



**TRAFFORD  
COUNCIL**

**Further Council Response in Relation to  
MMIQ3.12 – Is the approach of policy SL1  
towards residential development at the  
Pomona Island SL overly cautious?**

**4<sup>th</sup> March 2011**

## Introduction

Following discussion at Hearing Session 3 of the Core Strategy Examination the Inspector requested that the Council provides briefly in bullet point form the Council's score of the suitability of the strategic locations that anticipate new residential development on flood risk zone 2 land to clarify why Pomona Island is considered to be unsuitable for this use.

## The Council's Response

### Sequential Test

- The Council's Sequential Testing of Strategic Locations in March 2010 provided a basic assessment of their suitability to accommodate development, including residential, in terms of the overall extent to which they were affected by Flood Zones 1, 2 and 3 as shown on Environment Agency mapping produced in January 2010. This approach to broad locations was considered acceptable in PPS25 terms and following discussions with the Environment Agency.
- In terms of the proportion of the Strategic Locations within Flood Zone 1 (low risk), to which PPS25 states the Council should aim to steer development, the scoring was as follows:-

LCCC	100%
Carrington	79%
Trafford Centre Rectangle	76%
Wharfside	57%
Pomona	7%

Other factors, such as location within the Regional Centre, Inner Area or a Priority Regeneration area, whether or not the land was brownfield, potential overall regeneration benefits, sustainability and deliverability considerations were used to form a judgement that whilst a significant amount of the mixed use development proposed within the Core Strategy could be accommodated in these areas, further areas within Flood Zones 2 and 3 would need to be considered.

- In terms of the proportion of the Strategic Locations within Flood Zone 2 (medium risk), the scoring was as follows:-

LCCC	0%
Carrington	16%
Trafford Centre Rectangle	20%
Wharfside	41%
Pomona	42%

Other factors, such as location within the Regional Centre, Inner Area or a Priority Regeneration area, whether or not the land was brownfield, potential overall regeneration benefits, sustainability and deliverability considerations were used to form a judgement that a further proportion of the mixed use development proposed within the Core Strategy could be accommodated within these areas. With regards to housing development, it was considered that sufficient opportunities existed in the first four of the Strategic Locations to assist in meeting remaining needs.

- In terms of the proportion of the Strategic Locations within Flood Zone 3 (high risk), the scoring was as follows:-

LCCC	0%
Carrington	5%
Trafford Centre Rectangle	4%
Wharfside	2%
Pomona	51%

Other factors, such as location within the Regional Centre, Inner Area or a Priority Regeneration area, whether or not the land was brownfield, potential overall regeneration benefits, sustainability and deliverability considerations were used to form a judgement that regarding the remaining development proposed within the Core Strategy Pomona would provide a significant opportunity to assist in meeting employment land needs. However, further residential development would not be preferred given that this use is more vulnerable in national flood risk policy terms.

### **Level 2/Hybrid Strategic Flood Risk Assessment and Sustainability Appraisal**

- The Level 2/Hybrid Strategic Flood Risk Assessment for Manchester, Salford and Trafford in March 2010 provided comprehensive detailed flood risk data including Flood Zone coverage, depths, implications of climate change and overall hazard for each Strategic Location. The conclusions re-inforced the findings of the Sequential Test in terms of Pomona Island and concluded that more vulnerable land uses (such as residential) will be difficult to deliver given the high risk of flooding from the Manchester Ship Canal and Bridgewater Canal.
- Appendix II of the Sustainability Appraisal Report for the Core Strategy in June 2010 scored each of the Strategic Locations, including Pomona Island (taking into account the existence of a planning permission for 546 residential units), having regard to the Level 2/Hybrid SFRA. A summary of the conclusions for each Strategic Location affected by Flood Zone 2 is attached as the Appendix to this note.

### **Emerging Flexibility Issues**

- Following further discussions with the landowner/developer for Pomona Island, the Council's response to the Inspector's Main Matter 3.12 and the Examination Hearing session held on the 2<sup>nd</sup> March 2011, it is clear that further opportunity for residential development within the Pomona Island Strategic Location exists beyond the current extant permission and would provide an enhanced degree of flexibility to enable the Core Strategy to assist in delivering further housing within the Borough.
- It is further considered that flood risk issues could be addressed satisfactorily, whilst still having regard to the current evidence base, by amending the policy wording for the Pomona Island Strategic Location to ensure that uses classified in PPS25 as being More Vulnerable to flooding, such as residential, certain leisure uses, healthcare and educational facilities must be located outside Flood Zone 3. This change would also provide greater consistency with the approach used for the other Strategic Locations. The requirement for submission of an appropriate Flood Risk Assessment is already contained within the existing wording of SL1.4.

