



**TRAFFORD
COUNCIL**

**Core Strategy Post Submission
Sustainability Appraisal Addendum
Report**

October 2011

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CORE STRATEGY POST-SUBMISSION SUSTAINABILITY APPRAISAL ADDENDUM REPORT

1.0 Introduction and Purpose of this Report

Background

In September 2004, the Planning and Compulsory Purchase Act came into effect and introduced the requirement for Trafford Metropolitan Council to replace its existing land use development plan – the Revised Trafford Unitary Development Plan (Adopted June 2006) – with a new “spatial” development plan – the Trafford Local Development Framework. The Local Development Framework (LDF) is not a single plan but instead comprises of a series of individual documents that collectively deal with the spatial issues that will affect the people, who will live, learn, work and relax in the Borough over the next 15 years.

The Core Strategy is the overarching element of the LDF and all other Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) prepared by the Council are required to be in conformity with it. The Core Strategy will outline the Council’s vision for Trafford up to the year 2026, and will set out how the Council will manage the change necessary to realise this vision. Accordingly, it will need to establish an appropriate balance between growth, regeneration and environmental protection / improvement.

Sustainable development is the core principle underpinning the planning system and, as a consequence, sustainability will be at the heart of the Core Strategy. In order to ensure that new plans and strategies contribute towards sustainable development, the Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal (SA) to be carried out on all new or revised DPDs.

The purpose of SA is to promote sustainable development through the integration of sustainability considerations into the preparation, adoption and implementation of the Core Strategy. SA does not constitute a separate stage in the production of the Core Strategy but instead represents an iterative, on-going process that forms an integral part of the plan-making process. It involves the identification and evaluation of the social, environmental and economic impacts of the plan. In doing so, it provides an opportunity to consider ways in which the Core Strategy can make an effective contribution to sustainable development and provides a means of avoiding or reducing any adverse effects that the plan might have.

Purpose of this Report

Since the Core Strategy was submitted to the Secretary of State in December 2010 and the Examination process began, a number of issues have emerged which have had implications for the contents of the Core Strategy. Of most note in this regard was the publication of the HM Treasury’s document ‘A Plan for Growth’, which outlines the Government’s economic policy objective to achieve strong, sustainable and balanced growth across the country, and the identification of a Greater Manchester Enterprise Zone at Manchester Airport City.

In order to address issues raised during the Examination stage, the Council has proposed a number of changes to the submitted Core Strategy. The majority of these

changes are considered to be relatively minor in nature and therefore supported by the SA which was submitted alongside the Core Strategy in December 2010 (the Publication SA – CD6.2.2). However there are four areas of the Plan where the Council considered that the changes proposed were sufficiently significant to warrant further SA work being carried out. These proposed changes relate to the definition of the Regional Centre and Inner Area boundaries and also to Core Policies L5, W1 and R4.

Whilst this SA work has already been subject to public consultation (in February 2011, April 2011 and July 2011), in accordance with best practice, the Council has decided to produce a consolidated SA report summarising the results of the post submission appraisals. Thus bringing them together into a single document to improve the readers understanding of the process and how it has influenced the preparation of the Core Strategy. For the avoidance of doubt, this document does not contain new appraisals that have not previously been made available for public consultation.

This report should be read as an addendum to the SA Report produced for the Publication version of the Core Strategy (CD 6.2.2) which was the “submitted version” of SA. In supplementing the submitted SA (CD 6.2.2) it supersedes the appraisals of policies L5, W1 and R4 contained within it. The SA therefore now comprises of:

1. The submitted version of the SA;
2. The post-submission appraisals of the Regional Centre and Inner Area boundaries, RLAM’s development proposals for Davenport Green and Core Policies L5, W1 and R4; and
3. This document which provides a summary of, and additional commentary on, the most recent appraisals and which appends all of the post-submission appraisals in the accompanying document CD 12.104.2 for ease of reference.

2.0 Requirement for Sustainability Appraisal / Strategic Environmental Assessment

Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, where a Local Planning Authority is preparing a Core Strategy it is mandatory for the plan to be subject to SA throughout its production, to ensure that it is fully consistent with, and helps to implement, the principles of sustainable development. The SA performs a key role in providing a sound evidence base for the Core Strategy and provides a means of demonstrating to decision makers, and the public, that the plan is the most appropriate given reasonable alternatives.

In parallel with this, the European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (the Strategic Environmental Assessment or ‘SEA Directive’), which is transposed into United Kingdom law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the ‘SEA Regulations’), introduced a statutory obligation to conduct an environmental assessment of certain plans. The Regulations apply to a range of UK plans and programmes prepared by public bodies, including Trafford’s Core Strategy which meets the relevant criteria in that:

- It is “prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and is required by legislative, regulatory or administrative provisions” (Article 2(b)); and
- It concerns “town and country planning or land use... which sets the framework for future development consent of projects” (Article 5.2(a)).

While SA and SEA are distinct processes, many of their requirements overlap. As a consequence, the Government has prepared guidance¹ which advises that an integrated approach to SA and SEA should be pursued, so that the SA process also meets the requirements of the SEA Directive and Regulations. This involves extending the breadth of (predominantly environmental) issues required to be considered under SEA to cover the full range of aspects (including social and economic) for sustainability.

3.0 Stages in the Sustainability Appraisal Process up to the Submission of the Core Strategy

Trafford's Core Strategy has been subject to SA throughout each stage of its production. As detailed in the Core Documents list, the following SA documents were produced before the Core Strategy was submitted to the Secretary of State:

- Sustainability Appraisal Scoping Report (June 2007) CD 6.4.1;
- Sustainability Appraisal of Spatial Options (July 2008) CD 6.3.3;
- Supporting Documents on SA of Spatial Options (July 2008) CD 6.3.4;
- Sustainability Appraisal Report Non Technical Summary (June 2009) CD 6.3.11;
- Sustainability Appraisal Report (June 2009) CD 6.3.12;
- Sustainability Appraisal Report Appendices (June 2009) CD 6.3.13;
- Further Consultation Sustainability Appraisal (Oct 2009) CD 6.3.20;
- Further Consultation Sustainability Appraisal Appendix (Oct 2009) CD 6.3.21;
- Sustainability Appraisal Report (March 2010) CD 6.3.23;
- Sustainability Appraisal Report Appendices (March 2010) CD 6.3.30;
- Sustainability Appraisal Report (June 2010) CD 6.2.2;
- Sustainability Appraisal Report Appendices (June 2010) CD 6.2.4;

