



**TRAFFORD
COUNCIL**

**COUNCIL'S RESPONSE TO MAIN
MATTERS, ISSUES AND
QUESTIONS**

**MAIN MATTER 1
(21 February 2011)**

TOPIC PAPER

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Amendment

On the 21 February the Councils response to Paragraph 1.5.10 has been amended due to an error in the original version.

MAIN MATTER 1.1

Is the Core Strategy sufficiently outward looking and does its delivery strategy provide sufficient opportunities to ensure that it will contribute to and support the vision of the Manchester City Region becoming a world class city?

Council Response

- 1.1.1 The Core Strategy has been the subject of significant cross-boundary working throughout its preparation.
- 1.1.2 The Core Strategy has demonstrated that it has been prepared in the context of the Regional Spatial Strategy (CD 3.1.1), the Greater Manchester Strategy (CD 4.6.1) and the emerging GM Spatial Framework (CD 4.6.2 – 4.6.7). Section 2 of the Core Strategy outlines Trafford's role in the sub-region.
- 1.1.3 The Consultation Statement (CD 6.2.7 – 6.2.9) demonstrates the engagement that has taken place during the preparation of the Plan through a variety of liaison arrangements both individually, such as dialogue with GONW and neighbouring authorities, or collectively through dialogue with AGMA and other regional and national agencies.
- 1.1.4 It is considered that the Core Strategy is consistent with the developing Core Strategies of adjoining authorities, and that it supports the growth of the Greater Manchester Conurbation.
- 1.1.5 At the local level the Core Strategy has been taken and supported by the Local Strategic Partnership at key stages of its preparation. This has been done to ensure that the Core Strategy strikes a balance between delivering the priorities of the Trafford Community Strategy and to ensuring that Trafford contributes to and supports the delivery of the City Region's growth aspirations.
- 1.1.6 At the sub-regional level significant joint working on policy and evidence base documents has taken place. Section 4 of the Core Document list details the extent of documents that have been used in the preparation of the Core Strategy. These include work around the GM Strategic Housing Market Assessments (CD4.1.1), Town Centres (CD4.2.3 – CD4.2.6), Housing Growth Point, Flood Risk (CD4.4.4) and the GM Local Transport Plan (CD4.3.1).
- 1.1.7 The Joint Project Board (Salford, Manchester and Trafford Council's) meets regularly to discuss cross-boundary issues and has been used

as a consultation tool between neighbouring authorities to discuss the progress of respective Core Strategies.

- 1.1.8 The Airport Liaison Group (containing representatives from the Airport, Manchester CC, Stockport MBC and Cheshire East) has been used to consult on cross-boundary LDF and Airport related issues.
- 1.1.9 Bodies such as NWDA and 4NW and other regional and sub-regional stakeholders have been engaged in the preparation of the Core Strategy, to ensure the co-ordination of infrastructure and funding through the Housing Growth Point initiative.
- 1.1.10 As detailed in the Manchester Independent Economic Review (CD4.2.1) Trafford will play a key role in contributing to the delivery of the Economic and Housing growth ambitions of the sub-region and in the provision of high quality education facilities and residential neighbourhoods to support the growth of the sub-region.

MAIN MATTER 1.2

Does the Core Strategy provide a justified and effective boundary for the Regional Centre and Inner Areas? What others have been consulted upon and for what reasons were those alternatives rejected?

Council's response

- 1.2.1 The Council has adopted good practice in maintaining regular dialogue with the GONW in the preparation of its Core Strategy and their advice has appropriately focussed the direction of the Plan.
- 1.2.2 The Council issued GONW with an early draft of the Issues and Options document which contained multiple options for dealing with this matter.
- 1.2.3 The advice offered by GONW officers (at a meeting in May 2007) was that the boundaries should be agreed between the three authorities of Manchester, Salford and Trafford prior to being included within our emerging Core Strategy.
- 1.2.4 GONW officers considered this approach to be in line with the RSS Panel conclusions on this matter. In the light of this advice, the Council amended its Issues and Options consultation document, removing the Inner Areas and Regional Centre boundaries and commenced a dialogue with both Manchester and Salford through the Joint Project Board, with a view to reach consensus on this matter prior to offering a boundary for consultation.
- 1.2.5 The Joint Project Board (JPB) commissioned a piece of work to look at this matter in the context of RSS. This is attached as Appendix 1.2a.

- 1.2.6 Following the conclusion of this piece of work, and its presentation to the JPB, the three Chief Executives and Leaders of the authorities reached consensus over the proposed boundaries. This agreement is attached as Appendix 1.2b. The boundaries were subsequently included within the Preferred Options document (2008), without the identification of other alternatives for consideration. The work carried out in defining these boundaries demonstrates that the boundaries are justified and effective.

MAIN MATTER 1.3

As the Core Strategy defines in Figure 1 precise boundaries for the Regional Centre and Inner Areas should these also be shown on the Proposals Map?

Council's Response

- 1.3.1 Paragraph 2.15 states that this boundary will be detailed in the Land Allocations DPD. It is considered that the Core Strategy is by its nature a strategic document, the detail of which will be provided through the Land Allocations DPD. The Council considers that this remains the most appropriate course of action. The Proposals Map will be updated at that stage.

MAIN MATTER 1.4

How were the Places in Trafford as shown in Figure 2 identified? What evidence was used to identify them, and to define their associated profiles and key issues? What other Places were considered and consulted upon and for what reasons were those alternatives rejected?

Council's Response

- 1.4.1 The places in Figure 2 were derived following advice from GONW. This advice is detailed in Appendix 1.4a.
- 1.4.2 The main source of information used to identify these places was through the Council Ward Profile information produced by the Area Services Team. This information is maintained through the Council's website.
- 1.4.3 The places detailed in the Core Strategy do not purely reflect the ward profiles but are amalgamated to reflect communities of interest in Trafford and are cognisant with the Council's approach to neighbourhood engagement. The Council has done significant work to define these areas which are based on shared characteristics, priorities and issues. It was therefore considered appropriate to retain these within the Core Strategy.

- 1.4.4 As part of initial consultation work undertaken in relation to the Core Strategy these profiles, together with potential issues/questions facing the “places” were presented to Neighbourhood Forums. In this way stakeholders were able to make their views known.
- 1.4.5 Broadly speaking the Places as identified were welcomed at these Neighbourhood Forums, however in relation to the Altrincham Place, originally the information was split between Altrincham north and Altrincham south, to reflect the Neighbourhood Forum boundaries. Following the outcomes of these meetings, it was considered that these areas presented broadly the same planning issues and that for the purposes of this Plan, they should be combined.

MAIN MATTER 1.5

What are the key cross boundary issues to be addressed? How does the Core Strategy address them? Specifically, does the Core Strategy adequately reflect and maximise the potential contribution that Manchester Airport could make to ensuring that the Manchester City Region becomes a world-class city?

Council’s Response

- 1.5.1 The Core Strategy has been the subject of significant cross-boundary working throughout its preparation.
- 1.5.2 Key cross boundary issues include ensuring that Trafford plays its role in the sub-region and that it contributes to the delivery of the Regional Spatial Strategy (CD 3.1.1), the Greater Manchester Strategy (CD 4.6.1) and the emerging GM Spatial Strategy (CD 4.6.2 – 4.6.7).
- 1.5.3 The Council considers that the key cross boundary issues are ensuring the appropriate level of Economic and Housing Growth, the approach to the identification of the Regional Centre and Inner Areas, Strategic Housing Market, the timely provision of strategic infrastructure, Flood Risk, climate change, Housing Growth Point and airport related growth.
- 1.5.4 The AGMA Executive provides a sub-regional framework for the delivery of strategic cross boundary matters. The AGMA Planning & Housing Commission has a specific role in the co-ordination of strategic infrastructure and housing growth. It also provides a framework to monitor and oversee that the respective Council strategies are contributing to the sub-regions priorities.
- 1.5.5 The Greater Manchester Planning Officers Group (and respective sub-groups) provides the basis for the co-ordination of sub-regional work to support the individual Local Development Frameworks.
- 1.5.6 The response to Matter 1.2 (above) details how the Joint Project Board has been used in identifying the boundaries for the Regional Centre

and the Inner Areas. This group also oversees key issues relating to infrastructure planning for Manchester, Salford and Trafford.

- 1.5.7 The successful implementation of the Core Strategy requires the identification of cross boundary infrastructure and depends on influencing sub-regional funding priorities. A lot has already been achieved on the transport front via the Greater Manchester Local Transport Plan process. AGMA is in the process of establishing an Infrastructure Group to extend co-operation to other areas of provision. The cross boundary transport impacts of Trafford growth is being dealt with through the Phase 2a & 2b transport modelling work, as detailed in CD 12.3, Appendix 5.4.
- 1.5.8 The new Combined Authority comes into effect on the 01 April 2011. The Combined Authority vests the Economic Regeneration and Transport functions of AGMA within the new body. It abolishes the GM Integrated Transport Authority and creates Transport for Manchester. This strengthens further cross-boundary working amongst GM authorities.
- 1.5.9 Officers meet regularly with representatives of Airport to discuss matters of common interest relating to the growth of the airport and the preparation of Local Development Frameworks.
- 1.5.10 Manchester Core Strategy proposes a significant allocation for airport related uses through the Airport City concept. Through joint working with MCC and the Manchester Airport Group, Trafford is led to believe that the proposal for Airport City is adequately met from within the MCC area. This outcome has been reflected in Manchester's Pre Publication Partial Consultation Core Strategy (August 2010) (See appendix 1.5).
- 1.5.11 Page 163 – 170 of the RSS Panel Report detailed that non operational land does not have to be immediately adjacent the airport and that all districts within GM have a role to play in maximising growth associated with the Airport. Trafford considers that the Core Strategy allows for the growth of economic development in relation to the airport and contributes to the growth of the Manchester City Region (see also response to Matter 4.0). It is considered that this can be done in tandem with addressing the borough's regeneration objectives and will be best served by development at Carrington and Trafford Park, and the borough's Strategic Locations.

MAIN MATTER 1.6

Should the Key Issues facing Trafford Park also refer to the Strategic Freight Network and the impact of the resulting large volume of heavy goods vehicles on local roads?

Council Response

- 1.6.1 There is a lack of certainty regarding the forecasting information provided to date on this matter. However we are satisfied that we can manage potential growth in freight traffic within our existing powers and do not envisage this becoming a key issue over the life time of the Plan.

MAIN MATTER 1.7

Is there a typographical error in the first Key Issues identified for Urmston on page 11? Should this read 'Insufficient opportunities for...'?

Council Response

- 1.7.1 The intention of the bullet point was to indicate that, in the future, as a result of policies in this Plan sufficient facilities would exist in this Place for young people. The Council accepts that this key issue is poorly and details the following wording as Suggested Change 200.01 (CD12.4):

<p>Suggested Change 200.01</p>

<p><i>"Insufficient opportunities exist for young people;"</i></p>
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MAIN MATTER 1.8

Does the Core Strategy vision appropriately reflect the economic aspirations of the Sustainable Community Strategy?

