



# Trafford Core Strategy: Further Consultation On The Vision, Strategic Objectives And Delivery Strategy

Sustainability Appraisal Report  
and PPS25 Flood Risk  
Exception Test

March 2010



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**APPENDIX (Separate report)**

Sustainability Appraisal of the Amended Policies

## **SUSTAINABILITY APPRAISAL OF TRAFFORD'S CORE STRATEGY: FURTHER CONSULTATION ON THE VISION, STRATEGIC OBJECTIVES AND DELIVERY STRATEGY**

### **1. Introduction**

The Core Strategy will outline the Council's vision for Trafford up to the year 2026, and will set out how the Council will manage the change necessary to realise this vision. Accordingly, it will establish an appropriate balance between growth, regeneration and environmental protection / improvement.

In June 2009 Trafford Metropolitan Borough Council published its Core Strategy: Further Consultation on the Preferred Option report. A number of comments were submitted on this document which required further consideration. As a consequence, the Council amended several of the Core Policies in the Core Strategy, which were consulted on in November 2009. That consultation also detailed that further consultation on the Vision, Strategic Objectives, and Delivery Strategy would need to be undertaken in advance of the Core Strategy being Published and Submitted to the Secretary of State.

**This report provides a summary of the Sustainability Appraisal (SA) of these additional changes to the Vision, Strategic Objectives, and Delivery Strategy.**

The Core Strategy Vision has been amended to incorporate the Spatial Strategy and reflect the Council's revised approach to Strategic Locations and Sites. Section Two of this report provides a summary of the SA of the amended Vision for Trafford.

The Spatial Strategy within the Core Strategy: Further Consultation on the Preferred Option report included 13 Strategic Locations and 5 Strategic Sites. In response to representations received at the Preferred Option stage, the Council are proposing to significantly reduce the number of Strategic Locations in the Core Strategy from 13 to 5, with the remaining 8 Strategic Locations from the Preferred Option document being incorporated into the Core Policies. It is also proposed that all 5 of the Strategic Sites will be removed and incorporated into either the retained Strategic Locations or Core Policies. Section Three of this report provides a summary of the results of the SA of the 5 proposed Strategic Locations.

The Core Policies within the Core Strategy form part of the Delivery Strategy and will provide the Council with a framework within which new development in the Borough will be controlled and managed. In the light of comments received at previous stages in the Plan preparation process, a number of these policies have been refined, primarily to take account of the Council's revised approach to Strategic Locations. Accordingly, these amended policies are being published for an additional, informal consultation period, in advance of the Publication version. Section Four of this report provides a summary of the SA of these amended policies.

The proposed Strategic Locations and other development areas contained within the Core Strategy have been subject to a Sequential Test, as required by Planning Policy Statement 25 (PPS25): *Development and Flood Risk*. The results of this test can be found in Trafford Core Strategy PPS25 Flood Risk Sequential Test Report (February

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2010). In accordance with guidance contained within PPS25, a number of the Strategic Locations and other development areas also need to be subject to an Exception Test, which is presented in Section 5 of this report.

The full sustainability appraisal matrices of the Vision, Strategic Locations and Core Strategy Policies are presented in the accompanying Sustainability Appraisal Report Appendices, which is available on the Council's website.

## 2. The Vision for Trafford

The Vision has the potential to deliver a wide range of social, environmental and economic benefits. By prioritising development in the Regional Centre, Inner Areas and other regeneration priority areas the Delivery Strategy will provide more opportunities for residents in areas of disadvantage, which would have a significant positive impact on reducing economic disparities; improving access to services and facilities; decreasing poverty and social exclusion and equity and equality of opportunity. The Delivery Strategy's prioritisation of these areas also offers the most scope for redeveloping vacant / underused brownfield sites which would have key benefits for improving local neighbourhood quality; protecting and enhancing the diversity and distinctiveness of landscape, townscape character and cultural facilities; reducing crime and fear of crime; and conserving land resources and reducing land contamination.

Other high scoring objectives are enhancing Trafford's economic performance; improving the Borough's image as a business and tourism location; achieving a better balance and mix in the housing market; and encouraging the long-term sustainability of Trafford's town centres.

It is anticipated that there could be a negative impact on air quality in parts of the Borough due to the growth in traffic associated with the amount of development proposed. The focus on the peripheral areas of Partington and Carrington in particular has the potential to exacerbate the situation. Key mitigation measures will be the maintenance and development of an efficient public transport network and local tree planting schemes. There may also be the need to ensure new developments incorporate SUDs where appropriate to reduce surface water runoff into watercourses and reduce the flood risk. . This will address the uncertain impact of the strategy on water quality and vulnerability to climate change.

Other Policies in the Core Strategy are designed to ensure these mitigation measures are achieved

### 3. Strategic Locations

#### 3.1 *Pomona Island*

The proposals for Pomona have the potential to deliver a range of significant sustainability benefits. The key ones relate to improving accessibility for all to services and facilities; reducing poverty and social exclusion; conserving land resources; enhancing Trafford's economic performance; improving the Borough's image as a business location and reducing disparities. 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 location 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.

A significant proportion of the Pomona area is at a high risk of flooding. Consequently, the proposals are likely to have a negative impact on the objective of reducing the impact of climate change. As a result of the Sequential Testing of the Strategic Locations, the amended proposals for Pomona do not include a residential element and, by extension, will not contribute to/deliver new education facilities. Consequently, the proposals no longer have the potential to have a positive impact on the objectives of achieving a better balance and mix in the housing market and improving qualifications and skills. It is acknowledged that there is an extant permission for a residential development of 546 units on the area. However, this permission is due to expire in May 2012. The PPS25 Exception Test concluded that due to the presence of the hotel and bar uses, the proposals are unlikely to pass the Exception Test. It is therefore recommended that the hotel and bar uses be removed from the proposals.

As there has been re-vegetation on a portion of the area there is the possibility that its redevelopment could have a negative impact on biodiversity, flora and fauna. Key mitigation measures to prevent this will include the completion of appropriate nature conservation studies and the provision of suitably designed open spaces to compensate for any loss.

#### 3.2 *Trafford Wharfside*

The proposals for Trafford Wharfside are expected to have a largely positive impact on the sustainability objectives. In particular, the proposal is 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 amended 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 area 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, the amendments made to the policy mean that development in this location would also now 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 area is at risk of flooding, with 42% of the area 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 specify that residential development at Wharfside must be located outside Flood Zone 3 and there are other policies in the Core Strategy which should ensure that appropriate measures are taken to reduce the risk of flooding. However, to ensure the proposals pass the Exception Test, it is recommended that the requirement for the residential development to be located outside of Flood Zone 3 should be extended to the other 'more vulnerable' uses proposed for Wharfside, such as the hotel, leisure and community uses.

There are no other anticipated negative effects from the proposals for Trafford Wharfside.

### 3.3 *Lancashire County Cricket Club Quarter*

The proposals for the LCCC Strategic Location have the potential to deliver a wide range of sustainability benefits. The redevelopment of the stadium will significantly enhance Trafford's reputation as a location for national and international sporting events and strengthen Trafford's reputation as a tourism destination. The proposals would also result in the provision of a range of employment opportunities, a superstore, and education, community and leisure facilities in a location that is well related to areas of deprivation and accessible by public transport. As a consequence, it is anticipated that the proposals would have a major positive impact on the objectives relating to economic disparities; poverty and social exclusion; access to services and facilities; health; and skills and qualifications.

