these errors. We note also that the published version of the Sustainability Appraisal Exceptions Test document also has the correct date of 2012. However if all that has happened is the correction of dates and the deletion of comments regarding Peel's intentions this does not address the fundamental issue that, as the relevant exceptions test was based on the fundamentally flawed assumption that permission at Pomona expired in 2010 and was unlikely to be implemented by Peel, the results are consequently equally flawed and cannot be relied upon to support decisions regarding the scale of housing provision at Pomona and, by proxy, at Carrington. Consequently Peel believes that the exceptions testing exercise needs to be repeated prior to relevant housing allowances being finalized. Unless this work is undertaken again using the correct inputs the soundness of the Core Strategy will be compromised.

Furthermore, the March 2010 Sustainability Appraisal Report and Exception Test Document accepts that development at Pomona has the potential to deliver range of significant sustainability benefits, including improving accessibility for all to services and facilities, reducing poverty and social exclusion and conserving land resources. It further confirms positive effects stemming from its accessibility by public transport and proximity to areas of deprivation.

Given all these factors and obvious locational benefits and advantages, all acknowledged in the Council's own evidence base, it has to be the case that the correct approach is to look at the site closely from a flood risk perspective and ensure its ability to accommodate residential development is maximised. In addition to the already consented units, the approach for the remainder of the site should be to direct residential development to those areas which within the finally agreed technical flood risk analysis are shown to be at least risk of flooding.

Employment Component:

- 2.3 In line with their representations on other policies, as far as Peel can see, there are no provisions within the draft Core Strategy or other relevant documents such as the North West Regional Spatial Strategy which would justify the inclusion of the words "up to" at the start of the first bullet point. As specified, employment land requirements are not expressed as maximums and Trafford should be seeking to maximise economic investment in sustainable urban locations such as Pomona Island. Peel request that words "up to" to be deleted from the text.

Strategic Location 2 – Trafford Wharfside

Strategic Proposal

- 2.4 In line with their representations on other policies, as far as Peel can see, there are no provisions within the draft Core Strategy or other relevant documents such as the North West Regional Spatial Strategy which would justify the inclusion of the words "up to" at the start of the first bullet point. As specified, employment land requirements are not expressed as maximums and Trafford should be seeking to maximise economic investment in sustainable urban locations such as Trafford Wharfside. Peel request that words "up to" to be deleted from the text
- 2.5 More generally Peel requests that the Policy be expanded to specify, as it does for Policy SL4 (Trafford Centre Rectangle) that the detailed phasing of the infrastructure requirements will be addressed through the Land Allocations DPD. Such an approach would be supported by Peel.

Implementation

- 2.6 For the reasons given in paragraphs 2.33-2.34 below, the Water Taxi should be categorised as Priority 3.

- 2.7 There is no evidence or justification for schools (and contributions towards them) and it may be that the quantum of development would not require them.
- 2.8 Peel is already implementing the 'Direct Pedestrian Link Across the Manchester Ship Canal at MediaCity:UK' referred to. This requirement should therefore be deleted.
- 2.9 The list of projects also makes reference to 'the Strategic Processional Route' and 'Direct Pedestrian Link Across the Manchester Ship Canal at Clippers Quay'
- 2.10 Both of these schemes are categorised as Priority 2. According to Page 24 of the Core Strategy Priority 2 schemes are those "**needed** to ensure sustainability of growth proposed in the Core Strategy".
- 2.11 As far as Peel is aware, no work has been undertaken which demonstrates that such works are 'needed' and so the decision to propose a Priority 2 categorisation is unjustified and, accordingly, Peel wish to object.
- 2.12 Peel requests that the categorisation is amended to Priority 3 such that the schemes would '**assist** in ensuring the sustainability of planned growth'

Policy SL4 – Trafford Centre Rectangle

- 2.13 Peel is generally supportive of the provisions of Policy SL4, subject to the small number of amendments / additions which are requested in paragraphs 2.19 – 2.38 below being satisfactorily addressed.
- 2.14 Before these requests are outlined, the reasons why development at Trafford Quays has the potential to make a significant contribution towards the realisation of the Strategic Objectives of the Core Strategy are briefly summarised. These reasons have been described, at length, in previous Core Strategy related representations (August 2008 and June 2009).
- 2.15 With reference to Strategic Objectives S01, S03 and S05, Trafford Quays has the potential to accommodate a significant quantum of residential accommodation and in doing so will make a major contribution toward meeting housing land requirements in the plan period and beyond. Furthermore, its size will enable a mix of property types and tenures to be provided including family and affordable homes and homes which meet an aspirational need alongside commercial B1 accommodation and community facilities of an appropriate scale all set within an attractive and green setting. A wholly new neighbourhood will be created in close proximity to the key employment areas of Trafford Park and the Regional Centre,

capable of attracting and retaining a cross section of the Borough's population. As a consequence development of the site will make a significant contribution to meeting identified housing needs which in turn will support economic growth within the borough and the City Region.

- 2.16 The ability of Trafford Quays to accommodate a significant quantum and range of dwellings is particularly important given the absence of other significant residential development opportunities, particularly within northern areas of the borough and the need to attract families and high income households into the north of the borough.
- 2.17 With reference to Strategic Objective S06, it is of note that, with its proximity to Trafford Bus Station Trafford Quays is already highly accessible by public transport and, through the creation of a critical mass of residential development, there exists the opportunity to improve further the levels of transport connectivity with the rest of Trafford Park, Salford Quays and the Regional Centre as well as employment opportunities which shall emerge at Port Salford and Salford City Reds. Improved connectivity will further support economic growth.
- 2.18 With reference to Strategic Objectives S07 and S08, the inter-related stages of site master-planning and the preparation of detailed development proposals, will provide the appropriate forums to ensure the delivery of sustainable developments which incorporate sustainable construction principles and which protect the historic built environment.

Strategic Proposal

- 2.19 The support which Policy SL4 provides for B1 uses is welcomed by Peel. However, a small number of amendments to the draft policy are requested as follows:
- It is requested that the policy be expanded to include a form of words equivalent to that provided in paragraph 11.10 (i.e. the policy should be make it clear that as the Trafford Centre Rectangle has been selected as a Strategic Location supported by the completion of a need and sequential assessment by the Council, there will be no requirement for individual development proposals to satisfy these requirements of PPS4).
 - Peel request that the text of the second bullet point under this heading be amended to make clear that the figures for employment land provision relate only to the release of new employment land (i.e. land that is being brought forward for employment use for the first time with proposals to change the use of a building from Use Class B1 to B8, for example, or

proposals to redevelop an existing or former employment site not counting against the 'allowance'). Accordingly, the approved development of the former Kratos site should not be included within the 10 hectare provision.

- As far as Peel can see, there are no provisions within the draft Core Strategy or other relevant documents such as the North West Regional Spatial Strategy which would justify the inclusion of the words "up to" at the start of the second bullet point. As specified, employment land requirements are not expressed as maximums and Trafford should be seeking to maximise economic investment in sustainable urban locations such as the Trafford Centre Rectangle. Peel therefore request that words "up to" to be deleted from the text.

Developer Requirements

(i) Off Site Highway Works

2.20 Peel objects to and requests the deletion of the second bullet point under this heading which requires:

- a contribution towards a scheme to mitigate the impact of traffic generated by the development on the M60

2.21 The apparent justification for this requirement is contained within paragraph 8.8 which references the outcome of the Greater Manchester Transport Modelling Assessment.

2.22 A review of the relevant GM model reports reveals that the transport modelling work done to date is very broad brush and, in the circumstances, cannot be relied upon to support the detailed formulation of specific policy requirements of the Core Strategy.

2.23 For example, the main summary page of the web-site entitled 'Trafford Council, GM LDF Transport Modelling' confirms that the only work to date (Phase 1) reported in November 2009:

"takes no account of any HA proposals and.....the Western Gateway Improvement Scheme (WGIS)..."

It further advises that:

"caution needs to be applied in terms of drawing final conclusions".

- 2.24 The more specific Technical Note "Trafford Transport Impacts" of LDF proposals (November 2009) explains that there is 'global' assumed growth with no specific sites and it is not clear where this assumed growth is located.
- 2.25 It is Peel's firm view that the current wording of the third bullet point (re WGIS) should be taken as the being the full and sufficient contribution which development within the Trafford Centre Rectangle should make to off site highway works in the area as this is designed to assist in the relief of congestion in the wider area. In this connection, Peel notes that the Policy states that the detailed phasing of the infrastructure requirements will be addressed through the Land Allocations DPD. This approach is supported by Peel.
- 2.26 Notwithstanding a request which was sent by email to the Council on the 14th March by Turley Associates, Peel has not been provided with details of the Highway Agencies 'concordat' referred to in paragraph 4.27 of the Draft Core Strategy. Peel repeats its request that this be provided and, meanwhile, reserves its position to make further representations in respect of highway matters.

(ii) Secondary School Provision

- 2.27 Policy SL4 could be read as indicating that secondary school provision of an appropriate scale will be required on the Trafford Quays site although pre-submission discussions with Officers suggests that the intention is that the development should only contribute funding towards the building of a new school elsewhere. Accordingly, Peel requests that the policy be amended such that it clarifies that what is sought is a financial contribution toward the provision of a new school rather than physical provision on site.

(iii) Air Quality Constraints

- 2.28 Policy SL4 as currently drafted seeks to preclude residential development in areas of 'potentially' poor air quality around Trafford Boulevard and Barton Bridge. However, no justification for this approach is provided.
- 2.29 Accordingly Peel requests that this policy constraint be deleted. The Delivery Report submitted by Peel in August 2009 was supported by an Air Quality Assessment prepared by Air Quality Consultants. The AQC report clearly concludes road traffic emissions would not provide any constraints to development and that a satisfactory environment in terms of air quality impacts can be created for residents and workers occupying and using the development. Similarly, it is

concluded that the site's location relative to the Davyhulme waste water treatment facility should not be a factor which influences the site's redevelopment.

Implementation:

- 2.30 The Trafford Water Taxi development is identified as a 'Priority 1' infrastructure scheme. According to Page 24 of the Core Strategy, Priority 1 status means that the scheme is needed now to support existing development, when that is clearly not the case.
- 2.31 Peel believes that the categorization of the Water Taxi as Priority 1 serves only to over-emphasise its importance and believes that, at the very most, it should be identified as a Priority 3 requirement. Further, Peel request that the provisions of the Policy be expanded to make clear that should the Water Taxi facility be implemented then this will be taken into account by the Council when considering subsequent development proposals with reference to relevant Supplementary Planning Documents
- 2.32 The list of projects also makes reference to the 'Managed Motorway – M60- J8-12 and the provision of an 'Additional Lane Eastbound M60 between Junction 10 and 15. The Council has since confirmed that the reference to 'Eastbound' is an error and will be amended to 'Westbound' in subsequent drafts.
- 2.33 Both of these schemes are categorised as Priority 2. According to Page 24 of the Core Strategy Priority 2 schemes are those "**needed** to ensure sustainability of growth proposed in the Core Strategy".
- 2.34 As far as Peel is aware, no work has been undertaken which demonstrates that such works are 'needed' and so the decision to propose a Priority 2 categorisation is unjustified and, accordingly, Peel wish to object.
- 2.35 Peel requests that the categorisation is amended to Priority 3 such that the schemes would '**assist** in ensuring the sustainability of planned growth'

Policy Justification

Paragraph 8.3:

- 2.36 It is requested that the policy justification emphasises further the important role which Trafford Quays will play in meeting identified housing needs, in particular the need for high quality 'aspirational' homes in the north of the Borough, and

supporting economic growth in the Borough as a whole and Regional Centre more widely.

