

**Trafford's Core Strategy: Revised Sustainability Appraisals 2011
Representations on behalf of RLAM**

**Review of TBC's Revised Sustainability Appraisals
of the Core Strategy 2011**

By Jam



Davenport Green

Review of Trafford Metropolitan Borough
Council's Revised Sustainability Appraisals
of the Core Strategy 2011

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1.0 Introduction

- 1.1 At the pre-examination meeting of the Trafford Core Strategy on the 25 January 2011, the Inspector suggested that a further Sustainability Appraisal (SA) be undertaken by the Council, which should appraise all the sites considered at the Preferred Options Stage, including Davenport Green. It was noted that the appraisal should take account of Davenport Green's current policy designation; outside the Green Belt. The Inspector also encouraged the Council to discuss, and if possible, to agree upon the methodology for the further SA.
- 1.2 This report has been prepared by jam consult ltd on behalf of Royal London Asset Management (RLAM) to provide a review of the Sustainability Appraisal Methodology and the revised Sustainability Appraisal reports 2011 undertaken by Urban Vision on behalf of Trafford Metropolitan Borough Council (TMBC), in support of the production of the draft Core Strategy documents.
- 1.3 This report should be considered alongside the representation submitted by RLAM in November 2010 (Appendix 17), which set out the regulations and guidance relevant to the SA process and drew attention to the significant defects that have occurred to enable a view to be taken on the soundness of the SA and legal compliance of the process. This report does not repeat or extensively cross reference the critique of the 2009 SA contained within Appendix 17. To the extent that this SA has not addressed the points raised within Appendix 17, those matters are relied upon.
- 1.4 The review of the Council's revised Sustainability Appraisal documents in support of the Core Strategy has revealed that the Sustainability Appraisal process remains a fundamentally flawed process that is contrary to the regulatory requirements (SEA Regulations) and guidance (PPS12 and A Practical Guide to SEA, ODPM 2005). *(See Appendix 17 especially Section 2.0 Regulations and Guidance pp9 and Section 4.0 Conclusions pp37)*

2.0 Sustainability Appraisal Methodology

- 2.1 Appendix 3 of the Inspector's Note 2 of the Pre-examination meeting held on 25 January 2011 noted that the Council intended to speak with RLAM, the key representor on this matter, with a view to reaching agreement with regard to the SA methodology.
- 2.3 Initial correspondence from the Council on 27th January did not do this. It instead set out the Council's proposal and invited us to comment only on presentation to the Examination. It did not invite agreement to the methodology. Jam submitted a document with detailed proposals on methodology for the further appraisal, which was submitted to the Council on 1st February 2011. This document is reproduced as the first column of Appendix 1 to this report. A response to Jam's proposed methodology was not received until the evening of Thursday 9th February, less than 24 hours before the new SA was published on the afternoon of 10th February. This response is reproduced as the second column of Appendix 1, as referred to above (it is also Appendix iii to the Council's Further SA of Davenport Green (CD.12.27.2)). As a result of this late response, it was not possible to discuss or agree the proposed SA methodology prior to the revisions to the SAs being made.
- 2.4 Jam does not agree with the response provided by the Council (CD 12.37.2 Appendix iii) and the reasons for this are included within Appendix 1 to this report and comprise comments, together with references to regulations and guidance. This is set out in the third and fourth columns of Appendix 1 to this report.
- 2.5 Specific attention should be drawn to the comments in the covering note made on page 75 (CD 12.37.2).

"Sustainability Appraisal (SA) is a systematic process used to assess the extent to which a plan or strategy will help to achieve relevant social, environmental and economic objectives. Its purpose is to promote sustainable development by ensuring that sustainability considerations have been integrated into the preparation, adoption and implementation of a plan." Para 1

Whilst the above description of the Sustainability Appraisal process is considered correct the process, as described, has not been applied by the Council. The plan has failed to assess the options appropriately through the SA process in a systematic way. The lack of evidence to support the decisions taken and failure to reference the evidence relied upon in reaching conclusions fails to show that the SA has been an integrated process that has had full regard to sustainability considerations in the preparation of the proposed plan. The decision to extend the Green Belt to include

Davenport Green was taken without an appropriate assessment of the options or the likely significant impacts upon sustainable development. The results of the SA do not demonstrate in a clear, transparent manner that the decisions taken support the most sustainable development for the area.

- 2.6 A significant omission in the Council's methodology is the failure to assess the deliverability of proposals in the Core Strategy, and failure to assess the viability of proposals as an important element of deliverability. In this regard Jam takes issue with the Council's statement in paragraph 2 of page 1 of Appendix III (CD 12.37.2). This states

"SA is not intended as a detailed site evaluation tool to assess the viability or deliverability of proposals. Consequently whilst issues regarding the viability/deliverability of the options are central to the soundness of the Core Strategy, they are not central to the scope of the SA."

It is agreed that SA is not intended as a detailed site evaluation tool, such as Environmental Impact Assessment. SA is intended to assess the strategic implications for sustainable development of the policies and plan. However, it is incorrect that viability and deliverability should not be considered within the scope of the SA. As stated above, the purpose of the SA is to ensure that sustainability considerations have been integrated into the preparation, adoption and implementation of the plan. If the chosen options are not viable and deliverable, they will not be sustainable and will not be able to be implemented. The SA process cannot be divorced from the plan that is being prepared; its purpose is to inform the plan. In addition, in order for the Core Strategy to be 'justified' it must be demonstrated that it is the most appropriate strategy when considered against reasonable alternatives. An option which is not deliverable or viable cannot be considered the most appropriate strategy.