There would also be some positive impact on the objectives relating to enhancing Trafford's high economic performance and improving the social and environmental performance of the economy. In addition, the amendments made to policy stipulate that the superstore would be limited to a scale that will address the deficiencies in retail provision in the Old Trafford area, which addresses previous uncertainties

about the impact of the proposals on Trafford's town centres. As a result, it is now concluded that the proposals are unlikely to have any significant impact on the Borough's town centres.

The policy now states that the residential elements of the proposal will comprise principally of accommodation suitable for families, with an appropriate affordable housing contribution. As a result, the Strategic Location 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.

The performance of the proposals have been further strengthened by a number of other amendments to the policy. For instance, the addition of a requirement for development in this location to deliver improvements to the local highway network and better linkages to public transport infrastructure should have a positive impact on the objective of enhancing transport infrastructure and improving accessibility. Similarly, the new reference to renovating the Grade II listed Trafford Town Hall and delivering public realm enhancements to Warwick Road should ensure that the proposals have a positive impact on the objective of protecting and enhancing the diversity and distinctiveness of townscape character.

There are no anticipated negative effects from the proposals for the LCCC area. Nevertheless, there is uncertainty over the impact of the proposals on traffic generation and, by extension, air quality and contributions to climate change. However, the greater emphasis placed upon improvements to the local highway network and enhanced linkages to public transport infrastructure in the amended proposals should reduce the impact on these objectives. It will also be important to ensure that development in the location incorporates features to enhance the biodiversity value of the area to prevent the proposals from having a negative impact on the objective of protecting, enhancing and restoring biodiversity, flora and fauna.

#### *3.4 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. The policy now states 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.

The amendments made to the proposals strengthen their performance considerably against a number of sustainability objectives. The amended policy now places a significant emphasis on enhancing the accessibility of the location by public transport, referring to the need to significantly improve public transport infrastructure including an integrated, frequent public transit system; re-route local public transport provision through the area 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 additional detail provided on the ancillary community facilities means that it can now be concluded with a greater 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. While the incorporation 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 proposals have a positive impact on the objective relating to townscape character.

The proposals for the Strategic Location may have a negative impact on reducing the impact of climate change due to the level of flood risk on parts of the area. Trafford Council's Flood Risk Sequential Test report has demonstrated that the proposals would pass the Sequential Test. Nevertheless, the Exception Test concluded that it is uncertain whether more vulnerable uses proposed for the Trafford Centre Rectangle Strategic Location, and the Trafford Quays area in particular, would be safe from flood risk if they were to be located on the parts of the area at the highest risk of flooding. Consequently, to ensure the Exception Test is passed and also to mitigate the negative impact of the proposals on the objective of reducing the impact of climate change, it is recommended that the proposals should specify that the residential units, ancillary community uses and hotel should be located outside of these areas of highest risk.

In addition, there is also a need to undertake conservation surveys, particularly on the greenfield area adjacent to the designated Wildlife Corridor, to address the uncertain impact of the proposals on the open space, biodiversity, flora and fauna. The impact of the proposals on the objectives relating to conserving land resources and protecting water quality is also uncertain.

### 3.5 Carrington

It is anticipated that the proposals for the Carrington Strategic Location could 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 this will comprise predominantly of accommodation suitable for families should ensure that the amended proposals have a major positive impact on the objective of achieving a better balance and mix in the housing market. Similarly, the inclusion of a 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, 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 revisions to the proposals, in particular the specifying that the Mosslands will be protected as a carbon sink, ensure that the proposals have the potential to have a positive impact on mitigating climate change.

It is anticipated that the proposals for Carrington would have a negative effect on the objective of reducing the impact of climate change due to parts of the area being at risk of flooding. Trafford Council's Flood Risk Sequential Test report demonstrated that the proposals would pass the Sequential Test. However, the Exception Test concluded that it is uncertain whether more vulnerable uses would be safe from flood risk if they were located on the parts of the area at the highest risk of flooding. Consequently, to ensure the Exception Test is passed and mitigate the negative impact on the objective of reducing the impact of climate change, it is recommended that the proposals should specify that the residential units and ancillary community uses should be located outside of these areas of highest risk.

## 4.0 Amended Core Strategy Policies

### 4.1 L1: Land for New Homes

Policy L1 Land for New Homes has the potential to deliver a range of significant sustainability benefits. The key ones relate to a better balance and mix in the housing market, improving accessibility for all to services and facilities, enhancing transport infrastructure; improving accessibility and quality of life to all communities and reducing poverty and exclusion. Other high scoring objectives are protecting and improving local neighbourhood quality and also protecting and enhancing the diversity and distinctiveness of landscape, townscape character and cultural facilities.

The strength of this policy relates to its prioritisation of sustainable locations and derelict, vacant and underused land and the requirement for infrastructure contributions in less accessible locations. Key mitigation actions relate to conservation surveys on re-vegetated sites before development takes place. Other policies in the Core Strategy will ensure that this takes place. This will address the uncertain impact of this policy on the open space, biodiversity, flora and fauna objective.

The amendments made to the Policy would not have any substantial impact on its performance against the sustainability objectives.

### 4.2 L3: Regeneration and Reducing Inequalities

Policy L3 Regeneration and Reducing Inequalities scores well against the sustainability objectives. The proposals for Trafford's Priority Regeneration Areas would have a major positive impact on the objectives relating to achieving a better balance and mix in the housing market; improving accessibility for all to services and facilities; protecting and improving local neighbourhood quality; and enhancing Trafford's economy. The policy would have a positive impact on a wide range of other social and economic objectives, including those relating to enhancing transport infrastructure and accessibility; reducing crime and disorder; reducing poverty and social exclusion; encouraging a sense of community identity; improving qualifications, skills and health; reducing economic disparities and encouraging the long term sustainability of Trafford's town centres; and the social and environmental performance of the economy. As a consequence, the policy would have important positive secondary effects on the quality of life in the Borough.

The impact of the policy on a number of the environmental objectives is however less certain. The first of these is in relation to the objective of reducing the effect of traffic on the environment. The inclusion of Partington within this policy as a Regeneration Priority Area increases this uncertainty due to its peripheral location in the Borough. There is also an uncertain impact on the objectives of conserving land resources; protecting water quality; and protect and enhancing biodiversity, flora and fauna, due to the proposal at Partington involving the development of a greenfield area adjacent to the Manchester Ship Canal. However, this has to be balanced against the important regeneration benefits to Partington's town centre and balance of housing stock.

Policy L3 has the potential to have a negative effect on the objective of reducing the impact of climate change, which emanates largely from the level of flood risk

experienced in Partington at the Partington Canalside area. Trafford Council's Flood Risk Sequential Test report demonstrated that the proposals for Partington Canalside pass the Sequential Test set out in PPS25. However, the Exception Test concluded that it is uncertain whether housing would be safe from flood risk if it were located on the parts of the area at the highest risk of flooding. Consequently, to ensure the proposals do not fail the Exception Test, the policy should specify that the residential units should be located outside of the areas at highest risk of flooding.