### **The Council's Response**

The Council is proposing the following changes to Policy SL1 to address the issues raised in MMIQ 3.12 and the discussion at Hearing Sessions 1 and 3, see **S300.06**

## SL1 - POMONA ISLAND

- 1.1 Pomona is a key part of the Regional Centre in Trafford. This part of the former Manchester Docks has been vacant for over 20 years following its remediation and is one of the largest vacant sites in the Regional Centre. It represents a major opportunity to expand and diversify the offer of the Regional Centre and fill a huge gap close to its heart.

### POLICY SL1 – POMONA ISLAND

#### Strategic Proposal

SL1.1 A new mixed-use commercial and residential district will be created to complement the offers of the city centre and Salford Quays / Mediacity:uk. It will be a new destination for business and leisure users combining significant commercial and recreational development for communities in the city centre and Old Trafford areas.

SL1.2 ~~In addition to the 546 residential units that have the benefit of an extant planning permission,~~ The Council considers that this Location can deliver:

- 10 Ha of employment activity;
- 800 residential units;
- New commercial leisure facilities, including an hotel;
- Small scale ancillary retail and bar/restaurant uses;
- Appropriate new community facilities to support those people using the development;
- A substantial new area of open space for informal recreation, and,
- New and improved pedestrian links.

SL1.3 The site specific implications of this proposal will be detailed and identified in the Land Allocations DPD.

SL1.4 The design of development proposals in this Location should reflect its Regional Centre status, with a high density, high-rise built form. ~~Specifically the character and appearance of the proposed development will need to reflect the existence of the residential permission. In the event that this extant permission is not implemented, and that subsequent residential development proposals cannot be justified in PPS25 terms, the remaining elements of the scheme will be required to adopt similar design principles.~~

#### Development Requirements

SL1.5 In order for development in this Location to be acceptable the following will be required:

- A Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and that it will where possible reduce flood risk overall.
- An assessment of potential contamination must be carried out prior to development and any necessary remediation carried out in accordance with an agreed schedule;

- The provision of suitable pedestrian and cycle links to and from the existing Metrolink stations at Cornbrook and Pomona, to key bus routes and to the wider Irwell River Park area;
- The provision of a new informal recreation facility, centred around the canal basin;
- Improvements to local highway network and public transport infrastructure;
- [the provision of a new 1-form primary school by 2021 to serve the new residential community in this and the surrounding area \(including SL2 Trafford Wharfside, SL3 LCCC Quarter and SL4 Trafford Centre Rectangle\);](#)
- The provision of ancillary community facilities;
- A contribution towards the provision of additional utility capacity, including the reinforcement of the local waste water treatment works;
- Protect, preserve and enhance the grade II Brindley’s Weir and its setting;
- An assessment of biodiversity must be carried out prior to development and appropriate sites for nature conservation must be provided to compensate for any loss.

SL1.6 ~~The details of the site specific and infrastructure requirements will be addressed through the Land Allocations DPD.~~ [Residential development in this Location will be largely apartments, appropriate to its Regional Centre Location. However, a proportion of the residential development should be suitable for families, either in terms of size or type, in accordance with Policy L2.](#)

SL1.7 [Uses classified in PPS25 as being More Vulnerable to flooding such as residential, certain leisure uses, healthcare and educational facilities must be located outside Flood Zone 3.](#)

### Phasing

	2008/9 – 2010/11	2011/2 – 2015/6	2016/7 – 2020/1	2021/2 – 2025/26	Total
Residential	0	<del>240</del> 350	<del>306</del> 450	0	<del>546</del> 800
Employment	0	4	4	2	10

Residential – expressed in terms of units  
 Employment – expressed in terms of hectares

### Implementation

- 1.2 Implementation will be through private sector development. This Location is within a single ownership, part of location has the benefit of planning consent for residential units (546 units). Other significant sites within this Location will be identified and allocated in a Land Allocations DPD.