3.0 Sustainability Appraisal Report and Appendices of Preferred Option June 2009 – Revision February 2011

- 3.1 The Council has, at page 1 of the revised SA report (CD12.37.3), sets out the purpose of the report and states that this is to appraise Davenport Green “taking into account its correct status as outside the Green Belt”. The revised SA report seeks to address the inaccuracy of the 2009 SA report, which incorrectly stated that Davenport Green was located in the Green Belt. Revisions are made to the SA report and the accompanying Appendices (CD12.37.4) to correct this error. The new text is marked in blue and underlined and text which is incorrect or not applicable is underscored and in red.
- 3.2 The main change to the text within the SA report can be found on page 29. However, apart from a slight change to the wording in the first sentence, the text is the same as the original text in 2009, including a typographical error in the second paragraph. The text still fails to mention the current policy designation of the site: namely, as a Strategic Development Site and Major High Amenity Site in saved policies E13 of the UDP. The two paragraphs also appear to contradict each other: the first stating that the proposals will provide benefits for biodiversity, flora and fauna; and the second that the proposals will have a negative impact upon biodiversity, flora and fauna. In any event, the reasoning is unclear.
- 3.3 Further changes are marked in the revised Appendices but only concern the appraisal of Davenport Green (pages 96-100). The changes made are to remove any reference to Green Belt land; however, the scoring of the Appraisal has not been altered. Of most significance is the result for Objective E6: Conserve land resources and reduce land contamination. The commentary now states that the land comprises entirely of Greenfield land and is given a **major negative** result. Again the SA fails to mention the current policy designation of the site or the planning permission, which had been extant during earlier iterations of the SA, and which had expired shortly prior to the 2009 appraisal.
- 3.4 In the response from TMBC to the Inspector’s Note 1, 31 December 2010 (CD 12.3) it is stated in Matter 8 (para 8.22, page 39) that the appraisal of the locations and sites was informed by information submitted by third parties. A pro-forma setting out the information for Davenport Green is attached as Appendix 8.2 to CD12.3. However, there is no evidence within the SA commentary either in 2009 or the revised version 2011 that the detailed information provided in the pro-forma has been used to inform the assessment. Specific references within the pro-forma include the section on PPG2 Green Belts, which correctly sets out the status of the land at Davenport Green and the

UDP policy designation, as well as numerous references to the economic benefits of the proposals for the area. This information is not mentioned in the SA or cross-referenced as a key evidence document. There is also no evidence of the information used for the other Strategic Locations or how this information has influenced the conclusions.

- 3.5 A comparison of the changes in the results for Davenport Green between June 2009 and February 2011 are contained within Appendix 2 of this report for information and ease of reference so that the changes to the scores can be seen in a single document.
- 3.6 The revised June 2009 SA (2011), whilst changing the wording of the land from 'Green Belt' to 'Greenfield', fails to assess the implications of the change in the status of the land and the flaws in the methodology and the assessment that were identified by RLAM in their representation of November 2010 (Appendix 17).
- 3.7 If the Council had taken the opportunity to correct the flaws in the methodology, the SA process may well have led to different scorings for many of the Locations/Sites, not just Davenport Green. For example, the SA would have cited the evidence relied upon in reaching the conclusions, making the process transparent, as required by guidance. Failure to do so has resulted in another flawed stage in the SA process.
- 3.8 Although the land at Davenport Green is now correctly treated in the revised SA material as not within the Green Belt, this does not rectify the fundamental defect at the Issues and Options stage that an SA should have been undertaken which included an appraisal of at least two main options:
1. The retention of the land at Davenport Green as a strategic development site outside the Green Belt; and
 2. The extension of the Green Belt to include the land at Davenport Green
- The relevant policy provisions in the draft Core Strategy would then have followed from such an appraisal and be reflected in the SA of the CS.

4.0 Further Sustainability Appraisal of the Davenport Green Site, February 2011

- 4.1 The Further SA of the Davenport Green Site, 2011 (CD12.37.2) has been carried out in order to correct the failure to publish or undertake consultation on the SA of Davenport Green that was undertaken in July 2010. The report also seeks to address the previous appraisal of 2009, which incorrectly stated Davenport Green was within the Green Belt, by:

“Considering the findings of the results of a new 2009 appraisal for Davenport Green and any differences there are in the performance of the development proposals for this location compared to the previously published report;

Taking into account new information on Davenport Green submitted as part of the March 2010 and November consultations to carry out a further SA; and

Undertaking a comparative analysis of the SA results of each of the Strategic Locations and the Davenport Green site.” (page 4)

- 4.2 This SA is therefore assumed to supersede the SA undertaken in July 2010, which was not subject to consultation nor made available publicly until 31st December 2010 in seeking to respond to a question raised by the Inspector.
- 4.3 The SA report states (page 6) that the appraisal has been informed by the substantial information submitted by RLAM in November 2010. The appraisal of the other Strategic Locations remains based on the data available as of June 2010, with the addition of references to evidence base documents as requested by RLAM. The detailed results of the appraisal are set out in the matrices in Appendix 1 (pages 17-87, CD12.37.2).
- 4.4 A detailed assessment of the revised results is set out in Appendix 4 of this report for information. Appendix 2 and 3 provide summaries of the results for ease of reference. The results are still considered to be inaccurate and also fail properly to reflect the representations submitted by RLAM in November 2010. If the Council had taken the opportunity to correct the flaws in the methodology, the SA process may have led to different scorings for many of the Locations/Sites, not just Davenport Green. For example, it would have cited the evidence relied upon in reaching the conclusions, making the process transparent, as required by guidance. Failure to do so has resulted in another flawed stage in the SA process.

4.5 The key failings of the SA can be summarised as follows:

- The results fail to take into account RLAM's representation from November 2010 in a number of significant instances
- Although more reference to evidence has been added to the results there is still a lot missing and often the references are so generic as to be meaningless
- Mitigation is frequently suggested for Davenport Green but not for the other Strategic Locations that achieve both similar or worse scores, showing inconsistency in the method of appraisal
- The other Strategic Locations often get more favourable results than Davenport green despite constraints having been identified and the lack of evidence to show that these constraints can be overcome
- There is no mention of the current policy designation in the UDP, the lapsed planning permission or any exceptional circumstances such as might justify the extension of the Green Belt to include Davenport Green. In fact the mitigation proposed in relation to objective E6 states:

“Development should be built to an appropriate density whilst still safeguarding the visual amenity of adjacent Green Belt. By using land efficiently this will reduce the pressure to release further greenfield sites.”

4.6 As previously stated, although the land at Davenport Green is now correctly treated in the revised SA material as not within the Green Belt this does not rectify the fundamental difficulty at the Issues and Options stage that an SA should have been undertaken which included an assessment of at least two main options:

- 1 The retention of the land at Davenport Green as a development site outside the Green Belt; and
- 2 The extension of the Green Belt to include the land at Davenport Green

The relevant policy provisions in the draft Core Strategy would then have followed from the outcome of such an appraisal.

5.0 Conclusions

“The Sustainability Appraisal should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process. Sustainability Assessment should inform the evaluation of alternatives. Sustainability Assessment should provide a powerful means of proving to decision makers, and the public, that the plan is the most appropriate given reasonable alternatives.”

