Integrated Assessment of the draft Civic Quarter Area Action Plan

January 2020

## Quality Management

Title	Draft Integrated Assessment of the Civic Quarter
	Area Action Plan
Date	January 2020
Project Code	
Client	Trafford Borough Council
Prepared by	Claire Dobinson Booth
Checked by	Martin Craddock
A (1 ' 11	
Authorised by	Jackie Palmer

### **Contents**

1	Introduction	4
2	Sustainability Appraisal / Integrated Assessment	5
3	Scoping	8
4	Approach to Integrated Assessment	. 19
5	Assessing Area Action Plan Objectives	. 21
6	Integrated Assessment Policies Methodology	. 23
7	Integrated Assessment Outcomes	. 25
8	Overview of Outcomes	. 27
9	Identifying Indicators to Monitor the Area Action Plan	. 34
10	Next Steps	. 38

#### 1 Introduction

- 1.1 The Council is preparing a Civic Quarter Masterplan document as an Area Action Plan (the AAP) to guide development and positive change in the key growth area. The AAP area comprises approximately 55 hectares at the heart of Trafford including the Trafford Town Hall, the international sporting venue Lancashire Cricket Club and the old B&Q site. The Council has identified the Civic Quarter as pivotal in the regeneration of the surrounding area, in particular the regeneration of Stretford and Old Trafford.
- 1.2 In February 2020 the Council is also consulting upon an Integrated Assessment (IA) Draft Scoping Report. The Scoping Report identifies the type, nature and extent of potential effects that should be considered in assessing the sustainability of the emerging AAP. Scoping is the first stage in the IA process.
- 1.3 This IA Report accompanies the draft AAP (Regulation 18), which will be subject to consultation in early 2020.
- 1.4 The AAP, when adopted, will form part of the Development Plan for the area alongside the Trafford Core Strategy (adopted January 2012) and the Revised Trafford Unitary Development Plan (adopted June 2006). However, these two documents will be replaced by the Trafford Local Plan once that has been adopted (expected in 2022).

### 2 Sustainability Appraisal / Integrated Assessment

- 2.1 Section 19 of the Planning and Compulsory Purchase Act 2004¹ requires Local Planning Authorities to carry out Sustainability Appraisal (SA) of each of the proposals in a plan during its preparation. Section 39 of the Act requires that at every stage, plans must be prepared "with the objective of contributing to the achievement of sustainable development". SAs incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004² (commonly referred to as the "Strategic Environmental Assessment Regulations" or "SEA Regulations"). SA covers wider social and economic effects of plans, as well as the more environmentally-focused considerations of SEA. It is common practice to cover the requirements of SEA within SA of development plans.
- 2.2 The Government states that the purpose of SA "is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives"<sup>3</sup>. It is an iterative process, which identifies and reports on the likely significant effects of the plan and the extent to which the implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined.
- 2.3 The planning system has an important role to play in promoting and enabling sustainable development, particularly through the plan making process. The legislation states that the function must be exercised with the objective of contributing to the achievement of sustainable development<sup>4</sup>. The NPPF<sup>5</sup> sets out a "presumption in favour of sustainable development", which runs through

<sup>&</sup>lt;sup>1</sup> http://www.legislation.gov.uk/ukpga/2004/5/contents

<sup>&</sup>lt;sup>2</sup> http://www.legislation.gov.uk/uksi/2004/1633/contents/made

<sup>&</sup>lt;sup>3</sup> Strategic environmental assessment and sustainability appraisal, Planning practice guidance, Ministry of Housing, Communities & Local Government, 2019 <a href="https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal">https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal</a>

<sup>&</sup>lt;sup>4</sup> Planning and Compulsory Purchase Act 2004, section 39 <a href="http://www.legislation.gov.uk/ukpga/2004/5/contents">http://www.legislation.gov.uk/ukpga/2004/5/contents</a>

National Planning Policy Framework, Ministry of Housing, Communities & Local Government, 2019 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/810197/NPPF\_Feb\_2019\_revised.pdf

both plan-making and decision-taking. This involves three overarching objectives:

- an economic objective to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 2.4 SA of the emerging AAP will be joined by an assessment of the AAP's predicted impact upon health and equality. Together this will be known as an Integrated Assessment (IA). The IA will include three separate but complementary assessments in order to inform the development of the AAP. These are:
  - SA: to assess the effects of the AAP across a range of environmental, social and economic issues.
  - Health Impact Assessment (HIA): to assess the effects of the AAP on the health and well-being of the population and its ability to access health-related facilities and services. The IA objectives have been drafted to include health considerations as part of the appraisal.
  - Equalities Impact Assessment (EqIA): to assess the effects of the AAP in terms of equalities issues, with a particular focus on disadvantaged

or excluded groups of people. EqIA helps identify where equality of opportunity can be promoted.

2.5 The EqIA follows an established process by Trafford Borough Council for assessing authority proposals. This assessment has been included in Appendix 2.

### 3 Scoping

3.1 The first step of the SA process is "scoping". NPPG<sup>6</sup> explains that the scoping stage should "set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and objectives" Five stages are advised, as set out in Table 4-1.

Stage 1: Identify other relevant policies, plans and programmes, and sustainability objectives	Identifies environmental, social and economic objectives contained in other plans, programmes and policies that are most relevant to Trafford and any other that would ensure that SEA requirements are covered.
Stage 2: Collect baseline information	Summarises or expands on some of the data from Stage 1 and considers any other relevant data available to ascertain what the current social, economic and environmental conditions are within Trafford.
Stage 3: Identify sustainability issues and problems	Sets out the key issues and problems that Trafford faces, based on the findings of stages 1 and 2.
Stage 4: Develop the sustainability appraisal framework	Places the issues into relevant themes. It then turns these themes into objectives and questions that can be used to assess the emerging development plan to ensure it considers Trafford's sustainability issues.
Stage 5: Consult on the scope of the SA report	At least the three statutory consultees Historic England, the Environment Agency and Natural England must be consulted and feedback is used to refine the SA process.