Council Response

- 1.8.1 The Local Strategic Partnership has been engaged in the preparation of the Core Strategy at each key stage of its production. The Core Strategy has been presented to the Partnership Board and its various sub-groups (including the Trafford Economic Alliance) throughout the preparation of the document. Partnership Board minutes are available to detail this process, if required.
- 1.8.2 A shared vision with the Community Strategy was developed for the Core Strategy during the initial stages of the Plan's preparation. This vision was further refined to be more spatial and locally distinctive in light of representations received (particularly to address those raised by the GONW). In March 2010 the 'spatial strategy' was incorporated into the 'Vision' and reconsulted via the document 'Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (CD 6.3.22).
- 1.8.3 The revised vision was taken back to the LSP who confirmed that they considered the Core Strategy to represent the spatial expression of the Trafford Sustainable Community Strategy.
- 1.8.4 As such, the Council considers that the LSP has endorsed the approach to economic growth adopted in the Core Strategy.

MAIN MATTER 1.9

Should the Core Strategy vision include an intention to address the impact of development on climate change?

Council's Response

- 1.9.1 The Council considers that the Vision and Strategic Objectives should be read together and that it is not necessary to expressly refer to specific intentions, including addressing the impact of development on climate change. This is however a consistent theme of policies and proposals within the strategy.
- 1.9.2 By concentrating on the concept of 'well designed sustainable communities' we are addressing the matter of climate change in an holistic sense.
- 1.9.3 This is then supported by Strategic Objective 7 which clearly states the Council's views on addressing climate change issues. Further to this many Place Objectives state that the impact of new development on the environment is to be minimised via the application of latest building standards.
- 1.9.4 It should be noted that in consultation with the Highways Agency, the impact of development on climate change (in terms of transport) will be tested and addressed through Phases 2a (*CD 12.3 – Appendix 5.4*) and 2b of the LDF Transport Modelling work.

MAIN MATTER 1.10

Should the Core Strategy vision include reference to the Borough's natural landscape and the desirability of making prudent use of natural resources?

Council's Response

- 1.10.1 The Council considers that the Vision, Strategic and Place Objectives should be read together and that it is not necessary to expressly refer to specific intentions.
- 1.10.2 It is considered the suggested wording to include reference to the natural landscape from Natural England is covered in the Vision by the words "natural environment". However natural landscape is reference in more detailed parts of the plan and in particular Strategic Objective SO5 "Provide a Green Environment"

MAIN MATTER 1.11

Should the word 'residential' be removed from Place Objective RCO1 for Trafford's Rural Communities in order for the Objective to be applicable to all types of inappropriate development?

Council's Response

1.11.1 This objective relates specifically to Strategic Objective 1 – that relating to residential development. The reason for including it within this section of the Place Objectives is to address issues that have emerged in the past in relation to residential housing schemes being allowed through the “rural exceptions’ policy”. The Council considers that sufficient safeguards exist through the application of Green Belt policy to control inappropriate, non residential development. Therefore the Council does not consider it necessary to amend this Place Objective.

MAIN MATTER 1.12

Should a Place Objective for Altrincham identify land at Norman Road as a potential high quality residential site in line with the findings of the Technical Note on the Strategic Locations?

Council's Response

1.12.1 In response to a representation received at Publications stage the Council proposed a change to identify land at Norman Road as a potential high quality residential site within the Place Objectives for Altrincham (see SC5 of CD 6.1.2). This reflected its importance in delivering residential development in the south of the borough (as detailed in the findings of the Technical Note on the Strategic Locations).

MAIN MATTER 1.13

Should the Place Objectives for Altrincham emphasise more the asset of the international airport as a stimulus for economic growth and employment opportunities?

Council Response

1.13.1 Whilst it is correct that the Core Strategy should (and does) provide a framework for harnessing the opportunities for economic growth and employment opportunities arising out of the significant role to be played by Manchester Airport, it is not considered appropriate to include a specific Place Objective relating to the Airport for Altrincham. It is considered that growth stimulated by the airport will be delivered in the existing employment areas and the Strategic Locations across the borough and is not specific to Altrincham.

1.13.2 For example, Policy W1 (W1.10) details that Employment uses within the borough will support economic development both associated with and generated by Manchester Airport.

MAIN MATTER 1.14

To provide greater context should the Key Diagram identify the adjoining Local Authority areas?

Council Response

1.14.1 *Figure 2: Places in Trafford* on page 7 of the Core Strategy currently identifies the adjoining Local Authority areas.

1.14.2 The Key diagram can be amended to identify the adjoining Local Authority areas to demonstrate the relationship as detailed in Suggested Change 200.02 details this amendment.

Suggested Change 200.02

Amend the Key Diagram to identify the adjoining Local Authority areas.

MAIN MATTER 1.15

Are the references to areas at risk of flooding and areas benefiting from defences highlighted on the Key Diagram justified by the most up-to-date evidence? Does the Key Diagram provide an appropriate level of detail for this information?

Council Response

1.15.1 The key diagram is based on the Environment Agency mapping which uses outputs from broad scale modelling. The areas shown on the Key Diagram are those provided by the Environment Agency in January 2010 (CD12.13). The next flood map revision will be published on the Agency's website in February 2011 and the revised areas have now been indicated to the Council (CD12.14). There may be some minor changes to the mapping in this core document to meet the Agency's internal flood mapping quality review prior to publication on its website in February 2011. The Council will ensure that the final published map is used for the update to the Key Diagram. This is detailed as Suggested Change 200.03.

1.15.2 It is considered that the level of detail on the Key Diagram is appropriate given that it is intended to be illustrative rather than presenting information on an Ordnance Survey map base.

Suggested Change 200.03

Update to incorporate flood risk areas from the Environment Agency's revised flood map as indicated in CD: 12.14. N.B. There may be some minor changes to the mapping in this core document to meet the Agency's internal flood mapping quality review prior to publication on its website in February 2011. The Council will ensure that the final published map is used for the update to the Key Diagram.

MAIN MATTER 1.16

Should the Key Diagram highlight all of the key Metro links?

Council's Response

1.16.1 The key diagram is diagrammatic and shows the locations for strategic development. It also includes indicative transport infrastructure improvements alongside existing road/rail and Metrolink corridors. The key diagram will be updated to show the route of the Eccles line and the indicative routes for the committed schemes to Chorlton and the future extension to Manchester Airport, as set out in Appendix 5.6 (CD: 12.3). This will be detailed as Suggested Change 200.04

MAIN MATTER 1.17

Should the three highlighted transport infrastructure improvements be identified in the key to the Diagram?

Council's Response

1.17.1 The key diagram is illustrative and shows the locations for strategic development as required by PPS12: Local Spatial Planning, (CD: 2.1.15). The details of the three highlighted transport infrastructure improvements are yet to be determined. They are indicative of the infrastructure requirements identified in L4.1 (e) and to support SL4 – Trafford Centre Rectangle and SL5 – Carrington, as set out in the Core Strategy: Publication document (CD: 6.2.1). The key for the key diagram will be updated in order to illustrate that the indicative transport infrastructure improvements are the requirements of L4.1 (e). This is set out as Proposed Changes 200.04 and 200.05.

Proposed Change 200.04

The key diagram will be updated to show the route of the Eccles line and the indicative routes for the committed schemes to Chorlton (Phase 3a) and Manchester Airport (Phase 3b), as set out in Appendix 5.6 (CD: 12.3).

Proposed Change 200.05

The key diagram will be updated in order to illustrate that the indicative transport infrastructure improvements are the requirements of L4.1(e).

MAIN MATTER 1.18

To provide necessary certainty for delivery should strategic sites be identified in the Core Strategy? Does the apparent lack of detail to

enable this indicate that the Core Strategy is supported by an inadequate evidence base?

Council's Response

- 1.18.1 The Council considers that its spatial strategy based on Strategic Locations represents an appropriate balance between the supporting evidence and deliverability.
- 1.18.2 Work undertaken following the Preferred Option consultation (March 2010) established the process for the identification of Strategic Locations. This work is detailed in the Trafford Core Strategy: Technical Note on Strategic Locations & Sites Selection (CD 6.3.25) and provides the background for the approach taken in the Core Strategy. The Core Strategy is based on a thorough assessment of urban potential using criteria based on national guidance and advice.
- 1.18.3 In compiling the evidence to support the Core Strategy, it became clear, in relation to the matter of Strategic Locations and Sites, that a number of issues were not resolved to a sufficient degree of certainty with regard to deliverability, which would have enabled the Council to support the designation of Strategic Sites (see CD 6.3.25). It was however considered that there was sufficient evidence to support the more general identification of Strategic Locations to provide additional certainty for the delivery of sites within these locations through the Land Allocations DPD.
- 1.18.4 The lack of information on the level of deliverability is not an indication of an inadequate evidence base, it simply reflects the lack of certainty at this point in time on key matters affecting deliverability. The Council is confident that given the certainty that will be afforded by the identification of Strategic Locations, the issues regarding deliverability can be resolved in time to inform the preparation of the Land Allocations DPD and the Carrington Area Action Plan.

MAIN MATTER 1.19

Has the level of consultation on the Level 2 Strategic Flood Risk Assessment (SFRA) been adequate in order to obtain valuable technical information from key stakeholders to inform the preparation of the document, and to ensure a sound approach to evidence gathering? Is the SFRA robust?

Council's Response

- 1.19.1 The Council is committed to involving a wide range of stakeholders in developing the evidence base for the Core Strategy. This is expressed in its Statement of Community Involvement (CD: 5.1.11), where reference is made to informal engagement and discussions with

specific and general consultation bodies, and other consultees, at the survey and evidence gathering stages of development plan document production. This is demonstrated through the Consultation Statement (CD 6.2.7 – 6.2.9).