PPS12, para. 4.43

- 5.1 The review of the Sustainability Appraisal Report and Appendices of Preferred Option June 2009 – Revision February 2011 has shown that the main change to the document is the removal of references to ‘within the Green Belt’, which has been replaced with ‘greenfield land’. Whilst the wording is changed the SA fails to assess the implications of the change in the status of the land and the flaws in the methodology and the assessment that were identified by RLAM in their representation of November 2010 (Appendix 17). There is also no evidence within the SA commentary either in 2009 or the revised version 2011 that the detailed information provided on the site has been used to inform the assessment.
- 5.2 The review of the Further Sustainability Appraisal of the Davenport Green Site, February 2011 has also shown that the results are still inaccurate and fail properly to reflect the representations submitted by RLAM in November 2010 and evidence that is available.
- 5.3 The review of both the Council’s Revised Sustainability Appraisal documents in support of the Core Strategy has shown that the revisions have failed to rectify the fundamentally flawed process that has not been undertaken in accordance with the relevant regulatory requirements (PPS12 and SEA Regulations) and good practice guidance (A Practical Guide to SEA, ODPM 2005). The failures also demonstrate that it is not possible to integrate Davenport Green in to the Core Strategy process retrospectively. In particular the justification for the proposed amendment to the Green Belt boundary should have been considered at the Issues and Options stage of the plan.
- 5.4 The review of the SA as a whole has shown that Trafford’s approach cannot be considered to be the most appropriate given the reasonable alternatives as the SA process has failed to comply with guidance and regulations at each stage. (See references to Appendix 17 as set out in para. 1.4 above) The audit trail is still not clear and in many instances totally absent, making it impossible to determine why decisions were made.

5.5 The failures of the audit trail can be further illustrated by the assessment of Davenport Green specifically:

- The site was not included at the Issues and Options Stage (2007) and no SA report was published. The 'Business as Usual' option identified in the Scoping Report is not assessed
- The site was excluded at the Appraisal of the Spatial Options (2008) without adequate explanation or justification for its exclusion
- The Preferred Options Stage SA (June 2009, revised February 2011) now correctly shows Davenport Green as land outside the Green Belt; however, the status of the land in saved UDP policy E13 is not mentioned or the lapsed planning consent.
- The Further SA of Davenport Green (Feb 2011) improves the results in relation to transport but again fails to mention the UDP policy designation or provide suitable evidence or justification for the removal of the site as a strategic site.
- The SA did not properly assess options for Davenport Green land and therefore Policy R4 cannot be found to be sound. .
- The Submission Version June 2010 attempted to justify, by additions to the justification for Core Strategy Core Policy R4, the exclusion of Davenport Green from the Green Belt by reference to 'exceptional circumstances'. The proposal to put the land at Davenport Green back into the Green Belt has not however been subject to sustainability appraisal in any of the SA documentation.

5.6 The results of the appraisal also remain significantly flawed for these reasons:

- Inaccurate and inconsistent; the performance of different options is not clearly demonstrated by the results
- Mitigation measures are included for some locations but not for others, in particular Davenport Green
- Various assumptions have been made without clear evidence to support the decisions taken
- Neither robust nor, in several instances, credible
- Deficient in the justification for the rejection of Davenport Green
- Absence of information on viability, deliverability and timescales
- Show no assessment or recognition of the 'exceptional circumstances' needed to alter the Green Belt boundary
- Contradictory results between the Strategic Locations and Core Strategy Core Policies
- Reveal a significant failure to comply with guidance and the regulations at every stage.

- 5.7 The level of inconsistency in the scoring and commentary, coupled with the lack of reference to appropriate evidence in the results, reveals a thoroughly flawed and partial approach to the assessment. This lack of objectivity and justification in the assessment would appear to show a desire to provide the results for predetermined decisions. It is not possible to attempt to retrofit an appraisal into a policy, in circumstances where the appraisal should have been carried out before the policy was devised. The revised appraisals fail in any event to rectify the fundamental flaws in the SA. The facts to back up the decisions are not apparent. The findings, therefore, cannot be considered credible, justified or robust and can only lead to the conclusion that the SA is not fit for purpose and that the Core Strategy is not sound.

APPENDICES

- Appendix 1 - Response to Appendix iii – Jam’s proposed methodology
Trafford Council’s Core Strategy: Further Sustainability Appraisal of Davenport Green Site, February 2011
(CD 12.37.2)
- Appendix 2 - Summary of SA Report Appendices results for Trafford Strategic Locations, Feb 2011, July 2010 and June 2009 –
Trafford Council Core Strategy, Sustainability Appraisal of June 2009 Revised and Sustainability Appraisal July 2010
(CD 12.37.4)
- Appendix 3 – Summary of SA Report Appendices results for Trafford Strategic Locations, February 2011 –
Trafford Council Core Strategy Further Sustainability Appraisal of the Davenport Green Site, Appendix 1 Strategic Locations, February 2011 (CD 12.37.2)
- Appendix 4 – Summary of findings from SA Results for Davenport Green -
Trafford Council Core Strategy, Further Sustainability Appraisal of the Davenport Green site, February 2011 (CD 12.37.2) and RLAM’s representation November 2010, Appendix 13

Appendix 1 Response to Appendix iii – Jam’s Proposed methodology

Data Sourced from:

Trafford Council’s Core Strategy: Further Sustainability Appraisal of Davenport Green Site, February 2011 (CD 12.37.2)
Trafford Council/Urban Vision

JAM methodology 1/2/11	TBC/UV response to Jam 9/2/11	References	Comments
<p>Baseline Information</p> <p>1.1 Review baseline to ensure that it is up-to-date and complete e.g., to include draft Manchester City Council Core Strategy.</p>	<p><i>The appraisal will be updated to ensure it incorporates necessary references to the evidence base and the relevant statutory plans of neighbouring authorities that were available at the time of the original appraisals. This will include appropriate references to Manchester's Core Strategy Proposed Option report. The Manchester Pre-Publication Core Strategy was not issued until August 2010 and was not therefore considered during the original appraisals; appropriate references to this document will however be incorporated into the new appraisal.</i></p>	<p>SEA guidance, 5.A.2 'To get the best value from the baseline information, it is desirable to keep it up to date rather than merely being a snapshot of the situation at a particular time.'</p> <p>See also Appendix 3 and 4 of SEA guidance on baseline information</p>	<p>The baseline information published in the Scoping report 2007 has not been updated. The data included several gaps at that stage e.g. contaminated land</p>
<p>1.2 Reflect correct status of Davenport Green i.e., as per saved UDP Policy as opposed to as being within the Green Belt.</p>	<p><i>The Davenport Green site was reappraised in July 2010 to take into account the fact that the site is not within the Green Belt. This fact will continue to be reflected in the new appraisal work being carried out to inform the Hearing sessions.</i></p>		<p>The July SA was not published or consulted upon, which is why the Inspector asked for a new SA. There is no evidence that it was taken into account in the final plan. It was not reported to Committee.</p> <p>The new appraisal removes the reference to GB but does not reflect the UDP designation or the fact that there had been a planning application on the site.</p>