- 2.37 Accordingly it is requested that paragraph 8.3 be amended to include the additional text which is underlined below:

"The location is a predominantly a brown-field development location (with the exception of green-field land at the Trafford Quays site). It has the potential, particularly on the Trafford Quays site to deliver high quality residential accommodation that will help meet Trafford's identified housing needs up to and, potentially, beyond the end of the plan period.

The identified housing need includes a requirement for higher quality, larger 'aspirational' housing particularly in the north of the Borough to support employment and economic growth in the borough and Regional Centre more widely and to create a more sustainable pattern of development. With the exception of Trafford Quays, few sites in the Borough are of sufficient size to provide the mix of properties which Trafford requires nor do they enjoy the locational advantages of Trafford Quays in terms of its proximity to the Trafford Park Core Area and Regional Centre both of which are key employment locations. The Council's Strategic Housing Land Availability Assessment confirms that there are no other opportunities in the north of the Borough to create an aspirational residential environment capable of competing with the suburbs on the south of the borough.

Trafford Quays also has the potential to provide a range of employment opportunities to meet the economic regeneration and development needs of the Borough and to contribute towards the economic prosperity of the City Region. Using land efficiently within this location will reduce the need to release further Greenfield land elsewhere in the borough."

Additional Text:

- 2.38 It is requested that additional text be included within the policy justification which makes it clear that planning applications for development at Trafford Quays which address the requirements of Policy SL4 may be considered acceptable in advance of the adoption of the Area Allocations Development Plan Document.

Strategic Location 5 - Carrington

- 2.39 It is noted that the Core Strategy incorporates a revised approach for Carrington in that it is now identified as a Strategic Location for residential (1560 units) as well as employment development.
- 2.40 It is understood that this amendment has come about as a result of concerns being raised regarding the perceived flood risk issues at Pomona Island and the potentially flawed assumption that Pomona is not suitable of that site to accommodate development. Indeed it appears that the 1560 unit allowance has simply been transferred from Pomona to Carrington in order to ensure that the full Trafford housing requirement can be met.
- 2.41 At this stage Peel wishes to challenge the appropriateness of 'transferring' the whole of the 1560 allocation from Pomona and the assumption within the phasing strategy that development at Carrington will commence in 2011/2012, but it reserves its right to make further comment as necessary in light of ongoing work relating to the Strategic Flood Risk Assessment.
- 2.42 Given that Pomona has the benefit of planning permission for 546 residential units which shall remain extant until 2012 and which Peel intends to implement, the decision of the Council to 'transfer' the whole of the former Pomona allocation to Carrington is patently incorrect.
- 2.43 Further, bearing in mind the relevant timescales associated with progression of the LDF, applying for and securing planning permission, resolving any outstanding land ownership issues, discharging relevant planning conditions including those relating to site investigations and site remediation and putting in place the necessary and significant infrastructure improvements which are referred to in the text of the Policy and which are required to, amongst other things, make the site more accessible, the assumption that residential development can be delivered on this site from 2011/12 onwards appears unachievable. The site's historic use as a major chemicals complex with a complexity of ownerships (land, plant and equipment) and no doubt a need to address ground contamination and remediation issues is likely to further extend the time required before development can commence. Peel's view is that whilst the assumed annual rate of build may be achievable the start date and, therefore the ability of the site to deliver the quantum of development within the plan period currently envisaged is wholly unrealistic.
- 2.44 Peel note also that there has been no adjustment in the employment land allowance for this site notwithstanding the introduction of a substantial housing allowance and requests that the Council clarifies its position in this regard.

2.45 Taking the above points together, it is therefore requested that the scale of housing allocation awarded to Carrington and associated phasing strategy should be reconsidered. In particular, the allocation should be reduced by at least 546 units with the phasing strategy amended to reflect that at best, only very limited residential development is likely to occur before 2015. However, consistent with representations made in respect of Pomona Island, Peel's view is that a further reduction of at least 250 units over and above the 546 should be made to reflect a more realistic development programme.

Policy L1 – Land for New Homes

Policy L1.6

2.46 Consistent with the representations made in respect of Policy W1, Peel proposes that Policy L1.6 be amended to confirm that residential development within the Trafford Park Core Area will not be supported, notwithstanding its location within the defined Inner Area, due to its key importance as an employment area both for the borough and the City Region.

2.47 Consistent with the representations made in respect of Policies SL1 and SL5, Peel requests that the provisions of Table L1 be amended in part as follows:

Site	2008/9- 2010/11	2011/2- 2015/6	2016/7- 2020/1	2021/2- 2025/6	Total
Pomona	0	550	250		800
Carrington	0	0	380	380	760
Regional Centre Area Totals	0	950	550	200	1700
South City Region Area Totals	1150	2100	2080	2330	7660

Paragraph 11.5

- 2.48 Peel question the inclusion of the suggestion that growth in Trafford must be seen to “strengthen” the more vulnerable market areas both within and adjacent to Trafford. It is difficult to envisage how any development which is not physically within or contiguous with such areas could be shown to have a strengthening effect. Accordingly this requirement could be used to resist or call into question development proposals that are acceptable in all other respects. As stated in previous representations (June 2009) Peel requests that this reference be deleted from the text.

Paragraph 11.10

- 2.49 Peel wishes to support the intent of Paragraph 11.10 but consider that the important provisions of this paragraph are such that they should, in the interests of clarity, be contained within the main text of Policy L1 rather than the supporting justification. Accordingly suitable amendments are requested.

Policy W1

- 2.50 Peel wishes to restate its objection to the provisions of Policy W1 which were set out in correspondence dated 22nd December 2009 in response to an earlier draft of the Core Strategy and which have not been addressed in the revised (current) version.
- 2.51 Peel objects to the proposed removal of the reference to key economic growth sectors (as contained in W1.3 of the previous document) as this reference was much broader than that currently proposed of B1, B2 and B8.
- 2.52 Having reviewed the consultation document, Peel object to the proposed wording for Policy W1 and in particular the proposed distribution and allocation of employment land contained within Table W1 on the basis that the justification and assumptions used to determine these figures are unclear with insufficient supply identified in some areas. In order to remove this objection, Peel would request that further information be made available with regard to how these figures have been arrived at with reference to the evidence base.
- 2.53 Peel would also re-iterate their concern (as stated in June 2009) with regard to the proposed paragraph W1.5 (formerly paragraph W1.10) and the policy hurdle created for developing alternative uses on existing employment sites.

- 2.54 Peel maintain their previous objection to the use of the tests set out in paragraph W1.5 which contradict the Core Strategy's aspiration for a broader range of uses to be brought forward in the Strategic Locations.
- 2.55 Peel welcomes reference to office uses being appropriate at Pomona and Wharfside.
- 2.56 Peel would prefer for Policy W1 to confirm (within paragraph W1.3) that residential development and office development which is not ancillary to existing or proposed employment uses will not be supported within the Trafford Park Core, notwithstanding its location within the defined Inner Area. This amendment is requested having regard to what Peel understands is the Council's aspiration to protect Trafford Park Core Area for modern industrial, storage and distribution uses.
- 2.57 Finally, Peel requests that the third bullet point within paragraph 13.4 be amended to include reference to Media (in accordance with the relevant SPD), to read as follows:

- Cultural, creative and media industries

Policy W2 – Town Centres and Retail

- 2.58 Peel objects to the stated "presumption against the expansion of the three existing retail warehouse parks unless it can be justified against tests set out in Government Guidance". Peel also object to the proposal to limit any further development within the retail warehouse parks to bulky comparison goods only.
- 2.59 These provisions effectively pre-judge potential planning applications and, in the circumstances, Peel requests that the policy W2.14 be re-drafted as follows:
- "Proposals to expand any of the three existing Retail Warehouse Parks (White City, Trafford and Altrincham) should be justified against the tests set out in Government Guidance."*
- 2.60 Peel also request that Policy W2 be expanded to confirm that the borough's existing out of centre retail developments and parks should be the preferred focus (ahead of new sites) for further retail development of an appropriate scale that cannot be accommodated within or on the edge of a relevant town centre and that it be clarified that local services (that might include retail as part of a mixed use development) will not be prohibited in key locations such as Pomona, Wharfside or Trafford Quays.

- 2.61 Peel supports the provisions of Policy W2.10 which recognises the need to redevelop the local centre at Partington to create a modern shopping centre including a medium sized supermarket and other retail units.

Strategic Objective SO7 and Place Objectives TPO17/ OTO23 / ST020 / URO15 / SAO21 / AL026 / PA019 / CA023

- 2.62 Peel would like to express its support for Strategic Objective 7 and the proposals to encourage and support 'opportunities to locate low carbon / decentralised energy facilities' to deliver the objective in several districts of the borough. Peel believes that Trafford should play its part in contributing to the Northwest's energy and carbon reduction targets. Peel commends the identified strategic and place objectives and believes that low carbon facilities should be an essential part of the borough's infrastructure.

TPO1 (Page 10)

- 2.63 It is requested that a reference to Wharfside and the Trafford Centre Rectangle meeting regional centre needs and supporting economic growth be added.
- 2.64 A suggested form of words is provided below with the additional text shown underlined:

"To maximize the potential of the Wharfside and Trafford Centre Rectangle Locations to meet Trafford's housing needs, to support economic growth in the borough and Regional Centre and create sustainable residential development as part of high quality mixed use redevelopment/development schemes, supported by local community facilities."

UR013 (Page 13)

- 2.65 Reference is made in the Place Objectives for Urmston to an objective worded as being to manage the "congestion associated with the Trafford Centre". As stated in previous representations (August 2008 and June 2009) Peel objects to this reference and request its deletion since there is no evidence that the Trafford Centre is a cause of any significant or regular traffic congestion either in the immediate vicinity of the Trafford Centre or in Urmston.
- 2.66 Junction 10 of the M60, the main Urmston access for the motorway, will be significantly improved with the introduction of WGIS, both generally due to traffic flow changes and specifically for Urmston due to the widening of the Barton Road

entry. In busy periods the forecast future queues are approximately halved on this approach. Local journey times generally improve with WGIS and more local demand can pass through the area without delay. These improvements were recognised in the positive Committee Report prepared by Trafford's Officers for the WGIS planning application and in the Council's decision to grant planning permission for the WGIS proposals.

18 Implementation

- 2.67 Peel requests the inclusion of an additional paragraph after the existing paragraph 18.9 to read as follows:

"In accordance with the Trafford Statement of Community Involvement, it will be necessary, in due course to consult with City Airport Ltd (a relevant aerodrome operator) in relation to development proposals in the vicinity of City Airport Manchester and include appropriate aerodrome safeguarding policies within the future Land Allocations DPD / any Development Control Policy DPD.

Key Diagram

- 2.68 Peel requests that City Airport, Salford Reds Stadium and Port Salford be indicated as 'Significant Neighbouring Places.
- 2.69 Peel also request that WGIS be identified as an 'Indicative Transport Infrastructure Improvement'
- 2.70 Peel notes that the key diagram makes reference to areas at risk of flooding. As stated previously Peel intends to make further representations on Flood Risk Issues and, as necessary, on the key diagram.