#### 4.3 W1: Economy

There are a number of significant sustainability benefits associated with Policy W1 Economy. The key ones relate to enhancing Trafford's high economic performance; improving Trafford's image as a business destination; improving local neighbourhood quality; and protecting and enhancing townscape character. In addition, by seeking to focus economic activity on a number of key locations that are well related to areas of deprivation and by requiring smaller sites for employment development to be accessible by a range of alternative modes other than the private car, the policy will have a major positive impact on poverty and social exclusion and some positive impact on economic disparities. Policy W1 could also have a positive effect on the skills of the resident population. However, in order to increase the certainty of this impact, reference should be made to the use of legal agreements to secure employment opportunities for local residents.

Although B1 office developments would be focused in the Regional Centre and town centres, the amended policy would enable some B1 office development in out of centre locations. Nevertheless, some of these out of centre locations, such as Pomona, are accessible by public transport and a strong emphasis is placed on ensuring that new employment development is located where it will be accessible by a range of alternative modes other than the private car. Another key objective of the policy is to improve public transport infrastructure in Trafford Park. The amended Policy W1 should therefore still have a positive impact on reducing the effect of traffic on the environment; reducing contributions to climate change; improving air quality; and improving the environmental performance of the economy.

A number of the proposed locations for economic development are adjacent to the Manchester Ship Canal and/or Bridgewater Canal. Consequently, there is a degree of uncertainty over the impact of the proposals on water quality. However, other policies in the Core Strategy should ensure that new developments incorporate appropriate measures to reduce surface water runoff into watercourses and reduce the risk of flooding from sewers. As such, no mitigation measures are proposed.

Policy W1 seeks to focus employment uses in a number of locations, several of which are known to be at risk of flooding, including Pomona, Wharfside, Trafford Centre Rectangle, Trafford Park and Carrington. As a result, the policy is likely to have a negative impact on the objective of reducing the impact of climate change. Nevertheless, Trafford Council's Flood Risk Sequential Test report (2010) has demonstrated that the proposals for these areas pass the Sequential Test set out in PPS25 and an Exceptions Test is unlikely to be required. Furthermore, other policies in the Core Strategy will ensure that appropriate measures are taken to reduce the risk of flooding. As a result, no mitigation measures are proposed.

#### 4.4 W2: Town Centres and Retail

Policy W2 Town Centres and Retail has the potential to deliver a number of significant sustainability benefits. The key ones relate to enhancing Trafford's high economic performance; improving accessibility for all to services; and encouraging the long-term sustainability of the Borough's town centres. However, the amendments made to the policy place a stronger emphasis on public realm enhancements in Trafford's town centres and stresses the importance of respecting and enhancing the character and setting of the Conservation Areas and historic buildings in Altrincham and historic buildings in other local centres. As a result of these alterations, it is considered that the policy is particularly compatible with the objective of protecting and enhancing the diversity and distinctiveness of townscape character.

By encouraging the provision of a range of employment opportunities, services and facilities in highly accessible locations, Policy W2 should also have a positive impact on the objectives relating to reducing the effect of traffic on the environment; poverty and social exclusion; air quality; mitigating climate change; and reducing economic disparities. Other high scoring objectives relate to protecting and improving neighbourhood quality; reducing crime and fear of crime; conserving land resources; and enhancing Trafford's image as a business destination. The addition of a new and/or improved hospital facility to the list of proposed development in Altrincham town centre and the inclusion of a reference to the promotion of pedestrian links means that the revised policy has the potential to have a positive impact on the objective of improving health and reducing inequalities in health. However, it is acknowledged that there is only limited certainty about this relationship.

There are no negative effects on the sustainability objectives and no mitigation is proposed. However, the Level 2 SFRA demonstrated that sections of Trafford's town centres are susceptible to surface water flooding. The relationship between the policy and the objective of reducing the impacts of climate change is therefore considered to be uncertain. Nevertheless, it is noted that there are other policies in the Core Strategy which will ensure that appropriate measures are taken to reduce the risk of surface water flooding.

#### 4.5 R3: Green Infrastructure

Policy R3 Green Infrastructure will have a significant positive impact on a number of sustainability objectives. These, as can be expected, relate primarily to the environment. The development of a high quality and multi-functional GI network would have a major positive impact on protecting, enhancing and restoring open space, biodiversity, flora and fauna, geological and geo-morphological features; protecting and enhancing landscape character; and conserving land resources and reducing land contamination. In addition, it is anticipated that the policy will have a major positive effect on adaptation to climate change by providing wildlife habitats and reducing the risk of flooding

The alterations made to the policy generally strengthen its performance against the SA objectives. For instance, the emphasis now placed on developing a GI network that contributes to tourist development should ensure that the amended policy has a major positive impact on the objective of enhancing Trafford's image as a tourism

destination. Furthermore, the inclusion of Stretford Meadows as a significant GI opportunity should ensure that the policy has a major positive effect on reducing contributions to climate change and some positive impact on the objectives of reducing poverty and social exclusion and reducing crime, disorder and the fear of crime.

Policy R3 will have a positive impact on most of the other environmental sustainability objectives. It will contribute towards the social objectives of improving local neighbourhood quality; improving health; increasing accessibility and encouraging a sense of community identity. The development of an integrated network of green infrastructure will also have a positive impact on the economic objective of enhancing Trafford's high economic performance by improving the attractiveness to the Borough and encouraging potential investors.

There are no uncertain or negative effects on the sustainability objectives and no mitigation is proposed.

#### *4.6 R4: Green Belt and Other Protected Open Land*

The amended policy R4 Green Belt and Other Protected Open Land is another policy that scores well against the sustainability objectives. The key potential benefits of the policy relate to reducing the effect of traffic on the environment; protecting, enhancing and restoring open space; reducing contributions to climate change; and conserving land resources. In addition, by providing long-term protection against development that would have a detrimental impact on landscapes in the Green Belt and by preserving the setting and special character of a number of conservation areas in Trafford, including those at Dunham Town, Dunham Woodhouses and Warburton, the policy would also have a major positive effect on the objective of protecting the diversity and distinctiveness of landscape and townscape character.

The policy will have a positive impact on health and local neighbourhood quality by affording protection to open spaces that provide important areas for recreation, such as Timperley Wedge. It will also afford protection to areas of open land that contribute to image of the Borough and will thereby help protect local neighbourhood quality. However, although the policy will restrict housing supply and economic development opportunities, it will also provide a high quality environment that attracts skilled workers to the Borough and assist in urban regeneration by enabling investment to be focussed on key regeneration areas. Furthermore, the policy provides protection to land that is not included in the Green Belt in Warburton (south of Partington) and to the south of Shell, Carrington, to ensure this land makes the maximum potential contribution to housing and economic development needs beyond the Plan period". As a result, it is concluded that the policy could potentially have a positive impact on the objectives of enhancing Trafford's high economic performance and achieving a better balance and mix in the housing market.

The policy would however have an uncertain impact on the Borough's reputation as a business destination. This is due to the fact that it would restrict economic development opportunities. Nevertheless, it must also be recognised that the maintenance of the Green Belt would also have a positive impact on this objective by providing a high quality environment that can attract skilled workers to the Borough. Accordingly, no mitigation measures are proposed.

#### 4.7 R6: Culture and Tourism

By supporting culture and tourism developments in key locations in Trafford and promoting developments that contribute towards meeting the Borough's identified need for appropriate hotel accommodation and additional art galleries, Policy R6 would have a significant positive impact on the objectives relating to the Borough's image as a tourism destination and the diversity and distinctiveness of landscape and townscape character and cultural facilities. The policy would also have some positive impact on the objectives of enhancing Trafford's economic performance and encouraging the long-term sustainability of Trafford's town centres.