JAM	TBC/UV	References	Comments
<p>Evidence</p> <p>2.1 Review most up-to-date evidence available and ensure that the findings of the information and studies are accurately represented in the SA results (e.g., scores for the Strategic Locations have changed significantly between 2009 and 2010). Examples include the Land Contamination Prioritisation Study, draft Manchester Core Strategy and the Airport Masterplan.</p>	<p><i>It is acknowledged that, whilst the evidence base documents were used in carrying out the original appraisals, it is not always clear which documents resulted in which comments. The further appraisal will, therefore, make clear references to the evidence base documents, which were available at the time of the original appraisals. This will include appropriate references to Manchester's Core Strategy Proposed Option report and the Airport Masterplan. The Manchester Pre-Publication Core Strategy was not issued until August 2010 and was not therefore considered during the original appraisals; however references to this document will be incorporated into the new appraisal work.</i></p> <p><i>Although the Land Contamination Prioritisation Study was mentioned within the initial comments made by the Environment Panel (see CD 6.3.3, page 37), in relation to the February 2008 Sustainability Appraisal of the Draft Options, it was not available to the panel members and its scope was not clear. It did not, therefore, form part of that formal appraisal. Since that initial SA work was carried out the study's scope has become clearer, it is only intended as an audit of contaminated land. Additionally and not withstanding this fact, the study was never completed and published. Consequently this document will not be referred to in the new appraisal work.</i></p> <p><i>The scores appropriately changed between 2009 and 2010 given the further detail (and therefore certainty) provided within the draft Core Strategy. This further certainty was supported by information provided by prospective developers and land owners of the proposed Strategic Locations at various stages in the plan making process.</i></p>	<p>SEA Guidance 5.B.11</p> <p>'However, qualitative does not mean 'guessed'. Predictions need to be supported by evidence, such as references to any research, discussions or consultation which helped those carrying out the SEA to reach their conclusions. The Environmental Report must document any difficulties such as uncertainties or limitations in the information underlying both qualitative and quantitative predictions. Assumptions, for instance about underlying trends or details of projects to be developed under the plan or programme, need to be clearly stated. To enhance transparency, Responsible Authorities are encouraged to summarise reasons for their decision to pursue a quantitative or qualitative approach to prediction of effects for each predicted impact.</p> <p>Also See Fig 7 – Examination of DPD's Soundness Guidance, August 2009 "Soundness Guidance" 2.9 'Key Questions'</p>	<p>The revised SAs still fail to reference adequately the appropriate evidence documents.</p> <p>The SA should document any difficulties or uncertainties that have occurred. No reference has been made to the difficulties regarding the contaminated land evidence. The evidence provided in the SA does not demonstrate in a clear and transparent manner the issues that relate to the different sites with regard to contamination. The degree of contamination can have serious implications upon viability and deliverability and should have been considered as a 'likely significant impact'</p> <p>The SA does not provide a reference to the new evidence provided by prospective developers/landowners. Is it publicly available?</p>

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JAM	TBC/UV	References	Comments
<p>Evidence continued</p> <p>2.2 List all the information relied upon in assessing Sites / Locations, including the latest information relating to Davenport Green (i.e., as contained within RLAM's representations of 1 November 2010). The commentary needs to explain where that information has been used/relied upon in the assessment.</p>	<p><i>The appraisal will be updated to ensure it incorporates necessary references to the evidence base. The latest information received in November 2010, in relation to Davenport Green, will be used to inform the new SA work in order to compare the site against the Strategic Location appraisals.</i></p>	<p>Practical Guide to SEA, 2005, Appendix 9.</p>	<p>The new SA provides some references to evidence but it is still limited and does not adequately reflect the information submitted in November 2010. It is still impossible to determine from the commentary provided how some of the decisions have been taken.</p>

JAM	TBC/UV	References	Comments
<p>Assessment of effects</p> <p>3.1 Where the SA relies on assumptions due to limited detail of the evidence base this should be clearly spelt out (2009 SA para. 3.6)</p>	<p>This is detailed in the SA Report. For instance, section 3.6 of the Core Strategy: Further Consultation on Preferred Option SA Report (June 2009) states that it was necessary to assume that the proposals would be implemented in accordance with the proposed development phasing contained within the Core Strategy Preferred Option Document. This section of the SA Report also states that at this stage in the plan preparation process there was limited detail in the evidence base in relation to levels of flood risk, the ecological values of a number of Strategic Sites and Locations and limited detail on some of the proposals for the Strategic Locations. Most of these limitations were resolved before the appraisal of the Core Strategy: Publication Document undertaken in June 2010.</p>	<p>The SEA Directive (Annex I (h)). requires the Environmental Report to discuss 'any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information'</p>	<p>Information given is very limited. No mention of contaminated land, infrastructure</p>
<p>3.2 A consistent approach must be taken in the assessment of effects for each Strategic Location: the results for all the Strategic Locations should be reviewed to ensure that a consistent approach to the assessment has been made. A detailed commentary alongside the results will help the review of the results and show a transparent approach to the reader. Where evidence is not available the fact that it is not available should be documented e.g., infrastructure.</p>	<p>The SA Scoping Report (2007) (CD 6.4.1) sets out the Sustainability Objectives, Sub Objectives and Indicators which would be consistently used to appraise the Plan as it evolved. This document was subject to the statutory consultation.</p> <p>Following the initial appraisal work carried out in 2008 (CD 6.3.3), the SA was undertaken in an objective and consistent manner by a team of independent consultants who reached a consensus view on the sustainability of the Strategic Sites/Locations. It is noted that this approach is consistent with guidance on sustainability appraisal that is provided by the Planning Advisory Service (PAS) which recognises that using independent consultants to carry out the SA can ensure that the plan and its impacts are viewed more objectively.</p>	<p>SEA guidance pages 31-34 and Appendices 7, 8 & 9</p>	<p>The flaws identified in RLAM's rep Appendix 17 show that a consistent approach was not given to the method of scoring with conflicts identified between the different results and a lack of evidence to support the decisions taken.</p> <p>E.g. The assessment of E5 does not show that the sub-objectives and indicators have been used in the assessment. All the scores show no significant impact.</p>