Table 4-1: Stages of SA Scoping

- 3.2 A draft Report setting out this process was produced by Capita for Trafford Borough Council and consulted upon from January 2020. The feedback received has been considered and relevant amendments have been made to the Report.
- 3.3 From this scoping exercise, 16 IA objectives were derived that were deemed appropriate indicators to test the emerging AAP proposals against to ensure

<sup>&</sup>lt;sup>6</sup> Strategic environmental assessment and sustainability appraisal, Planning practice guidance, Ministry of Housing, Communities & Local Government, 2019 <a href="https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal">https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal</a>

they were addressing the issues that the Civic Quarter and Trafford faces. They cover social, environmental and economic elements. Readers are directed to the IA Scoping Report for more information on the process. To assist in the IA assessment, each IA Objective has a set of decision-aiding questions for policy assessment and a set for development allocation assessment, as set out in Table 4-2.

Objective	1. Provide housing of an appropriate mix of sizes, types, tenures in			
	locations to meet identified needs and reduce disparity			
IA Topic	Population, Equality and	Consistency with GMSF IA	1,2	
	Housing	Objectives		
Assessment Crite	eria: Will the AAP			
Ensure an appro	priate mix of types, tenures ar	nd sizes of properties in order t	o meet	
current and proje	cted housing needs?			
Support a reducti	ion in the disparity of housing	quality across the borough?		
Ensure housing I	and is well-connected with en	nployment land, centres and gr	een space	
or co-located who	ere appropriate?			
Support improve	ments in the energy efficiency	and resilience of the housing	stock?	
Ensure the numb	er of houses meets that of de	emand by meeting affordable ho	ousing	
needs in line with	growth and income?			
Assessment Crite	eria: Will proposed developme	ent		
Ensure an appro	priate mix of types, tenures ar	nd sizes of properties in order t	o meet	
current and proje	cted housing needs?			
Support a reduct	Support a reduction in the disparity of housing quality across the area?			
Ensure housing I	and is well-connected with en	nployment land, centres and gr	een space	
or co-located who	ere appropriate?			
Support improve	Support improvements in the energy efficiency and resilience of the housing stock?			
Ensure the numb	Ensure the number of houses meets that of demand by increasing access to affordable			
housing in line with growth and income?				
Objective	2. Promote equality of oppor	rtunity and reduce levels of dep	rivation	
	and disparity			
IA Topic	Population, Equality and	Consistency with GMSF IA	4, 5, 7, 8	

A	: \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	•			
	Assessment Criteria: Will the AAP				
Ensure equality of	of opportunity and equal acce	ss to facilities / infrastructure fo	r all?		
Avoid differential	negative impacts based on 'p	protected characteristics', as de	efined in		
the Equality Act 2	2010?				
Reduce the prop	ortion of people living in depr	ivation?			
Support reduction	ns in poverty (including child	and fuel poverty), deprivation a	nd		
disparity across t	he domains of the Indices of	Multiple Deprivation?			
Foster good relat	ions between different people	e?			
Assessment Crite	eria: Will the proposed develo	pment			
Ensure differentia	al negative impacts based on	'protected characteristics', as o	defined in		
the Equality Act 2	2010 are avoided?				
Support regenera	ation in a deprived area?				
Offer affordability	and opportunity?				
Be accessible by	all members of the communi	ty?			
Foster good relat	ions between different people	e?			
Objective	3. Support improved health	and wellbeing of the population	and		
	reduce health inequalities				
IA Topic	Health	Consistency with GMSF IA	6, 7		
		Objectives			
Assessment Crite	eria: Will the AAP				
Support healthier	lifestyles and improvements	in determinants of health?			
Reduce health in	equalities within Trafford and	with the rest of England?			
Promote and imp	prove social infrastructure and	l access to community services	and		
facilities?	facilities?				
Assessment Criteria: Will the proposed development					
Be within the vicinity of, or deliver, a health centre or GP service?					
Be within the vicinity of, or deliver, play space or recreational open space?					
Be within the vicinity of, or deliver, a sports facility?					
Have the potential to affect new or existing residents through noise, dust, light or					
smell?					

Objectives

Housing

Objective	4. Ensure sustainable econo	omic growth and job creation		
IA Topic	Economy and Education	Consistency with GMSF IA	2, 8	
		Objectives		
Assessment Crite	eria: Will the AAP			
Recognise the in	creasing importance of touris	m to the economy and increas	ing	
demand for touris	st facilities?			
Support education	on and training to provide a su	uitable labour force for future gr	owth?	
Increase the vital	lity and viability of Trafford's t	own centres?		
Meet the needs f	or retail, leisure, offices and o	other main town centre uses by	allocating	
a range of suitab	le sites for main town centre	uses?		
Promote the 'eve	ning economy' within town ce	entres and identify appropriate	sites and	
opportunities?				
Support the incre	easing importance of culture a	and leisure uses within the towr	centres?	
Provide sufficient	t employment land in location	s that are well-connected and	well-	
served by infrast	ructure?			
Ensure and main	tain a sufficient labour force	(in terms of volume and skills)?		
Improve the qualification and skill base of residents in order to meet employers' needs?				
Allocate high qua	Allocate high quality and attractive sites for office, industrial and warehousing uses to			
mirror its strengths in financial business, professional services, manufacturing and				
digital?				
Retain and conso	olidate suitable existing emplo	syment sites and areas where t	there is a	
reasonable prosp	pect of these continuing to be	used for employment purpose	s?	
Focus employme	ent uses in allocated employm	nent land, such as at Trafford P	ark?	
Set out criteria th	at development for non-emp	loyment uses on employment s	ites have	
to meet?				
Set out the targe	Set out the target of level of employment land in Trafford and phasing in accordance			
with GMSF?				
Allocate suitable	Allocate suitable sites of employment land (in addition to any strategic allocations			
coming through the GMSF)?				
Identify whether	there is a need for additional	culture and tourism facilities in	the	

borough?

Assessment Criteria: Will the proposed development ...

Protect and enhance the vitality and viability of existing employment areas and/or town centres?

Support appropriate retail, leisure, cultural and/or employment opportunities?

Support economic development in locations that are easily accessible by sustainable transport?

Support economic development in locations that are well-connected and well-served by infrastructure?

Provide a variety of employment land and mixed-use development sites over the plan period to support a varied and robust economy?

Contribute to growth in tourist facilities and jobs?