- 1.19.2 From the commencement of work on the Level 2/Hybrid Manchester, Salford and Trafford Strategic Flood Risk Assessment (SFRA) in June 2009 to its sign-off in March 2010 (CD: 8.4.4), the Council has had extensive dialogue with the Environment Agency, the Manchester Ship Canal Company, United Utilities, British Waterways and others on the technical data available on various sources of flood risk within the Borough and how it can best be used to inform work on the SFRA. The Environment Agency, in particular, played a central advisory role through its representation on the SFRA Steering Group (CD: 12.16).
- 1.19.3 Draft SFRA results, as they relate to the Manchester Ship Canal, were discussed with the Manchester Ship Canal Company and the Environment Agency. From November 2009 to March 2010 a number of high-level meetings were held to examine specific points of concern. (See Appendix 1.19 (a), letter from Trafford Council to Peel Holdings).
- 1.19.4 Paragraph 25 of Planning Policy Statement 25 (CD: 2.1.23) states that 'LPAs should consult the Environment Agency and other relevant bodies (including adjacent LPAs), when preparing policies in their LDDs on flood risk management and in relation to areas potentially identified as at risk of flooding. Their sustainability appraisals, land allocations and development control policies should all be informed by a SFRA carried out in liaison with the Environment Agency.' The Council has consulted on draft policies at each stage of Core Strategy preparation, as outlined in the Council's Consultation Statement (CD: 6.2.7, CD: 6.2.8 and CD: 6.2.9). Given the nature and level of engagement on the SFRA, the Council also considers that it has followed recommended practice as identified in the PPS25 Practice Guide (CD: 2.1.24).
- 1.19.5 In March 2010, the commissioning authorities agreed the SFRA as a finished body of work and therefore the Council considers that the SFRA is robust.
- 1.19.6 The Environment Agency has concurred that the modelling work undertaken for the SFRA is suitable for development planning purposes, taking as it does a suitably precautionary approach to areas of modelling uncertainty and residual risk based on the information available at the time (Appendix 1.19 (b), correspondence from the Environment Agency to Trafford Council). In its response to the Publication version of the Core Strategy (PUB-1096), the Agency confirmed that 'We consider that the Council has used the latest information available to inform the flood risk evidence base, however further discussions are ongoing with third parties with respect to flood risk from the Manchester Ship Canal. In conclusion, we feel that the

Core Strategy meets the tests of soundness as prescribed in Planning Policy Statement 12 for those issues which lie within our remit'.

MAIN MATTER 1.20

Are the sequential and exceptions tests of PPS25 appropriately applied? Or does the Core Strategy adopt an over-cautious approach in determining the range, quantum and distribution of land uses in a number of the Core Strategy Strategic Locations, in particular at Pomona Island (SL1) and Trafford Wharfside (SL2)?

Council's Response

- 1.20.1 The evidence that the Council has applied each of these PPS25 tests appropriately is contained within its PPS25 Flood Risk Sequential Test of Proposed Strategic Locations and Other Development Areas document (CD: 6.3.24) and Sustainability Appraisal Report and PPS25 Flood Risk Exception Test document (CD: 6.3.23) and related appendices (CD: 6.3.30).
- 1.20.2 The Core Strategy follows a suitably precautionary approach given the information available on flood risk at the time of its preparation. Sections 5 (I) and (II) of CD: 6.3.23 deal specifically with Pomona Island (SL1) and Trafford Wharfside (SL2).

MAIN MATTER 1.21

Has the Sustainability Appraisal (SA) been carried out in line with regulations and from the correct baseline position?

Council's Response

- 1.21.1 The Council considers that the SA has been carried out in line with Regulations. The main stages of the process were set out on the Core Documents list. Sustainability Appraisal was undertaken at each of the following stages:
- Sustainability Appraisal Report (June 2010)
 - Sustainability Appraisal Report Appendices (June 2010)
 - Sustainability Appraisal Report (March 2010)
 - Sustainability Appraisal Report Appendices (March 2010)
 - Further Consultation Sustainability Appraisal (Oct 2009)
 - Further Consultation Sustainability Appraisal Appendix (Oct 2009)
 - Sustainability Appraisal Report Non Technical Summary (June 2009)
 - Sustainability Appraisal Report (June 2009)
 - Sustainability Appraisal Report Appendices (June 2009)
 - Sustainability Appraisal of Spatial Options (July 2008)
 - Supporting Documents on SA of Spatial Options (July 2008)
 - Sustainability Appraisal Scoping Report (June 2007)

1.21.2 The Council considers that the SA Scoping Report published for consultation in June 2007 (CD 6.4.1) correctly set out the baseline position for Trafford (CD 6.4.1 pages 21-25) using data from the Annual Monitoring Report, Community Strategy and Local Area Agreement.

MAIN MATTER 1.22

With particular reference the Davenport Green site, is its audit trail clear and consistent?

Council's Response

1.22.1 The Council's response to Factual Matter 8 provides additional information relating to the chronology of decisions regarding Davenport Green and the SA audit. This document also identifies areas where inconsistencies were identified and how these were dealt with. These particularly related to the correct allocation of the land through the UDP.

1.22.2 Additional information is currently being produced, to inform the Examination process, relating to the June 2009 SA of the Preferred Option document.

MAIN MATTER 1.23

Have all other reasonable strategies been subject to SA and is it clear from the SA process why those alternatives have been rejected?

Council's Response

1.23.1 The Council considers it has subjected all reasonable Strategies to SA through the preparation of the Core Strategy.

1.23.2 At Issues and Options stage 3 alternative options were considered with summary SA information being provided within the document. The SA on the Preferred Options was published in July 2008 (the SA of Spatial Options) and details how the Options evolved as a result of the SA process (CD 6.3.3 Appendices 2,3 and 4).

1.23.3 Although the SA did not reject a specific option it is clear that the SA helped refine the different Strategies that were then subject to consultation in July 2008. A further report explaining how the options were refined was produced alongside The June 2009 Preferred Option as a Technical Appendix. (CD 6.3.10) This refers specifically to the SA in sections 3.27-3.29, 4.27-4.3, 5.27-5.29 and 6.25-6.27.

MAIN MATTER 1.24

Has the Habitats Regulations Assessment (HRA) been carried out correctly under the requirements of the Habitats and Birds Directive and Habitat Regulations? Has it adequately assessed the impact of development on regionally important conservation sites? Does it inappropriately rely on the Regional Spatial Strategy (RSS) evidence and conclusions as to the effect on the Mersey Estuary Ramsar /SPA designation? Is its methodology and conclusions agreed by Natural England?

Council's Response

- 1.24.1 The Council commissioned the Greater Manchester Ecology Unit to undertake HRA in line with Regulation (CD 6.2.4, CD 6.3.7 & CD 6.3.15). Assessments were undertaken in line with Natural England guidance in 2009 and 2010.
- 1.24.2 Despite the current uncertainties surrounding the status of RSS, CLG has made it clear that the evidence base underpinning that document remains valid. Therefore the Council considers that it is appropriate to rely on the conclusion of the RSS that the proposed scale of development in Greater Manchester was not deemed to have a likely significant effect on the estuary (CD6.2.4 section 3.4.1 & 3.4.2 on page 9). The Regional HRA and its conclusions are still relevant to the assessment of plans and policies at the local level. Therefore the conclusions presented in 3.4.2, that the Mersey Estuary can be 'screened out' of the assessment are justifiable and reasonable.
- 1.24.3 In addition, no issue has been raised regarding the 'screening out' of this site in any previous Natural England response on HRAs prepared across Greater Manchester. In looking at the latest response on the draft HRA for the Minerals & Waste Plan this would have similar distal effects to the Core Strategy in terms of hydrological and atmospheric pollution.
- 1.24.4 Finally, the policy and procedural framework of other Core Strategy documents provide sufficient assurance that any mitigating plans can be implemented effectively and do not rely solely on the provisions of the RSS to avoid significant impacts on the European sites. Specific reference is made to the Core Strategy documents in the answer to question 1.25 below.

MAIN MATTER 1.25

Does the Core Strategy adequately refer to all of the mitigation measures identified as being necessary in the HRA, with particular reference to development proposed in SL5 and other policies such as L1 and L4, in order to prevent harm specifically to the Manchester Mosses SAC and the potential need for further HRA to be carried out when further details of development proposals are known?

Council's Response

- 1.25.1 The conclusion of the HRA states that “Providing that the mitigating plans, policies and strategies are adopted and implemented appropriately through the development management process, it is considered that there will be sufficient safeguards in place to avoid significant harm” (CD 6.2.4 Table 8.1, page 20). However as a result of the comments from Natural England to the Publication version of the Plan additional text was added to the Core Strategy (CD 6.1.2, SC1). New text has also been added to Policies L1 (CD 6.1.2, SC18), L4 (CD 6.1.2, SC19) and SL5 (CD 6.1.2, SC13) to the potential need for further HRA in terms of more specific development proposals. It is not possible at this stage to undertake more detailed HRA as more specific plans have not been produced. The justification for Policy SL5 Carrington has also been altered to make it clear that the Carrington Area Action Plan will be subject to a separate HRA assessment prior to its adoption.(CD 6.1.2, SC14).
- 1.25.2 The Council considers that these proposed changes ensure that the Core Strategy now adequately refers to all mitigation measures identified as being necessary in the HRA.

MAIN MATTER 1.26

Is the Local Infrastructure Plan sufficiently up-to-date and robust and does it contain sufficient information with regards to funding requirements and sources to give necessary certainty to the implementation of the Core Strategy policies and proposals?

Council's Response

- 1.26.1 It is considered that the LIP is sufficiently up-to-date and robust. The latest version of the LIP (CD: 6.2.15) September 2010 and the updated information in Appendix 5.6 of CD: 12.3 provide the most up-to-date position based on available information in terms of funding requirements and sources.
- 1.26.2 The LIP is a “living” document which will continue to be updated as new information becomes available, for example, following the adoption of LTP3 and to include the outcomes of Phases 2a (CD 12.3 – Appendix 5.4) and 2b of the LDF Transport Modelling work.

APPENDICES

APPENDIX 1.2A - BACKGROUND PAPER FOR THE JOINT PROJECT BOARD

Defining the Inner Areas

Prepared by Andrew Fletcher (September 2007)

INNER AREAS BOUNDARY

1	<p>WHAT IS THE POLICY INTENTION OF RSS IN GENERAL AND MCR 2 IN PARTICULAR SO FAR AS THE INNER AREAS ARE CONCERNED?</p>
1.1	<p>The Panel's recommended wording of RDF 1 and MCR 1 provides the wider policy context for MCR 2.</p> <p>In introducing its recommendation for RDF 1 the Panel said</p> <p>"We therefore express a second priority, which is that residential development should take place in the surrounding inner areas, together with employment development where accessibility is good, where residential and employment areas are closely related, and where brownfield land is available. Emphasis should be placed on areas in need of regeneration and Housing Market Renewal Areas in particular."(para 4.63)</p> <p>The recommended policy incorporates the same wording</p> <p>"In making provision for development, plans and strategies should accord with the following priorities:</p> <ul style="list-style-type: none"> • The first priority for growth and development should be in the Regional Centres of the two conurbations; • The second priority should be the inner areas of the two conurbations. Residential development should be located in these areas together with employment development where accessibility is good, where residential and employment areas are closely related, and where brownfield land is available. Emphasis should be placed on areas in need of regeneration and Housing Market Renewal Areas in particular; • The third priority for growth is in and adjoining the centres of the other cities and towns which make up the three City Regions. Emphasis should be placed on areas in need of regeneration and Housing Market Renewal Areas in particular. Development in larger suburban centres within the City Regions would be