JAM	TBC/UV	References	Comments
<p>Scoring</p> <p>4.1 The scoring method used must be set out clearly and include commentary explaining the reasoning behind the score, including why the level of certainty has been applied. Such reasoning must be based upon /derive from the evidence base.</p>	<p>The methodology of the SA and a summary of the performance of each Strategic Location against the SA Framework are set out in each of the SA Reports. An explanation of the reasoning behind each score is provided in the appendices document. For example, the SA of the Core Strategy: Publication Document concludes that the development proposals for Pomona have the potential to have a negative impact on the objective of reducing the impact of climate change. At page 15 of the Core Strategy: Publication Document SA Appendices report (CD 6.2.3,) it is explained that the negative scoring is based on the fact that 546 residential units will be provided on this site due to an extant planning permission but that the Level 2 SFRA has demonstrated that a significant proportion of the site is at a high risk of flooding.</p>	<p>SEA Guidance figure 20, pp77</p>	<p>RLAM's rep Appendix 17 identifies several flaws in the SA where it is not clear from the commentary why decisions have been taken and the relevant evidence that might support the decisions has not been referenced</p>
<p>4.2 The score should reflect the impact upon sustainable development WITHOUT mitigation measures and the same approach must be taken for ALL Strategic Locations, despite the level of detail that may be available at this stage.</p>	<p>A consistent approach has been taken to the appraisal of all Strategic Locations. The performance of each Strategic Location against the SA objectives was appraised without mitigation measures. Scores reflect the position of the policy without mitigation measures. However as the plan has evolved these mitigation measures have been incorporated into revised versions of the policies so improving their sustainability score. Section 4.5 of the SA Report of the Core Strategy: Publication document (CD 6.2.2) provides a summary of what difference the SA process has made during each stage of the plan preparation process and provides details of mitigation measures that have been introduced.</p>	<p>SEA Guidance Figure 6, pp25</p>	<p>Areas where inconsistency was found are detailed in RLAM's rep Appendix 17. Some sites included mitigation measures and some did not.</p>

JAM	TBC/UV	References	Comments
<p>4.3 The commentary should include mitigation measures that will prevent, reduce or offset significant adverse effects.</p>	<p>The detailed Appraisal Appendices demonstrate the improvements in the locations sustainability scores; for example in the June 2009 SA appraisal appendices (CD 6.3.12), the scores against objective S3 (which assesses transport infrastructure) for both the Trafford Centre Rectangle and Carrington Locations are negative, due to the lack of public transport in those areas, (pages 63 and 74 respectively). Mitigation comments were made seeking more public transport services. In the June 2010 Appraisal Appendices these measures were incorporated into the development requirements of the Policies therefore the sustainability scores became positive (see CD 6.2.2, pages 33 and 41).</p> <p>Mitigation measures are documented in the SA appendices report where the SA produces negative scores. For example, the appraisal of the Trafford Centre Rectangle proposals contained within the Core Strategy: Further Consultation on the Preferred Option Report concluded that the development proposals for this location had the potential to have a detrimental impact on air quality. Accordingly, as a mitigation measure, the SA recommended that there was a need to ensure that public transport offers a viable alternative to the private car and, in particular, improve public transport services from the site to Trafford Park, the Quays and the conurbation core (see CD 6.3.13, page 6) As the iterative process of the Plan preparation evolved, those mitigation measures that were identified previously were incorporated into future revisions.</p>	<p>SEA Guidance 5.B.18, pp 33</p>	<p>The negative impacts of providing new road infrastructure at Carrington are not considered. Reference is not made to the evidence that has informed these decisions</p> <p>The mitigation measures that have been applied are not clear from the commentary. Mitigation measures proposed by RLAM have not been applied to DG</p>

JAM	TBC/UV	References	Comments
<p>Evidence/Audit trail</p> <p>5.1 Show how information received during the consultation process, particularly from the statutory consultees, has affected the SA. The results of the consultation process should be clearly documented in the SA report. (The 2009 SA was incomplete in this respect.)</p>	<p>A summary of the main comments received on the SA during the previous consultation period was incorporated within section 2.5 of the Core Strategy: Further Consultation on Preferred Option SA Report (June 2009) (CD.3.12). For example comments were received by GONW requesting an SA to be carried out on the Strategic Sites and comments from Natural England requested closer links to be made between the SA reports and the SA Scoping Report. In addition the Environment Agency requested the SA to be informed by the SFRA. The 2009 SA addressed these comments. In June 2009 only three respondents made comments on detailed scoring and none of these were statutory consultees. These were taken into consideration as appropriate in the March and June 2010 SAs (CD 6.3.23, 6.2.2).</p>	<p>Soundness Guidance 2.9</p> <p>'Key Questions'</p>	<p>There is a lack of evidence to show how the comments received in consultation have been addressed e.g. RLAM's reps.</p>

JAM	TBC/UV	References	Comments
<p>Deliverability</p> <p>1.1 The deliverability of the sites for economic growth must be considered and given relative scoring. (2009 SA is incomplete) (EC1)</p>	<p>Section 2.10 of the Planning Advisory Service's <i>Examining Development Plan Documents: Soundness Guidance</i> includes a series of questions to consider when assessing whether a DPD is deliverable. The questions relating to deliverability do not refer to the Sustainability Appraisal, because whilst issues regarding the viability/deliverability of the options are central to the soundness of the Core Strategy, they are outside the scope of the SA. The questions in 2.10 relating to deliverability are designed to establish whether or not the DPD in question clearly identifies the delivery mechanisms and timescales for implementation, who is intended to implement each section of the strategy and; whether the infrastructure implications of the strategy have been clearly identified.</p> <p>The Council has dealt with matters of deliverability within the Core Strategy Document and other supporting documentation. The role of the SA is to ensure that sustainability considerations have informed the content of the Plan. It is not intended as a site evaluation tool to assess viability of proposals. The SA reports therefore note that when undertaking the appraisal of the Strategic Locations it was necessary to assume that the proposals would be implemented in accordance with the proposed development phasing contained within the Core Strategy (see sections 3.6 of both the Core Strategy: Publication Document SA Report [June 2010] and the Core Strategy: Further Consultation on the Preferred Option SA Report [June 2009]).</p>	<p>The Planning Inspectorate – Local development Frameworks: Examining Development Plan Documents – Soundness Guidance, February 2010, 2.8 pp6</p> <p>The Planning Inspectorate – Local Development Frameworks: Examining Development Plan Documents – Soundness Guidance, February 2010, 2.9 pp6</p>	<p>The SA is integral to the plan preparation. If options are not deliverable then they are not sustainable. The SA process cannot be divorced from the plan that is being prepared, they should inform each other. Reference needs to be made to the evidence used. The issues of infrastructure and suitability of the sites for economic growth are significant issues that concern the sustainability of the plan. The reasoning that it was necessary to assume that the proposals would be implemented in accordance with the proposed development phasing is only logical if it has been demonstrated that the developments are in fact viable and deliverable and that there is evidence to show this.</p>