By directing cultural and tourism development principally to locations which are accessible and/or well-related to areas of deprivation, such as LCCC, the Regional Centre, Trafford's town centres and priority regeneration areas, the policy could result in the creation of a range of employment opportunities that have a positive impact on the objectives of reducing poverty and social exclusion and reducing disparities by releasing the potential of all residents particularly in areas of disadvantage.

It is however recognised that developments to support tourism can attract large number of visitors to the Borough, which will result in an increase in vehicle movements. Accordingly, it is considered that the policy has the potential to have a negative impact on the objectives relating to reducing the effects of traffic on the environment; reducing contributions to climate change and improving air quality. Key mitigation measures will include securing public transport enhancements to major tourist attractions in the Borough. Although Policies L4 and L8 will ensure proposals for major visitor attractions secure public transport improvements. Improving accessibility by public transport would also increase the likelihood that the policy would help to meet the objective of reducing poverty and social exclusion. However, it is acknowledged that the potential impact of the policy on traffic generation needs to be balanced against the important economic benefits that it is likely to deliver.

There is also potentially a negative impact on the objective of reducing the impact of climate change due to a number of the areas identified for culture and tourism development being susceptible to surface water flooding and/or flooding from watercourses. However, it is acknowledged that other policies in the Core Strategy should ensure that appropriate measures are taken to reduce flood risk.

## 5. Exception Test

Local authorities are required to undertake Strategic Flood Risk Assessments (SFRA) to inform the preparation of their Local Development Documents. SFRA provide an understanding of flood risk at a strategic level. They assist in refining the information provided by the Environment Agency mapping; provide a consideration of flood risk from a range of sources; and also take into account the impacts of climate change.

A sub-regional Greater Manchester Strategic Flood Risk Assessment, commissioned by the ten Greater Manchester districts, was published in August 2008. This sought to assess broad flood risk arising from each of the sources identified in Planning Policy Statement 25 (PPS25): Development and Flood Risk.

In order to supplement and update this sub-regional SFRA, and provide a sufficiently detailed evidence base to inform the preparation of Local Development Documents, a Manchester, Salford and Trafford Level 2/Hybrid SFRA was commissioned in May 2009. This Level 2/Hybrid SFRA investigates and identifies in more detail the extent and severity of flood risk to the area at present and in the future, under the terms of PPS25.

### **Planning Policy Statement 25 Policy Context**

PPS25 sets out the Government's policy on development and flood risk. It requires planning authorities to take flood risk into account at all stages in the planning process and seeks to avoid inappropriate development in areas at risk of flooding by steering new development to areas of lowest risk (Flood Zone 1) and keeping all development out of medium and high flood risk areas where possible (Flood Zones 2 and 3). Where new development is, exceptionally, necessary in such areas, PPS25 aims to make it safe, without increasing flood risk elsewhere, and, where possible, reducing risk overall.

PPS25 sets out that planning authorities identifying land for development in their Local Development Documents, of which Trafford's Core Strategy is one, should apply a Sequential Test to demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed.

If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones of lower probability of flooding, PPS25 states that Local Planning Authorities should apply the Exception Test.

The Exception Test provides a method of managing flood risk while still allowing necessary development to occur. PPS25 advises that the Exception Test is only appropriate for use where the Sequential Test alone cannot deliver acceptable sites, but where some continuing development is necessary for wider sustainable development reasons, taking into account the need to avoid social or economic blight and the need for essential civil infrastructure to remain operational during floods.

For the Exception Test to be passed:

- a) It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a SFRA where one has been prepared;
- b) The development should be on developable previously-developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously-developed land; and
- c) A FRA must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

As certain types of development and the people who use and live in them are more at risk from flooding than others, Table D.3 in PPS25 links the probability of flooding to the vulnerability of types of development. It highlights where particular forms of development are incompatible with the level of flood risk and also sets out the instances where an Exception Test will need to be applied.

Flood Risk Vulnerability and Flood Zone 'Compatibility' (Source: Table D.3, PPS 25)

Flood Risk Vulnerability classification (see Table D2)		Essential Infrastructure	Water compatible	Highly Vulnerable	More Vulnerable	Less Vulnerable
Flood Zone (see Table D.1)	Zone 1	✓	✓	✓	✓	✓
	Zone 2	✓	✓	Exception Test required	✓	✓
	Zone 3a	Exception Test required	✓	✗	Exception Test required	✓
	Zone 3b 'Functional Floodplain'	Exception Test required	✓	✗	✗	✗

Key:

✓ Development is appropriate

✗ Development should not be permitted

According to the flood risk vulnerability classification index in PPS25 'more vulnerable uses' include, inter alia, buildings used as dwelling houses; non-residential uses for health services, nurseries and educational establishments; hotels; drinking establishments; and nightclubs. Buildings used for: shops; financial, professional and other services; restaurants and cafes; hot food takeaways; offices; general industry; storage and distribution are all classified as 'less vulnerable uses'.

### Trafford Core Strategy: PPS25 Flood Risk Sequential Test Report

Taking into account the guidance contained within PPS25, and its accompanying Practice Guide (December 2009), Trafford Metropolitan Borough Council has applied the Sequential Test to the Trafford Core Strategy. The test involved the assessment of the proposed Strategic Locations and other development areas using the best available information relating to flood risk (the latest Environment Agency flood zone maps for rivers and the Manchester Ship Canal and the map of areas susceptible to surface water flooding), and taking into account the vulnerability of uses and the potential benefits of development.

Following the completion of the Sequential Test, the need to undertake an Exception Test of the following Strategic Locations/other development areas was identified:

- I. Pomona Island
- II. Trafford Wharfside
- III. Trafford Centre Rectangle (including Trafford Quays)
- IV. Carrington
- V. Partington (including Partington Canalside)

#### I. Pomona Island

Pomona Island constitutes one of the largest vacant sites in the Regional Centre and has been recognised by the Council as representing a major opportunity to expand and diversify the offer of the Regional Centre and fill a huge gap close to its heart. As such, Pomona Island is identified as a Strategic Location in the Core Strategy.

The Environment Agency mapping indicates that Pomona Island is subject to a significant risk of flooding, with 42% of the area considered to be at a medium risk of flooding (Flood Zone 2) and 51% at a high risk (Flood Zone 3). Furthermore, it was also established that parts of the area are susceptible to surface water flooding.

The Core Strategy identified a wide range of uses for Pomona, including up to 1,500 dwellings, employment activity, a hotel, commercial leisure facilities, small-scale ancillary retail, restaurant, café/bar, community facilities and a substantial area of open space. However, as a result of the Sequential Testing of the Strategic Locations, Pomona Island is no longer identified by the Council as a preferred location for residential uses. Nevertheless, as the proposals would still result in the provision of a hotel and bars in Flood Zone 3, both of which are classified as 'more vulnerable' uses of land for the purpose of PPS25, the proposals for Pomona Island will need to be subject to an Exception Test.