	<p>compatible with this priority provided they are at points where transport networks connect and where public transport accessibility is good;</p> <ul style="list-style-type: none"> • The fourth priority is the need to build up the major service centres elsewhere in the Region – notably Carlisle, Crewe and Lancaster. These should be the focal points for development within those parts of the Region; • The need to tackle the problems of Barrow and West Cumbria is such that investment should also be encouraged in the centres of Barrow, Workington and Whitehaven to provide employment opportunities; • In the rural areas development which is required to meet the local needs, including residential development, should normally be located in the Key Service Centres.” <p>The supporting text should be amended to reflect the reasoning set out in paragraphs 4.60 – 4.71 above.”</p>
1.2	<p>The recommended version of MCR 1 reads</p> <p>“Plans and Strategies in the Manchester City Region should:</p> <ul style="list-style-type: none"> • Support interventions necessary to achieve a significant improvement in the sub-region’s economic performance by encouraging investment and sustainable development in the Regional Centre, in or on the edge of the centres of the surrounding towns, and at other key locations which accord with Policies DP1-8, in order to contribute to the growth opportunities identified in Policy W1; • Secure improvements, including the enhancement of public transport links, which will enable the inner areas and the northern part of the City Region to capture growing levels of investment and reduce subregional disparities. Particular attention should be given to assisting with programmes to address worklessness; • Accommodate housing development in locations that are accessible by public transport to areas with strong economic prospects. A high level of residential development will be encouraged in the inner areas to secure a significant increase in the population of these areas; • Provide high quality housing to replace obsolete stock and where appropriate refurbish existing properties, to meet the needs of existing residents, and attract and retain new population in order to support economic growth; • Improve the City Region’s internal and external transport links in line with the priorities for transport investment and management set out in Policy RT9; • Maintain the role of Manchester Airport as the North of England’s key international gateway in line with Policy RT5 and paragraph

	<p>10.18;</p> <ul style="list-style-type: none"> • Develop the role of Manchester as a key public transport interchange and gateway to the region in line with Policy RT3 and enhance the accessibility of the Regional Centre by public transport to support economic growth and to ensure that the rest of the City Region can fully share the benefits of the wide range of economic, cultural and other opportunities it provides. Investment should support Policies MCR2 and MCR4 in particular; • Develop the roles of Wigan and Warrington as key public transport interchanges in line with Policy RT3; • Environmental resources should be focussed where they are most needed and will have the greatest benefit, to facilitate the sustainable development of the Regional Centre and Inner Areas. This includes integrated flood management works, the remediation of contaminated land, and provision of high quality green infrastructure as part of comprehensive regeneration schemes. Proposals and schemes will be directed primarily towards locations where they can contribute to these priorities.”
1.3	<p><i>AF Comments on LDF 1 and MCR 1</i></p> <p><i>The first reference in MCR 1 suggests that the inner areas are places that are suffering from sub regional disparities and that require increased levels of investment. This adds to the implication in RDF 1 that one of the purposes of development in the inner areas is to deliver regeneration. The mention of “programmes to address worklessness” in MCR 1 suggests that there is a resident population.</i></p> <p><i>The second reference in MCR 1 suggests that the primary spatial planning instrument to achieve change in the inner areas will be large scale residential development leading to significant population increase. The third reference doesn’t address the purpose of the policy for the inner Areas but says that environmental resources should be focused to support the sustainable development of these areas. It suggests that the inner areas may be subject to comprehensive regeneration schemes.</i></p> <p><i>Perhaps surprisingly, there is more guidance on the issue of employment development in the inner areas in RDF 1 than appears in MCR 1 or MCR 2.</i></p>
1.4	<p>The Panel recommend that the supporting text for MCR 1 should be that prepared by NWRA.</p> <p>The supporting text to MCR1 makes no mention of the Inner Areas</p>
	<p>MCR 2</p>
1.5	<p>On MCR 2 the Panel reported as follows</p> <p>We recommend that Policy MCR2 should read as follows:</p>

	<p>“Policy MCR2 Regional Centre and Inner Areas of Manchester City Region</p> <ul style="list-style-type: none"> • Plans and Strategies should ensure that the Regional Centre of the Manchester City Region continues to develop as the primary economic driver, providing the main focus for business, retail, leisure, cultural and tourism development in the City Region. The expansion of the knowledge economy throughout the Regional Centre, and particularly related to the Universities, will be a particular priority; • Proposals and schemes for residential development in the Regional Centre will be acceptable where they are part of mixed use employment schemes that comprise a good range of housing sizes, types, tenures and affordability and where they contribute to the vitality and viability of the Regional Centre; • Residential development should be focussed in the inner areas adjacent to the Regional Centre in order to secure a significant increase in their population, to support major regeneration activity including the Manchester-Salford Housing Market Renewal Pathfinder, and to secure the improvement of community facilities and the creation of sustainable communities. The emphasis will be on providing a good range of quality housing, in terms of size, type, tenure and affordability, with a high quality environment and accessible local facilities and employment opportunities; • Plans and strategies should provide for employment within the inner areas in accordance with Policies W2
1.6	<p>AF Comments on MCR 2</p> <p><i>The wording of the first two lines is somewhat ambiguous. I take it to mean that the inner areas are adjacent to the Regional Centre, and not that the residential development in the inner areas should be adjacent to the inner areas.</i></p> <p><i>The Panel’s Recommended W2 does not say anything specifically about the Inner Areas . It provides criteria against locations for Regionally Significant Employment should be assessed.</i></p>
1.7	<p>The Panel rejected AGMA’s suggested reference to Trafford Park within MCR 2.</p>
1.8	<p>Attached to MCR 2 is the footnote</p> <p>“The Inner Areas surround the Regional Centre and comprise the North Manchester, East Manchester and Central Manchester regeneration areas, Trafford Park, North Trafford and Central Salford.”</p> <p>On the subject of definition of boundaries the Panel’s comment was</p>

	<p>“We referred earlier to the question of the definition of the Regional Centre and Inner Areas. Footnotes 202 and 203 provide definitions which we are content to accept – but as we indicated earlier our lack of local knowledge leads us to do so with some caution. We note that SDL/AGMA/17 (page 22) includes a very similar definition though it adds a reference to Sportcity – we do not feel able to comment on this suggestion. RSS is not site specific and it will be at the local level that precise definitions and plans are produced.”</p>
1.9	<p>The Panel recommended that the supporting text to MCR 2 from draft RSS be retained.</p> <p>The relevant paragraphs of the supporting text in draft RSS read</p> <p>“As the regeneration of the Inner Areas is important to the overall success of the City Region, and because these areas are identified as high priority by initiatives like the Housing Market Renewal Pathfinder project and the creation of two Urban Regeneration Companies, Central Salford and New East Manchester, they are considered to be a suitable location for significant new housing and local economic development. It will be important to ensure the development of sustainable, mixed communities that appeal to a broad range of new and existing residents.</p> <p>The Inner Areas have enormous potential, which, if left untapped, will limit the ability of the Regional Centre to secure investment and generate further growth. Development within the Inner Areas will boost overall economic growth in the City Region, reduce local inequalities and deprivation and provide a clear alternative to further decentralisation and the unsustainable commuting patterns associated with it.”</p>
2	WHAT TESTS ARISE FROM THE ABOVE?
2.1	<p>Having considered all of the above I think that one can test the suitability of an area for inclusion within the Inner Areas of MCR by applying the following questions</p> <p>Questions - Location and Character.</p> <p>Is the area “adjacent to” the Regional Centre? (Dictionary definition of “adjacent” – “near or next to”)</p> <p>Is the area suffering from the sub regional disparities which are said by draft RSS to characterise the inner areas? Worklessness is mentioned in MCR 1 as a particular issue to be addressed in the Inner Areas.</p> <p><i>(The worklessness programme targeting which has been agreed by AGMA for the City Strategy may be a useful indicator. Also the Indices of Multiple Deprivation)</i></p>

	<p>Questions - Do the Proposals for the area “fit” with the Policy Intent for the Inner Areas?</p> <p>Is there to be residential development in the area that will contribute to a significant increase in population in the Inner Areas?</p> <p>Will that residential development have the following specific effects</p> <ul style="list-style-type: none"> • supporting major regeneration activity including the Manchester-Salford Housing Market Renewal Pathfinder, • and securing the improvement of community facilities; and • the creation of sustainable communities? <p>The wording of Panel’s MCR 2 suggests that all of these should be achieved.</p> <p>Or in a broader sense, will the development lead to regeneration in the inner areas which directly reduces sub regional disparities.</p> <p><i>(It appears to me that the scale of residential development proposed is a factor, but development in the inner areas must go further than making a strong contribution to a regional/sub regional requirement for additional housing. The reason it is being placed in the inner areas is because in that location it can have a regenerative effect in terms of creating sustainable communities.)</i></p> <p><i>(There will be developments outside the inner areas which indirectly benefit inner area residents. It appears to me that MCR 2 is intended to create a direct development led effect within the inner areas.)</i></p>
3	<p>WHAT OPPORTUNITIES DOES INCLUSION IN THE INNER AREAS POTENTIALLY CONFER?</p>
3.1	<p>Significant residential development</p> <p>Economic development – taking RDF 1; MCR 1; and MCR 2 together this is described as “local”, and to be acceptable “where accessibility is good, where residential and employment areas are closely related, and where brownfield land is available”; with there being no special dispensation for Regionally Significant development</p> <p>Environmental resources to support the above Public transport improvements (and other undefined “improvements”) Increased levels of investment Programmes to address worklessness</p>
4	<p>COULD THESE OPPORTUNITIES (OR SOME OF THEM) BE ACHIEVED BY A DIFFERENT POLICY ROUTE?</p>
4.1	<p>My reading of the Panel’s recommended policies is that MCR 4 (North) provides the same physical development and infrastructure improvement opportunities, but MCR 3 (South) does not.</p>

4.2	<p>Is there a possibility that a new MCRSS could present a special case (for, say, the Ship Canal Corridor) which sets it outside the North; South; Inner; Regional Centre framework? This assumes</p> <ul style="list-style-type: none">• an AGMA consensus about supporting an agreed programme of development;• and that it did not contradict the intentions of RSS.
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APPENDIX 1.2B - COMBINED JOINT PROJECT BOARD AGREEMENT TO THE REGIONAL CENTRE BOUNDARY WITHIN TRAFFORD (JUNE 2008).

Appendix 1.2b(i)

Correspondence regarding the definition of the Regional Boundary

Extract of Trafford's Response to Salford and Manchester City Councils

Graham/Anne

Thanks for your comments/agreement. I will get the map amended to just show the boundary within Trafford.

Clare

Clare Taylor-Russell

Strategic Planning and Developments

Trafford Council

Manchester's Response to Trafford

From: Anne Morgan [mailto:a.morgan@manchester.gov.uk]

Sent: 09 June 2008 13:06

To: Taylor-Russell, Clare

Cc: Smith, Dennis; Gentry, Graham; Haslam, Rob; Peter Babb

Subject: Re: Inner Areas and Regional Centre Boundary in Trafford

Clare,

I haven't got a problem with the report but I think it would be useful if we agreed the role and characteristics of the Regional centre and Inner Areas in more detail as we move forward - I appreciate this won't happen in time for your committee report but it is something we are doing work on at the moment so we could hopefully share a draft with you and Salford in the near future for discussion?

