

# UPDATED INTEGRATED ASSESSMENT OF THE CIVIC QUARTER AREA ACTION PLAN

# **REGULATION 19 PUBLICATION DRAFT**

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#### 1.0 INTRODUCTION

#### **Area Action Plan Overview**

- 1.1 The Council is preparing the Civic Quarter Area Action Plan (CQ AAP) to guide development and positive change in this key growth location. The AAP area comprises approximately 55 hectares at the heart of Trafford including the Trafford Town Hall, the international sporting venue of 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 Stretford and Old Trafford.
- 1.2 The CQ AAP is intended to provide clarity and increase certainty about how opportunities for growth and investment can be realised. It establishes a vision, masterplan and strategy for the area's revitalisation over the next 15 (plus) years, to 2037, to create Trafford's newest, greenest and most vibrant neighbourhood for local residents, businesses and visitors.
- 1.3 Once adopted the CQ AAP will form part of the overall Trafford Development Plan alongside the Trafford Core Strategy, adopted in January 2012 and the remaining "Saved" policies of the Revised Trafford Unitary Development Plan (UDP), adopted in June 2006. The development plan also includes the joint Greater Manchester Waste and Minerals plans and any adopted neighbourhood plans such as the Altrincham Neighbourhood Business Plan.
- 1.4 The emerging new Trafford Local Plan will supersede the Trafford Core Strategy, adopted in January 2012 and the remaining 'Saved' policies of the Revised Trafford Unitary Development Plan (UDP), adopted in June 2006. These existing Development Plan documents are becoming increasingly out of date. Once adopted, the Greater Manchester Spatial Framework will also form part of the Trafford Development Plan.

### **Integrated Assessment Overview**

- 1.5 An Integrated Assessment (IA) is an integral part of the plan-making process for the CQ AAP. Its purpose is to assess the impacts of the emerging plan on social, economic, environmental, health and equality objectives.
- 1.6 The Council completed consultation on the Consultation Draft CQ AAP (Regulation 18 version) between 5 February and 9 April 2020. Alongside its preparation, an IA document was also produced which included three separate but complementary assessments in order to inform the development of the AAP. The IA document was informed by a draft scoping report which set out the proposed scope, approach, and method of the IA process. The IA document and the draft scoping report were subject to consultation in parallel with the Regulation 18 CQ AAP.
- 1.7 The Council is now preparing a Regulation 19 (Publication) version of the CQ AAP. Consultation on this next stage document, due in early 2021, will take place alongside an <u>updated IA</u> which is contained in this report. The updated IA responds to the outcome of the earlier IA exercise and the recommendations that it made to the CQ AAP's vision, strategic objectives and its policies. The updated IA also tests a new CQ AAP policy (concerning 'Infrastructure and Obligations') which has been put forward at this Regulation 19 stage, whilst also reflecting on other recent adjustments to the AAP that have been made.
- 1.8 It should be noted that, when comparing the Regulation 18 and Regulation 19 versions of the CQ AAP, the overarching strategy for achieving the regeneration of the Civic Quarter is unchanged. There has been some adjustment to specific objectives and to policy wording as well as the incorporation of the new policy. It is also significant that the IA process concluded satisfactorily in its assessment of the Regulation 18 document, with some areas for improvement identified but nothing which required a material change in policy direction. The effect is that the scope of this document is a further refinement of the IA for the

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CQ AAP in acknowledging that it is a wholly iterative process. This updated IA should therefore be read alongside the Regulation 18 version, which is contained at Appendix A.

#### 2.0 THE INTEGRATED ASSESSMENT PROCESS TO DATE

- 2.1 Section 19 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to carry out Sustainability Appraisal (SA) of each of the proposals in a plan during its preparation. SAs incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the Strategic Environmental Assessment (SEA) Regulations). SA covers the wider social and economic impacts of plans, as well as the more environmentally-focused considerations of SEA. It is common practice to cover the requirements of SEA within the SA of development plans.
- 2.2 In preparing the CQ AAP, the process of SA has been combined with an assessment of the AAP's predicted impacts upon health and equality. This collective assessment, with three separate but complementary components, has been identified as an Integrated Assessment (IA). The three components comprise:
  - 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; and
  - 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.
- 2.3 A key initial stage in the IA process is the scoping stage. This is intended to identify the scope and level of detail of the information to be included in the IA process. The scope of the IA process that has been adopted for the CQ AAP is set out in the document that is contained at Appendix B. This scoping report was published for consultation purposes, alongside the IA itself and the Regulation 18 version of the CQ AAP, in February 2020.

The scoping report sought to identify a framework for the assessment process. This drew upon the statutory requirements and national planning policy guidance regarding the conduct of an SA/SEA, the baseline conditions within the Civic Quarter area and its locational challenges and opportunities, and the main aims and ambitions of the AAP. From this exercise a number of key sustainability, health and equality issues relevant to the CQ AAP were then identified. Further to this, 16 specific IA objectives were defined to capture the key issues, and with these used as 'assessment criteria' against which the policies of the CQ AAP would be judged. These IA objectives are identified in Table 1 below.

