

## 12.48

### Explanation for Changes to HRA - further to responses on MMIQs 1.24, 2(vi) & 3.26

The HRA has been revised (25<sup>th</sup> Feb 2011) to accommodate comments received from Natural England on the 21<sup>st</sup> Feb 2011. These comments highlighted concern about the impact of the Plan on the Mersey Estuary SPA/Ramsar Site. The changes to the HRA have been agreed with Natural England (see Appendix A), the Revised HRA issued 25<sup>th</sup> Feb 2011 has been produced. The changes cover greater cross-referencing to the Core Strategy in particular Policies L5 and SL5 and therefore dealing with the concerns raised about the impact of the Plan on the Mersey Estuary SPA/Ramsar Site. The comments made by Natural England concerning the Manchester Mosses SAC (September 2010) have been dealt with following proposed changes (CD 6.1.2 SC1, CD 6.1.2 SC13, CD 6.1.2 SC14, CD 6.1.2 SC19 and CD 6.1.2 SC29).

The below details the changes to the HRA (25<sup>th</sup> Feb 2011):

Text in black is the current HRA text. Text in blue is proposed additions and red scored through text will be removed.

#### 3.4.2 Diffuse Water Pollution

Effects on distant European sites can occur through increases in water pollution caused by nutrient enrichment and/or industrial processes. Where proposed developments within Trafford are likely to result in this type of diffuse pollution arising and affecting a European site, these have been screened into this Assessment.

Of the sites considered under Appendix 1, diffuse water pollution could potentially have an effect on the Mersey Estuary SPA/Ramsar Site, since the river Bollin and the Manchester Ship Canal pass through Trafford and these eventually discharge into the Estuary.

~~However,~~ ~~p~~ Prior to discharging into the Estuary these watercourses pass through other Metropolitan areas, and the Estuary itself is adjacent to the Merseyside conurbation. ~~The water flow through the Canal is controlled by a series of locks that in places serve to slow and/or divert water flow and this results in sedimentation occurring along the Canal, reducing deposition into the Mersey Estuary.~~ It would therefore be very difficult to establish whether any water pollution arising from development in Trafford was responsible for a significant effect on pollution in the Estuary. ~~Other strategies and plans, in particular the requirements of the EU Water Frameworks Directive and the associated River Basin Management Plans, will require measures to be taken to ensure a reduction in pollution levels in the Ship Canal and rivers, including the River Bollin. These requirements will also apply to the Estuary itself.~~ It is ~~further~~ noted that the HRA for the Regional Spatial Strategy (RSS) did not identify development ~~within~~ Greater Manchester as likely to have a significant effect on this European protected site. ~~and f~~

In order to deal with specific concerns raised by Natural England (January 2011) regarding diffuse water pollution effects on the Mersey Estuary SPA/Ramsar further consideration of the Core Strategy's approach to hydrological issues is provided at Section 5.1 below. For ~~these~~ reasons outlined above and further examined in section 5.1 below, the Mersey Estuary has been screened out of this HRA.

#### **NEW PARAGRAPH 5.1 Possible Impacts of the Plan on Mersey Estuary SPA/Ramsar – Further explanation of potential hydrological impacts**

Although the authors of this HRA have concluded that the Mersey Estuary SPA/Ramsar should be screened out of this assessment (see 3.4.2 above), specific concerns have been raised by Natural England (January 2011) regarding the issue of diffuse water pollution

entering the Estuary from Trafford. In order to facilitate an understanding of the situation it has been considered prudent to examine these specific issues further in this section.

Putting aside any debate as to whether diffuse pollution arising in Trafford is currently likely to have a significant effect on the interest of the Estuary, Trafford's Core Strategy has outlined a number of Policies which are specifically designed to further protect and improve the water quality of the borough's rivers and canals. Broadly the improvements fall into two areas; improvements in the treatment of waste water/contaminated water and the reduction in flood risk which for the purposes of this section is considered to be flood risk from sewers and surface water run-off, although Trafford identifies several other factors which also give rise to flood risks.

Policies dealing with broad strategic locations have specifically identified improvements to Waste Water Treatment Works (WWTW). These have been applied to Pomona Island (**SL1.4**), Lancashire County Cricket Club Quarter (**SL2.7**), Trafford Centre Rectangle (**SL4.4**) and Carrington (**SL5.2**). In addition, the Policy for Trafford Wharfside (**SL2.7**) identifies that no development can proceed until any identified negative impacts from the potential of contaminants to effect controlled waters are shown to be remediated.

**Policy L5 Climate Change** shows how Trafford intends to deal with issues which effect climate change. Specific to water pollution are Policies **L5.1** and **L5.7**, which deal with the requirements of development proposals to demonstrate the adequate management of water and that adverse pollution impacts are mitigated for. Policies **L5.10 – L5.12** go on to identify the mechanisms for reducing flood risk when considering future proposals. Flood risk is identified to include, but is not exclusive to, risks from sewers and surface water run-off.

The **justification for Policy L5** indicates that Trafford have considered the issues more fully (**14.29**) with reference to supporting national guidance and policies, including River Basin Management Plans and Catchment Flood Management Plans and cross boundary working with other administrative districts and statutory organisations (eg Environment Agency & United Utilities). In addition, Trafford along with the districts of Manchester and Salford have commissioned a Level2/Hybrid Strategic Flood Risk Assessment (**14.24**) that has informed the identification of Critical Drainage Areas (CDAs see **14.26**), which will subsequently be used to assist in the process of identifying strategic locations and other developments areas (**14.27**).

The evidence provided above further supports the conclusion that the Mersey Estuary SPA/Ramsar should be screened out from the HRA (section 3.4.2) and demonstrates that there is unlikely to be a significant effect on the special interests of the Estuary from development proposals or policies within the Core Strategy.

**Note** - Subsequent numbering in Section 5 will be altered to accommodate the new section 5.1.

## Appendix A

Email correspondence from Natural England showing support for changes made to HRA (Revised 25<sup>th</sup> February 2011).

**From:** Jewell, Mandy (NE) [mailto:Mandy.Jewell@naturalengland.org.uk]  
**Sent:** 25 February 2011 09:44  
**To:** Doow, Amarjit  
**Subject:** Trafford Core Strategy HRA

Amarjit

Further to our telephone conversation this morning I confirm that references to appropriate policies and text in the Core strategy, as mentioned in my comments in my email of 24 February 2011, refers to the inclusion in the HRA Report of cross-references to these policies and text as justification for the conclusion of no Likely Significant Effect on the Mersey Estuary SPA/Ramsar. There is no requirement to modify any of the text in the Core Strategy document in order to support the conclusion of no LSE; the appropriate wording is already there, but was not cited in the previous version of the HRA report as justification for the conclusions stated.

Kind regards

Mandy

Mandy Jewell

Planning and Conservation Adviser

**From:** Jewell, Mandy (NE) [mailto:Mandy.Jewell@naturalengland.org.uk]  
**Sent:** 24 February 2011 10:52  
**To:** Teresa Hughes; Doow, Amarjit  
**Cc:** Baguley, Janet (NE)  
**Subject:** HRA Trafford Core Strategy

Teresa, Amarjit

I have had a look at the revised text for the HRA in respect of the Mersey Estuary, and am now satisfied that the justification, with reference to the appropriate policies and text in the Core Strategy document, is sufficient to support the conclusion that there will be no Likely Significant Effect arising from the Core Strategy on the features of interest of the Mersey Estuary SPA/Ramsar Site.

Kind regards

Mandy

Mandy Jewell

Planning and Conservation Adviser