PEEL GROUP

TRAFFORD CORE STRATEGY

**FURTHER REPRESENTATIONS ON THE
FURTHER CONSULTATION EDITION (MARCH
2010) AND ASSOCIATED EVIDENCE BASE**

30 APRIL 2010

TURLEY ASSOCIATES

CONTENTS

1.	Introduction	1
2.	Consultation Requirements	2
3.	Methodology	4
4.	Precedents	6
5.	Site Specific Comments	7
6.	Conclusions	11

TA Ref: PEEM2002

LPA Ref:

Office Address: The Chancery
58 Spring Gardens
Manchester
M2 1EW

Telephone 0161 831 1300

Date of Issue: 30 April 2010

1. Introduction

- 1.1 These representations have been prepared by Turley Associates on behalf of the Peel Group (Peel) with support from Bircham Dyson Bell LLP, Aecom and HR Wallingford.
- 1.2 The representations are made in respect of the Level 2 Strategic Flood Risk Assessment (SFRA) prepared by JBA Consulting for Manchester, Salford and Trafford Councils (March 2010) and those planning policy decisions taken relating to it or which have been influenced by it. Accordingly, the representations relate also to the provisions of Trafford Council's "Further Consultation on the Vision, Strategic Objections and Delivery Strategy" document, the "Sustainability Appraisal Report and PPS25 Flood Risk Exception Test" document and the "PPS25 Flood Risk Sequential Test of Proposed Strategic locations and other Development Areas" document (all dated March 2010).
- 1.3 The representations are structured in the following way.
 - Section 2 – Consultation
 - Section 3 – SFRA Methodology
 - Section 4 – Precedents
 - Section 5 – Site Specific Considerations
 - Section 6 – Conclusions
- 1.4 It should be noted that the representations are additional to, and should be read alongside the formal representations on the Trafford Core Strategy Further Consultation Document which were submitted on behalf of Peel on the 16th April 2010.

2. Consultation Requirements

- 2.1 It is of significant concern to Peel that the Level 2 SFRA has been conducted without adequate consultation with them given the Group's clear and multi-faceted interest as a key stakeholder.
- 2.2 Peel in its various guises (including inter-alia the Manchester Ship Canal Company) has a legitimate interest in the SFRA in its capacity as a Navigation Authority, Statutory Undertaker and affected landowner. It benefits from powers to "make or maintain works for the drainage of land" and is, therefore, a de-facto operating Authority as detailed in Annex H14 of PPS25. PPS25 notes at paragraph 6 (Key Planning Objectives) that Local Authorities should adopt a "partnership approach" with such bodies to ensure "that best use is made of their knowledge and expertise and information". Paragraph 33 refers to the involvement of those stakeholders outlined in Appendix H in the formulation of Local Development Documents (LDD's) and paragraph 25 outlines the need for Local Authorities to consult "when preparing policies in their LDD's on flood risk management and in relation to areas potentially identified as areas at risk of flooding". Paragraph 23 recognises that flood risk issues can affect the value of land, the cost of developing it and the cost of its future management and use and, as such, advises that such matters be considered as early as possible.
- 2.3 The emphasis placed on consultation is repeated within the PPS25 Practice Guide. At paragraph 2.52, a list of further organisations is identified who ought to be consulted in addition to those identified in Annex H of PPS25. It advises at paragraph 2.59 that Navigation Authorities (defined as British Waterways and/or navigation authorities, as appropriate) should be consulted by the LPA in relation to sites adjacent to or which discharge into canals. This is because Navigation Authorities may be able to give advice on potential issues associated with the canal network (paragraph 3.29).
- 2.4 Paragraph 3.46 of the Practice Guide further advises Local Authorities of the need to ensure that SFRA's are developed in partnership with other key stakeholders and encourages early discussion on matters such as the scope of the assessment. Finally, navigation authorities are identified as potential sources of information for Level 1 SFRA's (paragraph 3.54).
- 2.5 Paragraph 3.1 on the SFRA reports that the Manchester Ship Canal Company is a key stakeholder and has been consulted as part of the SFRA process.
- 2.6 Contrary to this assertion, Peel believes the level of consultation undertaken to have been inadequate.

- 2.7 Given the lack of adequate consultation with the Peel Group, it is considered that the SFRA, as presently drafted, is predicated on an incomplete, flawed and potential unsound evidence base omitting inter-alia the input and engineering expertise of the Peel Group's engineering staff. .
- 2.8 PPS12 Local Spatial Planning requires that Core Strategies should be based on thorough evidence (paragraph 4.37) and this will be a factor to be considered as to whether the plan is justified and meets the important test of soundness (paragraph 4.52). The Practice Guide to PPS25 provides further amplification of this point advising that "it is unlikely that a LDD that was not supported by an adequate evidence base on flood risk would be found to be sound" (paragraph 3.40)
- 2.9 Therefore, for the Council to proceed without a completed evidence base on flood risk, having made decisions on policies and land use allocations based on incomplete and possibly unchecked information in respect of flood risk poses a high risk that the Core Strategy will be found to be "unsound".
- 2.10 Accordingly, the Peel Group urges the Council to engage with it in further discussion to ensure the flood risk issues are properly understood and planning decisions properly informed before the emerging Draft Core Strategy proceeds any further.
- 2.11 The concerns of the Peel Group as they relate to the more detailed elements of the Level 2 SRFA are set out in subsequent sections.

3. Methodology

- 3.1 As noted earlier, Peel has significant and serious concerns regarding the reliability of the Level 2 SFRA and its soundness and, hence, as this is as a critical piece of the evidence basis underpinning the emerging Core Strategy, regarding the soundness of the emerging Core Strategy itself.
- 3.2 These concerns relate principally to the methodology employed by JBA Consulting in the production of the Level 2 SFRA.
- 3.3 HR Wallingford has prepared a detailed review of the Level 2 SFRA on behalf of the Peel Group and their report is attached as Appendix 1. The key conclusions of the HR Wallingford assessment are as follows:
- The output of the SFRA does not address all the issues required in the PPS25 Practice Guide; in particular there is no assessment of the current condition, operation, management policy or probability of possible operational failures of the water management structures of the Manchester Ship Canal (MSC). Rather, scenarios of gate failures are proposed which do not reflect the operational experience of the MSC since its construction over 100 years ago.
 - The wording of the SFRA document casts unnecessary and unfounded doubt on the normal operation of the Manchester Ship Canal. The normal operation of the Manchester Ship Canal infrastructure should be the basis of comparison as the standard case; the description "best case" for normal operation is misleading since this casts doubt on whether the normal operating conditions are achievable.
 - The representation of the sluices of the MSC in the modelling of the Level 2 SFRA assumes that the discharge characteristics have reduced efficiency as being "a reasonable representation of residual risk". However, there is no justification of this arbitrary choice.
 - The breaching scenarios for the Bridgewater Canal give cause for concern as to the method used to identify potential breach locations and on the method used to determine the outflow hydrograph. Crucial factors that are missing from the method of assessment of the breach risk zones are: canal bank construction, canal bank surface cover; and canal bank condition maintenance and inspection regimes. An initial examination of the shape of the canal outflow hydrographs reveals that the shape is not always consistent with the usual effect of the progressive

erosion of the canal bed away from the breach, which is one of the controlling mechanisms stated on Page 39 of the Level 2 SFRA.

- Although the mapping of inundation extent might show areas which could flood under certain scenarios of canal embankment breaching, there is no assessment of the likelihood that should be associated with the breach. The Level 2 SFRA describes the approach as 'conservative' but without any assessment of the influence of this conservatism on the mapped area of potential hazard. The best use of the information in the scenarios might be to illustrate where a more detailed assessment is required, but the information cannot be sufficiently sound for making definitive planning decisions.
- In terms of the mapping, the assumptions used in the scenarios for the operation of the MSC and the breaching of the Bridgewater Canal presented in the Level 2 SFRA lead to an over estimate of the consequent flood levels for the supposed frequency of flood occurrence. Thus the extent of the Flood Zones are over-stated which will lead to a misrepresentation of the actual degree of flood hazard. A critical point is the interaction of the interpretation of these scenarios presented with the application of the Sequential and Exceptions Tests in planning decisions that flow from the SFRA. For previously developed land sites these may fail the Sequential Test, whereas the appropriate development should be considered through the Exception Test.

3.4 In addition to the review conducted by HR Wallingford, Peel has also taken legal opinion from Bircham Dyson Bell LLP. That advice reflects the conclusions of HR Wallingford. In respect of the application/interpretation of the Environment Agencies Policies and Guidance on Classification of Flood Defences they have confirmed that the sluices on the Ship Canal are not flood defences and should therefore be treated as operating normally for the purposes of modelling and mapping flood zones.

4. Precedents

- 4.1 Aecom has examined the approach adopted by the Environment Agency in preparing flood risks maps associated with the Upper River Thames and the River Nene. The conclusions of this assessment confirm the advice of Bircham Dyson Bell to be correct.
- 4.2 The Environment Agency owns 44 locks and weirs sites on the upper River Thames and one lock on the River Kennet. During normal flow conditions these structures help to maintain water levels between Cricklade and Teddington and ensure that the Thames is navigable by boats. When flows increase, these structures are opened to minimise any impact on the flow and level.
- 4.3 The internet based flood risk maps for the upper River Thames show a limited extent of flood risk, and so far as Aecom can ascertain, are predicated on a model which assumed sluice gates to be fully raised or operating in their normal mode; as per EA Policy Guidance. Such an approach is consistent with the conclusions of Bircham Dyson Bell.
- 4.4 Aecom draw similar conclusions in respect of the River Nene, along the navigable reaches of which are 37 locks and weirs. Again, the internet based flood risk maps prepared by the EA are predicated, as far as Aecom can tell, on the assumption of sluice gates being fully open or operating in their normal mode.

5. Site Specific Comments

Pomona Island (SL1)

- 5.1 The Pomona Island site has been identified by the Council as a key regeneration opportunity (being located within the Old Trafford Priority Regeneration Area). Its redevelopment has commenced (Adamson House) and planning permission exists for 586 residential units which the Peel Group fully intends to build out. There is also a Council endorsed Masterplan for the redevelopment of the wider site area.
- 5.2 The Trafford Core Strategy: Further Consultation on the Vision, Strategic Objectives and Delivery Strategy proposes to allocate Pomona Island for a mix of uses including inter-alia employment and commercial leisure. A previous proposal to include provision for c.1500 residential units within the allocation is proposed to be deleted.
- 5.3 The basis of the Council's proposal to delete the residential component of Pomona Island is unclear as is the interaction between the various documents generally. For instance, the final paragraph of Page 4 of the Exception Test document reports that the findings of the Sequential Test assessment can be found in the report dated February 2010 whereas the final version of that report is actually dated March 2010.
- 5.4 It is understood that at least part of the Council's reasoning may have related to the Level 2 SFRA showing the majority (51%) of the site to fall within Flood Zone 3 (paragraph 4.22 of the Sequential Test document refers). Peel believe this reasoning to be weak and not in accordance with the provisions of PPS25; in particular PPS25 does not set any thresholds relating to what proportion of sites must be within Flood Zones 1 and 2 for the Sequential Test to be satisfied.
- 5.5 As has been evidenced elsewhere in these representations, the Peel Group believes the Level SFRA 2 to be fundamentally flawed in terms of the methodology applied, and that this results in an exaggeration of the Flood Risk at Pomona Island rather than a true 'assessment' as is required by PPS25 (key objectives) and, as a consequence, it cannot be concluded with any certainty what proportion of Pomona Island falls within each of the three flood zones. What can be asserted however, is that a SFRA conducted in line with EA Policy and PPS25 guidance would show a material reduction in the proportion of the site within Flood Zone 3. Without this assessment, the Flood Risk mapping process cannot be concluded and, as a consequence, it is premature of the Council to make definitive decisions regarding the appropriate range and mix of uses at Pomona Island.