Anne

Anne Morgan

Group Leader, Planning Strategy Team

Manchester City Council

Planning

PO Box 463

Town Hall Extension

Manchester

M60 3NY

Salford's Response to Trafford

From: Gentry, Graham [mailto:Graham.Gentry@salford.gov.uk]

Sent: 09 June 2008 12:43

To: Taylor-Russell, Clare

Cc: Haslam, Rob; Smith, Dennis; Anne Morgan; Findley, Chris; Percival, David
Subject: RE: Inner Areas and Regional Centre Boundary in Trafford

Clare

Thanks for this.

I think that my one comment would be that it may not be appropriate/helpful to show the boundary of the Inner Area extending into Salford, as we will be looking at different options for this in our Core Strategy.

You haven't attempted to show the Regional Centre boundary outside Trafford, so hopefully there should not be a problem if you don't show the Inner Area either.

Regards
Graham

Extract of Trafford's Original Message

From: Taylor-Russell, Clare [mailto:Clare.Taylor-Russell@trafford.gov.uk]
Sent: 06 June 2008 12:29
To: Anne Morgan; Gentry, Graham
Cc: Haslam, Rob; Smith, Dennis
Subject: Inner Areas and Regional Centre Boundary in Trafford

Dear Anne and Graham

We have put together the attached paragraphs, which we intend to include in our Preferred Options document within our spatial profile section.

At the last Project Board you will recall that we said we would circulate amongst our sub-group the boundaries and the justification text we intend to include.

We have tried to keep this section of our Spatial Profile brief and based largely on RSS. We have also made reference to the Project Board and other joint working. This section is supplemented within the Preferred Options document by "place profiles and issues" and "place objectives" for each of our 10 areas, of which Trafford Park and Old Trafford are two. In turn we then consider how/to what extent each of our spatial options will achieve these objectives.

Is there any chance that you can consider the attached paper and the Regional Centre boundary over the next few days?

Could you let me know whether this would possible please.

Thanks

Clare

Clare Taylor-Russell

Senior Regeneration Officer

Trafford Council

Strategic Planning and Developments

Waterside House, Sale Waterside, Sale, M33 7ZF

Appendix 1.2b(ii)**Draft Extract from Trafford's Core Strategy "Trafford in the Region/Trafford in Partnership" – Circulated to Salford and Manchester for comment, 6th June 2008**

Trafford in the Region

The growth of Trafford needs to contribute to the aspirations for Greater Manchester as a whole. The North West Regional Spatial Strategy provides a framework for development and investment in the region over the next 15 - 20 years. It is part of the statutory development plan for every local authority in the North West.

It is important that the Trafford Local Development Framework is developed to contribute to the delivery of the Regional Spatial Strategy and support the vision of Greater Manchester becoming a world class city. Growth in Trafford should therefore be seen to support the priorities of residents and service providers but also to be contributing to the delivery of the Greater Manchester vision. The RSS: Proposed Changes provide a clear indication of the growth of the Borough to 2021 and for the period post 2021 which has enabled this Core Strategy to make assumptions beyond this date.

Policy MCR2 of the Regional Spatial Strategy identifies that the Regional Centre should be the primary economic driver of the Manchester City Region and the adjoining Inner Areas will be the first priority for residential development within the Manchester City Region. This is to ensure that the Regional Centre of the Manchester City Region continues to develop as the main focus for business, retail, leisure, cultural and tourism development in the City Region.

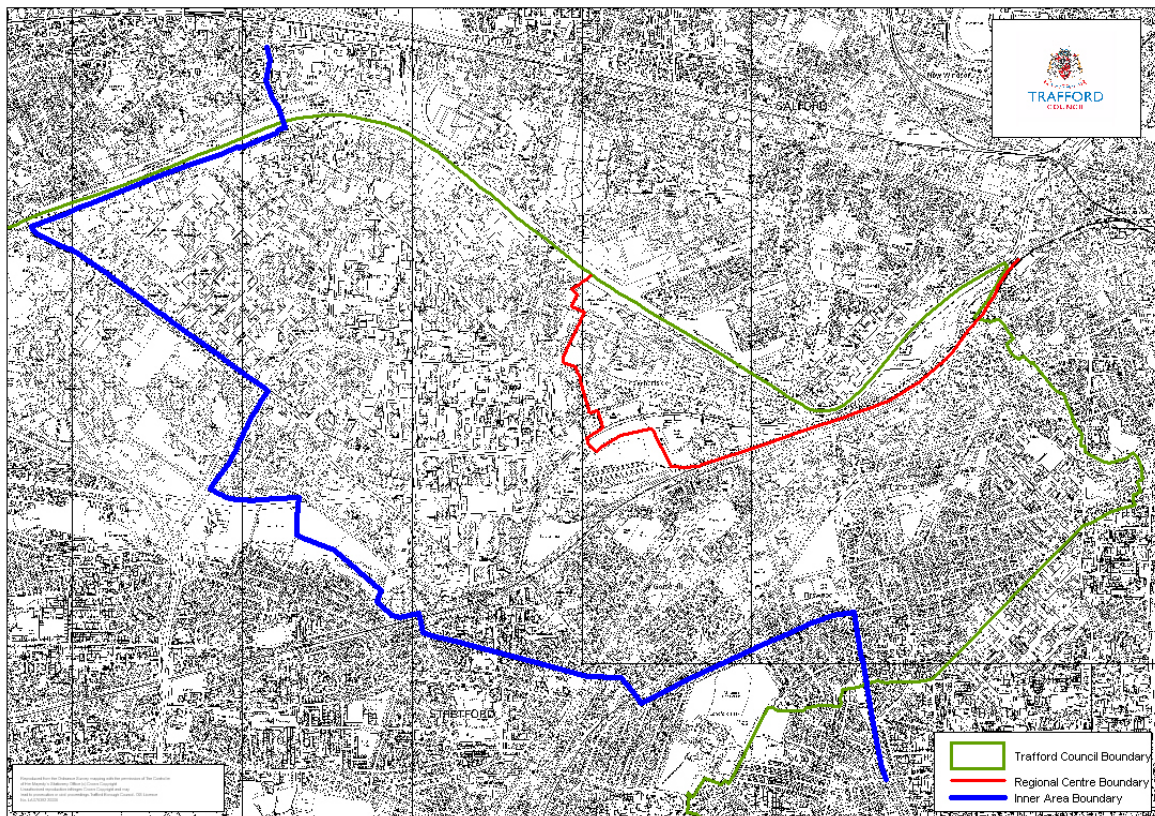
RSS details that the Regional Centre should comprise (in Trafford) Trafford Wharfside and Pomona, with an "arc of opportunity" stretching from the University of Salford in the west through to Piccadilly Station in the east, but it requires the detailed boundary definitions to be set out in the Local Development Framework, through close cross authority working.

The Regional Centre provides the main focus for business, retail, leisure, cultural and tourism development in the City Region. In Trafford Pomona, Wharfside (including mediacity:uk) and the Manchester United stadium all play a significant role in one or more of these types of development and provide opportunities for growth in these sectors. RSS states that residential development should be focussed in the Inner Areas and that this will, in turn, secure a significant increase in their population to support major regeneration activity and the improvement of community facilities and the creation of sustainable communities.

The Trafford Park core industrial area has a very significant role to play in the economy of the region and more specifically in terms of achieving a significant improvement in the performance of the sub-regional economy.

Figure 2.1 below proposes a detailed boundary for both the Regional Centre and Inner Areas that lie within Trafford. This boundary has been arrived at in collaboration with our neighbouring authorities Salford and Manchester. Outside of these areas RSS Policy MCR3 will apply.

Figure 2.1 Proposed Regional Centre and Inner Areas boundaries within Trafford



Trafford in Partnership

The Council has been working jointly with the neighbouring authorities to identify issues of joint relevance and to explore joint evidence base opportunities. This joint working has included work on studies such as Strategic Flood Risk, Strategic Housing Market Assessment and work around New Growth Points.

There has also been significant joint working with neighbouring authorities to look at cross boundary development opportunities and area frameworks. For example, we have worked with Manchester and Salford over the growth of the Regional Centre at Pomona, mediacity:uk and we have also adopted joint standards for Irwell City Park.

Officers from Salford, Manchester and Trafford meet regularly as the “Joint Project Board”. The purpose of this group is to facilitate the cross boundary/joint working arising out of the preparation of the three districts

Local Development Frameworks, and in particular their Core Strategies. The items for discussion/action therefore evolve over time, and although the formal membership of the group is made up from officers of the three Councils, key stakeholders are invited to contribute as appropriate. The initial items for consideration have included defining the Regional Centre and Inner Areas boundary and the potential for growth close to the Trafford Centre to support regeneration and development within the Manchester City Region.

Officers from Trafford also meet regularly with representatives from Manchester Airport and the neighbouring authorities of Manchester, Macclesfield, and Stockport, together with representatives from the Highways Agency to ensure that airport related issues are adequately addressed in each authority's Local Development Framework.

Finally links with Warrington have been established to consider the implications of increased use of the Manchester Ship Canal for freight and the potential growth levels proposed for Partington and Carrington.

APPENDIX 1.2B(iii) – TRAFFORD IN THE REGION

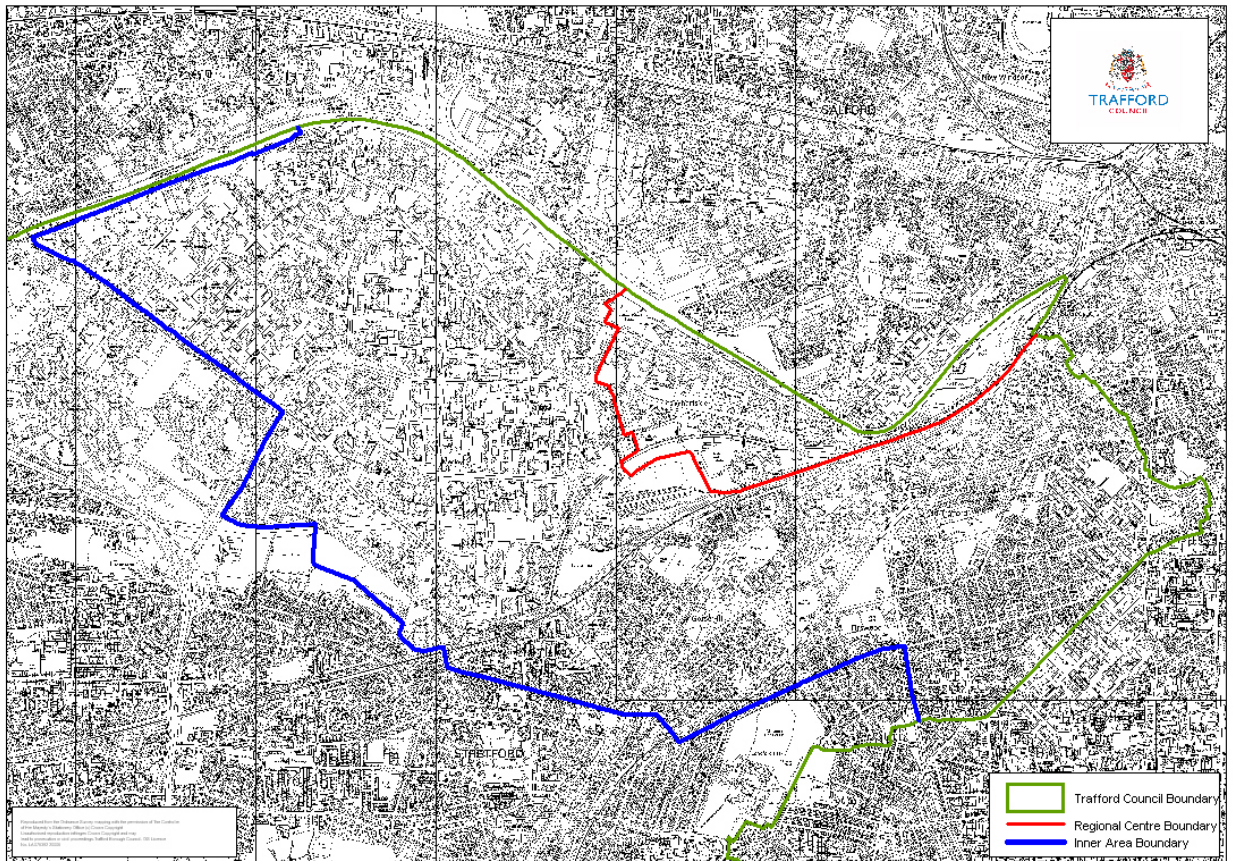
“Trafford in the Region/Trafford in Partnership” extract from Trafford’s Core Strategy Preferred Options Document. Submitted to the Executive for Approval on 30th June 2008.