**Table 1: The Integrated Assessment Objectives** 

IA Objective 1	Provide housing of an appropriate mix of sizes, types, tenures in locations to meet identified needs and reduce disparity
IA Objective 2	Promote equality of opportunity and reduce levels of deprivation and disparity
IA Objective 3	Support improved health and wellbeing of the population and reduce health inequalities
IA Objective 4	Ensure sustainable economic growth and job creation
IA Objective 5	Ensure that there is sufficient coverage and capacity of sustainable transport and utilities to support growth and development
IA Objective 6	Improve the accessibility of the Borough by equitable means to community facilities, services and other needs
IA Objective 7	Conserve and enhance landscape, townscape, and the character of the borough
IA Objective 8	Conserve and enhance the historic environment
IA Objective 9	Improve air quality
IA Objective 10	To conserve and protect land and soils, whilst reducing land contamination
IA Objective 11	Protect and improve the quality and availability of water resources
IA Objective 12	Conserve and enhance biodiversity and promote nature conservation
IA Objective 13	Promote sustainable consumption of resources and support the implementation of the waste hierarchy
IA Objective 14	Reduce per capita greenhouse gas emissions
IA Objective 15	Reduce the consequence of flooding
IA Objective 16	Ensure communities, developments and infrastructure are resilient to the other effects of expected climate change

2.5 The assessment itself took place within a specially prepared matrix where the effects of each CQ AAP policy were pitched against the IA objectives and with

the policies scored using a traffic-light approach. Whilst the <u>policies</u> of the AAP (at Regulation 18 stage) were the focus of the assessment, the <u>vision</u> of the AAP and its <u>strategic objectives</u> were also subject to assessment. The assessment scoring system is identified in Table 2 below. In relation to the assessment of the policies and vision, the matrix also factored in the short, medium and long-term effects.

**Table 2: The Assessment Scoring System** 

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

#### The Previous IA Conclusions

2.6 The CQ AAP contains eight strategic objectives, as stated in Table 3. These high-level objectives are then translated into the individual policies of the CQ APP which provide the means for achieving them.

**Table 3: AAP Strategic Objectives** 

AAP Strategic Objective 1	Creation of High-Quality Public Realm
AAP Strategic Objective 2	Supporting Sustainability
AAP Strategic Objective 3	Consolidation and Rationalisation of Car Parking
AAP Strategic Objective 4	Housing a Growing Community
AAP Strategic Objective 5	Enhancement of Heritage Assets
AAP Strategic Objective 6	Supporting Economic Growth
AAP Strategic Objective 7	Improved Permeability and Connectivity
AAP Strategic Objective 8	Creation of Defining and Distinctive Neighbourhoods

- 2.7 The IA undertaken at Regulation 18 stage assessed the strategic objectives against the 16 IA objectives. This was a less in-depth assessment than of the CQ AAP's policies in recognition of their high-level status. The scoring system concluded that the effects would range from 'major positive' to 'neutral', and with no adverse effects identified. In view of this conclusion, the strategic objectives have not been revised at Regulation 19 stage and the IA process has not revisited them.
- 2.8 The vision and the policies of the Regulation 18 were then assessed against the 16 IA objectives. Unlike the assessment done for the strategic objectives, this more detailed assessment also considered the duration of the effects. Whilst the assessment concluded favourably overall, and with a series of 'major positive' and 'positive' effects identified (over the short, medium and longer term), the scoring system did flag up a limited number of 'minor negative' effects and 'unknown' outcomes. Some recommendations were also given, to policy content and to the vision's aspirations, which could lead to improved IA results.
- 2.9 As a result, the vision and the policies of the Regulation 18 document were revisited having regard to the IA's conclusions, and with some amendments incorporated to feature within the Regulation 19 CQ AAP. The modifications undertaken have now been re-examined against the IA objectives, as contained in the remainder of this report. In addition, a new policy has been incorporated, partly in response to the IA's recommendations and also when having regard to wider evidential base. This new policy has been subject to its first IA assessment.

#### 3.0 THE UPDATED INTEGRATED ASSESSMENT

#### The Vision

3.1 The vision of the CQ AAP is intended to be an overarching statement which describes the Civic Quarter by the end of the plan period (by 2037). The previous vision scored well overall and with the assessment noting its focus on improving the attractiveness of the area (IA objective 4), on promoting the provision of a sustainable transport network (IA objective 5), and on encouraging new green infrastructure (IA objective 12). However, the assessment advised that more focus should be given to supporting the principles of inclusivity and accessibility (IA objective 2), and of making specific reference to enhancing heritage assets within the AAP area (IA objective 8). An amended vision is set out below:

'The creation of a new, inclusive, diverse, resilient and vibrant mixed-use neighbourhood that builds on and maximises the existing opportunities in the area. It will have its own distinctive identity, allowing for the enhancement of heritage assets, providing a unique and attractive destination for the wider community, residents, businesses and visitors alike. High quality design, including sustainable design features, provision of green infrastructure and promotion of sustainable modes of transport will be at the heart of development in the area. New opportunities for work, leisure and play will be created in a high-quality and accessible setting, improving health and wellbeing and creating a sense of pride in the local area.'