Sequential Test

- 5.6 Any re-application of the sequential test following the completion of a corrected SFRA must have regard to paragraph 4.38 of the PPS25 Practice Guide which states that 'where redevelopment is ongoing as part of an existing regeneration strategy in Flood Zones 2 or 3 it has to be accepted that redevelopment cannot go elsewhere as there are no other reasonably available sites Regeneration should not be halted or compromised where a scheme is already partially complete.' It goes on to suggest that, rather than dismissing such sites through application of the sequential test, the sites should be subject to the provisions of the Exceptions Test.
- 5.7 As noted earlier, Pomona Island is located within the Regional Centre. The emerging Core Strategy accepts that its mixed use redevelopment would assist with the regeneration of this part of the centre. It also has the potential to deliver a range of significant sustainability benefits including improving accessibility for all to services and facilities and reducing poverty and social exclusion. Peel believes that the exclusion of residential development from the allocation will compromise the ongoing regeneration at this site (see paragraph 5.1). Indeed, paragraph 3.1 of the Council's Exceptions Test document points out the potential negative effects of no residential development at Pomona in achieving the objectives of 'achieving a better balance and mix in the housing market and improving qualifications and skills'. It is therefore incumbent on the Council to apply the advice in paragraph 4.38 of the PPS25 Practice Guide and subject the residential component to the Exceptions Test if and as necessary.

Exceptions Test

- 5.8 In terms of the application of the Exceptions Test to a residential component of development at Pomona we refer the reader to our comments contained at Paragraph 2.2 of our initial representations dated 16th April 2010.
- 5.9 Pages 19-21 of the Exceptions Test document confirm that a hotel(s)/bar(s) would pass parts 1 and 2 of the 'test' but fail to pass part 3 on the basis that the risk of flooding from elsewhere (ie the Bridgewater Canal) would be increased.
- 5.10 Peel wishes to challenge that conclusion.
- 5.11 Whilst the Level 2 SFRA confirms that there is residual risk of flooding from canals such as the Bridgewater Canal this is 'usually associated with lower probability events such as overtopping and/or the breaching of embankments'. Further, it

confirms as paragraph 3.2 that 'no attempt is made in this SFRA to assess this probability, other than noting that such events are rare'.

- 5.12 The HR Wallingford Report considers the methodology used to assess overtopping and breach scenarios to be missing critical elements. HR Wallingford draw particular attention to the fact that the JBA Assessment does not give full and proper considerations to inter-alia canal bank construction, canal bank surface cover, canal bank condition, maintenance or inspection regimes.
- 5.13 They conclude that the best use of the information would be to illustrate where a more definitive assessment might be needed, but the information 'cannot be sufficiently sound for making definitive planning decisions'.
- 5.14 Taking this advice into account Peel does not believe that the Level 2 SFRA to have definitely demonstrated that development at Pomona would increase the risk of flooding elsewhere. In the circumstances it would be more appropriate for Policy SL1, to require a detailed FRA to be completed and submitted alongside an application for development involving hotel/bar uses should such uses be shown, following completion of a revised Level 2 SFRA, to fall within Flood Zone 3a.
- 5.15 With regard to detailed design/FRA considerations Peel wishes to express concern regarding the recommendations of the SFRA in terms of its use within Urban Design. The SFRA suggests that 'floor levels should be considered based on the residual risk scenarios rather than a traditional approach of adding free board to a pre-determined event'. This is a departure from current accepted practice which has not been explained or justified.

Trafford Centre Rectangle (SL4)

- 5.16 The Emerging Core Strategy (Policy SL4) indicates a requirement that those uses classified as being 'more vulnerable' to flooding such as residential, certain leisure uses and healthcare facilities be located outside those parts of the area within Flood Zone 3. This is based on a belief that a site specific FRA is unlikely to be able to demonstrate that such uses can be safe in these areas.
- 5.17 However, this policy is predicated on the conclusions of the Level 2 SFRA which, as has been demonstrated cannot be relied upon to inform definitive planning decisions.
- 5.18 In the circumstances, Peel believes that a more appropriate approach would, subject to the conclusions of a corrected SFRA, be for the policy to require a

detailed FRA to be completed and submitted alongside any application which proposes the development of 'more vulnerable' uses within Flood Zone 3.

Wharfside (SL3) and Regeneration and reducing Inequalities (Policy L3)

- 5.19 The comments made in respect of SL4 (Trafford Centre Rectangle) are equally applicable to the provisions of Policy SL3 (Wharfside) and Policy L3 insofar as it applies to the Partington Regeneration area.

6. Conclusions

- 6.1 These representations have been prepared on behalf of the Peel Group and are additional to and should be read alongside those submitted on the 16th April 2010.
- 6.2 They are supported by a Review of the Manchester City, Salford City and Trafford Council's Strategic Flood Risk Assessment (Level 2) which has been prepared by HR Wallingford and is attached at Appendix 1. Legal opinion has been obtained from Bircham Dyson Bell LLP.
- 6.3 The representations and associated appendices draw particular attention to the fact that the level of consultation with the Peel Group of Companies has been inadequate notwithstanding their legitimate interest in the Level 2 SFRA in their capacity as a Navigation Authority, Statutory Undertaker and affected landowner. The lack of consultation is contrary to the provisions of PPS12 and PPS25 and the associated PPS25 Practice Guide
- 6.4 Further, the representations highlight that Peel has significant and serious concerns regarding the reliability of the Level 2 SFRA and its soundness hence, as this is as a critical piece of the evidence basis underpinning the emerging Core Strategy, regarding the soundness of the emerging Core Strategy itself.
- 6.5 PPS12 Local Spatial Planning requires that Core Strategies should be based on thorough evidence. As noted earlier, the Practice Guide to PPS25 provides further amplification of this point advising that "it is unlikely that a LDD that was not supported by an adequate evidence base on flood risk would be found to be sound".
- 6.6 Therefore, for the Council to proceed without a completed evidence base on flood risk, having made decisions on policies and land use allocations based on incomplete and possibly unchecked information in respect of flood risk poses a high risk that the Core Strategy will be found to be "unsound".
- 6.7 Accordingly, the Peel Group urges the Council to engage with it in further discussion to ensure the flood risk issues are properly understood and planning decisions properly informed before the emerging Draft Core Strategy proceeds any further.

Review of Manchester City, Salford City and Trafford Councils Strategic Flood Risk Assessment



Report EX 6297

Release 1.0

April 2010



Document Information

Project	Review of Manchester City, Salford City and Trafford Councils Strategic Flood Risk Assessment
Report title	Review of Manchester City, Salford City and Trafford Councils Strategic Flood Risk Assessment
Client	Peel Group
Client Representative	Alan Hodkinson
Project No.	MCM6488
Report No.	EX6297
Project Manager	Paul Samuels
Project Director	Andy Tagg

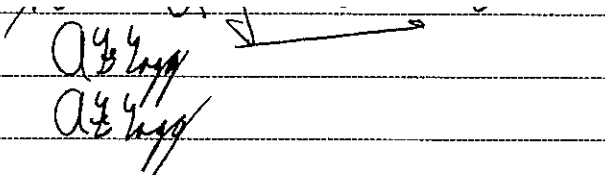
Document History

Date	Release	Prepared	Approved	Authorised	Notes
30/04/10	1.0	Paul Samuels	Andy Tagg	Andy Tagg	

Prepared

Approved

Authorised



© HR Wallingford Limited

HR Wallingford accepts no liability for the use by third parties of results or methods presented in this report. The Company also stresses that various sections of this report rely on data supplied by or drawn from third party sources. HR Wallingford accepts no liability for loss or damage suffered by the client or third parties as a result of errors or inaccuracies in such third party data.

Summary

Review of Manchester City, Salford City and Trafford Councils Strategic Flood Risk Assessment

Report EX6297
April 2010

This report contains a high-level review of the Level 2 Hybrid SFRA that JBA Consulting prepared for Manchester City, Salford City and Trafford Councils, and was published on the Trafford Council website in March 2010.

It is fundamental to understand that flood risk combines both the probability of flooding and its consequences; this is set out in the Flood and Water Management Act (2010). In this sense the mapping of flood extents and depths for the scenarios in the SFRA do not show “risk” but aspects of the flooding hazard, with some also having a probability assigned. In cases where probability is not assessed, decisions taken on the information can not be objectively “risk-based” but rather will rely on professional interpretation.

The Manchester Ship Canal and in particular the Manchester Ship Canal sluices cannot be construed as “flood defences” in terms of the preparation of maps of the Flood Zones for PPS 25. In normal operation these sluices exert considerable control on the discharge along the Manchester Ship Canal and provide for safe passage of flood water through the system, with sufficient capacity being available in all conditions experienced in over 100 years of operation.

This review Level 2 Hybrid SFRA identifies the following issues that affect the extent of flooding mapped and the interpretation of these maps in the preparation of LDF documents.

1. The output of the SFRA does not address all the issues required in the PPS 25 Practice Guide; in particular there is no assessment of current condition, operation, management policy or probability of possible operational failures of the water management structures on the Manchester Ship Canal. Rather scenarios of gate failure are proposed which do not reflect the operational experience of the Manchester Ship Canal since its construction over 100 years ago.
2. The wording of the SFRA document casts unnecessary and unfounded doubt on the normal operation of the Manchester Ship Canal. The normal operation of the Manchester Ship Canal infrastructure should be the basis of comparison as the standard case; the description “best case” for normal operation is misleading since this casts doubt on whether the normal operational conditions are achievable.
3. The representation of the sluices of the Manchester Ship Canal in the modelling of the Level 2 SFRA assumes that the discharge characteristics have reduced efficiency as being “*a reasonable representation of residual risk*”. However, there is no justification of this arbitrary choice.
4. The breaching scenarios for the Bridgewater Canal give cause for concern on the method used to identify potential breach locations and on the method used to determine the outflow hydrograph. Crucial factors that are missing from the method of assessment of the breach risk zones are: canal bank construction; canal bank surface cover; and canal bank condition, maintenance and inspection regimes. An initial examination of the shape of the canal outflow hydrographs reveals that the shape is not consistent with the usual effect of the progressive erosion of the canal bed away from the breach, which is one of the controlling mechanisms stated on page 39 of the Level 2 SFRA.

Summary continued

5. Although the mapping of inundation extent might show areas which could flood under certain scenarios of canal embankment breaching, there is no assessment of the likelihood that should be associated with the breach. The Level 2 SFRA describes the approach as “conservative” but without any assessment of the influence of this conservatism on the mapped area of potential hazard. The best use of the information in the scenarios might be to illustrate where a more detailed assessment is required, but the information cannot be sufficiently sound for making definitive planning decisions.
6. In terms of the mapping the assumptions in the scenarios for the operation of the Manchester Ship Canal and the breaching of Bridgewater presented in the Level 2 SFRA lead to an over estimate of the consequent flood levels for the supposed frequency of flood occurrence. Thus the extent of the Flood Zones are overstated which will lead to a misrepresentation of the actual degree of flood hazard. A critical point is the interaction of the interpretation of these scenarios presented with the application of the Sequential and Exception tests in planning decisions that flow from the SFRA. For previously developed land sites these may fail the Sequential test, whereas the appropriate development should be considered through the Exception test.