CD 12.54.6

Project	Status	Costs	Phasing	Responsibility	Funding Source
Bridgewater Way Scheme (Bridgewater Canal) Watersmeet To Trafford Park And Manchester	Priority 2	Approx £500k	Required By 2011	<b>Bridgewater Canal Trust/</b> Trafford Council/ Sustrans	Sustrans Connect2 Lottery Funds/ LTP Funds/ Local Authority Funds/ Private Developer/ Section 106
Reinforcement Of Water Supply Network	Priority 2	Unknown	Required By 2013/14	<b>United Utilities/</b> Private Developer	UU AMP 05-06/ Private Developer
Improvements To Local Highway Network And Public Transport Provision	Priority 2	<del>As Required By SPD1</del> <a href="#">In line with Policies L4, L8 and any associated SPDs</a>	Required By 2016	HA/ GMPTE/ <b>Local Highway Authority/</b> Private Developer	Private Developer/ Section 106
Improvements To Existing And Development Of New Indoor/Outdoor Sports Facilities	Priority 2	In line with Policies R5, L8 and any associated SPDs	Required By 2026	<b>Trafford Council/</b> Private Developer	Private Developer/ Section 106
Provision of Green Infrastructure And/OR Contribution Towards Off-Site- Provision	Priority 2	In line with Policies R5, L8 and any associated SPDs	Required By 2026	<b>Trafford Council/</b> Private Developer	Private Developer/ Section 106
<a href="#">On-site provision or contribution towards off-site provision of new 1 Form Entry Primary School (will also support development in Policy SL2 and SL3)</a>	<a href="#">Priority 3</a>	<a href="#">Approx £4-5m (plus any land costs)</a>	<a href="#">Required by 2021</a>	<a href="#">Trafford Council</a>	<a href="#">Section 106/Private Developer</a>
Development Of Small GP Practice To Supplement	Priority 3	Unknown	Subject To Phasing of Development	NHS Trafford/ Private Developer	NHS Trafford/ Private Developer/

## CD 12.54.6

<b>Project</b>	<b>Status</b>	<b>Costs</b>	<b>Phasing</b>	<b>Responsibility</b>	<b>Funding Source</b>
Media City Practice (Also Supports Development In SL2)					Section 106
Reinforcement Of The Local Waste Water Treatment Works	Priority 3	Unknown	Unknown	United Utilities	UU Amp 05-06/ Private Developer
Reinforcement Of The Local Electricity Supply Network	Priority 3	Unknown	Unknown	Electricity Northwest Ltd	ENW Funds/ Private Developer
Reinforcement Of The Local Gas Supply Network	Priority 3	Unknown	Unknown	National Grid	National Grid Funds/ Private Developer

\* Lead responsibility is highlighted in bold, where known

### Justification

- 1.3 Pomona is at Trafford's northern gateway, the redevelopment of this significant area of long-term vacant brown-field land for high quality mixed-use development, offering scope for large-scale development including tall buildings, represents a major opportunity to assist with the regeneration of this part of the Regional Centre. It will increase public safety in the area by introducing new levels of activity in the area and providing extensive opportunities for natural surveillance of paths and open space areas.
- 1.4 In view of the Location's important position in relation to the Regional Centre, it will be important to secure high quality urban design to ensure an appropriate mix of land uses and inter-relationship of buildings/open spaces, because the appearance of this site once developed will have a significant bearing on the overall regeneration of the Priority Regeneration Area and the wider Regional Centre.
- 1.5 Pomona lies within the Salford Quays / Irwell Corridor Strategic Regional Site as identified in July 2009 by the NWDA. The purpose of this designation is to expand and integrate the area with the rest of the regional centre of Manchester through a mixed-use framework. Development here will also assist in the delivery of the objectives of the Irwell River Park, Bridgewater Way and Ordsall South Strategies by enhancing and opening up the waterfront for safe use and enjoyment.
- 1.6 The Trafford Other Main Town Centre Uses Study (2009) concluded that due to a low number of suitable and available sites in town centre locations, it may be necessary to consider further sites situated in other appropriate locations as defined in PPS4 Policy EC5.1e. Pomona is a long term vacant and derelict site within the Old Trafford Priority Regeneration Area (see Policy L3), and the creation of new employment opportunities here would provide a valuable economic boost for the area and will serve to enhance Trafford's image as a tourism destination.