3.2 The revised assessment and matrix is contained in Appendix C. In summary, two previous 'minor negative' effects have been upgraded to 'positive' effects (covering IA objectives 2 and 8 over the short, medium and long term).

# Policy CQ1

3.3 Policy CQ1, Civic Quarter Regeneration, provides the guiding principles for the assessment of new development proposals within the AAP area. The previous policy wording scored well as a whole, and with the IA recording that the policy would have a positive effect on sustainable economic growth (IA objective 4), and on environmental quality within the Civic Quarter (IA objective 7). However, whilst the CQ AAP provides some context to the socio-economic conditions of the area, it was commented that the policy did not then directly aspire to improve outcomes for existing communities (IA objective 2). An adjusted policy, which addresses this shortcoming, is set out below:

- 1. To ensure comprehensive and coordinated development, applications will be required to provide a statement demonstrating how the proposals:
- Contribute to delivering the vision and objectives of the AAP;
- Accord with the AAP parameter plans in respect of land use, permeability, development massing and scale;
- Generally accord with the vision, principles and objectives of the Neighbourhood Area guidance;
- Integrate with and complement successfully existing and proposed neighbouring development;
- Actively address the climate change impacts of the development; and
- Provide development that would be of benefit to existing communities through contributing to healthy lifestyle choices, improving access to employment areas, to training and to education, offering improvements to the local environment, and providing an improved quality of design, construction and range of the area's housing stock.
- 2. Development proposals should not prejudice the viability or deliverability of the AAP objectives.
- 3.4 The revised assessment and matrix is contained in Appendix C. In summary, a previous 'unknown' outcome has been upgraded to a 'positive' effect in the short, medium and long term (concerning IA objective 2).
- 3.5 At this point, a response is provided regarding repeated feedback from the earlier IA and its analysis of policies in particular in respect of IA objective 8 (which is concerned with conserving and enhancing the historic environment). The IA concluded on a number of occasions that each policy did not make sufficient reference to its impact on this objective, and hence an 'unknown' outcome was recorded. This recommendation has not been directly addressed within each policy as there is a specific, dedicated CQ AAP policy (Policy CQ5) which is focussed on conservation and heritage. When the policies of the CQ AAP are applied as a whole (which is how the document would be used, together with other development plan policies), it is considered that Policy CQ5 would adequately serve to ensure that heritage assets within the AAP area

would be protected and enhanced through the planning application process. Thus, whilst the 'unknown' outcome has not been changed in respect of Policy CQ1 (and others, including CQ2 and CQ3), this updated IA is concluding on the basis that the CQ AAP overall sets out a holistic approach to the sensitive management of the AAP's historic environment.

# **Policy CQ2**

- 3.6 Policy CQ2, Housing, seeks to promote the CQ AAP as a new and expanded location for housing, and it provides some guiding principles for the design, tenure, type and design of new residential development. The previous IA concluded favourably, with it noting that the policy would deliver long-lasting benefits to the local housing market (IA objective 1), and with a commitment given to supporting a range of housing types to meet a variety of needs (IA objective 1). It should be noted that there has been some adjustment to this policy since the Regulation 18 stage in order to respond to wider feedback. This includes a further requirement for all new residential development to provide useable private amenity space for prospective residents. In addition, the option for viability considerations to be used at application stage to justify less affordable housing provision has been omitted since viability has already been considered as part of this plan-making process. These wider adjustments are not considered to have impacted upon the previous conclusions for Policy CQ2 and thus no revisiting of the IA for this direct purpose has been carried out. Most significantly, it is not considered that such amendments would result in any downgrading of impacts.
- 3.7 In recording a 'minor negative' effect (in the short, medium and long term) in terms of IA objective 13, it was previously commented that this policy did not make specific mention of the need for residential development proposals to appropriately plan for refuse provision and waste collection arrangements.
  Such a stipulation has now been introduced.

- In recording an 'unknown' outcome for IA objective 12 (which is concerned with nature conservation and biodiversity), the previous assessment expressed some concern regarding the potential effects of new residential development on land near a priority habitat of deciduous woodland. Whilst the need for the new residential development to protect and enhance biodiversity interests has not been specifically incorporated within Policy CQ2, this updated IA is satisfied that this objective is adequately expressed in other policies of the CQ AAP (Policy CQ4 in particular) and supported by wider development plan policies. It is noted that this particular concern is repeated in respect of a number of other policies, including Policy CQ3, but the same response is provided in redirecting the assessment towards Policy CQ4.
- 3.9 An adjusted Policy CQ2 is set out below:

The AAP will deliver up to 4,000 new homes over the plan period (2020-2037). New housing proposals will be supported in accordance with the following principles:

- The proposed mix of dwelling size, type and tenure should contribute to meeting the housing needs of the Borough;
- Proposals should comply with all Development Plan policy requirements including current and any future minimum space standards;
- The provision of family dwellings and adaptable "lifetime" homes, which future-proof internal and external accessibility arrangements, will be supported;
- Other forms of housing will be acceptable, including dwellings for older persons and specialist forms of housing including care/extra care to meet local needs;
- Student accommodation proposals will also be acceptable where they are appropriately connected to and/or in keeping with the creation of the UA92 Campus;
- The Council will expect proposals for housing (including the Private Rented Sector) to comply with its affordable housing policies and relevant national guidance;