Support education and training to provide a suitable labour force for future growth?

Ensure and maintain a sufficient labour force (in terms of volume and skills)?

Objective	5. Ensure that there is sufficient coverage and capacity of		
	sustainable transport and utilities to support growth and development		
IA Topic	Transport	Consistency with GMSF IA	3, 9
	Utilities	Objectives	

Assessment Criteria: Will the AAP...

Ensure that the transport network can support and enable the anticipated scale and spatial distribution of development?

Reduce the need to travel and promote efficient patterns of movement?

Promote a safe and sustainable public transport network that reduces reliance on private motor vehicles?

Champion the use of sustainable modes of transport by all throughout the borough?

Ensure infrastructure development, the business community and public transport networks are sufficiently connected, to reduce the need to travel by car?

Link to the objectives of the 2040 Transport Strategy and consider how new development can contribute to increasing capacity and supporting new infrastructure for Train routes and the Metrolink?

Improve transport connectivity, particularly to alleviate issues from travelling east to west across the Borough?

Ensure that utilities / digital infrastructure can support and enable the anticipated scale and spatial distribution of development?

Assessment Criteria: Will the proposed development ...

Be easily accessible and well served by public transport, walking and cycle routes?

Allow for improved travel connectivity?

Be connected to a transport network that can support the development alongside existing development and proposed growth?

Be within the vicinity of, or deliver, a range of facilities and services to meet residents' needs?

Be served by utilities/digital infrastructure that can support and enable the anticipated scale and spatial distribution of development?

Objective	6. Improve the accessibility of the Borough by equitable means to		
	community facilities, services and other needs		
IA Topic	Access and Community	Consistency with GMSF IA	5, 7, 8, 9
	Infrastructure	Objectives	

Assessment Criteria: Will the AAP...

Improve the availability of opportunities to residents and others to walk, cycle, horse ride and use public transport to meet their needs?

Ensure people are adequately served by healthcare and other key facilities, regardless of socio-economic status?

Ensure people obtain equitable access to affordable high-quality food shopping, and other fundamental needs such as chemists?

Ensure sufficient access to educational facilities for all children?

Promote access to, and provision of, appropriate community social infrastructure including playgrounds and sports facilities?

Assessment Criteria: Will the proposed development ...

Allow for access to primary and secondary schools?

Be within the vicinity of, or deliver, a range of facilities and services to support potential growth?

Be within the vicinity of, or deliver, appropriate community social infrastructure including playgrounds and sports facilities?

Tansport to meet their needs?  To Conserve and enhance landscape, townscape, and the character of the borough  A Topic  Landscape and Townscape  Objectives  Assessment Criteria: Will the AAP  Protect landscape character and improve the quality of open spaces and the public ealm?  Conserve and enhance townscape character, and the aesthetic quality of the built environment?  Respect, maintain and strengthen local character and distinctiveness?  Assessment Criteria: Will the proposed development				
of the borough  A Topic  Landscape and Townscape  Objectives  Assessment Criteria: Will the AAP  Protect landscape character and improve the quality of open spaces and the public ealm?  Conserve and enhance townscape character, and the aesthetic quality of the built environment?  Respect, maintain and strengthen local character and distinctiveness?  Assessment Criteria: Will the proposed development				
A Topic Landscape and Consistency with GMSF IA 16 Townscape Objectives  Assessment Criteria: Will the AAP  Protect landscape character and improve the quality of open spaces and the public ealm?  Conserve and enhance townscape character, and the aesthetic quality of the built environment?  Respect, maintain and strengthen local character and distinctiveness?  Assessment Criteria: Will the proposed development				
Townscape  Assessment Criteria: Will the AAP  Protect landscape character and improve the quality of open spaces and the public ealm?  Conserve and enhance townscape character, and the aesthetic quality of the built environment?  Respect, maintain and strengthen local character and distinctiveness?  Assessment Criteria: Will the proposed development				
Assessment Criteria: Will the AAP  Protect landscape character and improve the quality of open spaces and the public ealm?  Conserve and enhance townscape character, and the aesthetic quality of the built environment?  Respect, maintain and strengthen local character and distinctiveness?  Assessment Criteria: Will the proposed development				
Protect landscape character and improve the quality of open spaces and the public ealm? Conserve and enhance townscape character, and the aesthetic quality of the built environment? Respect, maintain and strengthen local character and distinctiveness? Assessment Criteria: Will the proposed development				
ealm? Conserve and enhance townscape character, and the aesthetic quality of the built environment? Respect, maintain and strengthen local character and distinctiveness? Assessment Criteria: Will the proposed development				
Conserve and enhance townscape character, and the aesthetic quality of the built environment? Respect, maintain and strengthen local character and distinctiveness? Assessment Criteria: Will the proposed development				
Respect, maintain and strengthen local character and distinctiveness? Assessment Criteria: Will the proposed development				
Respect, maintain and strengthen local character and distinctiveness?  Assessment Criteria: Will the proposed development				
Assessment Criteria: Will the proposed development				
lave scope to develop or improve the green infrastructure network?				
Protect landscape character and improve the quality of open spaces and the public				
ealm?				
Conserve and enhance townscape character, and the aesthetic quality of the built				
environment?				
Respect, maintain and strengthen local character and distinctiveness?				
Dbjective 8. Conserve and enhance the historic environment				
A Topic Cultural Heritage Consistency with GMSF IA 16				
Objectives				
Assessment Criteria: Will the AAP				
Conserve and enhance the historic environment, heritage assets and their setting?				
Assessment Criteria: Will the proposed development				
Have the potential to preserve or enhance the character, appearance or special				
interest of heritage assets or their settings?				
Objective 9. Improve air quality				
A Topic Air Quality Consistency with GMSF IA 10				
Objectives				
Assessment Criteria: Will the AAP				