This review concentrates on those elements of the SFRA document and plans that relate to the Manchester Ship Canal and the Bridgewater Canal. However, it is possible that the types of concern raised in this review could potentially affect the designation of flood risk in other areas that lie outside the scope of this initial review.

It is recommended that a fuller review of the technical basis of the assumptions of the whole the SFRA is undertaken and the SFRA revised where appropriate before it is used as evidence to inform planning decisions. Particular areas for consideration are:

- An assessment of the reliability of the sluices on the Manchester Ship Canal to inform a judgement on the degree to which potential failure contributes to overall flood risk
- A calibration of the discharge capacity of the sluices as recommended in the Level 2 SFRA report
- A review of the failure modes and potential breaching of the Bridgewater canal using current best available knowledge
- Combination of individual flood models to represent better the interactions between the various pathways for flood water along the watercourses and through the urban area as recommended in the Level 2 SFRA report.

Contents

<i>Title page</i>	<i>i</i>
<i>Document Information</i>	<i>ii</i>
<i>Summary</i>	<i>iii</i>
<i>Contents</i>	<i>v</i>
<i>Abbreviations</i>	<i>vi</i>

1.	Context	1
1.1	Appointment	1
1.2	Flood risk, its assessment and management	1
2.	The function of the Manchester Ship Canal	2
2.1	Primary purpose	2
2.2	Connectivity with natural catchments	3
2.3	Capacity and controls	3
2.4	Normal operation, maintenance and resilience	4
3.	Description of the Bridgewater Canal	4
4.	Review of preparation of SFRA	5
4.1	Appraisal of methodology against The PPS25 Practice Guide	5
4.2	Data	6
4.3	Review of key assumptions	6
4.3.1	Sluice operation on the Manchester Ship Canal	6
4.3.2	Choice of sluice coefficients for the Manchester Ship Canal	7
4.3.3	Overtopping and breach scenarios on the Bridgewater Canal	8
4.3.4	Suitability of models	10
5.	Mapping in the SFRA and Flood Zones of the Environment Agency	11
5.1	Implications for the mapping	11
5.2	Interpretation of risk	11
6.	Conclusions	12
7.	Recommendations	13
8.	References	14

Table

Table 2.1	Sluices in the Manchester Ship Canal	3
-----------	--	---

Abbreviations

Abbreviation	Definition
ABD	Areas Benefitting from Defences
DCLG	Department for Communities and Local Government
Defra	Department for the Environment, Food and Rural Affairs
LDD	Local Development Document
LDF	Local Development Framework
MSC	Manchester Ship Canal
PPS 25	Planning Policy Statement 25 on development and flood risk
SFRA	Strategic Flood Risk Assessment

1. Context

1.1 APPOINTMENT

The Peel Group commissioned HR Wallingford to undertake a high-level review of the Manchester City, Salford City and Trafford Councils Level 2 Hybrid SFRA, covering in particular their interests both as Navigation Authority for the Manchester Ship Canal and for the Bridgewater Canal and as having substantial land holdings in the three local authority areas concerned. Particular concerns include:

- the representation of the flood hazards associated with these two major canals; and
- the consequent interpretation of the scenarios in the Level 2 SFRA in the sequential and exception tests of PPS 25 in the preparation of the Core Strategy of the Local Development Frameworks that the local authorities are currently preparing.

The immediate purpose of this report is to support representations submitted by Peel Group to Trafford Council on their LDF draft core strategy which was published in March 2010.

No additional flood modelling has been possible in the short time available for this review and hence this review concentrates on an appraisal of the Level 2 SFRA reports as published on the Trafford Council website and digital copies of the supporting plans.

The review concentrates on those elements of the SFRA document and plans that relate to the Manchester Ship Canal and the Bridgewater Canal. However, it is possible that the types of concern raised in this review could potentially affect the designation of flood risk in other areas that lie outside the scope of this review.

1.2 FLOOD RISK, ITS ASSESSMENT AND MANAGEMENT

Both the DCLG and the Environment Agency aim to manage flooding on a risk-based approach, in line with the national policy “Making Space for Water” developed by Defra. A risk-based approach is also adopted by the European Directive on the assessment and management of flood risks (Directive 2007/60) which was incorporated in to UK legislation in 2009.

It is fundamental to understand that risk combines both the probability of flooding and its consequences. This is set out in the Flood and Water Management Act (2010) in Sections 2 and 3(1) as follows:

2 “Risk”

- (1) “Risk” means a risk in respect of an occurrence assessed and expressed (as for insurance and scientific purposes) as a combination of the probability of the occurrence with its potential consequences.
- (2) “Flood risk” means a risk in respect of flood.
- (3) “Coastal erosion risk” means a risk in respect of coastal erosion.
- (4) In each case the potential harmful consequences to be considered in assessing risk include, in particular, consequences for—
 - (a) human health,
 - (b) the social and economic welfare of individuals and communities,
 - (c) infrastructure, and

(d) the environment (including cultural heritage).

3 “Risk management”

- (1) “Risk management” means anything done for the purpose of—*
- (a) analysing a risk,*
 - (b) assessing a risk,*
 - (c) reducing a risk,*
 - (d) reducing a component in the assessment of a risk,*
 - (e) altering the balance of factors combined in assessing a risk, or*
 - (f) otherwise taking action in respect of a risk or a factor relevant to the assessment of a risk (including action for the purpose of flood defence).*

Important components of risk management include:

- Construction of physical flood defence infrastructure (e.g. walls, embankments, flood relief channels etc)
- Routine maintenance and renewal of flood defence infrastructure
- Operation of gates and sluices to control water during a flood event
- Spatial planning to prevent inappropriate development in areas liable to flood
- Provision of flood warnings to the emergency services and the public
- Contingency planning and evacuation and rescue
- Public information and education.

The implementation of the policy within PPS 25 is thus an important part of overall flood risk management as providing a framework to ensure that future development does not lead to an unacceptable increase in flood risk and that appropriate risk mitigation measures are identified.

The modelling and mapping in a SFRA is an assessment of the spatial extent and degree of flood hazard and the potential consequences including the impact upon people who may be affected by the flood. The SFRA describes the hazard for several scenarios, some of which contain an assessment of probability (the 1% and 0.1% probability floods, i.e. the 100 year and 1000 year floods) and others do not (e.g. those scenarios with allowance for climate change or breaching of defences).

The purpose of the Sequential and Exception tests of PPS 25 are to ensure that the consequences for any proposed development of a flood occurring in the future are acceptable in the context of overall sustainability.

2. *The function of the Manchester Ship Canal*

2.1 PRIMARY PURPOSE

The Manchester Ship Canal extends from the centre of Manchester to Eastham on the Mersey estuary. Along this length there are five locks at Model Wheel, Barton, Irlam, Latchford and Eastham. The depth of the canal is normally in excess of 8 m. Typically the bed of the channel is approximately 36 m wide with a typical water surface width of approximately 62 m.

To maintain the required navigation depth there are a sequences of sluices at the locks at Mode Wheel, Barton, Irlam and Latchford. The gates at all the sluices in the non-tidal part of the Canal are identical in design: 9.14 m in width and opening to a height of 3.05

m. The number of gates and the hydraulic head between the ordinary water level upstream and the sill of the sluices vary, see Table 2.1.

Table 2.1 Sluices in the Manchester Ship Canal

Sluice Location	Number of gates	Hydraulic Head (m)	Change in ordinary water level (m)
Mode Wheel	4	7.16	3.96
Barton	4	7.16	4.57
Irlam	5	7.16	4.88
Latchford	3	6.70	3.81

It should be noted that the sluices at Mode Wheel Barton and Irlam pass the flow from the River Irwell, while the Latchford sluices pass residual flood flows which do not return to the River Mersey at Rixton Junction.

Although the original function of the canal was to provide a navigation for ships to the docks in the Manchester area, in its construction it cut through several rivers and watercourses and the MSC also functions as a primary drainage route for surface water from the catchments affected. The MSC has provided safe passage of flood water through the system, with sufficient capacity being available in all conditions experienced in over 100 years of operation. However, the Manchester Ship Canal and in particular the Manchester Ship Canal sluices cannot be construed as “flood defences” in terms of the preparation of maps of the Flood Zones for PPS 25.

2.2 CONNECTIVITY WITH NATURAL CATCHMENTS

Along its upper reaches the Canal provides an artificial channel for the rivers Irwell and Mersey. The Irwell rises in the Pennines and flows through Bury and Salford into Manchester. The Canal then provides its course for approximately 12.8 km to Irlam, where it is joined by the River Mersey. After a further 6.4 km the Mersey leaves the Canal at Rixton Junction and flows to the north of the Canal through Warrington to the Mersey Estuary.

2.3 CAPACITY AND CONTROLS

The dimensions of the Manchester Ship Canal were set for navigation of shipping into the docks in Manchester. The hydraulic capacity of this artificial canal far exceeds that of the natural river channels that it replaced. The water levels over the entire length of the canal are controlled by the sluices which are operated principally to maintain prescribed navigation depths for a wide range of flows from the Irwell and Mersey catchments. The sluice operation also enables the Canal to discharge all but the most exceptional floods without flooding the land adjacent to the Canal.

The main control on the flood capacity of the Canal system arises from the operation of the sluices rather than the dimensions and resistance of the Canal channel. This is evident from the longitudinal profile of water levels included in the Level 2 SFRA report Figures 3-3 to 3-6, which shows the major changes in water level occurs at the structures rather than in the surface gradient between these sites. The channel capacity does become progressively more important as the flood discharge increases, but a proper understanding and representation of the sluice structures and their operation in flood conditions is essential in assessing the flood hazards and risks in the area.

2.4 NORMAL OPERATION, MAINTENANCE AND RESILIENCE

The sluices are operated automatically based on the upstream water level. The upstream water level is measured by three independent sensors and the results compared to determine the true value. Gate opening are adjusted automatically according to a pre-determined operating procedure. Water levels and gate openings are monitored at a central control centre, which can also override the automatic control system.

The gates are maintained and renewed from time to time. This involves isolating a single gate using temporary sheet steel dams and so during any such maintenance the gate is not available for use. The Navigation Authority has a planned programme of gate renewal in which one gate per year is replaced taking it out of service for about 10 weeks. It is possible to minimise this possibility by scheduling maintenance away from the main flood season. However, the possibility of a gate being unavailable at one site on the MSC cannot be eliminated, since the occurrence of floods is random and so there is a possibility that a flood will occur on the Irwell and Mersey catchments when a gate at one of the sluices is undergoing maintenance.

Each set of gates can draw power from two independent electricity supplies; this reduces the possibility of failure to operate normally due to total power failure. In the event of a total power failure all the gates can still be operated manually and staff are available 24 hours a day throughout the year to respond to any such emergency.

3. *Description of the Bridgewater Canal*

The Bridgewater Canal connects Runcorn, Manchester, and Leigh. It was commissioned by Francis Egerton, 3rd Duke of Bridgewater, to transport coal from his mines in Worsley to Manchester. This original section of the canal was on a single level with no locks. It was opened in 1761 from Worsley to Manchester, and later extended from Manchester to Runcorn, and then from Worsley to Leigh.