3.1 SA Scoping Report – June 2006 – July 2007

Process

Trafford Council began the pre-production stage, identifying the initial scope of the SA, in June 2006. In conjunction with key stakeholders across the 11 sub groups of the Trafford Partnership (Local Strategic Partnership), the Council identified and reviewed other relevant plans, policies and programmes that would affect and influence the Core Strategy; set out relevant social, environmental and economic baseline information; identified the key sustainability issues for the SA to address;

¹ Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents: Guidance for Regional Planning Bodies and Local Planning Authorities – ODPM, November 2005. This guidance has now been replaced by the Plan Making Manual. Nevertheless, this successor guidance, together with PPS12 and the Practical Guide to the SEA Directive, continue to recommend the integration of SEA into the SA process.

established an SA Framework consisting of sustainability objectives, indicators and targets; and produced a Scoping Report for consultation on the scope of the appraisal. The Trafford Partnership sub groups were particularly involved in the wording of the objectives, sub objectives and inclusion of indicators.

As part of this early stage in the SA process, twenty-three sustainable development objectives were established for appraising the Core Strategy. In addition, sixty-four sub-objectives were identified to assist with the assessment against the sustainability objectives. The establishment of these SA objectives and sub objectives is central to the SA process. The SA framework, based on these objectives, provides a way in which sustainability effects are described, assessed and compared. Sustainability objectives are distinct from those of the Core Strategy itself, however they are related. Additionally The SA objectives, including E1, E2 and E3 were developed using ODPM guidance on objectives in 'Sustainability Appraisal of Regional Spatial strategies and Local Development Documents, November 2005.

Consultation

Following publication of the Draft Scoping Report for consultation in November 2006 comments were received from consultees including Natural England, The Environment Agency, Highways Agency and GONW. The majority of comments concerned suggestions for indicators with a general support for the approach taken.

Influence of the Scoping Report in developing the Core Strategy Issues and Options

The involvement of the Trafford Partnership in the identification of key issues and the baseline position in the Scoping Report ensured that there was a close correlation between these issues and the Community Strategy priorities. In turn these assisted in identifying the Issues presented within the Issues and Options Stage report (CD 6.4.2).

As demonstrated by CD6.4.2, the Council developed only very broad options at this initial Plan preparation stage. Therefore with very little detail within the options, to give certainty to a sustainability score against individual sustainability objectives, it was considered that a separate Sustainability Appraisal would not be sufficiently meaningful as it would be unable to highlight the different sustainability implications of each option. This situation was anticipated by the Scoping Report (CD 6.4.1) in that paragraph 6.14 states that a separate Sustainability Report would not be prepared until the Preferred Options stage. This approach is consistent with the guidance outlined above.

The Scoping Report set out, at paragraph 6.12, that a "business as usual" option would be appraised in developing policy options, and it was envisaged that the Revised UDP Policies would be used as the "status quo". However given the advice from GONW in May 2007, recommending the appraisal of realistic broad strategic options, based on current and emerging guidance 'business as usual' was not considered to be a realistic option at the time.

As demonstrated in Factual Matter 8 (CD12.3), by this point in time the RSS review was well advanced. To have proposed an option for growth within Trafford as outlined within the UDP would have been seen to have been contrary to that emerging policy and indeed the evidence supplied to that Examination by the AGMA authorities, including Trafford. The key policy changes that rendered a "business as

usual” option as unrealistic were those relating to the new policy framework for the Manchester City Region being promoted by the AGMA authorities and the significantly increased housing land targets.

The Council considers that such an approach is in accordance with the advice offered by PAS in their Guidance on SA (page 27). This advice states that a business as usual option is optional:

"In some cases, the business-as-usual option can be included as a discrete alternative (for example, 'continue with the existing local plan policy'), although in some cases such an option will not be feasible (due, perhaps, to a change in government policy since the local plan was adopted)."

3.2 Sustainability Appraisal at Issues and Options Stage - July 2007

Process

At Issues and Options stage (2007) 3 alternative options were considered.

Section 4 of the Issues and Options Paper (July 2007, CD 6.4.2) sets out the Sustainability Issues. Here the link is made between issues identified in the Scoping Report and issues that arose from the spatial portrait of Trafford in Section 3 (pages 10-19) of CD 6.4.2. Section 6 details each of the Options, including the SA implications for each. This SA information was compiled by officers following a “round table discussion” comparing the 3 options against the sustainability objectives and noting down potential effects against the groupings of objectives under the headings social, environment and economic. As stated above, a full SA would have been inappropriate given the level of detail provided for the Options and would not have given a meaningful outcome.

Consultation

The only comments received during the Issues and Options consultation period in relation to the SA information were made by Natural England who noted that their comments from the Scoping Report had been taken into account and that the SA objectives should inform a fuller development of the Core Strategy Objectives. There were acknowledgements that SA would have a role in the next stages of the Core Strategy.

Influence of the SA at Issues and Options

At the Issues and Options stage, the main influence of the SA was to instil sustainability issues into the Core Strategy process. None of the Options were dismissed and no new ones were added between the 2 stages. Instead the Options were further refined in the light of comments made in 2007, the Council’s evidence base and as a result of SA.

3.3 Sustainability Appraisal at Preferred Options Stage – July 2008

As detailed in section A.4 of CD12.72, an SA was carried out in February 2008 on 3 draft preferred options but not in relation to policies or strategic locations or sites because insufficient information or certainty surrounding the detail of these areas of the Plan existed in 2008. The SA was carried out using 3 panels of officers from

across different Council Services using the framework set out in the SA Scoping Report and the additional evidence base documents listed on page 6 of the Core Strategy Preferred Options Document (CD6.3.1). The panels met to agree scores, comments and mitigation. These were taken on board in a revision of the Options developed in May 2008. A combined panel made up of members from the February panels met to rescore and comment upon the revised draft options. These appraisals were then subject to further comment from groups outside the Council. Final ratification of the scoring was made by the community chair of Trafford Partnership in agreement with senior Council Managers.

For the avoidance of doubt, no specific mention was made of Davenport Green within these SA appraisals, because no specific development proposals were proposed on the site. Instead within each option the area was identified as within the Green Belt.