- All new developments should be of excellent design quality and should demonstrate sound sustainability principles in accordance with Policy CQ4; and
- All proposals for residential development will need to preserve the residential amenity of existing residents, and deliver high standards of residential amenity to prospective residents. This will be achieved through appropriate siting, scale, massing and design and by ensuring that car parking, servicing and refuse management arrangements are adequately provided for. All new residential development shall provide useable private amenity space for residents.
- 3.10 The revised assessment and matrix is contained in Appendix C. In summary, a previous 'minor negative' outcome has been upgraded to a 'neutral' effect in the short, medium and long term (concerning IA objective 13). A positive outcome in respect of IA objective 13 has still not been identified since it is recognised that this policy does not in itself address the recommendation concerning the appropriate handling of construction waste. The same applies in respect of Policy CQ3 and Policy CQ6. The importance of this objective is not overlooked but it is considered most appropriately dealt with via other development plan policies.

3.11 The purpose of Policy CQ3, Mixed Use Communities, is to ensure that development within the Civic Quarter incorporates an appropriate mix and balance of uses, including shared spaces, community facilities and other local services, to appeal to all user groups and to enhance the sustainability of communities. The key recommendation arising from the earlier IA, and repeated in respect of a number of different IA objectives (including 3, 5 and 6), was that this policy failed to take account of the need for new development to contribute to the provision of new or improved infrastructure within the AAP area. Whilst this policy in itself has not been amended to address this shortcoming, a new standalone policy has been introduced (Policy CQ11). Ensuring that new growth within the Civic Quarter takes place in parallel with

improved services and amenities is considered a pre-requisite for sustainable development in this location. Accordingly, the IA assessment has not been updated in respect of Policy CQ3 as a response to the earlier feedback, however the previous assessment for Policy CQ3 should be read in conjunction with the new IA for Policy CQ11 (contained at Appendix C).

- 3.12 Another recommendation arising from the previous IA regarding this policy was in respect of IA objective 7. This is concerned with enhancing and conserving the townscape, landscape, and the character of the AAP area, and with the assessment recording an 'unknown' outcome and expressing some concern regarding the potential implications of a wide variety of uses (including commercial and service uses) on the character of the area and on more sensitive uses within it. In response, the policy has been modified to ensure the appropriate management of cafes, bars and restaurants in order not to adversely impact on the amenities of the area, and to prevent an overproliferation of such uses which could have adverse impacts on resident health. This new policy wording also makes specific reference to ensuring that waste generated by all uses would be adequately managed and controlled, thereby also responding to a further recommendation arising from consideration of IA objective 13.
- 3.13 It should be noted that this policy has been subject to some change irrespective of the previous IA process. The key change is in relation to the quantum of commercial (principally office) floorspace that is now sought. This has been scaled-back in response to more recent commercial demand analysis and is considered to reflect a more reasonable and likely target. A further modification, which reflects a wider change in Council policy, is that a replacement leisure centre on a new AAP site is no longer proposed. However, the need to improve the existing leisure centre facility (which is also within the CQ AAP boundary) is fully acknowledged; this is now proposed to be achieved through comprehensive refurbishment. With this in mind the IA has not been revisited to account for these changes, and it is not considered that different and less favourable scores would be achieved when tested against the IA

objectives. Indeed, the reduction in commercial floorspace further supports an improved outcome for IA objective 7, and a refurbished and enhanced leisure centre will still support IA objective 3.

3.14 The adjusted Policy CQ3 is set out below:

The following uses will be encouraged, subject to appropriate siting and compliance with relevant national and local policies:

- The creation of up to 50,000m2 of new offices and other commercial floorspace, where this will help to deliver job opportunities and meet market demand;
- A refurbished leisure centre;
- Small scale retail uses to meet local needs (Use Class F2);
- Cafés, bars and restaurants. This is subject to the amenities of existing and new residential occupiers being adequately protected through appropriate treatment of noise/disturbance, odour, waste, light pollution and other relevant considerations, and where this would not result in an over concentration of such uses that would have adverse impacts on the health of Trafford's residents;
- Hotels/aparthotel accommodation to meet market demand;
- Community and local service infrastructure, such as education, GPs and dentists; and
- Uses that would enhance the civic function of the area, such as museums.
- 3.15 The revised assessment and matrix is contained in Appendix C. In summary, a previous 'unknown' outcome has been changed to a 'neutral' effect (in the short, medium and long term (concerning IA objective 7), and a former 'minor negative' outcome has been changed to a 'neutral' effect (covering IA objective 13), again over all time periods.

