

PfE Response to IN37 Action Points following hearing session 5 July 2023

In addition to the summary responses provided in this document an updated version of all of the proposed main modifications' schedule (PMM) and a revised composite version of the Plan has been submitted to the inspectors to be published on the examination website.

Consequential modifications to other parts of the Plan

AP147. GMCA to identify consequential main modifications¹ to other parts of the Plan, including the maps and diagrams and reasoned justification, that are required to ensure consistency having regard to all of the proposed modifications set out in PMM5 and required as a result of the further Action Points set out in this note.

PfE Response

In line with AP147, consequential main modifications have been included in the updated Proposed Main Modifications Schedule and the composite draft PfE Plan. In particular, the following consequential changes have been included. However, it should be noted that no changes have been made at this point in time to the policy or reasoned justification paragraph numbering, the footnote numbering or the nomenclature and/or the numbering of maps/figures/pictures.

Plan ref	Consequential Main Modification	Reason
All maps, figures and diagrams	All maps, figures and diagrams have been modified to clearly illustrate the strategy and to take account of proposed main modifications to the Green Belt boundary, the allocations and thematic policies and to take account of the Peak District National Park	To ensure they correctly reflect the main modifications contained within the proposed main modifications schedule
All data	Statistics in the plan have been modified to take account of proposed modifications to the Green Belt boundary, the allocations and thematic policies.	To ensure they correctly reflect the main modifications contained within the proposed main modifications schedule

JPA1.1 Heywood / Pilsworth

¹ Additional (minor) modifications, which do not materially affect the policies in the Plan, may be made by GMCA on adoption. The response to AP147 should not include such additional (minor) modifications.

AP148. GMCA to amend the proposed main modifications to JPA1.1 in PMM5/GMCA12.3.2 to include an additional criterion (along with associated reasoned justification) to read as follows (or similar):

“Undertake hydrological and ground investigations to determine the extent and quality of any peat identified in the south-western part of the site to inform the potential for restoration and the comprehensive masterplanning of the site which should ensure that the loss or deterioration of any irreplaceable habitat is avoided”.

PfE Response

The PMM and the composite plan have been updated to include an additional main modification to allocation JPA1.1 and the associated reasoned justification as follows:

New criterion:

“Undertake hydrological and ground investigations to determine the extent and quality of any peat identified in the south-western part of the site to inform the potential for restoration and the comprehensive masterplanning of the site which should ensure that the loss or deterioration of any irreplaceable habitat is avoided”.

Add paragraph to reasoned justification following the new paragraph on Minerals Safeguarding Areas:

“The Natural England/Defra ‘Peaty Soils Location (England)’ layer is published on the Natural England website with the intention of identifying the extent of peaty soils and this shows a potential area of peat in the south-western part of the site to the north of the M60 Junction 18 Simister Island Interchange. There is very limited site-specific information from Natural England/Defra on the quality of the peat within the proposed allocation. As such, there will be a need to undertake hydrological and ground investigations to fully understand the extent and quality of any peaty soils in this area of the site to inform the potential for restoration and identify any areas of irreplaceable habitat where loss or deterioration should be avoided, subsequently helping to shape the comprehensive masterplanning of the site.”

JPA27 East of Boothstown

AP149. GMCA to amend the proposed main modifications to JPA27 in GMCA12.3.2/PMM5 to include an additional criterion (along with associated reasoned justification) to read as follows (or similar):

“Undertake hydrological and ground investigations to determine the extent and quality of any peat identified in the southern part of the site to inform the potential for restoration and the comprehensive masterplanning of the site which should ensure that the loss or deterioration of any irreplaceable habitat is avoided.”

PfE Response

The PMM and the composite plan have been updated to include an additional main modification to allocation JPA27 and the associated reasoned justification as follows:

New criterion below criterion 9 of policy JPA27:

“Undertake hydrological and ground investigations to determine the extent and quality of any peat identified in the southern part of the site to inform the potential for restoration and the comprehensive masterplanning of the site which should ensure that the loss or deterioration of any irreplaceable habitat is avoided.”

Add paragraph to reasoned justification following the new paragraph on Minerals Safeguarding Areas:

“The Natural England/Defra ‘Peaty Soils Location (England)’ layer is published on the Natural England website with the intention of identifying the extent of peaty soils and this shows a potential area of peat in the southern part of the site to the north of the Bridgewater Canal. There is very limited site-specific information from Natural England/Defra on the quality of the peat within the proposed allocation. As such, there will be a need to undertake hydrological and ground investigations to fully understand the extent and quality of any peaty soils in this area of the site to inform the potential for restoration and identify any areas of irreplaceable habitat where loss or deterioration should be avoided, subsequently helping to shape the comprehensive masterplanning of the site.”