Consultation

The SA received a number of comments at this, Preferred Options, stage. These ranged from agreement with the broad conclusions of the SA, to more specific comments on particular objectives and, specifically in Carrington, concern over the infrastructure requirements for delivery of new development; the effect on biodiversity; and whether the proposed development was realistic.

In relation to the evidence base, comments were made about the need for an employment land study and SFRA to be included within the evidence base, in order to inform the SA and that there should be better links between the Scoping Report and the SA report.

Finally, amongst others, GONW requested that the Strategic Sites be subjected to SA.

Influence of the SA at the Preferred Options Stage on the Preferred Option

Because the SA was carried out in two stages, it is clear that it helped further refine the Options and improve their performance against the sustainability objectives. The SA highlighted the issues around evidence and requirements within the developments to provide for infrastructure that needed to be addressed more fully in the next stage of the iterative process.

3.4 Proposals for Strategic Sites and Locations – January 2009

As detailed in section A.5 of CD12.72, specific work began in January 2009 on potential Strategic Sites and/or Locations. Key stakeholders, and land owners were invited to suggest suitable land for large scale development. As part of this process, and to inform the Council's Preferred Option stage, they were asked to provide site information, details of the proposed development, policy fit, deliverability and a self assessed Sustainability Appraisal.

The outcome of this work was that fourteen Locations and five Sites were identified (including land at Davenport Green) for the Council to consider within the context of the wider Core Strategy evidence base, prior to publishing their Preferred Option document in June 2009.

3.5 Developing the Preferred Option – May to July 2009

In May 2009, the Council commissioned consultants Urban Vision to undertake a sustainability appraisal of the Core Strategy Preferred Option which included for the first time Strategic Sites and Locations. The SA was carried out for the Delivery Strategy, Core Policies and all 14 Locations and five sites that emerged out of the Stakeholder consultation detailed above, including RLAM's original proposals for a Strategic Site at Davenport Green (SS1).

The evidence base used was that as set out in the SA Scoping Report and the list of new evidence base documents found on pages 5 and 6 of the Core Strategy Preferred Option Document (CD 6.3.9) together with the information submitted by all third parties following the stakeholder engagement.

For information, at this point in time the land at Davenport Green was incorrectly identified as being within the Green Belt. The implications of this error, in relation to the evolution of the Trafford Core Strategy, were addressed more fully in the Council's response to the Inspector's Note 1, in CD 12.3 (under Factual Matter 8).

Consultation

Responses received on the SA were far more extensive than at former stages reflecting the detail that now existed in the Plan. Comments ranged from challenging the consistency of mitigation comments to generally questioning the SA scoring.

Influence of the SA at the Preferred Option Stage

The SA comments, mitigation suggestions and consultation responses helped to highlight further information both on the locations and in the evidence base that was needed to inform the next stage of the Core Strategy. Page 4 of the Core Strategy Document (CD 6.3.9) highlighted the differences that the SA made and the need for further work to be done to appraise the effects of Flood Risk and the implications of traffic generation.

A further report explaining how the options were refined was produced alongside the June 2009 Preferred Option document, as a Technical Appendix, (CD 6.3.10). This referred specifically to the SA in sections 3.27-3.29, 4.27-4.3, 5.27-5.29 and 6.25-6.27. However, as previously and in line with ODPM advice, the SA was not the deciding document in choosing the Preferred Option.

3.6 Further Consultation on Core Policies L2, L4, L5, W1, R5, November 2009

SA was carried out on these policies following the refinement of these policies (CD 6.3.20 and CD 6.3.21) in the light of responses made to the Preferred Option document in June 2009. There were no comments received on the SA at this stage.

3.7 Further Consultation on the Vision, Strategic Objectives and Delivery Strategy – March 2010

The SA of this stage (CD 6.3.23 and CD 6.3.30) showed more positive scores than previously because more information was provided on the chosen 5 Strategic

Locations. These 5 locations had been chosen from the previous 5 Strategic Sites and 13 Strategic Locations, as published for consultation in 2009. With publication of the SFRA 2 in February 2010, there was more certainty on flood issues. For the avoidance of doubt Davenport Green was not subjected to SA because it was not included as a Strategic Site or Location at the Preferred Option stage (2009).

Consultation

For the first time representations were made challenging the soundness of the sustainability appraisal in relation to earlier stages and the process as set out in the Scoping Report. Additionally concerns were raised over inconsistencies in the scoring between the March 2010 appraisal of the Strategic Locations and the former 2009 SA of Davenport Green. These comments were submitted on behalf of RLAM, the owners of land at Davenport Green. No other responses to the SA were made at this stage in the Plan preparation process.

Influence of the SA from the March 2009 stage on the Publication Stage

As detailed in CD12.3 (under Factual Matter 8) and later in CD12.72, once the issue of wrongly stating the status of the UDP employment site at Davenport Green as “Green Belt” within the SA carried out in 2009 had been brought to the Council’s attention, the Council commissioned further SA work in respect of both RLAM’s originally proposed SS1 Strategic Site and the Council’s proposal to allocate the land at Davenport Green as Green Belt. The Council also sought comments from Urban Vision on the issues raised by RLAM’s consultants JAM in July 2010.

This work, carried out in July 2010, informed the Council decision as to whether or not it should proceed with the Publication of the Core Strategy in September 2010. The Council concluded that although some of the negative scores had now become uncertain and more mitigation proposals had been proposed by the developers, there was very little change in the SA and this would not have effected how the SA, together with other evidence, was used to determine decisions in relation to Davenport Green under Factual Matter 8.

3.8 Sustainability Appraisal at Publication – September 2010

A final SA of the Core Strategy was carried out in June 2010 (CD 6.2.2 and CD 6.2.4) and final improvements made to policies as a result. The Core Strategy was then published alongside the SA in September 2010 and submitted in December 2010. The submitted Plan contained only minor changes therefore it was considered that no further SA Report was necessary.

Consultation

At this point in time, representations were restated by RLAM challenging the soundness of the sustainability appraisal together with substantial new detailed information on RLAM’s development proposal at Davenport Green. No other responses to the SA were made at this stage in the Plan preparation process.