- 3.16 The purpose of this policy is to ensure that new development within the CQ AAP is underpinned by sound sustainability principles covering a wide range of issues, including sustainable transport options, sustainable drainage solutions, and encouraging enhanced biodiversity. The previous IA identified a series of 'major positive' outcomes arising from this policy and covering a number of IA objectives. In particular it was noted that the policy set high aspirations for improving water efficiency and securing sustainable drainage systems (IA objective 11), for increasing site biodiversity (IA objective 12), and for supporting the implementation of 'zero carbon plans' (IA objective 14).
- 3.17 In the intervening period the scope of the policy has been widened to incorporate an expectation for new development to make provision for the charging of plug-in and other ultra-low vehicles. In addition, the wording surrounding biodiversity has been further strengthened to make specific reference to achieving net gains. Whilst the IA has not been specifically revisited to respond to these changes (which took place irrespective of the IA conclusions), it is considered that they would only serve to further increase the number of 'positive' and 'major positive' outcomes, and that they would be no downgrading of effects.
- 3.18 A further change has occurred to the wording of this policy, in the interests of clarity upon its implementation. On the issue of air quality, the previous policy referred to new development making a positive contribution to air quality in both the 'local' and 'surrounding' areas. This has since been adjusted to refer solely to 'local' since the previous references were considered to duplicate the objective and to create some uncertainty regarding the area over which any contribution would be measured. The IA has not been revisited on this basis since it is not considered that it would materially affect the outcome of the assessment, and with it already noted that Policy CQ4 would have a 'positive' effect on IA objective 9 in the long term.

- 3.19 The adjusted Policy CQ4 is set out below:
  - 1. All development proposals within the AAP area will be expected to achieve the highest levels of energy and water efficiency that is practical and viable, and to maximise opportunities to incorporate sustainable design features where feasible.
  - 2. All developers will need to demonstrate how their proposals:
    - Improve the pedestrian and cycle environment;
    - Promote the use of sustainable transport modes;
    - Reduce the reliance on vehicular usage;
    - Incorporate sustainable drainage solutions;
    - Make provision for the charging of plug-in and other ultra-low emission vehicles; and
    - Increase site biodiversity and deliver biodiversity net gains.
  - 3. Demonstrate an actionable zero carbon plan, incorporating offsetting for both operational and embodied carbon over the first 60 years of the project.
  - 4. Demonstrate a positive contribution to air quality in the local area.
- 3.20 The IA has not been altered.

3.21 The previous IA concluded positively in respect of this policy, which is concerned with the conservation and enhancement of heritage assets within the CQ AAP. No other changes have been made to the policy and no further IA has been carried out.

# **Policy CQ6**

3.22 Policy CQ6, High Quality Urban Design, establishes a number of design principles that new development proposals will be expected to adhere to. A key purpose of this policy is to ensure that a high standard of design is delivered

across the AAP area in order to improve the character and quality of the Civic Quarter.

- 3.23 The original IA identified a number of areas where improvements could be made to this policy. This included a more specific reference to new development within the CQ AAP delivering a physical environment that would be useable by, and accessible to, all members of the community (in responding to a previous 'neutral' impact in respect of IA objectives 2 and 3).
- 3.24 A number of 'minor negative' effects were also identified, specifically on the subjects of waste management, on greenhouse gas emissions, and on flood risk (IA objectives 13, 14 and 15). In response, the policy has been further adjusted to include a reference to development making adequate provision for refuse and recycling facilities, and also to demonstrating sound sustainability principles in accordance with the requirements of Policy CQ4.
- 3.25 Some other adjustments to the policy have also taken place to address wider feedback. This includes a raising of expectations regarding the delivery of high standards of residential amenity for prospective new residents whilst preserving amenity levels for existing residents, and an objective of reducing the extent of surface level car parking across the Civic Quarter (rather than merely discouraging new provision). In addition, it has been made more explicit that new development should incorporate quality hard and soft landscaping. These wider adjustments are not considered to have impacted upon the previous conclusions for Policy CQ6 and thus no revisiting of the IA for this direct purpose has been carried out. Most significantly, it is not considered that such amendments would result in any downgrading of impacts.
- 3.26 The new policy text is provided below:

The Council requires all proposals to achieve high quality design which is accessible and useable by all sections of the community. Schemes which promote poor design solutions will not be acceptable. The Council will support proposals which:

- Demonstrate compliance with the AAP Design Code Principles;
- Deliver architecturally innovative design which will raise design standards within the area whilst preserving existing residential amenity standards and ensuring that high amenity standards are achieved in new residential development;
- Provide taller buildings, in line with the massing principles and specific Neighbourhood Area Policies set out in the AAP, ensuring that such proposals are sensitively designed;
- Reduce the provision of new and existing areas of open surface car parking;
- Provide new areas of public realm and green space, and incorporate quality hard and soft landscape treatments;
- Remove physical barriers and encourage permeability and passive surveillance, subject to compliance with Crime Impact requirements;
- Avoid poor quality or unnecessary signage and street clutter, to maintain the high design standards for the area;
- Provide adequate provision of refuse and recycling facilities in order not to impact on the amenity of the area or to undermine the quality of the public realm;
- Demonstrate sound sustainability principles in accordance with Policy CQ4; and
- Reduce the risk of crime, including the incorporation of hostile vehicle mitigation where necessary.
- 3.27 An updated IA is contained in Appendix C. In summary, the previous 'neutral' outcome concerning IA objective 2 has been elevated to a 'positive' effect in the short, medium and long term. The previous 'minor negative' impact for IA objective 13 has been altered to a 'neutral' outcome (over all time periods), and the previous 'minor negative' impacts that were found in relation to IA objectives 14 and 15 have been improved to 'positive' effects.