The canal is connected to the Rochdale Canal in Manchester, the Trent and Mersey Canal at Preston Brook, south-east of Runcorn, and to the Leeds and Liverpool Canal at Leigh.

When the River Medlock is in flood in Manchester an overflow from the river discharges excess flood water into the Bridgewater Canal. Recently a connection between the Bridgewater Canal and the Manchester Ship Canal was constructed at Pomona lock.

The recently constructed light railway follows the line of the Bridgewater Canal adjacent to the former Pomona Docks area, with the track way elevated on piers above the canal embankment which was renewed and strengthened as part of the light railway development.

Although there are no locks on the Bridgewater Canal there are several locations where stop-logs can be places across the watercourse to divide it into pounds for maintenance or in an emergency. In particular the Canal can be closed on either side of the aqueduct where it crosses the Manchester Ship Canal.

4. Review of preparation of SFRA

4.1 APPRAISAL OF METHODOLOGY AGAINST THE PPS25 PRACTICE GUIDE

The DCLG has produced practice guidance on undertaking flood risk assessments (DCLG 2009), with the current (second) edition being released in December 2009.

The Practice Guide Para 2.59 contains specific reference on the need to consult navigation authorities (which, from footnote 3, are designated collectively in later paragraphs as “British Waterways”). Para 7.6 gives a requirement to consult with “British Waterways” on residual risk from canals in SFRA preparation.

Paragraphs 3.39 to 3.79 inclusive of this Practice Guide discuss the preparation of Strategic Flood Risk Assessments (SFRA). The guidance covers Level 1 and Level 2 SFRA and the cases for coordination of several SFRA in a catchment and sub-regional SFRA.

Para 3.40 emphasises the importance of SFRA as part of the evidence base for the preparation of Local Development Documents (LDD), and warns that:

“It is unlikely that a LDD that was not supported by an adequate evidence base on flood risk would be found to be ‘sound’. Unsound plans must be withdrawn under regulation.”

Unfortunately the Level 2 SFRA does not fully address the above criteria for the Manchester Ship Canal (MSC). Firstly, there is no appraisal given of the current condition of the MSC infrastructure, and of likely future flood management policy with regard to its maintenance. Instead some arbitrary choices are made in relation to the hydraulic performance of the gates and their reliability in flood conditions. Although some scenarios for non-operation of the sluices are presented for the flood modelling and consequent mapping there is no appraisal of the probability of the possible failure of the sluices on the MSC as flood risk management infrastructure. Without an assessment of the reliability of these structures and their operational policies and practice, properly informed planning decisions cannot be made. The evidence base is inadequate since no objective opinion can be formed on the credibility of the scenarios proposed and their probability of occurrence.

Although the Manchester Ship Canal and its sluices are not flood defence infrastructure it is pertinent to note the requirements of the Practice Guide for a probabilistic understanding of the operation of flood defence structures in preparing a SFRA.

Para 3.65 of the Practice Guide lists the outputs of a Level 2 SFRA and includes the following requirements:

“A Level 2 SFRA should build on the source information that would be comprised within a Level 1 SFRA and contain:

- *an appraisal of the current condition of flood defence infrastructure and of likely future flood management policy with regard to its maintenance and upgrade;*
- *an appraisal of the probability and consequences of overtopping or failure of flood risk management infrastructure, including an appropriate allowance for climate change; ...”*

These two criteria are of relevance to the preparation of the portions of SFRA that cover the Manchester Ship Canal and the Bridgewater Canal, since both these canals convey flood water. The implication is that the SFRA should take account of operational reliability of these canals since this will determine the flood probability. This is not addressed in the SFRA; rather arbitrary choices of scenario are presented without consideration of the compounding pessimism in the assumptions made.

Indeed, the wording of the SFRA documentation casts unnecessary and unfounded doubt on the normal operation of the canal. The normal operation of the MSC infrastructure should be the basis of comparison as the standard case; even the terminology of “best case” for normal operation can be misleading since this casts doubt on whether these normal operational conditions are achievable.

For example, the “ABD” model is described as the “*best case flood risk scenario out of the three models*” (Section 3.3.1) even though this case has gates that are assumed not to operate as normal. It should be noted here that the Environment Agency Policy Number 132_06 on “Areas benefitting from defences and defended areas” states that in this case all sluices should be assumed to operate normally, without any failure or obstructions. Nevertheless the ABD mapping produced in the SFRA does not follow this principle since it assumes that “*all sluices are operational at Mode Wheel lock but with one closed at all other locks*” (see Section 3.3.1 of the Level 2 SFRA report).

The importance and implications of the sometimes arbitrary assumptions made in the preparation of the SFRA are explored more fully below.

4.2 DATA

The Level 2 SFRA has been prepared from a compilation of several existing computational models of the rivers that drain through the Manchester area. This follows normal practice since SFRA should draw on relevant studies already available in the area, updating as necessary.

The data for the various models in the Level 2 Hybrid SFRA come from different sources and have a variety of resolutions horizontally and vertically. It is expected that the data should be sufficiently precise for the mapping to be fit for the purpose of identifying areas of potential flooding through the Flood Zones and enabling a proper application of the Sequential and Exception tests of PPS 25.

For the detailed Level 3 flood risk assessment that would accompany any full planning application, more detailed and precise data may be required.

4.3 REVIEW OF KEY ASSUMPTIONS

4.3.1 *Sluice operation on the Manchester Ship Canal*

The assumptions made in the Level 2 SFRA are that at each of the sluices one or more of the gates does not operate, depending upon the scenario being investigated. No probability of occurrence is assessed for any of these scenarios for operational failure and so the risk associated with the potential failure cannot be evaluated.

The scenario for total failure of all gates bears no relation to the experience of the Navigation Authority. The gates have operated satisfactorily under automatic local water level control since the 1980s. The control system for the gates operates continuously to maintain water depths for navigation, with the gates moving in response

to flows along the MSC. This is in contrast to flood defence sluices which may only operate on demand in emergencies. The Navigation Authority has established procedures for the inspection and maintenance of the structures to ensure proper operation at all times.

Since the discharge capacity of these structures is considerable, the scenarios with the sluices all closed lead to substantial simulated flood levels, for example in excess of 25 m AOD for the 100 year flood upstream of Mode Wheel lock for the “undefended” Flood Zones case (See Figure 3-3 of the Level 2 SFRA). This is in contrast to levels of approximately 22 m AOD for the ABD case which has all gates open at this location. The SFRA case at this site has 3 of the 4 sluices open but with an arbitrarily assumed reduced efficiency for the gates (Level 2 SFRA Section 3.3.1) and shows a level of about 24 m AOD upstream of Mode Wheel. These levels are all substantially higher than the normal operation level of about 21.4 m at this location.

In 1982 HR Wallingford reported on an investigation of the land drainage function of the Manchester Ship Canal between Pomona Docks and the Mersey confluence (HR Wallingford 1982). It should be noted, this investigation concluded for the sluice capacity along the MSC that:

“the structures were able to pass all observed discharges without departing significantly from the ordinary water levels in the Canal. For example, the maximum observed flow of 500 m³/s could be passed at Mode Wheel, retaining the ordinary water level, by opening all four gates to 2.0m of the 3.05m available. This result conforms with the experience of the Ship Canal Company that the sluices have been able comfortably to pass all flood flows during over 80 years of operation”.

The ABD case with all sluices operating with a level of 22 m AOD (about 0.6 m above normal) for the 100 year flood is consistent with this conclusion.

4.3.2 Choice of sluice coefficients for the Manchester Ship Canal

The representation of the sluices of the Manchester Ship Canal in the modelling of the Level 2 SFRA assumes that the discharge characteristics have reduced efficiency as being “a reasonable representation of residual risk”. However, there is no justification of this arbitrary choice nor is there any confirmation in the SFRA documentation of the necessary consultation with the Navigation Authority.

The earlier studies at HR Wallingford of the MSC (HR Wallingford 1982) included a detailed calculation of the discharge characteristics of the sluice gates from published experimental data, with the coefficient of discharge depending upon a contraction coefficient (essentially constant over a wide range of conditions), the gate opening and the upstream depth over the gate sill. The documentation for the ISIS flow model indicates that the software incorporates a similar (but not identical) equation for the discharge coefficient for the sluices, which depends upon the same parameters. The two approaches will provide the same result for modest gate openings although the ISIS model will require an increasing discharge coefficient to match the HR Wallingford calculated coefficients as the gate openings increase in flood conditions.

We note that the Level 2 SFRA recommends that a physical model is constructed to refine understanding of the sluice capacity and that the Level 2 SFRA illustrates the importance of the choice of discharge coefficient in simulating flood levels especially upstream of Mode Wheel. We support this recommendation as providing firm evidence

to support the flood mapping in the area. An alternative would be to undertake a series of flow measurements in the MSC at different gate openings in time of flood assuming this to be practical.

4.3.3 Overtopping and breach scenarios on the Bridgewater Canal

The Level 2 SFRA discussed the consequences of breaches in navigation canals as required by the DCLG Practice Guide (DCLG 2009), which in Para 2.59 states:

“Navigation authorities (British Waterways and others) should be consulted by the LPA and developers in relation to sites adjacent to, or which discharge into, canals, especially where these are impounded above natural ground level. It is important that British Waterways are consulted in such circumstances so that they can ensure that LPAs and developers have properly mapped potential breach inundation from canals correctly and can check for consistency.”

Section 3.2.2 of the SFRA describes the overtopping scenario as follows:

“Two spill overflow hydrographs were measured at the two extreme ends of the canal model in order to represent the potential overtopping in the two sections of the canal, i.e. the upstream section which is immediately fed by the River Medlock and the sections downstream of the split at Stretford. Peaks of 1.3m³/s and 0.03m³/s per 100m of canal were measured for the up and downstream spills respectively. ... The “representative” overflow was fed into a JFLOW model with inflow points with a 100m interval to assess potential flood inundation extents.”

No information, however, is given on how the representative overflow was assessed or verified against the total overtopping volume available from the River Medlock, nor on the fate of the overflow from the canal once it reaches another water course. A better approach to assess this type of hazard, especially in proximity to the Manchester Ship Canal or another main river, would be to construct a coupled model of the watercourse and overland flow rather than treating the overland flow separately on assumed splits of discharge.

The breaching scenarios give cause for concern on two principal points:

- The method used to identify potential breach locations
- The method used to determine the outflow hydrograph.

The level 2 SFRA report states that:

“The potential breach locations / areas were then sub-divided into two Canal Breach Zones:

- A. A walkover survey of the canal was undertaken to identify the embankments more likely to breach, based on their height and width. This zone shows those areas that would be affected by a breach of one of these embankments. In this zone a detailed examination of canal breach flood risks are required.*
- B. Less likely breach locations, such as at wide, low or very low embankments, were identified by a walkover survey of the canal. At such locations it is more likely that this source of risk could be scoped out within any site specific FRA.”*

No information is provided in the Level 2 SFRA on how the walk-over surveys were conducted, what aspects of the canal condition were noted or how the canal bank level in relation to the local topography was assessed. There is no record of any consultation

with the Navigation Authority to use information available from their regular inspections of the canal.

Crucial factors that are missing from the method of assessment of the breach location and risk zones are:

- Canal bank foundation and construction
- Canal bank surface cover
- Canal bank condition, maintenance and inspection regimes.