- 1.7 Opportunities will be created to improve pedestrian and cycle movements to the existing Metrolink stations at Cornbrook and Pomona and to the wider City Region through new foot/cycle paths, including giving consideration to the creation of a new canal crossing.
- 1.8 Opportunities exist for the creation of multi functional green infrastructure enhancing the whole image of the area. The informal recreation facility, centred around the canal basin, will provide valuable amenity space for the new community; will help to reduce deficiencies and inequalities in open space provision in Old Trafford; and will enhance the ecological value of the wildlife corridor along the Manchester Ship Canal and Bridgewater Canal.
- 1.9 Due to the previous industrial use of the site, development cannot proceed unless potential contamination and its effect on controlled waters has been assessed.
- 1.10 The Sequential Testing of the Strategic Locations, undertaken in accordance with PPS25, does not identify Pomona Island as a preferred location for residential development. ~~Subsequent to that,~~ However, the Council acknowledges the existence of a planning permission for 546 residential units and that there may be scope for further residential development outside Flood Zone 3 within the Strategic Location. Whilst the SA further concluded that other “more vulnerable uses” such as certain leisure uses, healthcare and educational facilities would be unlikely to pass the “Exceptions Test” and that therefore such uses should be excluded from the Pomona Strategic Location, the Council acknowledges that there may be some scope for these outside Flood Zone 3 within the Strategic Location.
- ~~1.11 For this reason, neither this policy nor Policy L1 makes an allowance for this location to contribute towards the Council’s housing land target, above what has already been permitted. There is an outstanding full planning permission for 546 residential units on part of Pomona which does not expire until May 2012. Accordingly the infrastructure table above makes no reference to infrastructure that would be required to deliver additional residential development in this location. The Council considers that it would not be in accordance with the sequential approach that has been followed, to identify this location for more vulnerable uses. Instead, the Council has identified sufficient land elsewhere, in sequentially preferable locations in terms of PPS25, to meet its housing land target.~~

Which Objective(s) Delivered By This Strategic Location/Policy	Reference Number(s)
Key Objective(s) Of The SCS	SE2, SE4, SE5, SE7, SE10 PE1, PE3, PE5, PE6 BH1, BH2, BH3, BH4
Strategic Objective(s)	<u>SO1</u> , SO2, SO3, SO5, SO6, SO7 & SO8
Place Objective(s)	<u>OTO1</u> , <u>OTO2</u> , OTO8, OTO13, OTO14, OTO19

**SL1 - Phasing**

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Employment	0	4	4	2	10

Residential – expressed in terms of units

Employment – expressed in terms of hectares

**SL1 - Implementation**

Project	Status	Costs	Phasing	Responsibility	Funding Source
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Reinforcement Of The Local Waste Water Treatment Works	Priority 3	Unknown	Unknown	United Utilities	UU Amp 05-06/ Private Developer
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Reinforcement Of The Local Gas Supply Network	Priority 3	Unknown	Unknown	National Grid	National Grid Funds/ Private Developer

### SL1 Objectives Table

Which Objective(s) Delivered By This Strategic Location/Policy	Reference Number(s)
Key Objective(s) Of The SCS	SE2, SE4, SE5, SE7, SE10 PE1, PE3, PE5, PE6 BH1, BH2, BH3, BH4
Strategic Objective(s)	<a href="#">SO1</a> , SO2, SO3, SO5, SO6, SO7 & SO8
Place Objective(s)	<a href="#">OTO1</a> , <a href="#">OTO2</a> , OTO8, OTO13, OTO14, OTO19