Improve air quali	ty within the borough, particul	arly in Air Quality Management	Areas	
(AQMAs)?				
Assessment Crite	eria: Will the proposed develo	pment allocation		
Be within or adja	cent to an AQMA?			
Have the potentia	al to have an adverse effect o	n air quality in the area?		
Objective	10. To conserve and protect	land and soils, whilst reducing	land	
	contamination			
IA Topic	Land, Geology, and Soils Consistency with GMSF IA 17			
		Objectives		
Assessment Crite	eria: Will the AAP			
Support the deve	lopment of previously develo	ped land and other sustainable		
locations?				
Conserve and pro	otect geodiversity?			
Protect the best a	and most versatile agricultura	I land / soil resources from inap	propriate	
development?				
Encourage the re	edevelopment of derelict land,	properties, buildings and infras	structure,	
returning them to appropriate uses?				
Support reductions in land contamination through the remediation and reuse of				
previously develo	pped land?			
Assessment Crite	eria: Will the proposed develo	pment		
Bring brownfield	land or derelict buildings and	infrastructure back into benefic	ial use?	
Avoid potential in	crease in levels of land conta	mination?		
Avoid loss of bes	t and most versatile agricultu	ral land (Grade 1,2 or 3a)?		
Conserve and pro	Conserve and protect geodiversity?			
Objective	11. Protect and improve the	quality and availability of water		
	resources			
IA Topic	Water Resources	Consistency with GMSF IA	14	
		Objectives		
Assessment Crite	Assessment Criteria: Will the AAP			
Encourage compliance with the Water Framework Directive?				
Promote manage	ement practices that will prote	ct water features from pollution	and,	

where possible, create a net benefit by improving water quality?

Avoid consuming greater volumes of water resources than are available to maintain a healthy environment?

Assessment Criteria: Will the proposed development ...

Avoid consuming greater volumes of water resources than are available to maintain a healthy environment?

Be near a suitable watercourse or water body in order to assist with drainage issues?

Be affected by any known drainage constraints?

Avoid risk to the quality of any watercourse or water body?

Objective	12. Conserve and enhance biodiversity and promote nature		
	conservation		
IA Topic	Biodiversity	Consistency with GMSF IA	11
		Objectives	

Assessment Criteria: Will the AAP...

Provide opportunities to enhance new and existing wildlife and geological sites and facilitate biodiversity net gain?

Avoid damage to, or destruction of, designated wildlife sites, habitats and species and protected and unique geological features?

Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not unnecessarily prejudiced?

Support and enhance existing multifunctional green infrastructure and / or contribute towards the creation of new multifunctional green infrastructure?

Ensure access to green infrastructure providing opportunities for recreation, amenity and tranquillity?

Assessment Criteria: Will the proposed development ...

Avoid potential damage to designated wildlife sites and geological sites?

Avoid fragmentation of habitats?

Provide opportunities to enhance new and existing wildlife and geological sites?

Be within access to wildlife sites providing opportunities for recreation, amenity and tranquillity?

Objective 13. Promote sustainable consumption of resources and support the

	implementation of the waste hierarchy			
IA Topic	Materials and Waste	Consistency with GMSF IA	18	
		Objectives		
Assessment Crite	eria: Will the AAP			
Support the susta	ainable use of physical resour	rces?		
Promote moveme	ent up the waste hierarchy?			
Promote reduced	I waste generation rates?			
Assessment Crite	eria: Will the proposed develo	pment		
Promote moveme	ent up the waste hierarchy?			
Help to minimise	waste generation?			
Be within or impa	nct on a mineral safeguarding	area?		
Be within or impa	act on a mineral area of searc	h?		
Objective	14. Reduce per capita greer	nhouse gas emissions		
IA Topic	Climate Change and	Consistency with GMSF IA	15	
	Associated Risks	Objectives		
Assessment Crite	eria: Will the AAP			
Encourage the gr	rowth of businesses offering l	ow carbon goods and services	that	
contribute to emis	ssions reductions, create emp	ployment opportunities and eco	nomic	
growth?				
Improve the ener	gy efficiency of buildings and	encourage low carbon and de	centralised	
forms of energy of	generation that will be key to i	reducing greenhouse gas emis	sions?	
Encourage reduc	tion in energy use and increa	sed energy efficiency?		
Encourage the de	evelopment of low carbon and	d renewable energy facilities, in	cluding as	
part of convention	part of conventional developments?			
Promote a proact	tive reduction in direct and ind	direct greenhouse gas emission	ns emitted	
across GM?				
Assessment Criteria: Will the proposed development allocation				
Support the grow	Support the growth of the low carbon goods and services sector?			
Support a reducti	Support a reduction in energy use and increased energy efficiency?			
Help to minimise emissions of greenhouse gases?				
Promote low and	zero carbon technologies an	d renewable sources?		

Objective	15. Reduce the consequence	e of flooding						
IA Topic	Climate Change and	Consistency with GMSF IA	13					
	Associated Risks	Objectives						
Assessment Crite	Assessment Criteria: Will the AAP							
Restrict the deve	lopment of property in areas	of flood risk?						
Ensure adequate	measures are in place to ma	nage existing flood risk?						
Ensure that deve	lopment does not increase flo	ood risk due to increased run-o	ff rates?					
Ensure developm	nent is appropriately future pro	oof to accommodate future leve	els of flood					
risk including fror	n climate change?							
Assessment Crite	eria: Will the proposed develo	pment						
Avoid developme	ent in an area at risk of floodin	g (is it partly or wholly situated	in Flood					
Zone 3 or 2 or at	risk from Surface Water Floo	ding)?						
Allow for adequate	te measures to manage exist	ing flood risk?						
Increase flood ris	k in this location or elsewhere	e?						
Be appropriately	future proofed to accommoda	ate future levels of flood risk inc	luding					
from climate char	nge?							
Objective	16. Ensure communities, de	velopments and infrastructure	are					
	resilient to the other effects	of expected climate change						
IA Topic	Climate Change and	Consistency with GMSF IA	12					
	Associated Risks	Objectives						
Assessment Crite	eria: Will the AAP							
Ensure that communities, existing and new developments and infrastructure systems								
are resilient to the predicted effects of climate change across the borough, (e.g.								
temperature extremes, high winds, increased rain fall)?								
Assessment Crite	Assessment Criteria: Will the proposed development							
Ensure that comr	munities, existing and new de	velopments and infrastructure	systems					
are resilient to the	e predicted effects of climate	change across the area, (e.g.						
temperature extre	temperature extremes, high winds, increased rain fall)?							