An embankment which has sheet pile on one or both sides will have an entirely different resistance to overtopping and consequent erosion than a bare earth embankment. Likewise it is well known that vegetation can provide effective resistance to erosion, depending upon the type and density of the vegetation. Two key factors in the likelihood of a breach forming are signs of seepage anywhere through the embankment and poor condition of the embankment body (e.g. significant penetration of tree roots or animal burrows). These issues appear not to have been considered in the SFRA preparation.

The Level 2 SFRA report contains two example hydrographs for flow through hypothetical canal breaches for the Bridgewater Canal and the Rochdale and Ashton Canals see Figures 3-1 and 3-2. These show very rapid rate of rise of the flow rate to a peak value associated with a near instantaneous collapse to a maximum breach width, with a failure mode stated to be based on experience of British Waterways.

An initial examination of the shape of the canal outflow hydrographs reveals that the shape is not consistent with the usual effect of the progressive erosion of the canal bed away from the breach, which is the third of the controlling mechanisms stated on page 39 of the Level 2 SFRA. The progressive erosion of the canal bed away from the breach location should be associated with a nearly constant discharge out of each arm of the canal. Thus the overall outflow hydrograph should not appear as having a sharp peak as shown in these figures; rather it should have a lower and nearly constant outflow for a substantial time whilst the bed erosion occurs. It is not clear whether the assessment of outflow in the breaching scenarios have included the normal operational response of the Navigation Authority to insert stop logs to prevent the draining of the entire length of the canal (see Section 3 above).

In recent years there has been much research funded by the UK Research Councils, the Environment Agency and the European Commission on the reliability of embankments and the formation and flow through embankment breaches. This supports the Environment Agency's performance based approach to management of their flood defence assets. The likelihood of breach formation under hydraulic loading is represented through a "fragility curve" which is linked to the construction and current condition of the embankment. In the assessment of flooding from breached embankments, the largest uncertainty arises from the assessed outflow through the breach and thus from the breaching process. The sensitivity of the inundation extent to the breaching processes has not been considered in the SFRA, even for one or two illustrative cases. Scientific knowledge is available on breaching formation processes and coupled modelling of the soil mechanics failure mechanisms of the embankment and the hydrodynamics of flow through the breach.

Thus although the mapping of inundation extent might show areas which could flood under certain scenarios of embankment breaching, there is no assessment of the

likelihood that should be associated with the breach (e.g. 1% per annum or 0.1%) or the uncertainty in the area affected. Indeed the Level 2 SFRA describes the approach as “conservative” but without any assessment of the influence of this conservatism on the mapped area of potential hazard. The best use of the information in the scenarios might be to illustrate where a more detailed assessment is required, but the information cannot be sufficiently sound for making definitive planning decisions.

4.3.4 Suitability of models

The Level 2 SFRA depends upon several models of the watercourses and the local drainage; see Table 2-2 of the SFRA Report and references within the text. These include the one-dimensional network models ISIS, InfoWorks and HEC-RAS and the two-dimensional models JFLOW and TUFLOW. The Table 2-2 also describe the data sets used, some key assumptions and key limitations. All these modelling packages are directed at flooding problems; the Environment Agency have an approved list of 1-D models and the Environment Agency are currently undertaking a benchmarking of the performance of 2-D models such as TUFLOW. The original version of the JFLOW software was developed by JBA as a means of undertaking a consistent rapid assessment at national scale of flood extent for the indicative flood risk mapping. HR Wallingford undertook a review of this method prior to its implementation to confirm its suitability for the indicative mapping project (Ramsbottom et al. 2003).

In the Level 2 SFRA however, the model is being used to define the extent of inundation from hypothetical breaches from the Bridgewater Canal. At locations such as the former Pomona docks where a Bridgewater canal breach is close to the Manchester Ship Canal, the original version of JFLOW would give unduly pessimistic results as the software assumes that no flood plain flow enters the main river system. In informal discussion, the SFRA project manager at JBA confirmed that at Pomona Docks the JFLOW model predictions were truncated at the north bank of the MSC on the assumption that the breach flow would continue along the MSC even though the MSC itself was excluded from the JFLOW model. The effect of such an approach on the simulated water levels is unclear; the predicted levels should be viewed as “indicative” only.

The Level 2 SFRA does illustrate the complexity of the generation and movement of flood waters through the Greater Manchester area. The approach taken of considering factors in isolation by artificially dividing the simulation into modelling parts of the system inevitably does not account for the interaction between the various sub-systems thus generated. It is our experience that isolation of parts of a large system by artificial internal boundaries can introduce inaccuracies into the modelling. Chapter 7 of the Level 2 SFRA discusses examples of interaction and linkages between different components of the system (see for example Tables 7-1 and 7-2). In some cases the linkages have the potential to significantly influence the distribution of flow, for example by allowing the tail water level to drown an assumed hydraulic control (e.g. an embankment breach, embankment overflow, weir or sluice).

The effects of bridges and culverts on water courses and flow through urban areas can all lead to attenuation of the peak flows reaching the main river system. Section 2.7.3 of the Level 2 SFRA illustrates this point with Figure 2-2 showing the impact on levels in the Grey Irwell and the MSC of a constriction at Victoria Station and the consequent storage of water in the city in major floods.

The final paragraph of Section 7.1 of the Level 2 SFRA rightly identifies that models are now available for simulating flow in urban areas. The combination of the canal models, the main river models and surface inundation models potentially could provide a better understanding of the extent and character of flood risk issues. Such a coupled model approach would also contribute to the Environment Agency's objectives A1.3 and A1.4 of the recently published flood and coastal risk management modelling strategy (Environment-Agency 2010) to "*understand the interactions between different sources of flooding...*" and "*take a risk-based approach to improving our understanding of the forms and mechanisms of flooding from other sources and our modelling of it.*"

5. Mapping in the SFRA and Flood Zones of the Environment Agency

5.1 IMPLICATIONS FOR THE MAPPING

It is clear from the discussions in the Level 2 SFRA document and the critique in this review that the extent of the mapped areas liable to flood and the understanding of flood risk depend upon many assumptions made in the technical assessments. Whereas some assumptions and procedures are well established (e.g. methods for hydrological assessment, allowances to illustrate potential impact of climate change), others are open to professional assessment and should be subject to agreement between the principal stakeholders in the SFRA process (e.g. Local Authority, Environment Agency, Navigation Authorities) and their expert advisors.

From the technical issues considered above in this review, it will be evident that the mapping in terms of the Environment Agency Flood Zones, Areas Benefitting from Defences and the SFRM will all be influenced by the reasonableness or otherwise of the assumptions.

In terms of the mapping, the assumptions in the scenarios for the operation of the Manchester Ship Canal and the breaching of Bridgewater Canal presented in the Level 2 SFRA lead to an over estimate of the consequent flood levels for the supposed frequency of flood occurrence. Thus the extent of the Flood Zones are overstated which will lead to a misrepresentation of the actual degree of flood hazard.

5.2 INTERPRETATION OF RISK

As set out in Section 1 above risk is properly understood as a combination of the probability of flooding and of its consequences.

In this sense the mapping of flood extents and depths for the scenarios in the SFRA do not show "risk" but aspects of the flooding hazard. Moreover, only some of the scenarios have firm probabilistic information on the hydro-meteorological conditions (those for the 100 and 1000 year floods) and others represent pictures of what may happen in assumed scenarios (canal breach, gate failure, climate change) without any probability attached. Some of the scenarios (e.g. climate change sensitivity) are prescribed by PPS 25 and the Practice Guide as informing decisions in spatial planning, whereas others are open to professional recommendation and interpretation.

When constructing scenarios with multiple combinations of assumptions it is important

to consider the credibility of the combination of these factors. In some cases the probability can be assessed, such as the occurrence of an unseasonal flood when a gate is withdrawn for maintenance, such calculations are routine when assessing the safety of cofferdams. Likewise reliability analysis can provide estimates of probability of operational failure of a gate during a flood. Since the likelihood of an operational failure is independent of another gate being out of service, the joint probability of two gates being unavailable in these circumstances can be assessed. The likelihood of other scenarios is more open to speculation, such as the climate change factors recommended in PPS 25 that are the result of an interpretation of large-scale climate modelling undertaken about a decade ago.

A critical point is the interaction of the interpretation of these scenarios presented with the application of the Sequential and Exception tests in planning decisions that flow from the SFRA. Unrealistically cautious assumptions and uncertainties in some scenarios can overstate the perceived degree of “risk” (hazard and probability) and affect its classification as Flood Zone 2 or Flood Zone 3. For previously developed land sites these may then fail the Sequential test, whereas the appropriate development should be considered through the Exception test.

It is unclear what the term “residual risk” means in the description of the “residual risk” model in Section 2.7.3 of the Level 2 SFRA. An objective assessment of residual risk can only be made using the dimensions, capacities and normal operation of the flooding system as it exists, allowing for failures in a probabilistic fashion. Scenarios without information on their likelihood or credibility only provide illustrations of possible outcomes and need careful description and interpretation in decision making.

6. Conclusions

It is fundamental to understand that flood risk combines both the probability of flooding and its consequences; this is set out in the Flood and Water Management Act (2010). In this sense the mapping of flood extents and depths for the scenarios in the SFRA do not show “risk” but aspects of the flooding hazard, with some also having a probability assigned. In cases where probability is not assessed, decisions taken on the information cannot be objectively “risk-based” but rather will rely on professional interpretation.

The Manchester Ship Canal and in particular the Manchester Ship Canal sluices cannot be construed as “flood defences” in terms of the preparation of maps of the Flood Zones for PPS 25. In normal operation these sluices exert considerable control on the discharge along the Manchester Ship Canal and provide for safe passage of flood water through the system, with sufficient capacity being available in all conditions experienced in over 100 years of operation.

This review identifies the following issues that affect the extent of flooding mapped and the interpretation of these maps in the preparation of LDF documents.

1. The output of the SFRA does not address all the issues required in the PPS 25 Practice Guide; in particular, there is no assessment of current condition, operation, management policy or probability of possible operational failures of the water management structures on the MSC. Rather scenarios of gate failure are proposed which do not reflect the operational experience of the MSC since its construction over 100 years ago.

2. The wording of the SFRA document casts unnecessary and unfounded doubt on the normal operation of the Manchester Ship Canal. The normal operation of the Manchester Ship Canal infrastructure should be the basis of comparison as the standard case; the description “best case” for normal operation is misleading since this casts doubt on whether the normal operational conditions are achievable.
3. The representation of the sluices of the Manchester Ship Canal in the modelling of the Level 2 SFRA assumes that the discharge characteristics have reduced efficiency as being “*a reasonable representation of residual risk*”. However, there is no justification of this arbitrary choice.
4. The breaching scenarios for the Bridgewater Canal give cause for concern on the method used to identify potential breach locations and on the method used to determine the outflow hydrograph. Crucial factors that are missing from the method of assessment of the breach risk zones are: canal bank construction; canal bank surface cover; and canal bank condition, maintenance and inspection regimes. An initial examination of the shape of the canal outflow hydrographs reveals that the shape is not consistent with the usual effect of the progressive erosion of the canal bed away from the breach, which is one of the controlling mechanisms stated on page 39 of the Level 2 SFRA.
5. Although the mapping of inundation extent might show areas which could flood under certain scenarios of canal embankment breaching, there is no assessment of the likelihood that should be associated with the breach. The Level 2 SFRA describes the approach as “conservative” but without any assessment of the influence of this conservatism on the mapped area of potential hazard. The best use of the information in the scenarios might be to illustrate where a more detailed assessment is required, but the information cannot be sufficiently sound for making definitive planning decisions.
6. In terms of the mapping, the assumptions in the scenarios for the operation of the Manchester Ship Canal and the breaching of Bridgewater presented in the Level 2 SFRA lead to an over estimate of the consequent flood levels for the supposed frequency of flood occurrence. Thus the extent of the Flood Zones are overstated which will lead to a misrepresentation of the actual degree of flood hazard. A critical point is the interaction of the interpretation of these scenarios presented with the application of the Sequential and Exception tests in planning decisions that flow from the SFRA. For previously developed land sites these may fail the Sequential test, whereas the appropriate development should be considered through the Exception test.