3.28 Policy CQ7, Public Realm Principles, sets out a series of standards that planning applications would be expected to adhere to in delivering new areas of public realm. The previous IA concluded favourably, with only 'neutral', 'positive' or 'major positive' effects identified across the full range of IA objectives. Some recommendations for improvement were, however,

identified, including to ensure that public realm would be designed and delivered to ensure that it would be fully accessible by all sections of the community (IA objectives 2 and 3). The policy has since been adjusted to address this suggestion. In addition, further positive adjustments have been made in response to IA advice that the policy could make specific reference to new public realm being designed to enable biodiversity net gain and to incorporate sustainable drainage systems (IA objectives 11 and 12).

- 3.29 Some further wording modification has been made, aside from the IA exercise, to make it clear that streets and public spaces within the AAP area will be designed to link in with wider routes and networks beyond the Civic Quarter. The IA has not been revisited to account for this change, but it is considered likely that any change would serve to deliver a further improvement (for example, under IA objective 6).
- 3.30 The new policy wording is provided below:

The Council requires all proposals to achieve high quality, accessible public realm design, in accordance with the AAP Public Realm Principles, and Neighbourhood Landscape Design Principles. All development proposals should seek to maximise opportunities to:

- Increase permeability through the creation of clear, direct, convenient, safe and well-signed routes, into, out of and around the development site;
- Ensure a cohesive development that responds to the proposed street hierarchy and identified routes within and beyond the AAP area;
- Provide high quality street furniture and boundary treatments and minimise inappropriate street clutter;
- Provide a clear and strong hierarchy of streets and public open spaces which links in with wider routes and networks beyond the AAP area:
- Promote public art to enhance spaces and reinforce the creation of a distinct identity for the area;

- Promote sustainable maintenance and management of the public realm, including the incorporation of sustainable water management; and
- Incorporate new soft landscaping to further enhance the character of the area and to promote increased biodiversity.
- 3.31 An updated IA is contained in Appendix C. In summary, two previous 'neutral' outcomes, concerning IA objectives 3 and 12, have been upgraded to 'positive' effects in the short medium and long term. The reinforcement of the importance of sustainable drainage systems has not resulted in a formal change in outcomes (which is already at the 'positive' level) for IA objective 11, although the commentary in the IA identifies further improvement achieved in this area.

3.32 Policy CQ8, Wellbeing Route: Talbot Road, seeks to establish a health and well-being boulevard along the wide corridor of Talbot Road. The original IA concluded favourably in assessing this policy as a whole. No score lower than a 'neutral' impact was identified and within this a number of 'major positive' effects were highlighted. The assessment found that this policy would promote cycling and walking as a means of moving around the AAP area (IA objective 3), would enhance the physical environment by supporting new public realm (IA objective 7), and could encourage community engagement (IA objective 7). Some recommendations were given to further improve the positive score, and these have been taken on board in revised wording. The policy has been amended to refer to the importance of retaining existing trees (as well as encouraging new planting), and with this requirement further reinforced through an adjustment to the accompanying 'design principles'. Indeed, the policy itself remains concise and focussed in its coverage, but the design principles have been further embellished to refer to the well-being route incorporating local information boards and for its 'active ribbon' to be used for locally organised events; all in response to IA recommendations.

- 3.33 The revised text for Policy CQ8 is provided below:
  - 1. The Council will support the delivery of a Wellbeing Route along Talbot Road which seeks to enhance cycle and pedestrian permeability;
  - 2. Development proposals on sites that adjoin Talbot Road should ensure that development addresses Talbot Road, generating active street frontages, providing new and retaining existing quality landscaping, and ensuring a cohesive approach to development; and
  - 3. Development proposals that would prejudice the delivery of the Wellbeing Route will not be supported.
- 3.34 The updated IA is contained in Appendix C. To summarise, two previous 'neutral' impacts in the short and short/medium term have been upgraded to 'positive' effects (concerning IA objectives 2 and 3), and a former 'positive effect' (over all time periods) in relation to IA objective 7 has been elevated to a 'major positive effect' (again, over all time horizons).

- 3.35 This policy reimagines the combined route of Brian Statham Way and Warwick Road as a pedestrianised ceremonial walkway which would connect the two significant sporting venues of Lancashire Cricket Club and Manchester United Football Club. Again, the previous IA concluded positively with no negative impacts identified against any IA objective. Some suggestions were given, however, to further improve the policy's outcomes. Similar to the advice regarding Policy CQ9, this included the provision of local information boards to highlight the cultural and sporting heritage of the area. The safeguarding of existing mature trees was also referred to. In response, the policy text has been adjusted to refer to the protection of trees, as well as to new planting, and the accompanying design principles have been expanded to encourage public art and new wayfinding features that would celebrate the area's history.
- 3.36 Some further adjustment to the policy text has been undertaken in the interests of clarity and proper application, but these alterations are not considered to have materially impacted upon previous IA conclusions.