**APPENDIX – Summary of Sustainability Appraisal for the Strategic Locations affected by Flood Zone 2**

**Carrington**

- It is anticipated that the proposals for the Carrington Strategic Location will have a significant positive impact on the objectives relating to enhancing Trafford's economic performance; improving the Borough's image as a business location; reducing disparities; and conserving land resources and reducing land contamination. As the proposals involve the remediation and redevelopment of an under-utilised brownfield site there would also be some positive impact on local neighbourhood quality; water quality and townscape character.
- The inclusion of a substantial residential element within the proposals and the specification that approximately 80% of this will be accommodation suitable for families should ensure that the proposals have a major positive impact on the objective of achieving a better balance and mix in the housing market. Similarly, the requirement for the development to be accompanied by ancillary community facilities may have some positive impact on the objectives of improving accessibility for all to services and facilities; improving qualifications and skills and improving the health. The proposals now unequivocally stipulate that development in this location will be required to protect and enhance the Mosslands and other sites of nature conservation and biological importance, including Carrington Rides, Broadoak Wood and Brookheys Covert. In addition, new habitats may be created through the required Green Infrastructure provision. As a result, the revised proposals could have a significant positive impact on the objective of protecting, enhancing and restoring open space, biodiversity and flora and fauna.
- Carrington is presently poorly served by public transport and development in this area has the potential to result in unsustainable patterns of transport. The proposal would however deliver significant enhancements to public transport and also provide new road infrastructure to serve the development area, including a contribution towards a scheme to mitigate the impact of traffic generated by the development on the M60, which would have a positive impact on transport infrastructure and the social performance of the economy. The impact of the proposals on the objectives relating to the effect of traffic on the environment and air quality is however less certain. The inclusion of a requirement to protect the Mosslands as a carbon sink, should however ensure that the proposals have some positive impact on the objective of reducing contributions to climate change.
- The Council's Sequential Test Report demonstrated that 16% of the site is in Flood Zone 2 and 5% in Flood Zone 3. Consequently, development in this area may be particularly vulnerable to the effects of

climate change. Nevertheless, the amended proposals for Carrington now specify that uses classified in PPS25 as being More Vulnerable to flooding must be located outside of Flood Zone 3 and that development proposals will be required to be accompanied by a Flood Risk Assessment which demonstrates that the development will be safe from flooding without increasing flood risk elsewhere. As a result of these amendments, it is no longer considered that the proposals for Carrington would have a negative effect on the objective of reducing the impact of climate change.

### **Trafford Centre Rectangle**

- The Trafford Centre Rectangle Strategic Location has the potential to deliver a range of significant sustainability benefits. The key ones relate to enhancing Trafford's economic performance and improving the Borough's image as a business and tourism location. It is specified that the residential elements of the proposal will comprise predominantly of accommodation suitable for families, with an appropriate affordable housing contribution. As a result, the proposal should make a significant contribution to Trafford's identified housing needs and thereby have a major positive effect on the objective of achieving a better balance and mix in the housing market.
- A significant emphasis is placed upon enhancing the accessibility of the location by public transport, with reference made to the need to significantly improve public transport infrastructure including an integrated, frequent public transit system; re-route local public transport provision through the site and provide a direct pedestrian link to the Trafford Centre Bus Station. As a result, it is concluded that the proposals are likely to have some positive impact on the objectives relating to transport infrastructure; poverty and social exclusion; the effects of traffic on the environment; contributions to climate change; air quality; and economic disparities. The detail provided on the ancillary community facilities means that it can be concluded with a reasonable degree of certainty that the proposals would have a positive impact on the objectives of improving accessibility for all to services and facilities; improving qualifications and improving health.
- The inclusion of a requirement for the development to preserve or enhance the Barton-upon-Irwell Conservation Area, deliver improvements to the Barton Bridge Swing Aqueduct (Grade II\* listed) and protect and enhance the setting of Pugin's Grade I listed church of All Saints and the Grade II Presbytery should ensure that the amended proposals have a significant positive impact on the objective relating to townscape character. Similarly, the proposals now incorporate a requirement for an assessment of biodiversity to be carried out prior to development and for appropriate sites for nature conservation to be provided to compensate for any loss. As a result, the proposals are likely to have a positive impact on the objective relating to open space, biodiversity, flora and fauna.

- The Council's Sequential Test Report demonstrated that 20% of the Trafford Centre Rectangle is in Flood Zone 2 and 4% in Flood Zone 3. This flood risk is particularly acute in the Trafford Quays section of the site, 44% of which is in Flood Zone 2 and 15% is in Flood Zone 3. Consequently, development in this area may be particularly vulnerable to the effects of climate change. Nevertheless, the amended proposals for Trafford Centre Rectangle specify that uses classified in PPS25 as being More Vulnerable to flooding must be located outside of Flood Zone 3 and that development proposals will be required to be accompanied by a Flood Risk Assessment which demonstrates that the development will be safe from flooding without increasing flood risk elsewhere. As a result, it is no longer considered that the proposals would have a negative effect on the objective of reducing the impact of climate change.