Trafford in the Region

- 2.1 The growth of Trafford needs to contribute to the aspirations for Greater Manchester as a whole. The North West Regional Spatial Strategy provides a framework for development and investment in the region over the next 15 - 20 years. It is part of the statutory development plan for every local authority in the North West.
- 2.2 It is important that the Trafford Local Development Framework is developed to contribute to the delivery of the Regional Spatial Strategy and support the vision of Greater Manchester becoming a world class city. Growth in Trafford should therefore not only be seen to support the priorities of residents and service providers but also to be contributing to the delivery of the Greater Manchester vision. The RSS: Proposed Changes provide a clear indication of the growth of the Borough to 2021 and for the period post 2021 which has enabled this Core Strategy to make assumptions beyond this date.
- 2.3 RSS details that, in Trafford, the Regional Centre should comprise Trafford Wharfside and Pomona, and that the Inner Areas should comprise Trafford Park and North Trafford. It requires the detailed boundary definitions to be set out in the Local Development Framework, through close cross authority working.
- 2.4 Policy MCR2 of the Regional Spatial Strategy identifies that the Regional Centre should be the primary economic driver of the Manchester City Region. This is to ensure that the Regional Centre of the Manchester City Region continues to provide the main focus for business, retail, leisure, cultural and tourism development in the City Region. In Trafford Pomona, Wharfside (including mediacity:uk) and the Manchester United stadium all play a significant role in one or more of these types of development and provide opportunities for growth in these sectors.
- 2.5 RSS states that proposals for residential development in the Regional Centre will be acceptable when they are part of mixed use employment schemes, comprising a good range of housing sizes, types, tenures and affordability and where they contribute to the vitality and viability of the Regional Centre.
- 2.6 RSS details that the expansion of the knowledge economy throughout the Regional Centre should be a priority and identifies an “arc of opportunity” stretching from the University of Salford in the west through to Piccadilly Station in the east for particular priority in this regard.

- 2.7 The RSS states that residential development should be focused in the Inner Areas and that this will, in turn, secure a significant increase in their population to support major regeneration activity and the improvement of community facilities and the creation of sustainable mixed communities, appealing to a broad range of new and existing residents.
- 2.8 The Trafford Park core industrial area continues to have a very significant role to play in the economy of the region and more specifically in terms of achieving a significant improvement in the performance of the sub-regional economy.
- 2.9 Figure 2.1 below proposes a detailed boundary for both the Regional Centre and Inner Areas that lie within Trafford. This boundary has been arrived at in collaboration with our neighbouring authorities Salford and Manchester. Outside of these areas within Trafford RSS Policy MCR3 will apply. Policy MCR3 requires that plans and strategies focus employment development in order to support the overall economic growth of the City Region and allow residential development where it supports local regeneration strategies and meets local needs, particularly for affordable housing, in sustainable locations.

Figure 1: Proposed Regional Centre and Inner Areas boundaries within Trafford



Trafford in Partnership

- 2.10 The Council has been working jointly with the neighbouring authorities to identify issues of joint relevance and to explore joint evidence base opportunities. This joint working has included work on studies such as Strategic Flood Risk, Strategic Housing Market Assessment and work around New Growth Points.
- 2.11 There has also been significant joint working with neighbouring authorities to look at cross boundary development opportunities and area frameworks. For example, we have worked with Manchester and Salford over the growth of the Regional Centre at Pomona, mediacity:uk and we have also adopted joint standards for Irwell City Park.
- 2.12 Officers from Salford, Manchester and Trafford meet regularly as the “Joint Project Board”. The purpose of this group is to facilitate the cross boundary/joint working arising out of the preparation of the three districts’ Local Development Frameworks, and in particular their Core Strategies. The items for discussion/action therefore evolve over time, and although the formal membership of the group is made up from officers of the three Councils, key stakeholders are invited to contribute as appropriate. The initial items for consideration have included defining the Regional Centre and Inner Areas boundary and the potential for growth close to the Trafford Centre to support regeneration and development within the Manchester City Region.

- 2.13 Officers from Trafford also meet regularly with representatives from Manchester Airport and the neighbouring authorities of Manchester, Macclesfield, and Stockport, together with representatives from the Highways Agency to ensure that airport related issues are adequately addressed in each authority's Local Development Framework.
- 2.14 Finally links with Warrington have been established to consider the implications of increased use of the Manchester Ship Canal for freight and the potential growth levels proposed for Partington and Carrington.

APPENDIX 1.4A – SPATIAL PORTRAITS – DEFINING PLACES

Government Office for North West briefing Paper 2007

Spatial Portraits – Some Key Points

- The spatial portrait is the key initial step in preparing a core strategy. It's not a promotional document. Its purpose is to describe the area and to draw out the main spatial issues. Keep in mind that, at the end of the day, the emphasis needs to be on a joined-up strategy for promoting sustainable communities and neighbourhoods.
- The spatial portrait should describe the various places within a district and set out their characteristics, the issues they face and their relationship to other parts of the district. Spatial planning issues are, of course, wider than the traditional land use issues addressed in former development plans.
- There is a need to get away from a thematic based approach and move towards a spatial one which takes a more holistic look at both the district and its various settlements.
- By taking a place based, rather than thematic, approach in the spatial portrait this can lead to the identification of the main spatial issues that need to be addressed in the core strategy and other LDDs and this, in turn, would lead into consultation on spatial issues and options.
- It would be helpful to set out a settlement hierarchy, including a retail hierarchy, to provide a framework for this place based approach.
- The spatial portrait also needs to set the district in a wider context. For example, what is its role within the Manchester City Region? How does it relate to adjoining areas? What are the key sub-regional issues?
- The issue of housing market areas needs to be addressed and the various housing needs that these market areas contain. Guidance on these matters will be available from CLG shortly.
- Environmental constraints should be identified.
- Where are the main employment areas? What is the nature of these various employment areas?
- How has the district, and the various local areas, changed over time and what is the likely direction of change.
- Information could usefully be presented in a bullet point form rather than a commentary. This would enable the document to focus on key issues affecting the district as a whole and the various local areas it contains in a concise and user friendly form.

**APPENDIX 1.5 – EXTRACTS FROM MANCHESTER CORE STRATEGY:
PRE-PUBLICATION PARTIAL CONSULTATION ON MANCHESTER'S
CORE STRATEGY (AUGUST 2010)**

Policy EL4 – Airport City

Policy EL4 - Airport City

The area to the north of Manchester Airport is a significant opportunity for employment development in Wythenshawe. The location adjacent to the airport offers a strategic competitive advantage which is likely to attract to a wide range of business sectors, including users which would otherwise locate in a different region or country.

The development of this location will be promoted as the core of a wider Airport City opportunity, creating functional and spatial links with nearby parts of Wythenshawe to maximise the catalytic potential of the airport to attract investment and increase economic activity.

The area is suitable for high technology industries, logistics, warehousing and airport hotels. Any development of the site would be expected to:

- Continue the regeneration of the Wythenshawe area
- Provide a focus for mixed use economic development
- Ensure development is accessible to the communities in Wythenshawe by a choice of sustainable and public transport
- Take advantage of the existing transport hub at Manchester Airport and proposed extension of Metrolink and the SEMMMS road scheme.
- Able to offer employment opportunities accessible to the local communities

Any development proposal would be expected to be set within the context of a comprehensive scheme for the whole area. This will address access, delivery, design and layout, flooding, energy infrastructure and the scale of uses within the area.

3.12 Development on the Airport site is constrained by the need for uses to be essential to the operation of the Airport. The Airport City area is able to take advantage of the economic development opportunities presented by the Airport, particularly for businesses which want quick and reliable access to the airport. It is seeking to capture economic growth which would otherwise locate to another region or country. It is expected development will take advantage of this unique position and seek to attract business which can take advantage of international connectivity, improve the competitiveness of businesses requiring an Airport location and attract inward investment. The jobs created should be accessible to the local community via public transport; also many will be accessible in terms of type and the skills required. This is particularly important as Wythenshawe is a regeneration priority for the City, and residents here can find it difficult to access jobs in the Regional Centre.

3.13 Wythenshawe offers a range of opportunities for economic development particularly focused on Manchester Airport, Airport City and University Hospital South Manchester, including its links to Roundthorn Industrial Estate. It is expected that there will be a net increase of approximately 10,000 jobs and that the communities of Wythenshawe will benefit from accessibility to these jobs. Furthermore Manchester Airport is a significant transport hub served by a range of transport infrastructure including a train station and bus/coach station. Connectivity will be enhanced through the provision of the proposed Metrolink extension and SEMMMS road scheme helping to spread the benefits to wider communities including Wythenshawe.

3.14 The Wythenshawe SRF establishes the principle of the East and West Wythenshawe Economic Development Corridors, concepts which provide spatial integration of the opportunities for economic development in Wythenshawe. There are particular catalytic opportunities to the south of this area focused on Manchester Airport and University Hospital South Manchester.

Manchester Airport

8.1 Manchester Airport is identified as making a positive contribution to the delivery of the on the delivery of the Sustainable Community Strategy due to the continued expansion and increase in flights. Aviation is also identified as a growth sector and these are recognised in the Sustainable Community Strategy to make the greatest contribution to economic growth.