- 3.37 The new policy wording is provided below:
  - 1. The Council will support the delivery of a Processional Route along Brian Statham Way and Warwick Road which seeks to enhance cycle and pedestrian permeability;
  - 2. Development proposals on sites that adjoin the route should ensure that development addresses Brian Statham Way and Warwick Road, generating active street frontages, providing public art and proving new and retaining existing quality landscaping, and ensuring a cohesive approach to development; and
  - 3. Development proposals that would prejudice the delivery of the Processional Route will not be supported.
- 3.38 The updated IA for Policy CQ9 is contained in Appendix C. In summary, the scoring has altered in respect of IA objective 12 and IA objective 16, with these now achieving 'positive' effects over the short, medium and long term.

Policy CQ10 (Movement and Car Parking Strategy) is underpinned by a desire 3.39 to maximise sustainable transport solutions across the AAP area, to promote walking, cycling and public transport use, and to minimise congestion and emissions. The policy scored well in the original IA, although some recommendations for improvement were identified. This included a greater commitment to looking beyond the spatial area of the CQ AAP and offering improved public transport, walking and cycling connections to the rest of Trafford and beyond. Further suggestions comprised a requirement for the development of new car parks to include infrastructure to support the charging of electric and low-emission vehicles, and for the new multi-storey car parks identified within the CQ AAP to be designed to include green walls. Accordingly, the policy has been reworded to support improved onward linkages and connections outside the AAP area, and with a new requirement for electric/low emission vehicles charging infrastructure (to complement Policy CQ4). Whilst the green wall requirement has not been specifically identified, the importance of ensuring that new multi-storey car parks would be of quality design, which could include green walls/roofs, has been reinforced.

3.40 The altered wording for this policy is set out below:

The Council will support development that assists in the delivery of the following movement and car parking principles:

- Creation of new or enhanced pedestrian and cycling connections, including providing improved connections beyond the AAP area;
- Creation of new or enhanced connections to existing public transport services including beyond the AAP area. Any measures that will enhance the accessibility and frequency of such services should be delivered where possible;
- Creation of new multi-storey car park solution(s), which are of high design quality, located on the periphery of the AAP area to discourage traffic from utilising Talbot Road;
- Consolidation of existing surface car parking where it can be demonstrated that the existing car parking is surplus to requirements; and
- Make adequate provision to enable the charging of plug-in and other ultra-low emission vehicles.
- 3.41 A refreshed IA for this policy is included in Appendix C. In summary, three previous 'neutral' impacts regarding IA objectives 3, 6 and 14 have been improved to 'positive' effects in the short, medium and long term. In addition, a previous 'positive' impact under IA objective 9 has been raised to a 'major positive' effect (concerning all time periods). The reinforcement of the importance of a high quality design response for the new multi-storey car parks has not resulted in a formal change in outcomes (which is already at the 'neutral' level) for IA objectives 12 and 16, although the commentary records some further improvement achieved.

- 3.42 Policy CQ11, Infrastructure and Obligations, is a new policy. Whilst it was acknowledged as a concept in the Regulation 18 version of the CQ AAP, it is only at this Regulation 19 stage that policy wording has been drafted. It has not previously been subject to IA.
- In order to make development acceptable, Government guidance makes it clear 3.43 that it is reasonable to seek planning contributions where new development could have an adverse impact on local infrastructure and services by placing increased pressure on it, or where a development could contribute to specific needs (for example, affordable housing). It is evident that new growth in the Civic Quarter area will need to be supported by new and improved infrastructure, facilities and services in order to provide a sustainable and functioning community. A detailed assessment of the essential infrastructure that will be needed to deliver and support new development in the Civic Quarter has recently been undertaken. The identified infrastructure includes new public realm and environmental/security enhancements, new green space and leisure provision, new education and health facilities, and upgrades to services and utilities. Policy CQ11 confirms the scope of infrastructure which new major development proposals must support by way of a single financial contribution (to be secured through a Section 106 legal agreement). The policy also provides the mechanism to secure onsite affordable housing.
- 3.44 The policy wording is provided below:

The Council expects all planning applications for major development to contribute towards the delivery of essential infrastructure in the Civic Quarter.

A financial sum will be required from all major residential schemes to address the following items:

- Public realm and environmental upgrades (including hostile vehicle mitigation to provide enhanced security within public and pedestrianised spaces);
- Green space and leisure;

- o Education;
- o Health; and
- o Utility upgrades.

A financial sum will be required from all major commercial development schemes to address the following items:

- Public realm and environmental upgrades (including hostile vehicle mitigation); and
- Utility upgrades.

The financial contribution payable under this policy shall be calculated in accordance with the rates set out below (at the time of the AAP's adoption but subject to future indexation).

- o Residential: £145.81 per m2;
- o Offices: £66.89 per m2;
- o Hotels: £66.89 per m2; and
- Other commercial, business and service development (covered by Class E of the Use Classes Order, or any subsequent equivalent, and to include drinking establishments and takeaways): £66.89 per m2.