4. Post Submission Sustainability Appraisal

This section provides a summary of the results of the post-submission SA of:

- The Regional Centre and Inner Area boundaries;
- The development proposals for Davenport Green; and
- Core Policies R4, W1 and L5.

These appraisals considered the degree and type of impact, split by short term (0-5 years), medium term (5-10 years), and long-term (10+ years). It also predicted the certainty of impact (in terms of high, medium and low); the scale of impact (which ranged from local to national); the permanence of the impact; any key secondary, cumulative and/or synergistic impacts; and options for mitigation. When undertaking this appraisal the default level of certainty was considered to be medium.

The full SA matrices are available in the Appendices to this report (see separate document – CD12.104.2).

4.1 Sustainability Appraisal of the Regional Centre and Inner Area Boundaries

i) The Need for further Sustainability Appraisal Post Submission

Following discussion at Hearing Session 1 of the Core Strategy Examination, the Inspector requested that the Council re-consider its approach to the level of detail being proposed within the Core Strategy in relation to the Regional Centre and Inner Areas Boundary. The principal concerns raised by the Inspector were the apparent lack of consideration of alternative realistic options prior to the selection of a “preferred option” and the apparent lack of sufficient evidence to justify the preferred boundaries, as published in the Publication Core Strategy (CD 6.2.1), particularly with reference to the Inner Areas boundary.

In the light of these concerns, the Council decided that it would be both positive and appropriate to undertake a further consultation on possible options for the Regional Centre and Inner Areas boundaries as part of the Core Strategy process.

ii) Alternatives Considered

Regional Centre

The Regional Centre, with Manchester City Centre at its core and extending into parts of Salford and Trafford, is the economic driver of the City Region and has greatest potential to drive its continued economic growth, and to do so with the least environmental costs.

In CD 12.70 the Council identified two potential options for the Regional Centre Boundary. The first was to define the Regional Centre, within Trafford, as Pomona and Wharfside, as allocated within the Revised Unitary Development Plan (UDP) (2006). The second option is that which was presented by the Council in the Publication version of the Trafford Core Strategy at Figure 1. This proposed boundary includes Pomona and Wharfside, as allocated within the Revised UDP

(2006), together with the Manchester United Stadium Area and its immediate environs, also as allocated in the Revised UDP (2006).

Inner Area

In CD 12.70 the Council identified four options for the Inner Area Boundary.

- Option 1 – would include that part of the Old Trafford Priority Regeneration Area, not included within the Regional Centre and the Gorse Hill regeneration area (as identified with the Revised Trafford UDP). It would also extend through Trafford Park to its western boundary with Parkway, the Bridgewater Canal and the Manchester Ship Canal.
- Option 2 – would contain all of the land identified in Option 1 but would extend through the whole of the remaining area of Trafford Park (not included in the Regional Centre), i.e. to its western boundary with the Manchester Ship Canal and the M60.
- Option 3 – would encompass that land covered by Options 1 and 2, whilst extending the boundary to include the built up area of Stretford, stretching to the M60 in the west, but excluding the Green Belt land.
- Option 4 – would encompass that land covered by Options 1, 2 and 3, whilst extending the boundary to include the built up area of Urmston, stretching to the Manchester Ship Canal in the west, but excluding the Green Belt land.

iii) Results of the Sustainability Appraisal

The options for the Regional Centre and Inner Area boundaries were presented in CD 12.70 and made available for consultation. The options were subject to SA, the findings of which were included within the consultation document. The SA did however note that the appraisal of these boundary options was more complex than a regular SA in the requirement to understand the implications of the different boundary options in terms of the sustainability objectives given the limited description of the purpose of the Regional Centre and Inner Area boundaries in the Regional Spatial Strategy. As a result, the SA considered that there is only a low level of certainty over the effect of the options on a number of the sustainability objectives.

A summary of these appraisals is provided below and the full SA of the boundaries is presented in Appendix A (see separate document – CD12.104.2).

Regional Centre

This SA concluded that the two options for the Regional Centre boundary would have a relatively similar impact on the sustainability objectives. In particular, by leading to a number of derelict and underused sites, some of which are known to be contaminated, being remediated and brought back into effective use, the appraisal considered that both options would have a major positive impact on the objective relating to conserving land resources and reducing land contamination. Both of the options were considered to have some positive impact on 14 of the objectives. Given that both locations would result in major business, retail, leisure, cultural and tourism facilities being provided in a location that contains areas at risk of flooding as defined by the Level 2 SFRA, it was however considered that both options had the potential to have a negative impact on the objective of reducing the effects of climate change. In addition, both options would have an uncertain impact on the objective relating to enhancing transport infrastructure.

The SA concluded that the principle difference between the two options related to their performance against the objective of enhancing Trafford's image as a business and tourism destination. By including MUFC within the Regional Centre it was considered that Option 2 would have a major positive impact on this objective. Conversely, the exclusion of MUFC from the Regional Centre boundary proposed by Option 1 would not be consistent with the role of the Regional Centre as a major focus for leisure, cultural and tourism development. The SA therefore anticipated that this option would have a negative impact on the objective of enhancing Trafford's image as a business and tourism destination.

Inner Area

The SA considered that none of the options would have a negative impact on any of the objectives but a pattern of scores for the options was however clearly apparent with Options 1 and 2 having a positive impact on a considerably greater number of sustainability objectives. It was concluded that these options would have a positive or major positive impact on 12 of the sustainability objectives. All four options were however considered to have a positive impact on the objective relating to encouraging the long term sustainability of Trafford's town centres. Each of the options were also considered to have an uncertain impact on the objective of enhancing transport and each of the options would have a neutral impact on the objectives relating to: crime and fear of crime; encouraging a sense of community identity; protecting local neighbourhood quality; protecting open space and biodiversity; reducing the environmental impacts of consumption; conserving land resources; protecting water quality; protecting the diversity and distinctiveness of landscapes and townscapes; and improving the social and economic performance of Trafford's economy.

iv) Consultation

No responses were received in relation to the SA.

v) How the Post-Submission Sustainability Appraisal Influenced the Process

Taking into account the findings of the SA, together with their view that it reflected the definitions provided within RSS and was more closely aligned with the Core Strategy's of Manchester and Salford, the Council concluded that Option 2 was the most appropriate definition of the Regional Centre Boundary.