Policy MA 1 - Manchester Airport

Manchester Airport Strategic Site

In line with the Future of Air Transport White Paper, the growth of Manchester Airport to accommodate 45 million passengers per annum by 2030 will be supported and is designated as a Strategic Site. This will involve the expansion of the developed Airport area. Areas for expansion are identified on the proposals map. The Green Belt boundary in this area has been amended to exclude any areas needed for airport development.

Schedule of Uses 2030

Table 8.1 explains the uses which are expected across the Manchester Airport Operational Area within Manchester in 2030, just beyond the plan period.

Table 8.1		
Area	Area reference in MAG Masterplan	Uses

		Terminal, taxiways, aircraft apron, ancillary operational facilities, offices, hotels and other uses, surface access and car parking
1a – Existing Area	N/A	
		Runways, taxiways, airfield, operational and ancillary facilities, landscape mitigation, utilities and car parking.
1b - Existing Area (Airfield)	N/A	
		taxiways, aircraft apron, aircraft maintenance, operational facilities, cargo facilities and landscape mitigation.
2 - Cloughbank Farm	A	
		Operational facilities, cargo facilities and car parking and landscape mitigation.
3 - Land to the west of the A538 (Oak Farm)	E	
		Commercial/cargo development including airline offices and hotel with a new vehicle access to Thorley Lane
4 - Land within and adjacent to Junction 5 of the M56	C	
		Surface access and Car Parking with new vehicle access to Ringway Road and Styal Road
5 - North of Ringway Road	B	

The Manchester Airport Strategic Site includes areas 1a, 2, 3, 4 and 5. This site will accommodate the development described in the table above, which includes the significant development required to meet operational requirements by 2030. However, within the Strategic Site development which does not reflect the schedule of uses above but is within those listed in the reasoned justification will be acceptable where the applicant has demonstrated:

- that it does not impede the operation of the airport and the planned growth outlined in this policy,
- that the development is a part of the phased development of the airport organisation set out in Table 8.1 above,
- that development is needed due to the operational expansion of the Airport, and,
- that there would be no greater negative environmental effect, either alone or cumulatively, than would occur for the uses in table 8.1 (these are set out in the axis environmental baseline and environmental assessment reports).

Area 1b is the southern part of the airport which includes the runway, ancillary facilities, existing and consented transport infrastructure and landscape mitigation. This land is expected to continue to operate in a similar way over

the life of the plan. This land sits outside the Strategic Site, and because it is felt to contribute to some of the purposes identified in PPG2 will remain in the Green Belt.

All development proposed as part of the Airport expansion should seek to ensure that any environmental effects of development are assessed at the planning application stage to ensure these create no greater negative impact than those identified in the Axis Environmental Baseline and Environmental Assessment reports. Any effects should demonstrate they can be mitigated or compensated, in particular:

- minimise any adverse impact on areas of international or national conservation, ecological and landscape value. In particular, development should avoid the Cotterill Clough SSSI. Where it is not possible to avoid harm, mitigation measures to compensate for any adverse impact will be necessary. Development within the expansion areas must implement the mitigation measures agreed with the City Council, informed by an up to date environmental assessment,
- retain or relocate the allotments in Area 4.
- demonstrate the extent to which surface access and car parking arrangements encourage the use of public transport, walking and cycling,
- seek the maximum possible reductions in noise through compliance with the Manchester Airport Noise Action Plan and Manchester Airport Environment Plan.
- demonstrate that the number of people affected by atmospheric pollution is minimised and the extent to which any impact can be mitigated, and
- improve access to training and job opportunities particularly for people in the Wythenshawe and local area.

8.2 The Future of Air Transport White Paper 2003 considered aviation growth nationally and forecast growth at each of the airports. Manchester Airport was forecast to grow to 50 million passengers per annum by 2030 partly due to the existing runway capacity being able to cater for this figure. The forecasts for growth have been revised down to 45 million passengers per annum to take into account the impact of climate change policies and economic forecasts in the UK Air Passenger Demand and CO2 Forecasts January 2009. The White Paper acknowledges the importance of air travel to national and regional economic prosperity, and that not providing additional capacity where it is needed would significantly damage the economy and national prosperity.

8.3 Within the City-Region Manchester Airport is key economic driver, adding value to the attraction of the City-Region for indigenous businesses and inward investment. Businesses have cited the Airport as being important in terms of access to markets customers or clients and inward investors are attracted by the range of direct flights to key European and global cities. The Airport also plays a significant role in attracting inbound tourism to the region. The need to maintain the role of Manchester Airport as a key economic driver and international gateway is supported by the Regional Spatial Strategy. It is also a significant provider of employment in its own right. It is an important source of employment opportunities for residents of Wythenshawe, one of the most deprived communities in Manchester, as well as further a field. This

contribution has been identified in the Regional Strategy and the MIER, as well as in national policy through the Air Transport White Paper. The City Council recognises that the growth of the airport can be a significant catalyst for the economic development of the City Region.

8.4 Airport capacity is a function of passenger flow (an airport has some periods which are busier than others) and the maximum passenger/flight capacity of the facilities. An airport's capacity needs to be able to handle its busiest period rather than the average passenger throughput. The facilities which determine capacity are surface access and car parking, terminal and freight handling, apron and runway. The Need for Land Document and Airport Masterplan explains how the need for these uses translates into an indicative masterplan. The documents also explain how these proposals reflect the most efficient use of land and set out the Airport's sustainability principles.

8.5 The scale of the proposed expansion will require a phased approach, in the course of which it may be sensible to establish uses on a temporary basis to enable the delivery of the overall masterplan. Such proposals will be acceptable, although the City Council will need to be confident that the proposals are part of the overall expansion, and may consider the use of temporary planning consents. The uses mentioned in the policy are supported based on environmental assessments which have demonstrated that these may have an acceptable environmental impact. It will be essential that any temporary development does not exceed the environmental impacts identified through the Environmental Baseline Study. At the application stage more up to date information on the effects of development may emerge and the most appropriate mitigation/ compensation measures at the time should be employed. It is also important that the principles which have informed the final masterplan are maintained throughout development, including for issues such as traffic management. Therefore, it will be essential that any temporary uses are justified by the operational requirement of the airport.

8.6 In order that the environmental impacts of airport expansion are minimised, all development needs to consider its impact in terms of ecology, air quality and noise. The White Paper seeks to ensure that maximum possible reductions in noise level are achieved alongside minimising the number of people affected. It also recognises that further work will be required to develop a package of surface access improvements at Manchester to cater for the forecast level of growth and to increase the levels of public transport use. It also states airport operators will need to work closely with local and regional partners to develop measures to limit the growth in road traffic and prevent any adverse impact on air quality. Air quality at Manchester Airport is monitored against the Air Quality Management Area and the Air Quality Action Plan seeking to prevent levels exceeding national standards. Manchester Airport is seeking to be carbon neutral in its energy use and vehicle fuel use.

8.7 Manchester Airport is located on the edge of the urban area and the extension areas fall within open countryside and undeveloped land. There is

the potential for development in these areas to cause ecological harm, and this is a particular issue in areas of recognised ecological value such as the Cotterill Clough Site of Special Scientific Interest and the Sunbank Woods Site of Biological Importance. Manchester Airport Group has submitted an Environmental Appraisal by AXIS which sets out the impact of the expansion proposals. This appraisal has concluded that the environmental impact of the proposals will be acceptable alongside a range of mitigation measures. At the application stage further appropriate information on the environmental impact of the proposal will be necessary, including details of mitigation measures to be agreed by the Council.

8.8 The City Council will seek to protect the Cotterill Clough SSSI and the SBIs in the area, and the Need for Land document demonstrates that the SSSI and the Sunbank Woods SBI can be avoided, which will be a fundamental requirement of the airport's expansion. There will also be a need to create a woodland buffer between the SSSI and airport development. Sunbank Woods SBI and ancient woodland would be wholly excluded from the developable footprint. A local SBI (Ponds Near Runway) may be subject to some development and a small area of Cotterill Clough SBI and ancient woodland outside the SSSI will be lost, but this is an unavoidable consequence of the airport's expansion, appropriate mitigation measures will be prepared and implemented before this development commences. Development proposals would be subject to assessment under the Habitats Regulation. To the north of Manchester Airport there are allotments and these will be retained or replaced. If relocated this will be in accordance with allotment legislation and seek to reduce the impact on existing allotment holders and consider proximity of alternative sites to reduce travel and inconvenience.

8.9 Appropriate development within the Airport should be necessary for the operational efficiency or amenity of the Airport. This approach is consistent with Government guidance in PPG13. Development will be limited to that necessary for the operational efficiency and amenity of the Airport, include the following uses:

1. Operational facilities and infrastructure including: runways and taxiways; aircraft apron and handling services buildings and facilities; Aircraft fuelling and storage facilities; emergency Services and control authorities facilities; control tower, air traffic control accommodation, ground and air navigational aids, airfield and approach lighting; facilities for the maintenance, repair and storage of service vehicles; airfield drainage facilities.
2. Passenger and terminal facilities including: terminal facilities including passenger handling, lounges, baggage handling, catering and retail; administrative accommodation for airlines, handling agents; tour operators, airport authority and Government agencies; public and staff car parking; public transport facilities, including rail, light rail, buses, coaches and taxis; facilities for general and business aviation (including air taxi, helicopter and private use).
3. Cargo facilities including: freight forwarding and handling facilities and bonded warehouses; associated accommodation for airline agencies,

freight forwarders, integrators and Government agencies; lorry parking, fuelling and servicing facilities; in-flight catering and flight packaging facilities.

4. Airport ancillary infrastructure including: car rental, maintenance and storage facilities; hotel accommodation; training centres for airlines and airport related services; ancillary office accommodation; maintenance facilities for aircraft and avionics; petrol filling stations; utility infrastructure including sewage, waste, telecommunications, water, gas and electricity.
5. Landscaping works including: strategic planting, earth mounding and habitat creation
6. Internal highways and infrastructure, including cycleways, footways and roadways.

8.10 Infrastructure provision at Manchester Airport will be improved in order to support its expansion. This will be provided by a number of organisations, and details are provided in the Infrastructure Plan accompanying the Core Strategy and will include:

- Improvements to M56 - Styal Road
- Manchester Airport Station Extensions and improvements
- M56 Widening (J5 - J6)
- Junction 6 M56 Improvements
- Metrolink extension to the Airport
- Realignment of the A538 Wilmslow Road and link to J6
- Service and utilities "corridors" and improvements

8.11 We previously consulted on three options related to reviewing the Green Belt and approach to Airport expansion. Following consultation and based on reviewing further evidence, the City Council's preferred option is 3 which set out reviewing the Green Belt in the current operational area and proposed extensions and removing those areas which no longer served a Green Belt function during the lifetime of the Core Strategy.