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JAM	TBC/UV	References	Comments
<p>Economy</p> <p>2.1 The assessment should reflect the net additional activity at both the sub regional and the regional level and not just activity from firms that are attracted to relocation from within Greater Manchester. (EC1)</p>	<p>The appraisal considers the contribution that the Strategic Locations can make to both Trafford's economic performance and regional growth as reflected in the wording of the objective and sub objectives linked to EC1. For instance, the appraisal of Trafford Wharftside against EC1 notes that the Strategic Location, together with the adjacent MediaCity site could form a thriving media and knowledge based centre of international significance (see CD 6.2.2, page 23).</p>		<p>It is unclear why DG scores a less positive result than the other SLs. Evidence submitted in RLAM's rep. not referred to in SA. Again the results fail to link to evidence.</p>
<p>2.2 When considering economic growth in the southern part of the borough the issues of Manchester Airport, Wythenshawe and access to a skilled labour pool should all be included in the evidence base. (EC1)</p>	<p>The impact of cross boundary issues known at the time of appraisal on the performance of the Strategic Locations has been taken into consideration. For example, the appraisal of Trafford Wharftside recognises that the proximity of the site to Salford Quays has a positive impact of the performance of the development proposals against a number of economic objectives (see CD 6.2.2, pages 23 and 24). In addition, the appraisal of the development proposals for Davenport Green carried out in July 2010 noted that the site is well related to areas of deprivation outside the plan area, such as Wythenshawe (see CD 12.3 Appendix 8.3 comments to objective EC2 together with Appendix II of this report). The appraisals will however be updated to ensure that appropriate references are made to the relevant statutory plans of neighbouring authorities.</p>		<p>The July 2010 appraisal was not part of the SA process as it was not issued for consultation or reported to the Committee, hence the request by the Inspector to produce a new SA. The evidence in RLAM's rep is not referred to in the SA commentary. Evidence to support the decisions made for other SLs not provided.</p>

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JAM	TBC/UV	References	Comments
<p>Economy</p> <p>2.3 Improving accessibility and removing barriers to movement should be assessed and included in the evidence base when assessing the impact. (EC2)</p>	<p><i>The performance of the Strategic Locations against this objective takes into consideration not just the accessibility of the site but also the proposed measures to improve accessibility to each location. For instance, the appraisal of the development proposals for Trafford Centre Rectangle recognised that measures to enhance the accessibility of the site form an integral part of the development proposals themselves (CD 6.2.2, pages 30 – 31).</i></p>		<p>The new SA gives all SLs (except DG) a positive result. Mitigation through S106 measures are suggested except for DG. Carrington scores a major positive result despite access issues. Lack of evidence to support results. No mention of deliverability.</p>

JAM	TBC/UV	References	Comments
<p>Infrastructure</p> <p>3.1 Services and facilities outside the borough boundary should be taken into account where appropriate e.g. Manchester Airport, University Hospital of South Manchester. (S2)</p>	<p>The impact of services and facilities outside the borough on the performance of the Strategic Locations has already been taken into consideration. The appraisals will however be updated to ensure that appropriate references are made to the relevant statutory plans of neighbouring authorities.</p>	<p>See Soundness Guidance 2.10 'Key Questions'</p>	<p>Not reflected in the scores of the new SA. S2 scores no significant impact for DG despite evidence provided in RLAM rep.</p>
<p>3.2 The impact of providing new infrastructure should be included in the assessment and be linked to the evidence base. (S3)</p>	<p>In relation to SA objective S3, the performance of the Strategic Locations against this objective takes into consideration not just the accessibility of the site but also the proposed improvements to transport infrastructure for each site.</p>		<p>The negative impacts of providing the new road infrastructure at Carrington are not considered</p>
<p>3.3 The viability and deliverability of providing the new infrastructure should be included (S3)</p>	<p>Issues regarding the viability/deliverability of the options are outside the scope of the SA. Notwithstanding this, the SA reports note that when undertaking the appraisal of the Strategic Locations it was necessary to assume that the proposals would be implemented in accordance with the proposed development phasing contained within the Core Strategy.</p>	<p>See references above</p>	<p>See comments on viability and deliverability above</p>

JAM	TBC/UV	References	Comments
<p>Infrastructure continued</p> <p>3.4 The assessment should include the capacity of waste management/treatment facilities; forecasts of the likely quantities of waste for each strategic location during the construction and operation of the plan period; the amount of off-site waste treatment that will be needed; the number of vehicle movements that will be generated; the distance from each Strategic Location to waste management facilities. (The neutral results given in all of the SAs are not considered to be accurate.) (E5)</p>	<p><i>Whilst it is considered that this level of detail is potentially more suited to an appraisal of a specific development proposal rather than a strategic allocation in a Core Strategy, it is noted that information regarding the capacity of waste management/treatment facilities; the likely quantities of waste generated during construction and operation and the amount of off-site waste treatment needed are all considered in the Greater Manchester Waste DPD, Needs Assessment (2010) as referred in paragraph 15.3 of CD 6.2.1. The neutral score is considered to be consistent with the outcomes of the Waste DPD Needs Assessment and its Waste DPD and its associated SA.</i></p>		<p>This assumption was not explained in the original SA.</p> <p>The new results leave the score as no significant impact for all the SLs. The findings of the LIP are not discussed, which identified sewerage capacity problems in a number of locations. No mitigation is proposed.</p> <p>The RLAM rep showed that the impact was more likely to be uncertain with mitigation measures used to reduce any potential negative impacts.</p> <p>The new SA does not reflect the evidence available.</p>
<p>3.5 The assessment should also address the infrastructure requirements with regard to water supply and sewage capacity – both issues are identified within the Infrastructure Plan as potential issues for several of the locations. (The neutral results given in all of the SAs are not considered to be accurate.) (E5)</p>	<p><i>The issue of infrastructure requirements for each of the Strategic Locations is considered in the Trafford Infrastructure Capacity Assessment (2009). This study identifies the necessary infrastructure requirements for each Strategic Location and a contribution towards the provision of this additional utility capacity is a requirement of the development proposals for each Strategic Location. The neutral scoring is consistent with the outcomes of the LIP.</i></p>		<p>The contribution towards additional utility capacity does not explain what the likely impacts are in each of the locations or the significance of the impacts. The neutral scoring is not considered to be accurate.</p>