Table 4-2: IA Objectives and Assessment Criteria

### 4 Approach to Integrated Assessment

4.1 The suite of 16 IA Objectives will be to be used to assess the draft AAP using a matrix where the AAP proposals would be "pitched" against the IA Objectives and an outcome noted using the colours and symbols in Table 5-1.

Symbol	Definition
++	Major positive effect
+	Positive effect
n	Neutral effect
-	Minor negative effect
	Major negative effect
u	Unknown at this stage

Table 5-1: Assessment scoring system

4.2 During the assessment, a number of factors will have to be considered to determine whether a predicted effect has the potential to be significant. These factors are listed in Table 5-2 below.

Issues for consideration	Details
Type of Effect	<ul> <li>Positive or Negative</li> <li>Direct or Indirect</li> <li>Cumulative, secondary, synergistic</li> <li>Temporary or Permanent</li> </ul>
Magnitude and Spatial Extent	<ul> <li>Where will it impact? Will it be within the AAP boundary or outside it?</li> <li>Will it cause trans-boundary issues and impact on adjacent areas or regionally (GM) or nationally?</li> <li>What is the geographical area and size of population likely to be affected?</li> </ul>
Who it will affect, key groups or communities to be considered include:	<ul> <li>Old and young people</li> <li>Socio economic groups (variable)</li> <li>Women and men</li> <li>Asylum seekers and refugees</li> <li>Black and ethnic minority people (including Gypsy and Traveller communities)</li> <li>Disabled people</li> <li>Faith communities</li> <li>Lesbian, gay, bisexual and transgender people</li> </ul>
Vulnerability of Receptor	<ul> <li>Sensitivity of receptors</li> <li>Special natural characteristics/areas or cultural heritage</li> <li>Protected areas</li> <li>Relative importance of the site, whether it is a nationally or</li> </ul>

Issues for consideration	Details
	internationally important feature or of local significance
Timing and Duration of the Effect	<ul> <li>Short-term: 0-4 years</li> <li>Medium-term: 5-9 years</li> <li>Long-term: 10+ years</li> </ul>

Table 5-2: Factors to consider in assessment

4.3 The matrix would allow for consideration of the above factors, and clearly set out assessment outcomes. Suggested mitigation or enhancements would also be noted with the matrix. The proposed matrix is illustrated below.

<b>AAP Policy</b>	AAP Policy / Proposal							
IA	Short-	Medium-	Long-	Supporting comments	Mitigation			
Objective	term	term	term					
	impact	impact	impact					
1	+	+	+					
2	-	-						
Etc								

- 4.4 As noted within this Report, HIA and EqIA can be integrated within an IA. To aid this, specific IA Objectives have been prepared that would allow for assessment of AAP proposals upon health (IA Objective 3) and equality (IA Objective 2).
- 4.5 A separate EqIA is provided in Appendix 2.

### 5 Assessing Area Action Plan Objectives

- 5.1 The draft AAP contains eight strategic objectives that set out the key components required to meet the overarching vision of the AAP. They are as follows:
  - 1. Creation of High-Quality Public Realm
  - 2. Supporting Sustainability
  - 3. Consolidation and Rationalisation of Car Parking
  - 4. Housing a Growing Community
  - 5. Enhancement of Heritage Assets
  - 6. Supporting Economic Growth
  - 7. Improved Permeability and Connectivity
  - 8. Creation of Defining and Distinctive Neighbourhoods
- 5.2 Whilst these strategic objectives are expressed in more detail through the AAP's proposed policies, it is beneficial to assess them at this stage to ensure there are no significant adverse effects envisaged from their implementation. As the strategic objectives will be assessed in full by virtue of assessing the AAP's proposed policies, it is appropriate to undertake a less in-depth assessment of the strategic objectives themselves. The strategic objectives have therefore been tested against each of the IA Objectives in the matrix below, using the following scoring approach.

AAP		IA Objectives														
Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	n	+	++	+	++	n	++	+	n	n	n	n	n	n	n	n
2	n	n	n	n	n	n	n	n	n	n	n	n	n	++	n	++
3	n	n	n	n	n	n	++	n	n	n	n	n	n	n	n	n
4	++	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n
5	n	n	n	n	n	n	++	++	n	n	n	n	n	n	n	n

6	n	+	n	++	n	n	n	n	n	n	n	n	n	n	n	n
7	n	n	n	n	++	n	+	n	n	n	n	n	n	n	n	n
8	n	n	n	+	n	n	++	n	n	n	n	n	n	n	n	n

5.3 The matrix did not identify any clear conflicts between the IA objectives and the strategic objectives. However, there are several occasions where the outcome is irresolute. In those cases, there is the potential for negative, positive or neutral effects, or a combination. There is confidence that the draft Area Action Plan in combination with the Core Strategy and emerging Local Plan contains sufficient policy coverage to avoid or mitigate any negative effects.

### 6 Integrated Assessment Policies Methodology

The methodology for undertaking the IA is derived from that used for the integrated appraisal of the emerging Local Plan. The proposed policies have been assessed within a matrix where the policy or allocation is "pitched" against the 16 IA Objectives and an outcome noted using the colours and symbols below. The decision-aiding questions set out under 4.3 were used to reach an outcome.

Symbol	Definition
++	Significantly positive effect
+	Positive effect
n	Neutral effect
-	Minor negative effect
	Significantly negative effect
u	Unknown at this stage

- 6.2 The matrix also considers the short, medium and long-term effects. A commentary is provided on the likely significant effects of implementing the policy or delivering the allocation, along with a discussion of the likely probability and duration of effects. Suggested mitigation or enhancements are also set out.
- 6.3 The SEA Directive requires that any difficulties in carrying out the IA are identified. The following limitations in knowledge have been identified in carrying out the IA:
  - Evolving evidence base evidence is constantly updated which can render assessments out of date, although this is unlikely to be to such an extent that it would materially affect outcomes.
  - Climate change assessing long-term climate change is difficult and therefore its potential effects upon Trafford and the Civic Quarter can be uncertain.
  - Heritage Assets it is unclear at this stage what impact the AAP would have upon heritage assets. Whilst designated heritage assets within the vicinity have been identified and the area will generally be

improved, the impact upon their significance is at this stage unclear and would only be fully understood at detailed design stage. However, it is assumed that investigation will take place and the significance of any heritage assets will be protected and enhanced through the planning process.