JPA28 North of Irlam Station

AP150. GMCA to prepare main modifications which delete policy JPA28 from the Plan, along with any consequential changes to other policies, reasoned justification and maps.

PfE Response

The PMM and the composite plan have been updated to include main modifications to delete allocation JPA28 (the policy, reasoned justification and picture 11.40), in its entirety. Consequential changes to other policies, reasoned justification and maps are set out in the PfE response to AP147

JPA29 Port Salford Extension

AP151. GMCA to amend the proposed main modifications to part 1 of JPA29 in GMCA12.3.2/PMM5 to read as follows (or similar):

“Be in accordance with a masterplan/framework consistent with a phasing and delivery strategy prepared in accordance with policy JP-D1. Central to the masterplan shall be the consideration of opportunities to restore habitats, strengthen ecological networks, and manage the carbon and hydrological implications of development, having regard to the presence of peat on this site.”

AP152. GMCA to replace the proposed new criterion below part 11 in GMCA12.3.2/PMM5 to read as follows (or similar):

“Make provision for biodiversity in accordance with policy JP-G9. Where appropriate and necessary, the priority for any off-site nature conservation enhancements will be

the Foxhill Glen Site of Biological Importance and ecological enhancements to remaining areas of Green Belt to the site's south-western and north-eastern boundaries."

AP153. GMCA to replace part 18 in GMCA12.3.2/PMM5 with a new criterion to read as follows (or similar):

"Undertake hydrological and ground investigations to inform the comprehensive masterplan and use of suitable construction techniques to ensure any loss or deterioration of irreplaceable habitat, and adverse impacts on the hydrology of undeveloped areas, is minimised. Where loss or deterioration is unavoidable, a suitable compensation strategy should be identified and delivered, including the potential restoration of lowland raised bog and complementary habitats either within the site and/or in other parts of Chat Moss."

AP154. GMCA to amend the proposed main modifications in PMM12.3.2/PMM5 to include the following text in the reasoned justification (or similar):

"The allocation was found sound at examination on the basis that, in principle, the public benefit arising from the development proposed would be likely to clearly outweigh the loss or deterioration of an irreplaceable habitat and that a suitable compensation strategy was capable of being delivered. The policy seeks to ensure that detailed development proposals are consistent with that conclusion."

PfE Response

The PMM and the composite plan have been updated to include the following additional main modifications to allocation JPA29.

In line with AP151, part 1 of JPA29 has been amended to read as follows:

"Be in accordance with a masterplan/framework consistent with a phasing and delivery strategy prepared in accordance with policy JP-D1. Central to the masterplan shall be the consideration of opportunities to restore habitats, strengthen ecological networks, and manage the carbon and hydrological implications of development, having regard to the presence of peat on this site."

In line with AP152, a new criterion is proposed below part 11 to read as follows:

"Make provision for biodiversity in accordance with policy JP-G9. Where appropriate and necessary, the priority for any off-site nature conservation enhancements will be the Foxhill Glen Site of Biological Importance and ecological enhancements to remaining areas of Green Belt to the site's south-western and north-eastern boundaries."

In line with AP153, part 18 is replaced with a new criterion to read as follows:

"Undertake hydrological and ground investigations to inform the comprehensive masterplan and use of suitable construction techniques to ensure any loss or deterioration of irreplaceable habitat, and adverse impacts on the hydrology of

undeveloped areas, is minimised. Where loss or deterioration is unavoidable, a suitable compensation strategy should be identified and delivered, including the potential restoration of lowland raised bog and complementary habitats either within the site and/or in other parts of Chat Moss.”

In line with AP154, the reasoned justification has been amended to include the following new paragraph above paragraph 11.266 as follows:

“The allocation was found sound at examination on the basis that, in principle, the public benefit arising from the development proposed would be likely to clearly outweigh the loss or deterioration of an irreplaceable habitat and that a suitable compensation strategy was capable of being delivered. The policy seeks to ensure that detailed development proposals are consistent with that conclusion.”

JPA30 Ashton Moss West

AP155. GMCA to amend the proposed modifications in GMCA12.3.2/PMM5 to replace the suggested new criterion on peat with the following (or similar):

“Use suitable construction techniques to ensure that any impact on the carbon storage function of deep peat is minimised.”

PfE Response

The PMM and the composite plan have been updated to replace the originally suggested new criterion on peat, in allocation JPA30, and to amend the reasoned justification paragraph 12.274, with the following wording:

New criterion in line with AP155 (second new criterion after criterion 16):

“Use suitable construction techniques to ensure that any impact on the carbon storage function of deep peat is minimised;”

In line with AP155, the reasoned justification has been amended at paragraph 12.274:

“One of the principle challenges to developing Ashton Moss West is the underlying peat overlain with a volume of placed material, alongside other geotechnical considerations. Contamination testing, gas monitoring, and ground investigation and analysis will therefore be required to produce an earthworks assessment and remediation strategy prior to development taking place.”