In relation to the Inner Area boundary, the SA assisted the Council by identifying Options 1 or 2 as the most sustainable options. The Council then concluded that Option 2 was the most appropriate definition of the Inner Area boundary due to it reflecting the definitions provided within RSS and also because this option would support the growth of the Regional Centre and the location of residential development at the Trafford Centre Rectangle.

4.2 Sustainability Appraisal of Policy L5: Climate Change

i) The Need for further Sustainability Appraisal Post Submission

The submitted version of Policy L5 was subject to SA as part of the appraisal of the Publication version of the Core Strategy. The results of this appraisal are contained within CD.6.2.2.

However, at the eighth Hearing session of the Trafford Core Strategy Examination the Inspector considered that, in its submitted form, Policy L5 is not effective and it is unclear if it is justified. She therefore concluded that, as written, Policy L5 was unsound and invited the Council to re-write both the policy text and its justification in a manner that its requirements can be easily and clearly understood; its mechanisms for delivery are realistic and transparent and; its implications for development are taken into account, both in isolation and as part of the overall package of costs imposed on development by the Core Strategy.

To address these concerns the Council proposed to re-draft the policy by:

- Removing the policy text relating to the national timeline to achieve zero carbon new buildings;
- Applying only the CO₂ reduction targets within the Trafford Low Carbon Study, with the baseline for the targets being national Building Regulations Part L 2006;
- Simplifying the policy to detail two CO₂ reduction targets:
 - 40% for major development, located in the Low Carbon Growth Areas; and
 - 30% for all major development outside of these areas.
- Removing the CO₂ reduction target for minor developments; and
- Revising the policy to acknowledge the impact of all required planning obligations on scheme viability, and the need to demonstrate flexibility.

ii) Alternatives Considered

As the amendments to the policy were being made to address specific concerns raised by the Inspector, it was decided that it was not necessary to consider alternatives at this stage.

iii) Results of the Sustainability Appraisal

The amended Policy L5, together with its accompanying SA, was made available for consultation in April 2011 (CD 12.71). A summary of this appraisal is provided below and the full SA is presented in Appendix B (see separate document – CD12.104.2).

This SA concluded that the amended policy has the potential to deliver a number of significant sustainability benefits, including reducing both contributions to and the effects of climate change and reducing the environmental impacts of consumption and production.

It considered that the amended policy L5 would have a positive effect on a number of other objectives and did not anticipate that it would have any negative effects on the sustainability objectives. Evidence supporting the policy demonstrates that the CO₂ reduction targets are deliverable and will not impact upon the supply or pace of housing delivery set out in the Council's housing trajectory. As a result, the appraisal

concluded that there is a greater level of certainty that the costs of incorporating the necessary features to meet these standards would not have a significant impact on the objective of achieving a balanced housing market. Similarly, the SA considered that the objectives relating to Trafford's high economic performance can be achieved as there is also flexibility to negotiate on a site-by-site basis where viability concerns are raised as a potential impediment to growth.

The appraisal concluded that the amended policy would not have an uncertain impact on any of the sustainability objectives and was unlikely to have any significant effects in relation to the following objectives: improving the accessibility for all to services and facilities; encouraging a sense of community identity and welfare; improving qualifications and skills; conserving land resources; protecting and enhancing landscape and townscape character. Other policies within the Core Strategy are however intended to support the achievement of these SA objectives.

iv) Consultation

No responses were received in relation to the SA

v) How the Post-Submission Sustainability Appraisal Influenced the Process

The SA showed the revised policy to be sustainable. It did not anticipate that the amended Policy L5 would have a negative effect on any of the sustainability objectives nor did it consider that the policy would have an uncertain impact on any of these objectives. The SA did not therefore recommend any changes to the amended Policy L5.

4.3 Sustainability Appraisal of RLAM's Development Proposal (SS1) at Davenport Green

i) The Need for further Sustainability Appraisal Post Submission

At the Pre Hearing Meeting the Inspector requested that the Council published for consultation the SA work it had undertaken showing Davenport Green as at 2009 in its correct position, outside the Green Belt. Consequently, in order to ensure that the SA for the Core Strategy is transparent and robust, the Council published an SA of the Davenport Green proposals which reflected its status as being outside of the Green Belt for a period of public consultation in February 2011 (CD 12.37.2). This appraisal also took into account the further information on Davenport Green submitted by RLAM in November 2010.

Following this consultation it became apparent that not all the information submitted had been used in the appraisal, therefore the Council decided that a re-appraisal of the February SA of Davenport Green was needed. This appraisal was published for public consultation in CD 12.72.

In June 2011 a further SA was carried out on the RLAM (SS1) proposal for Davenport Green alongside that prepared for the Council's preferred option for the land. This SA assessed the proposals against new evidence, in particular the Government's statement "Plan for Growth". This is detailed in relation to Policy R4, below and was made available for consultation in July 2011 (CD 12.95).

ii) Alternatives Considered

The Alternatives for Davenport Green are considered below under section 4.3 on Policy R4.

iii) Results of the Further Sustainability Appraisals

A summary of each of the further appraisals of the Davenport Green proposals are provided below and the full SAs are presented in Appendix C (see separate document – CD12.104.2).

Re-appraisal of RLAM's Development Proposal (SS1) at Davenport Green (February 2011) (CD 12.37.2)

The appraisal of the Davenport Green proposals published in February 2011 (CD 12.37.2) considered that the proposals for Davenport Green would bring a number of benefits, particularly in relation to the economic objectives and those relating to open space and biodiversity; reducing the impact of climate change; enhancing the distinctiveness of landscape; and enhancing accessibility.

Nevertheless, the appraisal considered that, by resulting in the permanent loss of a substantial greenfield area, RLAM's proposals would have a significant negative impact on the objective of conserving land resources. It also considered that the proposals would have an uncertain effect on the objectives relating to reducing the effect of traffic on the environment; reducing contributions to climate change; and protecting air quality. The extent to which the proposals would contribute to the objectives relating to poverty and social exclusion and reducing disparities was also considered to be uncertain.