### 7 Integrated Assessment Outcomes

7.1 The full assessments for proposed policies are set out at Appendix 1, a summary of the outcomes is provided below.

#### **Spatial Vision**

The AAP sets out a strategic Vision for the area to 2037 and beyond. It talks about creating a new mixed-use neighbourhood with high quality design, green infrastructure, and sustainable transport that helps the area create its own distinct identity.

As expected from such a positively worded vision the impact on the IA objectives is broadly positive. However, there are two areas of concern. Whilst the Vision talks about "maximising existing opportunities" it fails to mention the heritage assets which are discussed throughout the report. More importantly there is no mention of reducing the levels of deprivation in the area.

#### Policy CQ1: Civic Quarter Regeneration

The first policy in the AAP is a broad policy to ensure that all new development complies with, and does not prejudice, the delivery of the AAP. Therefore, the appraisal of this policy covers the entire AAP.

The appraisal, in the most part, is positive except for the impact the AAP would have on IA Objective 2: "Promote equality of opportunity and reduce levels of deprivation and disparity". Whilst the initial chapters of the AAP mention the low levels of deprivation in the area there is no mention in the document how the policies or proposals within the AAP might remedy this. Based on the information available it is unclear whether the AAP will have a positive or negative impact on reducing disparity.

#### Policy CQ2: Housing

The housing policy will deliver 4,000 homes over the plan period. The homes will be a mix of size, tenure and type and be expected to accord with the other policies within the Plan.

The delivery of a mix of homes will have positive social and economic impacts. There is the opportunity for environmental negative impacts, particularly the impact on the heritage assets in the area. Until further detail of development is known it is difficult to judge what the impact will be.

#### Policy CQ3: Mixed Use Communities

Whilst this policy encourages a mix of uses in the Civic Quarter it does not insist on any of these. This reduces an immediate positive impact of this policy as it would take some

time for such uses to come forward as the new communities become more established. The policy could be revised to require infrastructure alongside new housing development.

#### Policy CQ4: Sustainability and Climate Change

The policy requires development within the AAP to achieve a number of environmental criteria that promote high levels of energy efficiency and environmental sustainability. Consequently, the policy has a positive effect on the environmental IA objectives and a neutral or positive impact on the social and economic objectives.

#### Policy CQ5: Conservation and Heritage

The protection and enhancement of the historic environment would not have any negative effects.

#### Policy CQ6: High Quality Urban Design

The policy's approach to securing high quality design is in accordance with the NPPF. Promoting and securing high quality design has been assessed as a highly positive approach against some objectives. Whilst the policy scores negatively against objectives to improve energy efficiency and managing flood risk, when the AAP is taken as a whole, other policies balance this negative impact.

#### Policy CQ7: Public Realm Principles

Improving the public realm in the Civic Quarter will have no negative sustainability impacts. The approach will have a positive impact on sustainable walking routes, green infrastructure and water management.

#### Policy CQ8: Wellbeing Route – Talbot Road

The precise wording for CQ8 has not been provided but the overall nature of the proposal has been assessed with an overall range of positive likely effects, particularly in relation to promotion of sustainable forms of travel and the local environment.

#### Policy CQ9: Processional Route

This policy to retain and enhance a processional route through the area has some very strong positive impacts on the social, environmental and economic objectives within the IA. The policy will encourage walking, improve the image of the area and provide environmental enhancements.

#### Policy CQ10: Movement and Car Parking Strategy

This policy's impact is broadly neutral as although rationalising parking will bring positive impacts to spaces it unlikely to deter car use

#### 8 Overview of Outcomes

#### General

- 8.1 Policies tend to "score" well when assessed against the IA objectives. The unmitigated conclusions can be neutral or even negative at times but suggested mitigation measures tend to improve this outcome. It is usually the case that the suggested mitigation is mandatory as part of the planning process and therefore will be implemented. For example, flood mitigation and high standards of design are often cited as mitigation measures that should be pursued; these are mandatory elements of development as set out in NPPF, Trafford's Core Strategy and in the draft Local Plan.
- 8.2 The AAP has been prepared in accordance with the NPPF and both the current Core Strategy and emerging Trafford Local Plan; there is generally no reasonable alternative policy approach.
- 8.3 The outcomes of the IA assessments are very important in providing, in a transparent manner, an understanding of the potential sustainability of proposals, policies and allocations, and the degree to which the effects of the AAP can effectively be mitigated. However, it is important to understand that the IA itself cannot singularly determine a particular direction the AAP must take. The AAP fits into a hierarchy of planning documents, and is therefore influenced by national, regional and local planning policy that has also been subject, in most cases, to some form of sustainability appraisal. In addition, the AAP is guided by a suite of evidence that sets out and considers matters such as the aspirational objectives of the Council, balanced against the realism and viability of the AAP being delivered.

#### How does the AAP assist in the objective to provide a mix of housing?

8.4 The AAP aims to deliver 4,000 new homes within the AAP boundary. It is looking to deliver a mix of housing appropriate to the area, including different tenures and specialist housing such as care homes and student housing.

- 8.5 The environmental proposals within the AAP seek to improve the image of the area and should help attract new development to the area.
- 8.6 There are some policies within the AAP that will place additional requirements on housing, such as being carbon neutral. Whilst this could affect the viability of some schemes, it is not a major conflict and not itself a reason to remove these policies. It is the role of the planning application process to balance the policies where there may be a viability issue.
- 8.7 It is considered that cumulatively, the AAP's policies work well together to provide a mix of housing to meet identified housing need, which would also have a positive effect at a local and regional level addressing the wider housing market area.

# How does the AAP promote equality of opportunity and reduce levels of deprivation and disparity?

- 8.8 The overall strategy of the AAP aims to improve the image of the area and encourage new development. The introductory chapters discuss the high levels of deprivation in the area at present, but the document is unclear how the policies and proposals will provide for equal opportunities for existing residents. The AAP aims to bring new employment and a new community. Whilst it is likely that this will improve levels of employment in the area and reduce deprivation it is possible that existing residents will be precluded from the new employment and homes.
- 8.9 It will be important to ensure new development look outwards and the edges of the AAP area and that the improved routes also support connectivity beyond the AAP boundaries. Policy CQ 2 of the AAP requires a mix of housing to meet the needs of the area. This should reduce the possibility of a new community disconnected from the residents around.