JAM	TBC/UV	References	Comments
<p>Cross Boundary issues</p> <p>4.1 Relevant statutory plans which may affect, or be affected by, the Core Strategy should be considered (e.g., draft Manchester Core Strategy) (SA does not address)</p>	<p><i>It is acknowledged that, whilst the relevant statutory plans of neighbouring authorities were used in carrying out the original appraisals, it was not always clearly documented. The new appraisal will ensure that appropriate references are made to the relevant statutory plans of neighbouring authorities.</i></p>	<p>Practical Guide to SEA, 2005, Appendix 2 and Soundness Guidance 2.10 'Key Questions'</p>	<p>References have now been added</p>
<p>4.2 Services and facilities that are located outside the borough boundary but which will have a significant impact must be considered in the assessment e.g. Manchester Airport – a multi modal public transport interchange - and University Hospital of South Manchester (S2 and S3)</p>	<p><i>The impact of services and facilities outside the borough on the performance of the Strategic Locations against the SA Framework has already been taken into consideration. For instance, the appraisal of Trafford Wharfedale takes into consideration the proximity of the site to MediaCity and Salford Quays. The new appraisal will however be updated to ensure that appropriate references are made to the relevant statutory plans of neighbouring authorities and specifically takes into account more recent information, for example proposals in the Manchester Pre-Publication Core Strategy (August 2010).</i></p>		<p>See above. Services and facilities are now mentioned but no change has been given to the scores. The evidence for higher scores in other locations is not apparent.</p>

JAM	TBC/UV	References	Comments
<p>Cross Boundary issues continued</p> <p>4.3 The impact of options on areas outside the borough boundary should also be considered e.g. Wythenshawe. (S5)</p>	<p>The impact of the options on areas outside the borough has already been taken into consideration. For example, the appraisal of Trafford Wharfside recognises that the proximity of the site to Salford Quays has a positive impact of the performance of the development proposals against a number of economic objectives (see CD 6.2.1, pages 23 and 24). In addition, the appraisal of the development proposals for Davenport Green notes that the site is well related to areas of deprivation outside the plan area, such as Wythenshawe (see CD 12.3 Appendix 8.). The new appraisal will include appropriate references to the relevant statutory plans of neighbouring authorities.</p>		See above
<p>4.4 When considering economic growth in the southern part of the borough the issues of Manchester Airport, Wythenshawe and access to a skilled labour pool should all be included in the evidence base. (EC1)</p>	<p>The impact of cross boundary issues on the performance of the Strategic Locations against the SA Framework has already been taken into consideration. For example, the appraisal of Davenport Green in July 2010 makes reference to the proximity of the site to areas of deprivation outside the plan area, such as Wythenshawe, and the public transport interchange at Manchester Airport (see CD 12.3 Appendix 8.3). The appraisals will however be updated to ensure that appropriate references are made to the relevant statutory plans of neighbouring authorities.</p>		See above and note on July 2010 SA

JAM	TBC/UV	References	Comments
<p>Climate Change</p> <p>5.1 Consideration must be given to all relevant elements of climate change impacts (- Climate change impacts include consideration of emissions generated from the built environment in relation to both construction and operation, not just transport). (E3)</p>	<p>The assessment was based on the information available which included limited information on the predicted energy consumption during both construction and operation. Whilst it is considered that this level of detail is potentially more suited to an appraisal of a specific development proposal rather than a strategic allocation in a Core Strategy, it is considered that the SA should be amended so that the level of certainty of the proposals on objective of E3 is reduced to low and the comment column updated accordingly to explain this.</p>		<p>There is no evidence to support that this was the case. An additional statement has been added to each location on the need to consider the built environment. None of the other SLs scores have been altered to reflect this change. Mitigation measures are attached for DG but not for the other SLs. The measures set out in RLAM's rep. are not mentioned.</p> <p>All development will inevitably contribute to climate change the results are therefore inaccurate.</p>
<p>5.2 Proper consideration should be given to the impact a site will have on the contributions to climate change (- It is unlikely that any site will have a positive impact on the contributions to climate change). (E3)</p>	<p>The assessment was based on the information available which included limited information on the predicted energy consumption during both construction and operation. Whilst it is considered that this level of detail is potentially more suited to an appraisal of a specific development proposal rather than a strategic allocation in a Core Strategy, it is considered that the SA should be amended so that the level of certainty of the proposals on objective of E3 is reduced to low and the comment column updated accordingly to explain this.</p>		<p>Reference has not been made to the Core Strategy policy on Climate Change and the mitigation measures that would need to be incorporated in new development</p>

JAM	TBC/UV	References	Comments
<p>Climate Change continued</p> <p>5.3 The impact on the contributions to climate change should be measured in a logical and meaningful manner. Ideally, objective E3 should be re-phrased to 'reduce additional contribution to/impact of Climate Change' but, at the least, a clear scoring system should be used to show how this is to be measured. (E3)</p>	<p>It is considered that the impact on the contributions to climate change have been measured in a logical and meaningful manner. In the SA report (CD 6.2.2) the appraisal of the impact of a proposal on the contributions to climate change has considered a range of impact dimensions, including the timescale of the impact, the level of certainty of the impact, its geographic scale, permanence and whether there are any secondary, cumulative or synergistic impacts. The phrasing of the SA objectives was set out in the Council's SA Scoping Report (CD 6.4.1). They were agreed with Statutory Consultees following the necessary period of consultation and cover all the key considerations required by sustainability objectives. This approach is consistent with national guidance on both SEA (see sections 3 and 5 of A practical Guide to the Strategic Environmental Assessment Directive [ODPM, 2005]) and Sustainability Appraisal (see section 2.2.20 of Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents [ODPM, 2005]).</p>		<p>See RLAM rep. Appendix 17</p>