Further Re-appraisal of RLAM's Development Proposal (SS1) at Davenport Green (April 2011) (CD 12.72)

The re-appraisal of the February 2011 SA of the development proposal at Davenport Green (April 2011) (CD 12.72), which fully incorporated the substantial information provided by RLAM in November 2010, resulted in a significant improvement in the performance of the Davenport Green proposals against the SA objectives. In particular, by resulting in the provision of a high quality employment development in an area that is attractive to market and visible from the motorway, it was considered that the development proposals had the potential to have a major positive impact on the objectives relating to enhancing Trafford's high economic performance; and enhancing Trafford's image as a business destination. It was also considered that in the long term the development proposals had the potential to have a major positive impact on the objectives relating to reducing poverty and social exclusion; and reducing disparities. In addition, the SA concluded that by protecting existing biodiversity on site and improving the ecological and recreational value of Davenport Green through the creation of a rural park, it was considered that the proposals also have the potential to have a major positive impact on the objective relating to open space, biodiversity, flora and fauna.

Whilst Davenport Green is located in an area that is defined as being within the least accessible parts of the Borough by the Developer Contributions to Highway and Public Transport Schemes SPD, the SA considered that the range of measures that would be implemented to improve the accessibility of the site by public transport and

non-motorised forms of transport would mean that the proposals would have a positive impact on the objective relating to enhancing transport infrastructure and some positive impact on the objectives relating to reducing the effect of traffic on the environment and reducing contributions to climate change. Nevertheless, it was acknowledged that the peripheral location of the site, coupled with its proximity to the motorway network, reduces the level of certainty of this impact on these objectives.

The appraisal considered that Davenport Green had the potential to have a positive impact on a range of other objectives including those which relate to reducing the impact of climate change; protecting and improving water quality; protecting and enhancing landscapes and townscape character; improving health; improving qualifications and skills; and local neighbourhood quality.

However, the development of the site would lead to the permanent loss of a significant area of greenfield area and is unlikely to offer the opportunity to reduce land contamination in the Borough. As a result, the SA considered that the development proposals would have a negative impact on the objective relating to conserving land resources and its sub-objective of reducing the amount of contaminated, derelict and underused land. The impact of the proposals on the objective of reducing the environmental impacts of consumption and production was also considered to be uncertain.

Further Appraisal of RLAM's Development Proposal (SS1) at Davenport Green (July 2011) (CD 12.95)

The further SA on RLAM's SS1 proposal for Davenport Green, carried out in June 2011 (CD12.95) to assess the proposals against the new evidence, produced very similar results to the appraisal undertaken in April 2011. It was considered that these proposals for Davenport Green would continue to have a positive impact on a wide range of sustainability objectives, particularly those relating to economic issues.

Whilst this further SA of the proposals of Davenport Green produced very similar results to the appraisal undertaken in April 2011, a number of changes were made to the commentary contained within this appraisal. These changes to the commentary principally related to the need for the appraisals to take into account changes to Government policy, in particular the identification of an Enterprise Zone at Manchester Airport, and the findings of the recent DTZ study (CD 12.86).

iv) How the Post-Submission Sustainability Appraisal Influenced the Process

Once the full range of information provided by RLAM in November 2010 was taken into consideration, the SA results show that development at Davenport Green can be sustainable and could have a positive impact on many of the sustainability objectives. However up until June 2011, as set out in CD 12.72, the Council did not consider that sufficient justification, in economic terms existed to amend the plan in relation to land at Davenport Green. Instead it continued to propose that the land be returned to the Green Belt.

Nevertheless, as detailed further in section 4.4 below, changes to Government policy and the emergence of new evidence led the Council to change its approach to land at Davenport Green in June 2011. This different approach was supported by the SA which demonstrated that the proposals for Davenport Green had the potential to have a positive impact on a wide range of sustainability objectives.

4.4 Sustainability Appraisal of Policy R4: Green Belt, Countryside and Other Protected Open Land

i) The Need for further Sustainability Appraisal Post Submission

Policy R4 set out with how the Council will protect Green Belt land, Countryside and Other Protected Land. The policy has been subject to SA at several stages during the preparation of the Core Strategy and was fully appraised as part of the SA of the Publication version of the Core Strategy. The results of this appraisal are contained within CD.6.2.2.

In direct response to concerns raised by RLAM in February 2011, an additional SA of Policy R4 was undertaken in April 2011. This appraisal provided a more detailed consideration of the impact of returning the former development site at Davenport Green to the Green Belt. This re-appraisal of Policy R4 was made available for public consultation in April 2011 (CD 12.72).

On the 23 March 2011, the Government set out a “Plan for Growth” statement (CD 12.92) which outlines the Government’s economic policy objective to achieve strong, sustainable and balanced growth across the country. Amongst other things, the “Plan for Growth” detailed the Government’s intention to establish 21 new Enterprise Zones across the UK. Within Greater Manchester an Enterprise Zone was identified at (Manchester) Airport City. The Government has made it clear that it expects this statement to be a material consideration in planning decisions with immediate effect. The Council therefore instructed independent consultants DTZ to assess the potential opportunities and impacts for Trafford relating to the designation of the Manchester Airport City Enterprise Zone, particularly in terms of the implications for Davenport Green.

The key messages in relation to Davenport Green that emerged from this work (in CD 12.86) were as follows:

- The trend in office market demand over the last 15 years has shifted its focus toward city centres and larger town centres and away from traditional style business parks;
- Davenport Green has failed to attract a large inward investor during a period of continual economic growth;
- DTZ consider that the proposal as presented by RLAM in SS1 is not exceptional, and the earliest phases of development require significant enabling development (including an hotel) to subsidise the development which could impact negatively on Altrincham Town Centre and other centres;
- DTZ consider that the uses being proposed by RLAM in SS1 could be accommodated on a number of other employment sites within a reasonable drive time of the Airport and would not maximise the potential opportunities and advantages that the Davenport Green site presents;
- RLAM’s (SS1) scheme includes significant infrastructure investment, estimated in the order of £15m. DTZ would not normally expect a developer to commit to this level of investment without an identified (and committed) occupier whilst occupiers are more likely to show interest in a serviced site; and

- Rather than trying to stimulate investment of this important asset in the short term, DTZ suggested that it would make more sense to ensure Davenport Green remains available for a special inward investor to Greater Manchester looking for a high quality site close to the Airport or MediPark.