# How does the AAP support improved health and wellbeing of the population and reduce health inequalities?

8.10 The vision, and subsequent policies for the Civic Quarter includes reducing the visual impact of car parking, improving routes through the site, increasing green infrastructure and improving air quality. Whilst the AAP does not specifically allocated land for health facilities it is highly compatible with this objective by encouraging sustainable forms of transport and encouraging people to get out and about using the new routes.

#### Will the AAP ensure sustainable economic growth and job creation?

- 8.11 One of the main aims of the AAP is to build on current opportunities and promote economic growth in the area. This will have a strong positive impact on this objective that would be felt across the Civic Quarter and wider to Trafford and the region. Whilst on its own this aim could have negative environmental impacts, other policies in the AAP to promote carbon neutral development will mitigate any potential negative impacts.
- 8.12 Overall, the policies and proposals of the Area Action Plan are highly compatible with this objective and are likely to give rise to a widespread positive impact. In the long term, the Plan will create and sustain high quality employment opportunities and a strong tourism sector.

# Ensure that there is sufficient coverage and capacity of sustainable transport and utilities to support growth and development

- 8.13 The AAP's spatial strategy is a highly positive approach with regards to this IA Objective. The AAP contains policy to improve connectivity through and beyond the AAP boundaries. With two light rail stations on the AAP boundary the proposals to improve routes through the area will have a positive impact on this objective.
- 8.14 At present the private car has a substantial impact upon the area with many surface car parks across the Civic Quarter and busy roads. The policies to

encourage sustainable links and rationalise the car parking will encourage more people to choose sustainable options, however, this will take some time.

# Will the AAP improve accessibility, by equitable means, to community facilities, services and other needs?

- 8.15 The AAP encourages a mixed-use community, with policy CQ3 in particular encouraging a number of uses, including services and facilities. However, the AAP does not require these facilities so it would be expected that it would take time for any facilities to come forward within the area, only doing so when an established community would be in place.
- 8.16 However, over the long term, this AAP policy along with others that look to improve accessibility through the area, it is likely that there will be a positive impact in improving accessibility to such facilities.

# How does the AAP assist in the objective to conserve and enhance landscape, townscape, and the character of the area and conserve and enhance the historic environment?

- 8.17 The Civic Quarter has a mixed character and townscape. The area is dominated by car parking and large units that don't connect to each other nor reflect the area's heritage. The AAP seeks to regenerate the area and contains a number of design policies to respect the existing character but also enhance with new buildings and spaces.
- 8.18 Nevertheless, any development has the potential to impact upon the built environment, positively, negatively or neutrally. This would be determined at the detailed design stage and managed through the development management process. The AAP includes positive policies on design, townscape and the historic environment, which aim to avoid negative effects and promote positive effects. The area-based proposals also have site-specific design guidelines that include the requirement for high quality design, hard and soft landscaping schemes, and consideration for nearby heritage assets.

#### Does the AAP improve air quality?

- 8.19 Given that the AAP provides for an increase in local population and growth in employment, there is the potential for a wider national impact in terms of the generation of pollution and greenhouse gas emissions resulting from increased traffic movements which will have a negative impact on air quality.
- 8.20 However, the wider strategy of focusing development in a sustainable location, such as the Civic Quarter, close to public transport links will minimise the need to travel. The AAP contains a proactive strategy for improving transport and access, including the provision of cycle and walking routes. Policy CQ4 requires development proposals to demonstrate a positive contribution to air quality, promote the use of sustainable transport modes and reduce the reliance on vehicle use.
- 8.21 Overall, it is considered the proposals within the AAP could have a cumulative negative impact on this objective. Whilst the Plan contains many ways in which to lessen, avoid or mitigate negative effects, an increase in pollution is an inevitability of growth. Policies must be well implemented, monitored and mitigated if required to keep negative impacts as low as possible.

# Will the AAP conserve and protect land and soils, whilst reducing land contamination?

- 8.22 The AAP focuses development on brownfield sites within the urban core of Manchester which reduces the need for development on edge of settlement greenfield sites and supports the IA Objective to conserve and protect land and soils.
- 8.23 Policies and proposals are required to incorporate sustainable drainage which will reduce contamination but generally the AAP will have little impact on reducing land contamination across the Civic Quarter and Trafford.

# Will the AAP protect and improve the quality and availability of water resources?

- 8.24 It is not expected the AAP will have a significant impact on the availability of water resources. However, any development has the potential to contaminate and negatively impact on water quality and availability.
- 8.25 Any negative impact can be mitigated with the uses of water efficiency and sustainable drainage solutions as required by policy CQ4 of the AAP. This in combination with national planning policy should be effective in achieving positive impacts against this IA objective.

# Does the AAP conserve and enhance biodiversity and promote nature conservation?

- 8.26 The Civic Quarter is not an area particularly rich in ecology but there are several elements of green infrastructure, especially along Talbot Road and Metrolink line and around the Town Hall. This includes several mature street trees along Talbot Road.
- 8.27 The AAP sets out a positive approach to increasing green infrastructure and biodiversity in the area and by focusing development in this urban area away from natural habitats the Plan will have a very positive impact on this IA objective.

# Does the AAP promote sustainable consumption of resources and support the implementation of the waste hierarchy?

8.28 The provision of around 4,000 dwellings in this area would be likely to have a negative effect on waste generated, both in construction and in use. At present, there is nothing within the AAP policies to support sustainable waste management systems or to support the use of recycled materials in development.

Will the AAP help to reduce per capita greenhouse gas emissions?

- 8.29 The location of the AAP indirectly, positively impacts reducing greenhouse emissions due to the proposed location of development, reducing the need for travel, and the approach to delivering sustainable modes of transport. Policy CQ4: Sustainability and Climate Change requires development to demonstrate an actionable zero carbon plan and demonstrate a positive contribution to air quality.
- 8.30 Without this policy the AAP's proposals relating to housing growth, employment and leisure are likely to increase pollution including CO2 emissions, but it is expected that through implementation of policy CQ4, this negative impact would be reduced so that it would not be significant.