- a) *Would the development provide wider sustainability benefits to the community that outweigh flood risk, informed by a SFRA where one has been prepared?*

The proposed development of a hotel and drinking establishments at Pomona has the potential to deliver a number of wider sustainability benefits to the community. It would help meet the need for additional hotel provision identified by the Trafford Other Town Centres Uses Study (2010). The provision of a hotel and drinking establishments would also result in the creation of a number of employment opportunities and will increase activity at different times of the day, making the area

more vibrant and safe. The jobs created would be in a location that is highly accessible by public transport due to its proximity to two Metrolink stations and a high frequency bus corridor. The jobs would also be accessible to areas of deprivation due to the proximity of the area to Old Trafford.

The provision of a hotel and drinking establishments at Pomona Island would therefore have a positive impact on the following sustainability appraisal objectives:

- Reducing the effect of traffic on the environment;
- Enhance transport infrastructure; improve accessibility and quality of life to all communities;
- Enhance Trafford's image as a business and tourism destination; and
- Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage.

*b) Is the development on developable previously developed land? Or, if it is not on previously developed land, are there no reasonable alternative sites on developable previously developed land?*

Planning Policy Statement 3 (PPS3): Housing states that to be considered developable, sites should be in a suitable location for development and there should be a reasonable prospect that the site is available for, and could be developed at the point envisaged. Pomona comprises entirely of previously developed land. It is a sustainable area that is well served by public transport and well-related to, and accessible from, areas of deprivation. Pomona is also presently vacant and has been subject to some remediation. In addition, the majority of the area is in a single ownership, which increases the likelihood of the area being developed out. As a result, it is concluded that the area constitutes developable previously developed land.

*c) Could a FRA demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall?*

The Level 2 SFRA concludes that the majority of Pomona Island is at significant residual risk from the Manchester Ship Canal, with significant flood depths and hazards in a 1 in 100 year event considering climate change. In addition, it is noted that the area allows water from the Bridgewater Canal to pass into the Manchester Ship Canal at times of high flow (from the River Medlock). As such, Pomona Island serves an important role in decreasing flood risk from the Bridgewater Canal in the south of Trafford. Making the development safe from flooding could therefore have a counter effect on flood risk elsewhere in the Borough.

The SFRA also notes that the nature of the flood risk from the Bridgewater Canal is unpredictable and may result in the operational failure of defences. It is also noted that access/egress from the area during a flood event would be difficult and safety not guaranteed. This is exacerbated by the fact that a significant proportion of the area is at a higher risk of embankment failure. As a result, it is concluded that whilst limited lower vulnerability land uses could potentially be provided on Pomona Island, subject to the submission of a Flood Risk Assessment (FRA) and a flood action plan, the provision of 'more vulnerable uses' would be at an unacceptable risk of flooding. Therefore, it is considered to be unlikely that a FRA could demonstrate that the

proposed hotel and drinking establishments could be made safe without increasing flood risk elsewhere.

### Conclusion

The provision of a hotel and drinking establishments at Pomona Island would result in a number of wider sustainability benefits to the local community. The area also comprises of developable previously developed land. However, the Level 2 SFRA has demonstrated that 'more vulnerable uses' on the area would be at an unacceptable risk of flooding and it is therefore unlikely that a FRA could demonstrate that the proposed hotel and drinking establishments could be made safe without increasing flood risk elsewhere. Consequently, because of the presence of the hotel and bar uses, it is concluded that the proposals as presently drafted are unlikely to pass the Exception Test. It is therefore recommended that the hotel and bar uses be removed from the proposals for Pomona Island.

## **II. Trafford Wharfside**

Wharfside is considered to be a key strategic part of Trafford lying as it does within the Regional Centre and adjacent to Salford Quays. The area has therefore been recognised by the Council as having great potential as part of Mediacity:uk for new economic and residential development. As such, Trafford Wharfside is identified as a Strategic Location for major mixed-use development in the Core Strategy.

The Environment Agency mapping established that 41% of Trafford Wharfside is at a medium risk of flooding (Flood Zone 2) and 2% at a high risk (Flood Zone 3). Furthermore, parts of the area are susceptible to surface water flooding. The Core Strategy identified a wide range of uses for Wharfside, including up to 900 dwellings, 10,000sqm of offices, a hotel, leisure uses and an appropriate scale of supporting retail and community uses. The proposals also involve the redevelopment of Victoria Warehouses which is a prominent long-standing, under-used, 1.4 hectare area to provide a mixed-use development comprising of: residential apartments, commercial offices, a hotel, and ancillary leisure and retail accommodation.

The current proposals for the Strategic Location unequivocally stipulate that residential development at Trafford Wharfside must be located outside of Flood Zone 3. Consequently, as PPS25 states that more vulnerable uses of land are appropriate uses in Flood Zones 1 and 2, the residential element of the proposals will not need to be subject to an Exception Test. However, due to the inclusion of a hotel and unspecified leisure and community uses within the proposals, both of which are classified as 'more vulnerable' uses of land for the purpose of PPS25, the proposals for Trafford Wharfside still need to be subject to an Exception Test.

a) *Would the development provide wider sustainability benefits to the community that outweigh flood risk, informed by a SFRA where one has been prepared?*

The proposed hotel, leisure and community uses at Wharfside have the potential to deliver a number of wider sustainability benefits to the community. It would help meet the need for additional hotel provision identified by the Trafford Other Town Centres Uses Study (2010) and maximise the potential of visitor attractions, such as the

Imperial War Museum North and the Trafford Centre, to retain visitor spend in the Borough.

The proposals would also result in the creation of a number of employment opportunities and will increase activity at different times of the day, making the area more vibrant and safe. The jobs created would be highly accessible to all members of the community due to Wharfside's proximity to the public transport network and areas of deprivation in both Trafford and Salford. In addition, the provision of community uses, including a new 2-form primary school, a secondary school and health facilities, would improve access to services and facilities and could also have a positive impact on educational attainment and the health of the population.

The proposed hotel, leisure and community uses at Wharfside would therefore have a positive impact on the following sustainability appraisal objectives:

- Reducing poverty and social exclusion;
- Enhance transport infrastructure; improve accessibility and quality of life to all communities;
- Improve accessibility for all to services and facilities;
- Improve qualifications and skills of the resident population;
- Improve the health and, inequalities in health of the population;
- Enhance Trafford's image as a business and tourism destination; and
- Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage.

*b) Is the development on developable previously developed land? Or, if it is not on previously developed land, are there no reasonable alternative sites on developable previously developed land?*

PPS3 states that to be considered developable, sites should be in a suitable location for development and there should be a reasonable prospect that the site is available for, and could be developed at, the point envisaged. Wharfside consists entirely of previously developed land. It is considered to be a suitable location for a hotel and community/leisure uses due to its accessibility by public transport and its proximity to both areas of deprivation and major attractions, such as the Manchester United Stadium, Salford Quays and Mediacity:uk. The Strategic Location presently contains a number of vacant/underused sites and, although it is in multiple ownership, there are no known physical constraints that would prevent the site from being developed at the point envisaged. As a result, it is concluded that the site constitutes developable previously developed land.

*c) Could a FRA demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall?*

The Level 2 SFRA establishes that the north west and canalside areas of Wharfside are at a residual risk of flooding from the Manchester Ship Canal. However, the SFRA acknowledges that the flood depth and hazard should be manageable through the careful consideration of urban form to take account of the residual risk. It is also noted that the mitigation measures needed to make the development safe would not have a negative impact on flood risk in other areas downstream or adjacent. As a result, the SFRA concludes that the development proposed for the Trafford Wharfside Strategic Location would be safe subject to a detailed consideration of

flood risk issues in a FRA and the more vulnerable developments not being placed in high flood risk areas.