8.12 The proposed expansion of Manchester Airport prompted a Green Belt review in line with PPG2 as part of the preparation of the Core Strategy. In the UDP the majority of the Airport Operational Area is located within the Green Belt and is designated a Major Developed Site and PPG2 applies. The RSS approved in 2008 allowed for detailed changes in the Green Belt to accommodate expansion of Manchester Airport. A review of Green Belt has been undertaken and now forms part of the evidence base. The expansion of Manchester Airport is an exceptional circumstance and therefore it is appropriate to review the extent of the Green Belt in this area.

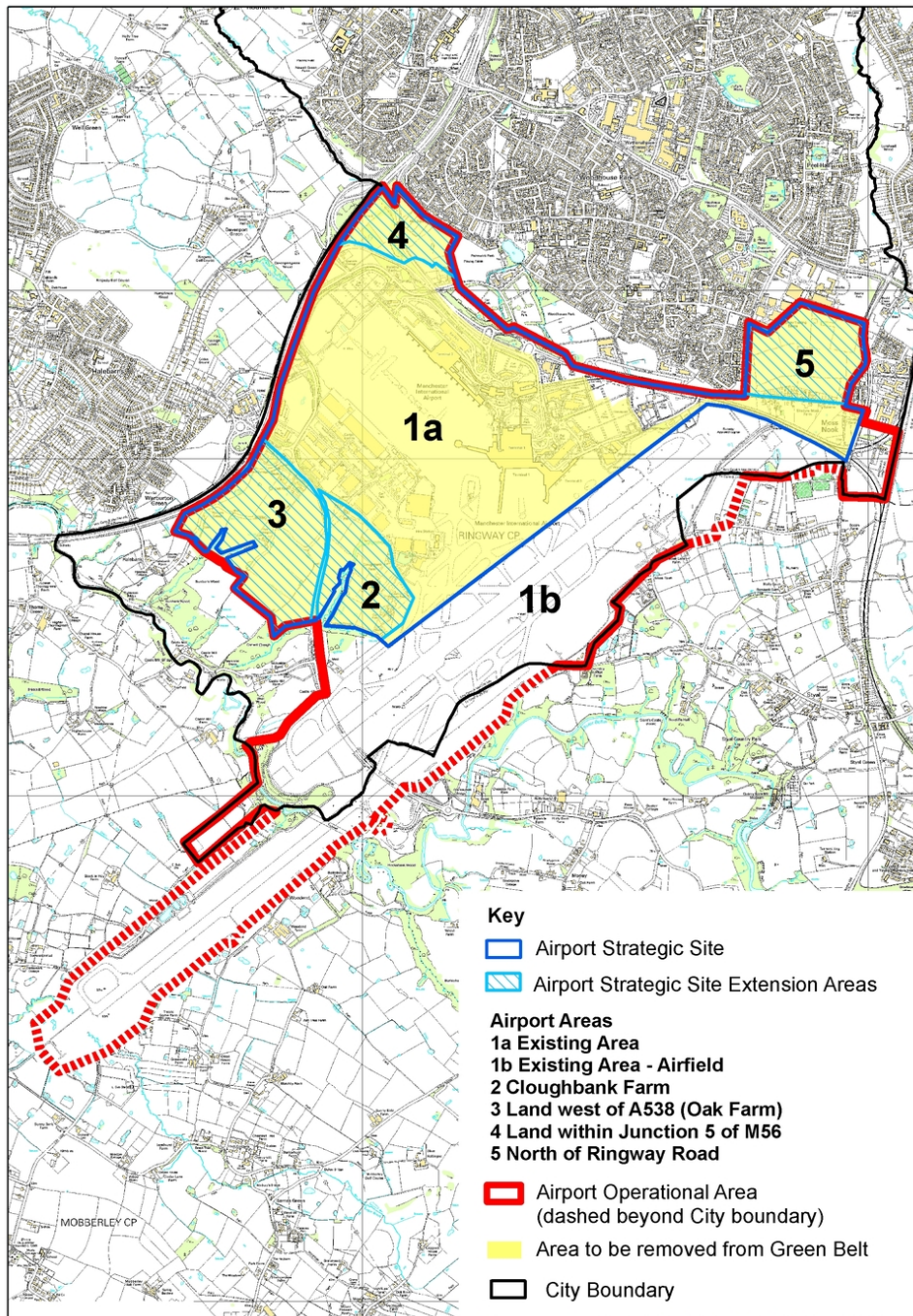
8.13 Despite the review identifying areas of the proposed operational area which do serve a Green Belt function growth at Manchester Airport has exceptional circumstances, including :

- Economic driver for the City-Region
- Generates significant job growth and supply chain benefits
- Expansion has been managed to minimise and where possible avoid ecological damage

- Planned to ensure the most efficient use of land at the Airport
- Airport is a unique use and expansion has nowhere else to go
- National policy support in the Air Transport White paper
- The extensions are required to implement national policy
- A number of identified uses require direct runway access and cannot be located elsewhere.
- Whilst ancillary uses (e.g. hotels, offices and car parking) could be located outside Green Belt, these are uses which are specifically related to the Airport.
- Despite being developed, operational restrictions mean that certain areas will remain open.

8.14 The results of the assessment of the Green Belt suggest that the runways and adjacent airfield perform a significant Green Belt function and could form a permanent boundary. The existing built up area around the terminals should be removed from the Green Belt as it does not serve a Green Belt function and will continue to be a focus for development. The proposed operational area extensions should be removed because they either did not serve a Green Belt function or there were exceptional circumstances justifying an amendment to the boundary. The overall integrity of the wider Green Belt will remain unchanged and the exceptional circumstances put forward to support the amendments are unique to the airport, they do not set a precedent, and cannot be used to support other small scale incremental changes elsewhere in Greater Manchester.

Picture 8.1 Airport Strategic Site



8.15 Picture 8.1 shows the proposed Airport Strategic Site alongside the Airport Operational Area, which is included for information and reflects the Manchester Airport Land Use Plan. The area of Green Belt proposed for removal will largely follow the Strategic Site boundary with the addition of Painswick Park. It will not affect those areas already outside of the Green Belt which fall within the Strategic Site boundary.

APPENDIX 1.19A - LETTER FROM TRAFFORD COUNCIL TO PEEL HOLDINGS (12 APRIL 2010)

Mr Peter Hosker
 Director of Legal and Corporate Affairs
 Peel Holdings (Management) Ltd
 Peel Dome
 The Trafford Centre
 Manchester
 M17 8PL

Strategic Planning & Housing Services

First Floor, Waterside House
 Sale Waterside, Sale, M33 7ZF
 strategic.planning@trafford.gov.uk
 Tel: 0161 912 4475 Fax: 0161 912 3128

Please ask for: Dennis Smith
Direct Line: 0161 912 4061
Our Reference:
Date: 12th April 2010

Dear Mr Hosker

Trafford Core Strategy – Further Consultation on the Vision, Strategic Objectives and Delivery Strategy – Strategic Flood Risk Assessment

Thank you for your letter of the 26th March.

The Council acknowledges the need to involve a range of stakeholders in the development of the evidence base to underpin the Core Strategy. This commitment is expressed in its Statement of Community Involvement (February 2010), where reference is made to informal engagement and discussions with specific and general consultation bodies, and other consultees, at the survey and evidence gathering stages of development plan document production.

From the commencement of work on the Manchester, Salford and Trafford Level 2/Hybrid Strategic Flood Risk Assessment (SFRA) in June 2009 to its signing-off by the commissioning authorities in March 2010 the Council has had extensive dialogue with the Environment Agency, the Manchester Ship Canal Company and others on the technical data available on flood risk arising from the Manchester Ship Canal and how it can best be used to inform work on the SFRA.

You will recall that a Memorandum of Understanding was signed by both the Environment Agency and the Manchester Ship Canal Company in May 2008 setting out the terms under which modelled data relating to the Ship Canal would be shared with the Agency, used to inform their flood mapping work and subsequently as a basis for further discussions with local authorities on SFRA production. Throughout 2009 specific discussions were held between each of these parties on outputs from this work and how they would be used by Manchester, Salford and Trafford's SFRA consultants JBA.

The draft results from JBA's work, as they related to the Manchester Ship Canal, have been discussed on an informal basis with the Manchester Ship Canal Company and from November 2009 to March 2010 a number of high-

level meetings were held to examine specific points of concern. In March 2010, the commissioning authorities agreed to accept the SFRA as a finished body of work and the Environment Agency concurred that the modelling work undertaken by JBA for the SFRA is suitable for development planning purposes, taking as it does a suitably precautionary approach to areas of modelling uncertainty and residual risk based on the information available at this time.

Paragraph 25 of Planning Policy Statement 25 (March 2010) states that 'LPAs should consult the Environment Agency and other relevant bodies (including adjacent LPAs), when preparing policies in their LDDs on flood risk management and in relation to areas potentially identified as at risk of flooding. Their sustainability appraisals, land allocations and development control policies should all be informed by a SFRA carried out in liaison with the Environment Agency.' The Council strongly supports the need to consult widely on such important issues and, as such, has consulted on draft policies at each stage of Core Strategy preparation. The current consultation provides a further opportunity for Peel Holdings and other key stakeholders to make their views known.

Given the nature and level of engagement on the SFRA to date, the Council also considers that it has followed recommended practice as identified in the PPS25 Practice Guide (December 2009).

As regards the flood mapping on which the SFRA is partly based, in accordance with national policy and best practice the undefended flood zone maps produced by the Environment Agency have been used as a starting point and then consideration has been given to a range of defended scenarios in order to arrive at a precautionary view of actual and residual flood risk. The Council, along with the other commissioning authorities and the Environment Agency, considers this to be a sound, robust approach which provides the appropriate basis for development planning.

I trust this information is helpful.

Yours sincerely

Dennis Smith
Head of Strategic Planning & Housing Services

APPENDIX 1.19B – CORRESPONDENCE FROM THE ENVIRONMENT AGENCY TO TRAFFORD COUNCIL (19 MARCH 2010).

From: Cameron, Andrew [andrew.cameron@environment-agency.gov.uk]

Sent: Friday, March 19, 2010 1:21 PM

To: Horsfall, Will

Cc: Moss, Colin; Hannah O'Callaghan; Andrew Short; Findley, Chris; Smith, Dennis; Jonathan Cooper; Moss, Fiona; Chadwick, Mark; Broad, Ian; Glasgow, Karen; Ashcroft, Keith; Hughes, Kate

Subject: RE: Finalization of SFRA

Will,

Apologies for the delay in getting back to you on this.

After some internal discussion and clarification from Jonathan Cooper, I can confirm that we are satisfied that the modelling work undertaken for the SFRA is suitable for development planning purposes. This takes a suitably precautionary approach to areas of modelling uncertainty and residual risk, based on the information available at this time.

I hope this clarifies things for you but if you need to discuss further, please feel free to ring me.

Regards,

Andy

Andrew Cameron
Development & Flood Risk Technical Specialist
North West Region, South Area

Appleton House, 430 Birchwood Boulevard, Birchwood, Warrington,
Cheshire, WA3 7WD
01925 251841
☐07768 276751