### **Trafford Wharfside**

- The proposals for Trafford Wharfside are expected to have a largely positive impact on the sustainability objectives. In particular, the proposals are expected to have a major positive effect on economic performance; reducing poverty and social exclusion; Trafford's image as a business destination; the conservation of land resources; and reducing economic disparities. Other high scoring objectives include improving accessibility for all to services and facilities; improving health; improving qualifications and skills; reducing crime and fear of crime and improving the social and environmental performance of the economy. The proposals place a strong emphasis on securing a high quality design for the redevelopment of Victoria Warehouse and ensuring that tall buildings, in particular, are well designed and iconic. This should enhance the performance of the proposals against the objective of protecting and improving local neighbourhood quality.
- The site is well connected to, or within walking distance of, the public transport network and the proposals would also support walking and cycling through the provision of a pedestrian bridge crossing to the Quays and the creation of a processional route to the LCCC Strategic Location. Furthermore, it is stated that development in this location will be expected to contribute to the provision of a high frequency public transport system. Consequently, it is anticipated that the proposals would have a positive impact on traffic generation and, by extension, air quality and contributions to climate change. However, there is only limited certainty about this correlation due to the proposals also having the potential to exacerbate congestion, with the GM transport model forecasting a significant increase in journey times on the A56 and A5081.
- Trafford Wharfside is immediately adjacent to the Manchester Ship Canal and the Level 2 SFRA has demonstrated that a significant proportion of the site is at risk of flooding. The Council's Sequential

Test Report showed 41% of the site falling within Flood Zone 2 and 2% in Flood Zone 3. As a result, the proposal is likely to have an adverse impact on the objective of reducing the effects of climate change. It is however noted that the proposals have been amended to specify that all uses classified by PPS25 as being More Vulnerable to flooding must be located outside the part of the site that is within Flood Zone 3. In addition, the amended policy now stipulates that development proposals at Wharfside will be required to be accompanied by a Flood Risk Assessment which demonstrates that the development will be safe from flooding without increasing flood risk elsewhere. As a consequence of these amendments, the proposals are no longer considered to have a negative effect on the objective of reducing the impact of climate change.

- There are no anticipated negative or uncertain effects from the proposals for Trafford Wharfside.

### **Pomona Island**

- The proposals for Pomona have the potential to deliver a range of significant sustainability benefits. The key ones relate to reducing poverty and social exclusion; conserving land resources; enhancing Trafford's economic performance; and improving the Borough's image as a business location. By resulting in the redevelopment of a prominent, vacant site the proposals would also have a positive impact on the objectives relating to enhancing townscape character; reducing crime and fear of crime; and improving local neighbourhood quality.
- The accessibility of the site by public transport and its proximity to areas of deprivation could also result in positive effects on a range of sustainability objectives, including reducing the effect of traffic on the environment; reducing contributions to climate change and improving air quality. The inclusion of a requirement for development to enhance pedestrian and cycle links to existing Metrolink stations at Cornbrook and Pomona will further strengthen the performance of the proposals against these objectives. Other objectives that the proposals would have some positive impact on include those relating to the social and environmental performance of the economy; transport infrastructure; sense of community identity; and water quality.
- Due to an extant planning permission, 546 residential units will be provided at Pomona. The majority of these will be 2 bed dwellings and it is therefore anticipated that the proposals will make a positive contribution to achieving a better balance in the housing market. However, a significant proportion of the Pomona site is at a high risk of flooding. Consequently, the inclusion of a residential element within the proposals means that they are likely to have a negative impact on the objective of reducing the impact of climate change.

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- As a result of the Sequential Testing of the Strategic Locations, the amended proposals for Pomona no longer include certain leisure uses, healthcare and educational facilities. Consequently, the degree to which the proposals impact positively on the objectives relating to accessibility to services and facilities and reducing disparities is reduced.
- As there has been re-vegetation on a portion of the site there is the possibility that its redevelopment could have a negative impact on biodiversity, flora and fauna. However, the amended policy now stipulates that an assessment of biodiversity must be carried out prior to development and that appropriate sites for nature conservation must be provided to compensate for any loss. As a result, it is considered that the proposals will have a positive impact in the long term on the objective of protecting and enhancing biodiversity, flora and fauna.