Given the Government's Plan for Growth statement and the uncertainty relating to the future need for the Davenport Green site to support the growth of Airport City and/or the MediPark in the long term, the Council's Executive resolved on 27th June 2011 to propose an amendment to Policy R4. The change related to the 36ha of land at Davenport Green, which is currently outside of the Green Belt but that was proposed in the Submitted Core Strategy to be returned to Green Belt. In summary, the Council proposed to amend this policy so that the land at Davenport Green would remain outside of the Green Belt but be protected as Countryside with criteria (as set out in R4.4) to control the nature and extent of development which may be permitted and the circumstances in which such development could come forward.

A further SA on this amended Policy R4 was undertaken and made available for public consultation in July 2011 (CD 12.95).

ii) Alternatives Considered

Due to the current uncertainty/fluidity in relation to the future expansion of Airport City and/or the MediPark proposals at the University Hospital South Manchester, the Council recognised that there is a need for the Core Strategy to be sufficiently flexible to respond to changes in economic circumstances. In particular, the Council acknowledged that CD12.86 identified a potential need for a high quality, greenfield site to be retained in close proximity to Manchester Airport which could provide additional land to support proposals at Airport City or for a medipark at the University Hospital South Manchester in the future. Given the findings of CD12.86 in relation to the required attributes of such a site, it was concluded that the requirement could not be met by sites within Trafford's town centres or on alternative sites, to Davenport Green, that are outside of the Green Belt. This conclusion was also supported by the PPS4 study (CD8.3.6).

Based upon the findings of the work undertaken on behalf of the Council in relation to the proposed Enterprise Zone at Airport City (CD 12.86), the Council considered that there were therefore five alternative options in relation to the Core Strategy and the future of Davenport Green:

1. Continue to recommend the site's inclusion in the Green Belt;
2. Delay the Examination to consider significant new emerging information;
3. Amend the status of the site to some other protected land designation;
4. Propose a change to the Core Strategy to include a Strategic Site at Davenport Green;
5. Withdraw the Core Strategy.

These options were considered by the Executive at their meeting on 27th June 2011 (CD 12.83)

Having examined the additional work and the five options, the Council concluded that delaying or withdrawing the Core Strategy would not only have potentially adverse implications relating to the Council's ability to manage new development in the

Borough but would also not provide the certainty required by key stakeholders to deliver key development sites within the Borough.

As noted above, the Council considered that it is not possible to detail with certainty whether or not there will be a need for this land at some point over the lifetime of the Plan. Given this level of uncertainty in relation to need, the Council concluded that it is no longer possible to demonstrate the 'permanence' to return the land at Davenport Green to the Green Belt, as required by PPG2. Therefore, the Council concluded that pursuing the first of these options was no longer appropriate.

In relation to the option of designating land at Davenport Green as a Strategic Site for employment uses in the Core Strategy, the Council did not consider that the type of development being promoted by the site's owners directly related to the emerging proposals at the Airport. The Council therefore concluded that if the site was developed as currently proposed by the land owners then there is potential for it to compete with other employment allocations within Trafford and the rest of Greater Manchester which, in the Council's view, would have the potential to displace investment and impact on the delivery of development elsewhere within the Borough and the sub-region which would be preferable in PPS4 terms. It was therefore considered that the option of allocating Davenport Green as a Strategic Site was not appropriate.

The Council therefore concluded that the only appropriate option would be to designate the land at Davenport Green as "Countryside" with criteria (as set out in R4.4) to control the nature and extent of development which may be permitted and the circumstances in which such development could come forward.

iii) Results of the Further Sustainability Appraisals

A summary of each of the post-submission appraisals of Policy R4 is provided below and the full SAs are presented in Appendix D (see separate document – CD12.104.2).

Re-appraisal of Policy R4 (April 2011) (CD 12.72)

The re-appraisal of Policy R4, which provided a more detailed consideration of the impact of returning Davenport Green to the Green Belt (CD 12.72), concluded that the policy R4 performed well against a number of sustainability objectives. The key potential benefits of the policy were considered to relate to protecting, enhancing and restoring biodiversity and open space; and conserving land resources. In addition, by providing long-term protection against development that would have a detrimental impact on landscapes in the Green Belt, including those identified as being historically significant landscapes by the Trafford Urban Historic Landscape Characterisation Report, the SA concluded that the policy would also have a major positive effect on the objective of protecting the diversity and distinctiveness of landscape and townscape character. The appraisal also concluded that the policy had the potential to have a positive impact on the objectives relating to reducing the effect of traffic on the environment, reducing contributions to climate change and health. It did however consider that the level of certainty that the policy would have a positive impact on the objective relating to health impact was reduced by the fact that the policy would reduce the likelihood of a rural park being provided at Davenport Green.

The SA anticipated that the policy would not have any negative effects on the sustainability objectives. Nevertheless, it concluded that the policy would have an uncertain impact on a number of sustainability objectives. The appraisal noted that the policy would result in a site at Davenport Green that was allocated for employment use in the UDP being returned to the Green Belt. It was recognised that the Trafford Employment Land Study (2009) indicated that a sufficient supply of suitable and developable employment sites exist to meet the Borough's requirements without the need to retain the allocation of Davenport Green as an employment site. In addition, Trafford's PPS4 assessment concluded that Davenport Green was not suitable for office development in relation to the tests in PPS4. Notwithstanding this, the Commercial Review submitted on behalf of RLAM in November 2010 states that Davenport Green is the only site within Trafford that is capable of attracting large levels of investment from multi-national businesses. As a result, the SA considered that the impact of the policy on the objectives relating to Trafford's economic performance and its image as a business destination was uncertain.

The SA also concluded that the policy would have an uncertain impact on the objectives relating to air quality and reducing the impact of climate change.

Appraisal of the Amended Policy R4 (July 2011) (CD 12.95)

The appraisal of the amended Policy R4 which proposed to designate Davenport Green as 'Countryside' rather than return the site to the Green Belt (July 2011) (CD 12.95), concluded that the amended Policy R4 continued to perform well against a number of sustainability objectives, particularly those relating to protecting, enhancing and restoring biodiversity and protecting the diversity and distinctiveness of landscape and townscape character. The appraisal considered that the policy would continue to have a positive impact on the objective relating to health and that the certainty of this impact was improved by the fact that the policy would only allow development at Davenport Green if 99 hectares of land surrounding the development site will be protected, enhanced and managed for, inter alia, recreational access.