In relation to Victoria Warehouse, the SFRA confirms that the limited parts of the area that border the Bridgewater Canal are potentially at risk in an extreme event. However, it concludes that the proposed development will be safe and is acceptable subject to the completion of a FRA.

### Conclusion

The provision of a hotel, leisure and community uses at Wharfside would lead to a number of wider sustainability benefits for the community. The location also comprises of developable previously developed land. The SFRA concludes that the development proposed for Wharfside would be safe without increasing flood risk elsewhere subject to the more vulnerable uses not being placed in high flood risk areas.

Given the size of the area and the relatively modest proportion of it that is at a high risk of flooding, it is considered that there is scope for arranging the proposed uses so that the more vulnerable uses are not placed in the parts of the area that are within Flood Zone 3. The proposals already require the residential development at Wharfside to be located outside Flood Zone 3. Consequently, subject to extending this to specify that the other 'more vulnerable' uses proposed at Wharfside should be located outside of Flood Zone 3, it is considered that the proposals are likely to pass the Exception Test.

### **III. Trafford Centre Rectangle**

The Trafford Centre Rectangle is a key strategic part of Trafford, forming the western part of Trafford Park. The location has been recognised by the Council as containing a number of areas that offer significant opportunities to contribute to both local and sub-regional priorities over the Plan Period and beyond. As such, the Trafford Centre Rectangle has been identified as a Strategic Location for major mixed-use development in the Core Strategy.

A wide range of uses for Trafford Centre Rectangle are identified in the Core Strategy, including up to 10 hectares of land for employment activity, a hotel and a museum. In addition, the Core Strategy states that the Trafford Centre Rectangle Strategic Location will deliver up to 1,050 dwellings, commercial office space and ancillary community facilities including school provision and health facilities on a greenfield area known as Trafford Quays.

The Environment Agency mapping established that 20% of the wider Trafford Centre Rectangle location is at a medium risk of flooding (Flood Zone 2) and 4% at a high risk (Flood Zone 3a). However, the level of risk is particularly acute in the section of the area known as Trafford Quays, 44% of which is in Flood Zone 2 and 15% is in Flood Zone 3a.

The proposed hotel and the housing, school and health facilities proposed for the area known as Trafford Quays are all classified as 'more vulnerable' uses.

Consequently, as both the Trafford Centre Rectangle and Trafford Quays contain land that falls within Flood Zone 3a, the inclusion of these 'more vulnerable' uses within the proposals mean that both the Trafford Centre Rectangle and Trafford Quays need to be subject to an Exception Test.

a) *Would the development provide wider sustainability benefits to the community that outweigh flood risk, informed by a SFRA where one has been prepared?*

The residential element of the proposals for Trafford Quays and the ancillary community facilities have the potential to deliver a number of wider sustainability benefits to the community. The residential development would comprise predominantly of accommodation suitable for families, with an appropriate affordable housing contribution, and would therefore make a significant contribution to Trafford's identified housing needs.

The provision of community uses, including a school and health facilities to meet the needs of local people, would improve access to services and facilities, create employment opportunities and could also have a positive impact on educational attainment and the health of the population.

The proposed provision of a high quality hotel and conference facility would help meet the need for additional hotel provision identified by the Trafford Other Town Centres Uses Study (2010). It would also maximise the potential of visitor attractions, such as the Imperial War Museum North and the Trafford Centre, to retain visitor spend in the Borough, create a number of employment opportunities and increase activity at different times of the day, making the area more vibrant and safe.

The proposals for Trafford Centre Rectangle specify that the development must deliver significant improvements to public transport infrastructure including an integrated, frequent public transit system, the re-routing of local public transport provision through the area and the provision of a direct pedestrian link to the Trafford Centre Bus Station. These requirements will further enhance the accessibility of the Trafford Centre and surrounding areas, such as Trafford Park, by public transport and have a positive impact on the sustainability of the development itself.

The proposed residential development, ancillary community facilities and hotel would therefore have a positive impact on the following sustainability appraisal objectives:

- Achieving a better balance and mix in the housing market;
- Enhance transport infrastructure; improve accessibility and quality of life to all communities;
- Reducing poverty and social exclusion;
- Improve accessibility for all to services and facilities;
- Improve qualifications and skills of the resident population;
- Improve the health and, inequalities in health of the population;
- Enhance Trafford's image as a business and tourism destination; and
- Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage.

b) *Is the development on developable previously developed land? Or, if it is not on previously developed land, are there no reasonable alternative sites on developable previously developed land?*

Whilst the majority of the Trafford Centre Rectangle location is previously developed land, the section known as Trafford Quays, which would accommodate the housing, school and health facility elements of the proposals, is a greenfield site. The location nevertheless has the potential to deliver a sustainable development that makes a major contribution to Trafford's identified housing needs and supports nearby key economic drivers, such as the Trafford Centre and Trafford Park. Furthermore, if the Trafford Quays part of the area were to be left undeveloped it would be to the detriment of the proper development of the Trafford Centre Rectangle.

It is noted that Core Strategy policy L1 specifies that the development of greenfield land for housing will only be considered where it can be demonstrated that the proposed development will be capable of creating sustainable communities; will contribute significantly to the Plan's overall objectives, including the economic growth of the City Region and the provision of affordable housing; and where it can be demonstrated that the development of that land will not compromise the Council's achievement of its brown-field land target over the Plan period and that without its release, the Council's 5-year housing land supply target could not be delivered. The Council has stated that they are satisfied that the proposed residential development at Trafford Quays would meet these provisions.

Furthermore, following the completion of the Sequential Test report in February 2010, the Council have concluded that it is not possible, consistent with wider sustainability objectives, for the development to be located on an area with a lower probability of flooding.

c) *Could a FRA demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall?*

In relation to Trafford Quays, the Level 2 SFRA establishes that the canalside sections of the area are at residual risk of flooding from the Manchester Ship Canal, with significant depths and hazards occurring in places during a 1 in 100 year event, considering climate change. It is stated that development in these sections would need significant alterations to the urban form and, as a result, development in these areas should be sequentially avoided. Accordingly, it is considered to be unlikely that a site-specific FRA would demonstrate that residential units or community facilities would be safe if they were located within the part of the Trafford Quays area that is at the highest residual risk.

The SFRA also notes that development to the south of the Trafford Quays area would need to be designed to take account of the risk from a breach on the Bridgewater Canal, particularly as it would be difficult to provide flood warning for such an occurrence.

With regards to the remainder of the Trafford Centre Rectangle Strategic Location, the Level 2 SFRA established that only a very small part of this area is at residual risk from the Manchester Ship Canal. Nevertheless, flood depths and hazards in this area would be significant during an extreme event and the SFRA therefore

recommends that these areas of highest risk should be sequentially avoided. As a result, it is considered to be unlikely that a site-specific FRA would demonstrate that the proposed hotel could be made safe if it were to be located on this part of the Trafford Centre Rectangle location.

The SFRA also notes that development on much of the Trafford Centre Rectangle location would need to be designed to take account of the risk from a breach on the Bridgewater Canal, particularly as it would be difficult to provide flood warning for such an occurrence.