JPA33 New Carrington

AP156. GMCA to amend the proposed modification to part 1 of JPA33 in GMCA12.3.2/PMM5 to read as follows (or similar):

“Be in accordance with a masterplan that has been developed in consultation with the local community and approved by the local planning authority. The masterplan must include a phasing and delivery strategy as required by policy JP-D1. Central to the masterplan shall be the consideration of opportunities to restore habitats,

strengthen ecological networks, and manage the carbon and hydrological implications of development, having regard to the presence of peat on parts of the site. It should also have regard to the anticipated Hynet North West Hydrogen pipeline (as relevant). The masterplan will be prepared in partnership with key stakeholders to ensure the whole allocation is planned and delivered in a coordinated and comprehensive manner, with proportionate contributions to fund necessary infrastructure.”

AP157. GMCA to amend the proposed modifications in GMCA12.3.2/PMM5 to include a new criterion to read as follows (or similar):

“Undertake hydrological and ground investigations as necessary to inform the comprehensive masterplan and use of suitable construction techniques to ensure any loss or deterioration of irreplaceable habitat, and adverse impacts on the hydrology of undeveloped areas, is minimised. Where loss or deterioration is unavoidable, a suitable compensation strategy should be identified and delivered, including the potential restoration of lowland raised bog and complementary habitats elsewhere within the site.”

AP158. GMCA to amend the proposed main modifications in PMM12.3.2/PMM5 to include the following text in the reasoned justification (or similar):

“The allocation was found sound at examination on the basis that, in principle, the public benefit arising from the development proposed would be likely to clearly outweigh the loss or deterioration of an irreplaceable habitat and that a suitable compensation strategy was capable of being delivered. The policy seeks to ensure that detailed development proposals are consistent with that conclusion.”

PfE Response

The PMM and the composite plan have been updated to include the following additional main modifications to allocation JPA33 and the associated reasoned justification.

In line with AP156 amend Part 1 of JPA33 as follows:

“Be in accordance with a masterplan that has been developed in consultation with the local community and approved by the local planning authority. The masterplan must include a phasing and delivery strategy as required by policy JP-D1. Central to the masterplan shall be the consideration of opportunities to restore habitats, strengthen ecological networks, and manage the carbon and hydrological implications of development, having regard to the presence of peat on parts of the site. It should also have regard to the anticipated Hynet North West Hydrogen pipeline (as relevant). The masterplan will be prepared in partnership with key stakeholders to ensure the whole allocation is planned and delivered in a coordinated and comprehensive manner, with proportionate contributions to fund necessary infrastructure.”

Amend Reasoned Justification, to insert new paragraph after 11.321 as follows, which incorporates AP158:

“The masterplan will need to have regard to the presence of peat on parts of the site and identify opportunities to restore habitats as part of the development. The allocation was found sound at examination on the basis that, in principle, the public benefit arising from the development proposed would be likely to clearly outweigh the loss or deterioration of an irreplaceable habitat and that a suitable compensation strategy was capable of being delivered. The policy seeks to ensure that detailed development proposals are consistent with that conclusion.”

In line with AP157, add a new criterion after criterion 32 as follows:

“Undertake hydrological and ground investigations as necessary to inform the comprehensive masterplan and use of suitable construction techniques to ensure any loss or deterioration of irreplaceable habitat, and adverse impacts on the hydrology of undeveloped areas, is minimised. Where loss or deterioration is unavoidable, a suitable compensation strategy should be identified and delivered, including the potential restoration of lowland raised bog and complementary habitats elsewhere within the site.”

AP159. GMCA to amend the proposed main modification to part 7 in GMCA12.3.2/PMM5 to read as follows (or similar):

“Make provision for a minimum of 15% affordable housing across the allocation to be provided in accordance with local policy requirements.”

PfE Response

In line with AP159, the PMM and the composite plan have been updated to amend the proposed main modification to part 7 as follows and reasoned justification:

“Make provision for a minimum of 15% affordable housing across the allocation to be provided in accordance with local policy requirements.”

Amend reasoned justification paragraph 11.326 to read as follows:

“Trafford has an acute affordable housing need and this site offers an opportunity to deliver affordable housing on a greenfield site. Reflecting the PfE Viability Assessment, the policy requires a minimum of 15% affordable housing to be delivered across the whole allocation. To achieve this, it is possible that some parts of the allocation will need to deliver a higher proportion of affordable housing than others. This should be considered as part of the preparation of the masterplan, the delivery strategy and through individual planning applications, having regard to differing levels of viability within the site. The Council will monitor affordable housing provision across the allocation to ensure the 15% overall requirement is met. Any affordable housing provision should be delivered in accordance with the Trafford Local Plan.”