In addition to the infrastructure contribution requirement the Council requires all qualifying residential development proposals within the AAP boundary to provide for a minimum of 25% affordable housing. The affordable housing should be provided on site and delivered in line with the Council's most up to date affordable housing policies.

- 3.45 An assessment of Policy CQ11 against the 16 defined IA objectives is contained at Appendix C. It follows the established methodology that has been used throughout this IA process. In summary, the IA for Policy CQ11 has found that only 'neutral', 'positive' or 'major positive' effects would be experienced across all IA objectives. The most significant and beneficial outcomes are identified below:
  - A 'major positive' effect over all time periods in respect of IA objective 1;
  - A 'positive' effect over all time periods in relation to IA objectives
     2, 6, 7 and 12; and
  - A 'positive effect in the medium and long term under IA objectives
     3, 4, 11 and 14.

3.46 This is considered to be a highly positive result for a policy subject of its first assessment, and is reflective of the key premise of the policy in seeking to ensure that development in the Civic Quarter provides the necessary services, facilities and accommodation that the community needs.

#### 4.0 EQUALITY IMPACT ASSESSMENT FOR POLICY CQ11

- 4.1 In addition to the general IA process that was undertaken at Regulation 18 stage of the CQ AAP, a separate Equalities Impact Assessment (EqIA) was carried out. This followed an established process adopted by the Council in order to ensure that its policies, practices and decision-taking processes do not unlawfully discriminate against any group with protected characteristics.
- 4.2 Again, it was the policies and the vision of the CQ AAP that were the subject of assessment, and with these assessed against the nine equality-based characteristics identified in Table 4 below. The scoring system was based on the policy/vision having either a: positive impact; a neutral impact; or a negative impact on each characteristic.

Table 4: EqIA Characteristics Assessed under the IA

Equality characteristic 1	Sex
Equality characteristic 2	Pregnant women and women on
	maternity leave
Equality characteristic 3	Gender reassignment
Equality characteristic 4	Marriage and civil partnership
Equality characteristic 5	Race
Equality characteristic 6	Disability
Equality characteristic 7	Age group
Equality characteristic 8	Sexual orientation
Equality characteristic 9	Religious/faith groups

- 4.3 The EqIA undertaken at Regulation 18 stage is contained within Appendix 1. In summary, when the policies and vision of the CQ AAP were tested against each characteristic, the result was either a 'positive' or 'neutral' impact. No 'negative' impacts were identified.
- 4.4 To reiterate, some minor adjustments, to the policies and to the vision, have been undertaken to respond to the wider IA assessment and specifically to respond to recommendations for improvements. However, the EqIA itself has not been revisited in detail since it is considered that the adjustments to the policy/vision made would not materially impact on previous conclusions and would not, most significantly, result in any downgrading to a 'negative' impact.

This conclusion has been reached when also having regard to the fact that some of the defined IA objectives, as detailed in Table 1, have in themselves been devised to assess the extent to which the CQ AAP promotes equality of opportunity within its objectives.

4.5 However, an EqIA of the new policy has been necessary, and this has been carried out in accordance with the previous structure. The results are contained in Appendix D. In summary, it is concluded that the new policy, which establishes a framework for developer contributions, would have a range of positive outcomes and which would be available to all users groups.

#### 5.0 CONCLUSIONS

- 5.1 The Council is preparing the CQ AAP to guide development and positive change in this key growth location. It establishes a vision, masterplan and strategy for the area's revitalisation over the next 15 (plus) years, to 2037, to create Trafford's newest, greenest and most vibrant neighbourhood for local residents, businesses and visitors. On its adoption the CQ AAP will form part of the overall Trafford Development Plan against which individual planning applications will be assessed.
- 5.2 An Integrated Assessment (IA) is an integral part of the plan-making process for the CQ AAP. Its purpose is to assess the impacts of the emerging plan on social, economic, environmental, health and equality objectives. The Council completed consultation on the Consultation Draft CQ AAP (Regulation 18 version) earlier this year. Alongside its preparation, an IA document was also produced which included three separate but complementary assessments in order to inform the development of the AAP.
- 5.3 The CQ AAP is now further advanced, and a Regulation 19 (Publication) version of the document has been produced ahead of further consultation in early 2021. Some adjustments to the CQ AAP have been made in order to respond to the outcome of the earlier consultation, adjustments to the evidential base, and to address feedback from the original IA exercise. In general terms, however, the strategy for the Civic Quarter to be progressed via the AAP is unchanged.
- 5.4 The purpose of this document has been to revisit the IA to account for the changes to policy content, and also to assess the effects of a new policy. A separate EqIA for the new policy has also been undertaken. This updated IA will be published alongside the Regulation 19 version of the CQ AAP.
- 5.5 Overall, the IA has concluded constructively, with improvements recorded relative to the previous assessment reflecting positive adjustments to

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policy/vision wording. In relation to all 16 IA objectives, the policies, vision and strategic objectives of the CQ AAP are expected to achieve 'major positive', 'positive' or 'neutral' outcomes. The previous, limited number of 'minor negative' impacts have been bettered.