### Conclusion

The provision of residential units, ancillary community facilities and a hotel would provide a number of wider sustainability benefits to the local community. Whilst the residential units and ancillary community facilities would be located on a greenfield area known as Trafford Quays, it is considered that the proposal has the potential to deliver a sustainable development that makes a major contribution to Trafford's identified housing needs and supports nearby key economic drivers, such as the Trafford Centre and Trafford Park. Furthermore, if the Trafford Quays part of the area were to be left undeveloped it would be to the detriment of the proper development of the Trafford Centre Rectangle. The hotel would be delivered on developable previously developed land.

Dealing in the first instance with the Trafford Quays part of area, the Level 2 SFRA established that the canalside parts of the Trafford Quays area are at residual risk of flooding from the Manchester Ship Canal, with significant depths and hazards occurring during a 1 in 100 year event, considering climate change. The SFRA therefore recommends that these areas should be sequentially avoided. As a result, it is unlikely that a site-specific FRA could demonstrate that housing or community uses would be safe in these areas. Consequently, to increase the likelihood of the proposals passing the Exception Test it is recommended that the proposed residential uses and ancillary community facilities be directed away from these areas of greatest residual risk.

In relation to the remainder of the Trafford Centre Rectangle location, the Level 2 SFRA established that only a very small part of the remainder of the Trafford Centre Rectangle Strategic Location is at residual risk from the Manchester Ship Canal. Flood depths and hazards in this area would however be significant during an extreme event. As a consequence, it is anticipated that a site-specific FRA would be unlikely to demonstrate that the proposed hotel could be made safe if it were to be located on this part of the Trafford Centre Rectangle location.

Nonetheless, only 4% of the wider Trafford Centre Rectangle Strategic Location is considered to be at a high risk of flooding. Given the size of the area and the relatively modest proportion of it that is at a high risk of flooding, it is considered that there is scope for arranging the proposed uses so that the hotel would not be situated in the part of the area that is at residual risk from the Manchester Ship Canal. Consequently, subject to the inclusion of a requirement for the hotel proposed at Trafford Centre Rectangle to be located outside of the area of highest risk, it is considered that the proposals are likely to pass the Exception Test.

#### IV. Carrington

Carrington is considered to be a key strategic location within the south of the Borough that has the potential to accommodate a major mixed-use development to provide a much larger residential community, together with employment, educational, health and recreational facilities. As such, Carrington has been identified as a Strategic Location in the Core Strategy.

The Environment Agency mapping establishes that 16% of Carrington is at a medium risk of flooding (Flood Zone 2) and 5% at a high risk (Flood Zone 3). Furthermore, parts of the area are susceptible to surface water flooding. The Core Strategy identified a wide range of uses for Carrington, including 1,560 residential units, up to 75 hectares of land for employment activities, convenience retail, school provision, health and recreational facilities and high quality green infrastructure. Due to the fact that part of the area falls within Flood Zone 3, the inclusion of the residential element, school provision and health facilities within the proposals, all of which are classified as 'more vulnerable' uses of land for the purpose of PPS25, means that the proposals for Carrington need to be subject to an Exception Test.

a) *Would the development provide wider sustainability benefits to the community that outweigh flood risk, informed by a SFRA where one has been prepared?*

Carrington is located in the west of the Borough on the banks of the Manchester Ship Canal. A petrochemicals works has traditionally dominated the area, however more recently a business park has been developed and the petrochemicals operations have been scaled back. Carrington has been identified as a sub-regional economic asset for some time, with the capability of providing much brownfield land for economic regeneration. However, transport infrastructure and public transport provision is presently very limited.

The residential elements of the proposals for Carrington and the ancillary community facilities have the potential to deliver a number of wider sustainability benefits to the community. The large-scale residential development would comprise predominantly of accommodation suitable for families, with an appropriate affordable housing contribution, and would therefore make a significant contribution to Trafford's identified housing needs. The quantum of development proposed would also enhance the viability of public transport services to Carrington and thereby help overcome existing deficiencies in transport infrastructure and public transport provision. As a result, the proposals would contribute directly to the following place objectives identified for Carrington in the Core Strategy Further Consultation on the Vision, Strategic Objectives and Delivery Strategy report:

- To create a high quality, sustainable residential development as part of a high quality mixed use redevelopment scheme;
- To ensure that there is an appropriate mix of housing types and tenures to contribute significantly to meeting the housing needs of Trafford;
- To ensure the development of sustainable modes of transport to key town centres from Carrington;
- To secure significant improvements to the public transport infrastructure;
- To secure improvements to the transport infrastructure; and

- To provide the right conditions to support local community facilities and those of nearby Partington.

The proposal for Carrington would lead to the remediation and redevelopment of a significant brownfield site, which would not only improve perceptions of the area, but also has the potential to have a positive impact on water quality and biodiversity. The provision of community uses, including a school and health facilities, would improve access to services and facilities, create employment opportunities and could also have a positive impact on educational attainment and the health of the population.

The residential element of the proposals and the ancillary community facilities would therefore have a positive impact on the following sustainability appraisal objectives:

- Achieving a better balance and mix in the housing market;
- Enhance transport infrastructure; improve accessibility and quality of life to all communities;
- Improve accessibility for all to services and facilities;
- Improve qualifications and skills of the resident population;
- Improve the health and, inequalities in health of the population;
- Protect and improve water quality; and
- Protect and improve local neighbourhood quality.

*b) Is the development on developable previously developed land? Or, if it is not on previously developed land, are there no reasonable alternative sites on developable previously developed land?*

PPS3 states that to be considered developable, sites should be in a suitable location for development and there should be a reasonable prospect that the site is available for, and could be developed at, the point envisaged. The Carrington Strategic Location comprises overwhelmingly of previously developed land. It represents one of the largest brownfield sites in the Borough and is well-located for supporting a number of Trafford's key economic drivers, such as Trafford Park and the Trafford Centre. As a consequence, Carrington is deemed by the Council to be a suitable location for the development. The Strategic Location is presently under-utilised and the majority of the area is in single ownership. As such, there is considered to be a reasonable prospect that the area will be available for, and could be developed at, the point envisaged.

*c) Could a FRA demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall?*

The Level 2 SFRA identified that the north of the Carrington Strategic Location is at residual risk from the Manchester Ship Canal considering climate change. In addition, this portion of the area is also at serious risk of flooding from the River Mersey in a 1 in 100 year event considering climate change or if a breach in defences along the Mersey were to occur. The SFRA therefore concludes that a limited range of land uses could be put forward after careful consideration and the completion of a detailed FRA but this section of highest risk should be sequentially avoided and more vulnerable uses steered to lower risk areas. As a result, it is considered that a site-specific FRA would be unlikely to demonstrate that residential units or community facilities could be made safe if they were to be located within the part of the area that is at the highest residual risk.

Although the SFRA notes that the nature of the flood risk is unpredictable and may result in the operational failure of defences, it also establishes that the mitigation measures needed to reduce the impact of flood events would have no significant impact on increasing the vulnerability of other areas downstream or adjacent to the area.

### Conclusion

The proposed residential units and ancillary community facilities would provide a number of wider sustainability benefits to the local community. The area also comprises predominantly of developable previously developed land. The Level 2 SFRA identified that the north of the Carrington Strategic Location is at residual risk from the Manchester Ship Canal and the River Mersey and should therefore be sequentially avoided and more vulnerable uses steered to lower risk areas. As a result, it is considered that a site-specific FRA would be unlikely to demonstrate that residential units or community facilities could be made safe if they were to be located within this part of the area that is at the highest residual risk. Any such proposal would therefore be unlikely to pass the Exception Test.