The appraisal of the revised R4 did however consider that the extent to which the policy would have a positive impact on the objective relating to conserving land resources was reduced slightly in the longer term by the fact that it would allow for the release of a greenfield site at Davenport Green. Nevertheless, the appraisal of the amended R4 shows improved scores in the long term against a number of economic objectives and also the objectives that relate to enhancing transport infrastructure and reducing poverty and social exclusion.

iv) Consultation

As part of the April consultation RLAM reiterated their concerns with regard to the SA process and one further response questioned the positive score for development at Davenport Green in relation to objectives S2 and S3. It was not considered any change to the Policy or SA was needed in response to these comments.

As part of the July consultation RLAM acknowledged that Davenport Green performed well in sustainability terms but considered that the reappraisal scored favourably independently, and regardless of any connection with Airport City and MediPark. Other detailed comments were also received querying the accuracy of the SA with regard to referencing burnt out cars (S9); the value of the development for the disadvantaged communities of Trafford; the conclusion that DG is the only site

capable of attracting the calibre of development cited (EC1); the apparent contradiction that EC4 makes reference to the DG proposals being in conflict with PPS4 and; the conclusions in relation to E1 and E8.

v) How the Post-Submission Sustainability Appraisal Influenced the Process

Although the emergence of new evidence and the change in Government policy have been the overriding reasons for the proposed changes to R4, the SA has demonstrated that the proposed amendments to R4 would still result in a policy that performs well against the sustainability objectives. Moreover, the SA has highlighted that the amended Policy R4 shows improved scores in the long term against a number of economic objectives and also the objectives that relate to enhancing transport infrastructure and reducing poverty and social exclusion.

4.5 Sustainability Appraisal of Policy W1: Economy

i) The Need for further Sustainability Appraisal Post Submission

Policy W1 aims to facilitate the continued modernisation and revival of industrial and commercial activity through the release of sufficient land. The policy has been subject to SA at several stages during the preparation of the Core Strategy and was fully appraised as part of the SA of the Publication version of the Core Strategy. The results of this appraisal are contained within CD.6.2.2.

In light of suggested amendments to Policy R4 since the Core Strategy was submitted to the Secretary of State (see section 4.3 above), a number of consequential changes were proposed to Policy W1 to provide clarity about the definition of Davenport Green as a potential employment site in order to ensure the plan retains sufficient flexibility to respond to changes in economic circumstances and the Government's "Planning for Growth" agenda.

ii) Alternatives Considered

As the proposed changes to Policy W1 were consequential changes resulting from changes to Policy R4, no alternatives were considered.

iii) Results of the Further Sustainability Appraisal

The amended Policy W1, together with its accompanying SA, was made available for public consultation in July 2011 (CD 12.95). A summary of this appraisal is provided below and the full SA is presented in Appendix E (see separate document – CD12.104.2).

The appraisal of the revised Policy W1 concluded that the amendments made to the policy since it was last consulted upon do not have a significant impact on its performance against any of the sustainability objectives. It concluded that the amended Policy W1 would continue to have a number of significant sustainability benefits with the key ones relating to enhancing Trafford's high economic performance; improving Trafford's image as a business destination; improving local neighbourhood quality; and protecting and enhancing townscape character. In addition, by seeking to focus economic activity on a number of key locations that are

well related to areas of deprivation and by requiring smaller sites for employment development to be accessible by a range of alternative modes other than the private car, it was concluded that the policy would have a major positive impact on poverty and social exclusion and some positive impact on economic disparities. The SA considered that Policy W1 could also have a positive effect on the skills of the resident population. However, in order to increase the certainty of this impact, it recommended that reference could be made to the use of legal agreements to secure employment opportunities for local residents.

The SA noted that although B1 office developments would be focused in the Regional Centre and town centres, the policy would enable some B1 office development in out of centre locations. Nevertheless, some of these out of centre locations are accessible by public transport and a strong emphasis is placed on ensuring that new employment development is located where it will be accessible by a range of alternative modes other than the private car. In addition, the policy specifies that B1 office development in Trafford Park and Carrington will be ancillary to existing or proposed employment uses and seeks to improve public transport infrastructure in Trafford Park. Consequently, the SA concluded that Policy W1 should still have a positive impact on reducing the effect of traffic on the environment; reducing contributions to climate change; improving air quality; and improving the environmental performance of the economy.

A number of the proposed locations for economic development identified in Policy W1 are adjacent to the Manchester Ship Canal and/or Bridgewater Canal. As a result, the SA noted that there is a degree of uncertainty over the impact of the proposals on water quality. However, it recognised that other policies in the Core Strategy should ensure that new developments incorporate appropriate measures to reduce surface water runoff into watercourses and reduce the risk of flooding from sewers. As such, no mitigation measures were proposed by the SA in relation to this issue.

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

iv) How the Post-Submission Sustainability Appraisal Influenced the Process

The appraisal of the revised Policy W1 concluded that the proposed amendments to Policy W1 did not have a significant impact on its performance against any of the sustainability objectives. As a result, the appraisal did not recommend any new mitigation measures to improve the sustainability of the amended policy.

5.0 How to Comment

This SA Report will be subject to a two week consultation period ending at noon, 24th October 2011.

During the consultation period, copies of the document will be available for public inspection at all public libraries/Access Trafford offices in Trafford, during normal opening hours. Additionally, it will be available on the Council's website at:

<http://www.trafford.gov.uk/environmentandplanning/strategicplanning/localdevelopmentframework/corestrategyexaminationinpublicdocuments/>

Comments may be made by any of the following means:

- By email, to: programme.officer@ntlworld.com
- By post, to:
Yvonne Parker
The Programme Officer
c/o Strategic Planning and Developments Team
Trafford Metropolitan Borough Council
1st Floor, Waterside House
Sale Waterside
Sale
M33 7ZF

All comments should be received no later than noon on Monday 24th October 2011.

Comments submitted during this period will be considered by the Planning Inspector who has been appointed by the Secretary of State to carry out the Examination into the Trafford Core Strategy. The Inspector will then decide whether it is necessary to hold an additional hearing session to consider the responses received.

The Inspector will then issue a report to the Council containing binding amendments that must be made to the Core Strategy before it is legally adopted. A summary of the main issues raised on the SA, and how these were taken into account in the development of the plan and SA Report, will be produced as part of the adoption statement for the Core Strategy.

The significant effects of implementing the Core Strategy will then be monitored.