#### Will the AAP reduce the consequence of flooding?

- 8.31 Whilst Trafford does have several areas that suffer from flood risk, the Civic Quarter is largely free of areas of flood risk. However, risk cannot be completely eliminated, and development growth, as proposed in the AAP, is likely to increase water run-off.
- 8.32 The AAP does not include a policy to reduce flooding, however, it does require all development to incorporate sustainable drainage solutions. This allows for development to incorporate avoidance and mitigation measures to avoid negative effects that would have a local scope.

# Does the AAP help to ensure communities, developments and infrastructure are resilient to the other effects of expected climate change?

8.33 The AAP is clear that high quality design should be pursued and requires that development is delivered in accordance with policy CQ4, which deals specifically with sustainable design measures. It is not clear how exactly development would be delivered to be resilient to climate change effects and may require further exploration at a site-specific level. However, the AAP provides a sound basis upon which explore those issues. A neutral effect is envisaged at this stage.

### 9 Identifying Indicators to Monitor the Area Action Plan

- 9.1 The SEA Directive requires the significant environmental effects of implementing the plan or programme to be monitored in order to identify unforeseen adverse effects and to be able to undertake remedial action.
- 9.2 The significant effects indicators should be developed to ensure a robust assessment of policy implementation. The IA monitoring will cover significant social, economic and environmental effects.
- 9.3 Monitoring should assess whether:
  - the assessment's predictions of sustainability effects are accurate;
  - the AAP is contributing to the achievement of the desired IA objectives and targets;
  - if mitigation measures are performing as well as expected;
  - if there are any adverse effects and whether these are within acceptable limits or remedial action is desirable.
- 9.4 The responsibilities for carrying out the monitoring programme lie with the local planning authority. The Council already has a comprehensive monitoring framework and publishes monitoring reports on a regular basis.
- 9.5 Local planning authorities are responsible for responding to any significant negative environmental effects of implementation of their plans. Similarly, local planning authorities are responsible for identifying and responding to unforeseen adverse effects of the implementation of the AAP, with help from the other bodies subject to the Duty to Co-operate.

IA Objective	Proposed monitoring to measure effects of the Area Action Plan				
	Proposed indicator	Target			

IA Objective	Proposed monitoring to measure effects of the Area Action Plan						
	Proposed indicator	Target					
1. Provide housing of an appropriate mix of sizes, types, tenures in	Annual housing delivery	<ul> <li>Deliver sufficient homes each year to achieve 4,000 over the lifetime of the AAP.</li> </ul>					
locations to meet identified needs and reduce disparity	Affordable housing	Deliver sufficient homes on sites of 10 dwellings or more and collect required amount of commuted sums from smaller developments of 2-9 dwellings to meet identified, viably secured affordable housing needs within the Core Strategy and emerging Local Plan.					
2. Promote equality of opportunity and reduce levels of	Indices of Deprivation	Improvement of scores in Gorse Hill and Longford wards.					
deprivation and disparity	Jobs growth	<ul> <li>Reduction in number of universal credit claimants in Gorse Hill and Longford wards.</li> </ul>					
3. Support improved health and wellbeing of the population and reduce health inequalities	Improvements to health	Access to essential services and facilities					
4. Ensure sustainable economic growth and job creation	Job creation	<ul> <li>Reduction in number of universal credit claimants.</li> <li>Number of jobs created.</li> </ul>					
5. Ensure that there is sufficient coverage and capacity of	Transport and Accessibility.	Improve transport options for cycling and walking.					
sustainable transport and utilities to support growth and development	Public Transport Accessibility	Number of bus passenger journeys to and out of the area					
6. Improve the accessibility of the Borough by	Transport and Accessibility.	<ul> <li>Improve transport options for cycling and walking.</li> </ul>					
equitable means to community facilities, services and other needs	Public Transport Accessibility	Number of bus passenger journeys to and out of the area					

IA Objective	Proposed mon Plan	itoring to measure effects of the Area Action
	Proposed indicator	Target
7. Conserve and enhance landscape, townscape, and the character of the Borough	Design	High quality standard of design is required in planning. No development permitted contrary to design advice.
8. Conserve and enhance the	Heritage at Risk	Zero assets 'at risk'
historic environment	Design	High quality standard of design is required in planning.
9. Improve air quality	Air Quality	<ul><li>Fewer AQMAs in Trafford</li><li>Reduction in NO2</li></ul>
10. To conserve and protect land and soils, whilst reducing land contamination	Contamination	No development permitted where relevant evidence indicates unacceptable exposure to contamination.
11. Protect and improve the quality and availability of water resources	Drainage	No planning applications approved contrary to advice of the Lead Local Flood Authority.
12. Conserve and enhance biodiversity and	Biodiversity	<ul> <li>No development resulting in harm to designated sites.</li> <li>Secure net increase in biodiversity.</li> </ul>
promote nature conservation	Green Infrastructure Network	Net increase in green infrastructure (including street trees)
13. Promote sustainable consumption of resources and support the implementation of the waste hierarchy	Waste	% of household and commercial waste which is recycled and composted
14. Reduce per capita greenhouse	Carbon	Number of proposals including an actionable zero carbon plan
gas emissions	Rationalisation of car parking	An overall reduction in the number of parking spaces
	Transport and Accessibility.	Improve transport options for cycling and walking.

IA Objective	Proposed monitoring to measure effects of the Area Action Plan					
	Proposed indicator	Target				
		Average distance travelled to work				
15. Reduce the consequence of flooding	Flood Risk	No planning applications granted contrary to advice of Environment Agency on flooding grounds.				
	Sustainable drainage and water quality	No planning applications approved contrary to advice of the Lead Local Flood Authority.				
16. Ensure communities, developments and infrastructure are resilient to the other effects of expected climate change	Flood Risk.	No planning applications granted contrary to advice of Environment Agency on flooding grounds.				

### 10 Next Steps

10.1 This Integrated Assessment assesses the policies within the draft Area Action Plan. The process of assessing the policies is largely complete at this stage but it may be necessary to assess any further changes to the final plan if these are proposed through the consultation period and eventually during an Examination.