Only 5% of the Carrington Strategic Location is considered to be at a high risk of flooding. Given the size of the area and the relatively modest proportion of it that is at a high risk of flooding, it is considered that there is scope for arranging the proposed uses so that the more vulnerable uses are not placed in the parts of the area that fall within Flood Zone 3. Consequently, subject to the inclusion of a requirement for the 'more vulnerable' uses proposed at Carrington to be located outside the areas of highest risk, it is considered that the proposals are likely to pass the Exception Test.

## V. Partington

Policy L3: *Regeneration and Reducing Inequalities* of the Core Strategy seeks to encourage investment in Partington in order to tackle deprivation and improve access to employment opportunities and services. A key element of the proposals for Partington is the development of a significant substantially vacant/unused 16 hectare greenfield area abutting the Manchester Ship Canal to provide 550 residential units known as Partington Canalside.

From the Environment Agency mapping it is discernable that this canalside area is subject to a significant risk of flooding, with 60% of the area considered to be at a medium risk of flooding (Flood Zone 2) and 17% at a high risk (Flood Zone 3). Furthermore, parts of the area are susceptible to surface water flooding. The proposals for Partington Canalside have passed the Sequential Test. However, as the proposal would result in the provision of housing (a 'more vulnerable' use for the purpose of PPS25) in Flood Zone 3, they need to be subject to an Exception Test.

a) *Would the development provide wider sustainability benefits to the community that outweigh flood risk, informed by a SFRA where one has been prepared?*

Partington was a small rural settlement that was transformed when a large number of council houses were built to accommodate Manchester City Council residents. The

area is still dominated by rented accommodation, is poorly connected with the rest of Trafford and the Regional Centre and contains areas that are amongst the most disadvantaged 5% in the country. Core Strategy policy L3: *Regeneration and Reducing Inequalities* therefore identifies Partington as a Priority Regeneration Area and recognises that it is in need of investment in its local economy (particularly the shopping centre) and the diversification of its housing stock.

The proposed development at Partington Canalside would result in the development of a vacant/unused 16 hectare greenfield area abutting the Manchester Ship Canal to provide 550 private sector residential units. It would therefore broaden the range of housing types and tenures in Partington to provide for local need/demand and help create a mixed sustainable community. As a result, the proposals would contribute directly to the following place objectives identified for Partington in the Core Strategy Further Consultation on the Vision, Strategic Objectives and Delivery Strategy report:

- To provide an appropriate level of new residential development to tackle population decline; and
- To establish a better balance in type and tenure of housing in the area.

By improving the quantity, quality and diversity of the stock on offer in the township, the proposals for Partington Canalside would also have a number of other sustainability benefits for the community. The proposals would support the development of Partington as an attractive and sustainable residential location and help attract and retain economically mobile people to the area. This is considered to be essential for maintaining the viability of schools, ensuring the sustainability of the new Healthy Living Centre and other community facilities, and facilitating the improvement of public transport provision to address deficiencies in the existing linkages from Partington to the Regional Centre, Altrincham and Trafford Park.

Core Strategy policy L3 also requires the residential development on Partington Canalside to secure or contribute to the redevelopment of the existing local shopping centre in the township. As a result, the proposed development would improve and enhance the existing retail offer within the local shopping centre to create a more vital and vibrant centre and result in a number of employment opportunities within a redeveloped local shopping centre.

Partington is in an area of sufficiency in terms of the quantity of open space, however it is acknowledged that there needs to be significant improvement to the quality and accessibility of open space in Partington. The proposed development would address this deficiency to the benefit of the local community by providing a 'green loop' to connect existing areas of green space to create an accessible, attractive route for walking and cycling around Partington. The proposed development would also reduce pressure to release Green Belt land to meet the housing needs of the Borough up to and beyond the end of the Plan period (2025/6).

The proposals for Partington Canalside would therefore provide a wide range of sustainability benefits to the community. In particular, it is concluded that they would have a positive impact on the following sustainability appraisal objectives:

- Achieving a better balance and mix in the housing market;
- Improve accessibility for all to services and facilities;
- Enhance transport infrastructure; improve accessibility and quality of life to all communities;

- Improve qualifications and skills of the resident population;
- Improve the health and, inequalities in health of the population; and
- Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage.

*b) Is the development on developable previously developed land? Or, if it is not on previously developed land, are there no reasonable alternative sites on developable previously developed land?*

The Partington Canalside area comprises entirely of greenfield land. Whilst there are a number of previously developed sites within Partington, it is considered that they are not of a sufficient size, either individually or collectively, to deliver the quantum of development necessary to make a significant contribution to the regeneration priorities of Partington and secure its transformation.

It is noted that Core Strategy policy L1 specifies that the development of greenfield land for housing will only be considered where it can be demonstrated that the proposed development will be capable of creating sustainable communities; will contribute significantly to the Plan's overall objectives, including the economic growth of the City Region and the provision of affordable housing; and where it can be demonstrated that the development of that land will not compromise the Council's achievement of its brown-field land target over the Plan period and that without its release, the Council's 5-year housing land supply target could not be delivered. The Council has stated that they are satisfied that the proposed residential development at Partington Canalside would meet these provisions.

Furthermore, following the completion of the Sequential Test report in February 2010, the Council have concluded that it is not possible, consistent with wider sustainability objectives, for the development to be located on a site with a lower probability of flooding.

As such, it is contended that there are no reasonable alternative sites on developable previously developed land that could accommodate the quantum of development necessary to make a significant contribution to the regeneration priorities of Partington.

*c) Could a FRA demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall?*

The Level 2 SFRA notes that the canalside areas to the south west are at residual risk of flooding from the Manchester Ship Canal in a 1 in 100 year event considering climate change. It notes that in an extreme event there would be a significant residual risk affecting around half of the area. Whilst the level of risk is significant the SFRA notes that the flood risk is well understood and that the mitigation measures required would not have a significant effect on the vulnerability of areas downstream or adjacent to the Partington Canalside.

The SFRA therefore concludes that a limited range of land uses could be put forward after careful consideration and the completion of a detailed FRA but more vulnerable uses should be steered to lower risk areas. Consequently, it is uncertain whether a

site-specific FRA could demonstrate that residential units can be made safe if they were to located within the parts of the area that are at the highest risk of flooding.

### Conclusion

The proposed development at Partington Canalside would deliver a significant number of sustainability benefits to the community. Although the proposal would take place on a greenfield site, the Council are satisfied that there are no reasonable alternative sites on developable previously developed land that could accommodate the quantum of development necessary to make the required contribution to the regeneration priorities of Partington.

17% of the area is at a high risk of flooding and the SFRA specifies that more vulnerable uses should be steered to lower risk areas. As a result, it is uncertain whether a site-specific FRA could demonstrate that any housing located on the part of the area at the highest risk of flooding will be safe. The likelihood of any such proposal passing the Exception Test is therefore also uncertain.

However, if these parts of the area are excluded from residential development, Partington Canalside could still accommodate 550 dwellings at a density of circa 42 dwellings per hectare, which is considered to be an appropriate density for the area. Consequently, subject to the proposed housing being located outside of the portion of the area that is at the highest risk, it is considered that the proposals are likely to pass the Exception Test.