The review concentrates on those elements of the SFRA document and plans that relate to the Manchester Ship Canal and the Bridgewater Canal. However, it is possible that the types of concern raised in this review could potentially affect the designation of flood risk in other areas that lie outside the scope of this review.

7. Recommendations

The SFRA is a critical document in setting the future local development framework by the Councils involved; the flood maps it contains will influence decisions in the sequential and exception tests. The maps may also have wider impacts within the

communities through the identification of areas as being liable to flooding which previously did not have such a designation.


In light of the concerns documented in this initial review, it is recommended that a fuller review of the technical basis of the assumptions of the whole the SFRA is undertaken and the SFRA revised where appropriate before it is used as evidence to inform planning decisions. Particular areas for consideration are:

- An assessment of the reliability of the sluices on the Manchester Ship Canal to inform a judgement on the degree to which potential failure contributes to flood risk
- A calibration of the discharge capacity of the sluices as recommended in the Level 2 SFRA report either through physical model testing or if feasible site measurement
- A review of the failure modes and potential breaching of the Bridgewater canal using current best available knowledge
- Combination of individual flood models to represent better the interactions between the various pathways for flood water along the watercourses and through the urban area. This is also highlighted on p13 of the Level 2 SFRA report.

8. References

- DCLG. (2009). "Planning Policy Statement 25: Development and Flood Risk Practice Guide."
- Environment-Agency. (2010). "Flood and coastal risk management modelling strategy." Environment Agency, 16.
- HR-Wallingford. (1982). "The land drainage function of the Canal between Pomona Docks and the Mersey confluence." HR Wallingford.
- Ramsbottom, D. M., Evans, E. P., Whiltlow, C. D., and Samuels, P. G. (2003). "Extreme Flood Outline Review of fluvial methodology." HR Wallingford.

Trafford's Core Strategy: Further consultation on The Vision, Strategic Objectives and Delivery Strategy

Comment Form – March 2010  **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO**
strategic.planning@trafford.gov.uk

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 contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on			
Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	x	Page number	
Sustainability Appraisal		Paragraph number	2.3
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Are you supporting, seeking change or do you have general comments about this specific part of the document?

Support	Seeking a Change yes	General Comment

Please provide comments below and explaining your reason for supporting, the details of the change that you are seeking or the general comment that you wish to make in relation to this specific part of the document.

See attached comment sheet.

Please continue on a separate sheet if required

Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

Paragraph 2.3 – The Vision.

Redrow Homes do not object to the generality of the vision that is proposed, including the principle of regenerating the identified 5 Strategic Locations. However, it is suggested that the identification of site specific locations for regeneration should be addressed elsewhere within the document and not within the general vision, especially as it is considered that the approach is in need of modification (as set out in other representations).

Furthermore, we note that the second bullet point in the list of means whereby the Vision will be achieved is that “all” of the most deprived areas will be regenerated. Once again, we do not object to the broad principle, but as this document is concerned with delivery we believe that this goal may be unduly ambitious and it would be better to refer to:


A strategy that meets the needs of Trafford for new development with a particular focus on the regeneration of the most deprived areas.

In a similar vein, we have concerns with the final bullet point relating to Carrington, we do not see why Carrington is identified separately from the regeneration locations in the second bullet point.

Whilst a vision, almost by definition, has an element of aspiration within it, in the context of an LDF it must be possible to demonstrate that the vision is also deliverable; it is a consistent theme of our representations that we question the genuine deliverability of the Vision and, in the event that our fears are proved correct, then it does not appear that there is at present a strategy which can come forward as may be required to provide the required level of development. Given the significant level of uncertainty, we do not believe that it is appropriate to rely upon a future review of policy to address this potential issue, the mechanism needs to be put in place in this Core Strategy.

In summary, we consider that the Vision and the means whereby it will be achieved need to be a little more general so as to allow greater flexibility elsewhere in the Plan.

Trafford's Core Strategy: Further consultation on The Vision, Strategic Objectives and Delivery Strategy

Comment Form – March 2010  **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO**
strategic.planning@trafford.gov.uk

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 contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on			
Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	x	Page number	18
Sustainability Appraisal		Paragraph number	
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	Partington
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Are you supporting, seeking change or do you have general comments about this specific part of the document?

Support	Seeking a Change yes	General Comment

Please provide comments below and explaining your reason for supporting, the details of the change that you are seeking or the general comment that you wish to make in relation to this specific part of the document.

See attached comment sheet.

Please continue on a separate sheet if required

Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

Partington – Place Objectives.


Redrow Homes support the general objective of regenerating/developing Partington. However, we have the following comments in relation to some of the Objectives:

PA01 – We do not consider that merely arresting population decline will be sufficient. In order to move forward, a level of population growth is required that is sufficient to support enhanced facilities.

PA014 – If development in Partington is seen as a positive factor in reducing the physical isolation of Carrington, then this would suggest that Partington is in many respects a preferred location for development.

PA018, 19 and 20 – We do not understand why these general objectives are set out in relation to Partington, but not, apparently in relation to all other places. Surely, the objectives, insofar as they may be demonstrated to be justified (no detail is provided), should either be generally applicable or not applicable at all.

Trafford's Core Strategy: Further consultation on The Vision, Strategic Objectives and Delivery Strategy

Comment Form – March 2010  **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO**
strategic.planning@trafford.gov.uk

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 contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on			
Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	x	Page number	22 - 25
Sustainability Appraisal		Paragraph number	4.6 to 4.24
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	General approach
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Are you supporting, seeking change or do you have general comments about this specific part of the document?				
Support		Seeking a Change yes		General Comment
Please provide comments below and explaining your reason for supporting, the details of the change that you are seeking or the general comment that you wish to make in relation to this specific part of the document.				
See attached comment sheet.				

Please continue on a separate sheet if required

Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

Strategic Locations – paragraphs 4.6 to 4.24.

Redrow Homes support the revised approach to the assessment of Strategic Locations and Strategic Sites since deliverability is obviously a fundamental requirement.

However, what the reassessment demonstrates is that there is insufficient knowledge and certainty in relation to any of the identified locations to justify them being identified as Strategic Sites and that only five locations can be identified as Strategic Locations in recognition of their emerging, but as yet inadequately established, potential.

Whilst welcoming what we regard as a more realistic assessment of the present knowledge and deliverability of these complex sites, the outcome is of genuine concern when it is fed through into the policies relating to the provision of the required levels of development.

We raise a specific concern in relation to paragraph 4.23. Our concerns with regard to deliverability are not addressed by a commitment to establishing project delivery teams, such an approach may, if appropriately managed, maximise the potential of a particular location, but it cannot deliver a fundamentally undeliverable project. The potential of any site will depend primarily on the nature of the project itself, market demand, the cost of infrastructure and land control; it is these factors that are likely to determine whether a particular site will come forward in whole or in part within the Plan period and not the existence of a project delivery team, albeit that it may prove helpful if the other factors are all positive.

Trafford's Core Strategy: Further consultation on The Vision, Strategic Objectives and Delivery Strategy

Comment Form – March 2010  **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO**
strategic.planning@trafford.gov.uk

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 contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on			
Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	x	Page number	30
Sustainability Appraisal		Paragraph number	6.1 to 6.9
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	SL2
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Are you supporting, seeking change or do you have general comments about this specific part of the document?

Support	Seeking a Change yes	General Comment

Please provide comments below and explaining your reason for supporting, the details of the change that you are seeking or the general comment that you wish to make in relation to this specific part of the document.

See attached comment sheet.

Please continue on a separate sheet if required


Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

SL2 – Trafford Wharfside.

Redrow Homes make the following observations in relation to this proposal:

1. We have no objection to the principle of redevelopment in this area; it is clearly one within which there is significant potential for regeneration/redevelopment.
2. Given the need for the proposals to be taken forward through the Land Allocations Plan DPD, presumably with requirements for masterplanning and the submission and approval of applications thereafter, including what will clearly be complex S.106 obligations, the delivery of dwellings from 2011 onwards is clearly impractical. We would suggest that 2014/15 is more realistic as the earliest possible start date.
3. We note that the site is in multiple ownerships which will not assist in bringing the development forward.
4. The assumption that a significant number of the dwellings will be apartments raises particular problems in the current market conditions. The apartment market may improve, but this cannot at present be relied upon and certainly not to the extent that it would support a development of this nature which is so heavily skewed towards apartments; furthermore, in the current market a development with a large number of apartments within it would not even obtain finance, even if a developer was prepared to contemplate development.
5. It is clear that the infrastructure requirements, for which the costs are generally unspecified, will run into many millions of pounds, this places a major financial burden on the proposals and potentially introduces cash flow issues.

Trafford's Core Strategy: Further consultation on The Vision, Strategic Objectives and Delivery Strategy

Comment Form – March 2010  **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO**
strategic.planning@trafford.gov.uk

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 contact details but please put your name on each additional comments sheet and indicate the total number of comments sheets enclosed in the box provided on the contact details form.

What are you commenting on?			
Please indicate the document and the specific paragraph number, policy, map or table you are commenting on			
Document		Section	
Core Strategy: Further consultation on the Vision, Strategic Objectives and Delivery Strategy	x	Page number	34
Sustainability Appraisal		Paragraph number	7.1 to 7.7
Strategic Locations Background Note		Policy number	
Other document, (please specify)		Vision reference	
		Strategic Objective reference	
		Spatial Strategy reference	
		Strategic Location reference	SL3
		Table/Figure reference	
		Other (including omissions and suggestions for alternative approaches)	

Are you supporting, seeking change or do you have general comments about this specific part of the document?

Support	Seeking a Change yes	General Comment

Please provide comments below and explaining your reason for supporting, the details of the change that you are seeking or the general comment that you wish to make in relation to this specific part of the document.

See attached comment sheet.

Please continue on a separate sheet if required

Thank you for taking the time to fill in our Core Strategy comments form, your comments are very much appreciated.

SL3 – Lancashire Cricket Club Quarter.

Redrow Homes make the following points in relation to this Strategic Location:

1. We have no objection to the principle of this regeneration proposal.
2. We note that the site is in multiple ownerships, both public and private, if the development is to be brought forward as a comprehensive strategy, then it is clearly important that the land is brought into a single ownership, the cooperation of individual owners in this respect cannot be relied upon.
3. Although the infrastructure requirements seem less than in relation to some of the other Strategic Locations they are, nevertheless, still very significant and the ability of the scheme to deliver the full package of proposals cannot be assured unless, or until, the masterplanning and feasibility exercises have been completed.
4. As the Background Note on the Strategic Location confirms that construction on the residential sites will not commence until 2018 (paragraph 4.25), it is clearly unrealistic to assume the delivery of houses from 2011/2012 onwards – 2018/19 is the earliest possible which would suggest that construction will run well over the end of the Plan period.