

Trafford Metropolitan Borough Council
Planning & Building Control Services
1, Town Hall
Waterside Plaza
Sale
Cheshire
M33 7ZF

Our ref: SO/2006/000285/SL-
02/IS1-L01
Your ref:
Date: 02 May 2014

Dear Sir/Madam

Trafford Local Plan - Land Allocations Consultation Draft

Thank you for inviting comments on the above Land Allocation document. We would wish to make the following comments.

We support the inclusion of the list of the sites identified in Appendix C – Housing Delivery Site Information. However we also wish to point out that In accordance with NPPF (Technical Guidance to the National Planning Policy Framework) housing developments should not be permitted in areas of functional floodplain (Zone 3B) as outlined Table 1: Flood Zones.

All areas within flood zone 3 should be considered as functional floodplain unless, or until, an appropriate flood risk assessment shows to the satisfaction of the Environment Agency that it can be considered as falling within Zone 3A'.

By definition functional floodplain is defined as an area that would flood with an annual probability of 1 in 20 or greater or at another probability to be agreed between the LPA and Environment Agency or; is designed to flood in an extreme (0.1 percent) flood.

Housing developments should only be permitted in flood zone 3A in exceptional circumstances (i.e. Meeting the requirements of the Sequential and Exception test) and therefore we would wish to see housing located in areas of lower risk. (NPPF National Planning Policy Framework Technical Guidance)

Environment Agency, Richard Fairclough House, Knutsford Road,
Warrington, WA4 1HT. Customer Services line: 03708 506 506.
www.environment-agency.gov.uk

In addition, when surveying sites and assessing if they are developable we would expect the following constraints to be considered with the associated impacts:

- Level of Flood Risk and when a flood risk assessment is required,
- If application of the Exception / Sequential test is required.
- Watercourses and Main River Designations
- Protected Species and habitats
- Contaminated Land

With regard to identifying new sites for development we will require suitable buffer strips (minimum 8m) be provided alongside any sites containing watercourses. These buffer strips should remain undeveloped. We would also want to ensure that any sites be in line with the aims outlined in your Core Strategy (R3) Green Infrastructure, (R2) Natural Environment in order to protect the local environment from inappropriate and non-sustainable development.

I trust that you will find these comments useful. Should you wish to discuss anything in further detail please get in touch.

Yours faithfully

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