JAM	TBC/UV	References	Comments
Climate Change continued			
<p>5.4 The results must be linked to the evidence base, in particular the GMTU modelling, and be assessed in a consistent manner. (E1)</p>	<p><i>It is acknowledged that, whilst the evidence base documents were used in carrying out the original appraisals, they are not always clearly referenced. The appraisal will be updated to ensure it incorporates relevant references to the evidence base documents.</i></p>		<p>The new results do not appear to reflect the findings or likely impacts</p>
<p>5.5 The findings of the SFRA should be used to assess the significance of impacts. Consequential changes to the scoring should be made in this regard. (The results given in the SAs are not considered to be accurate or to reflect/represent the evidence base.) (E4)</p>	<p><i>The SA of the Core Strategy: Further Consultation on the Preferred Option Report (June 2009) (CD 6.3.12) states in section 3.6 that there was uncertainty over the impact of some of the proposals on flood risk and adapting to climate change due to the Level 2/Hybrid SFRA having not been completed. The Level 2 SFRA was finalised in February 2010 and the findings of this study were used to assess the performance of the Strategic Locations against objective E4 in the sustainability appraisals of both the Core Strategy: Further Consultation on the Vision, Strategic Objectives and Delivery Strategy Report (March 2010)(CD 6.3.23) and the Core Strategy: Publication Document (June 2010) (CD 6.2.2). One of the key changes as a result of the SFRA findings is detailed in SL 1 Pomona (CD 6.2.1)</i></p>		<p>See RLAM rep. on flooding</p>

JAM	TBC/UV	References	Comments
<p>Climate Change continued</p> <p>5.6 Contaminated land matters and water table levels should be considered when proposing the use of SUDS. The application of SUDS may be limited in areas where contamination and water table levels are high – scoring should be reviewed accordingly. (E4)</p>	<p><i>The development proposals for the Strategic Locations do not make specific reference to the use of SUDS. As such, the Strategic Locations were appraised with the assumption that SUDS would not be incorporated within the proposed development. Where it was considered that the development proposals would have a negative impact on objective E4, due to the level of flood risk at the Strategic Location, the SA noted that in terms of mitigation Core Strategy policy L5 would ensure that appropriate measures to reduce the risk of flooding. These mitigation measures may or may not include the use of SUDS, depending on a range of factors including the appropriateness of SUDS on the particular site, however the suitability of the site for SUDS would not affect the performance of the Strategic Location against objective E4.</i></p>		<p>The SA would be more robust if the reader could understand what the situation is with regard to contaminated land and water table issues at the different locations in order to identify the severity of the impact and appropriate mitigation measures.</p>

JAM	TBC/UV	References	Comments
<p>Contamination</p> <p>6.0 The impact of contaminated land must be assessed as part of this objective. (The Land Contamination Prioritisation Study was not published or included in the Council's list of key documents. It is not clear that it has been taken into account in the 2009 SA). The findings of this study (if it exists) are likely to have significant implications for the viability and deliverability of development in several locations. (E6)</p>	<p><i>In February 2008, the Council's Environmental Protection team began an audit of known contamination in the Borough however the, previously referred to, "Land Contamination Prioritisation Study" was not in fact produced. The issue of land contamination was however taken into account during the appraisal of the Strategic Locations against objective E6. For example, the appraisal of both Pomona and Trafford Wharfside notes that the previous industrial uses of the sites are likely to have resulted in ground contamination and that the development proposals provide the opportunity to tackle this contamination (see CD 6.2.3, pages 16 and 23). The role of the SA is to ensure that sustainability considerations have informed the content of the Plan. It is not intended as a site evaluation tool to assess the viability of proposals. Issues regarding the viability of the options are outside the scope of the SA and the SA reports therefore note that when undertaking the appraisal of the Strategic Locations it was necessary to assume that the proposals would be implemented in accordance with the proposed development phasing contained within the Core Strategy (see sections 3.6 of both the Core Strategy: Publication Document SA Report [June 2010] and the Core Strategy: Further Consultation on the Preferred Option SA Report [June 2009]).</i></p>		<p>The SA should identify the likely significant impacts that need to be addressed, using appropriate evidence. The SA does not demonstrate that the issue of contaminated land has been suitably addressed. The findings could have significant implications for the viability and deliverability of the SLs.</p>

JAM	TBC/UV	References	Comments
<p>Air Quality</p> <p>7.1 The Guidance on Air Quality and Planning provided by Environmental Protection UK should be followed including the significance of any increase in emissions of local air pollutants and greenhouse gasses and any proposed mitigation measures. (E8)</p>	<p><i>The impact of proposals on greenhouse gas emissions is considered through the assessment of the proposals against SA objective E3. The potential implications of development proposals on air quality have been assessed and where these are considered to be negative mitigation measures have been recommended. For example, the appraisal of the Trafford Centre Rectangle proposals contained within the Core Strategy: Further Consultation on the Preferred Option Report concluded that the development proposals for this location had the potential to have a detrimental impact on air quality. Accordingly, as a mitigation measure, the SA recommended that there was a need to ensure that public transport offers a viable alternative to the private car and, in particular, improve public transport services from the site to Trafford Park, the Quays and the conurbation core (see CD 6.3.13, page). This was addressed in later versions of the Core Strategy which incorporated a development requirement in SL4 for significant improvements to public transport infrastructure including an integrated frequent public transit system.</i></p>		<p>The evidence does not support the results. The new SA requires mitigation at DG despite a score showing no significant impact. Other sites get positive scores despite the transport modelling results showing to the contrary and no mitigation measures. The results are not consistent, linked to evidence and cannot be considered accurate.</p>

JAM	TBC/UV	References	Comments
<p>Air Quality continued</p> <p>7.2 The assessment should be based on evidence and include consideration of journey times, catchment areas and existing levels of pollution. (E8)</p>	<p>The impact of the proposals on existing levels of congestion has been considered. using the Trafford Transport Impacts of LDF report (CD 8.6.3) For example, the appraisal of the proposals for both Trafford Wharfside and LCCC area make reference to the potential for these proposals to exacerbate existing congestion (see CD 6.2.2, pages 21 and 28). Existing levels of pollution, and specifically Air Quality Management Areas, have been considered. For instance, the SA of the LCCC Area and Trafford Centre Rectangle proposals in the Core Strategy: Publication Document includes a specific reference to the proximity of the sites to Air Quality Management Areas and the potential for the development proposals to have an adverse impact on air quality (see CD 6.2.2, pages 29 and 38).</p>		<p>See above</p>

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JAM	TBC/UV	References	Comments agreed 18/2/11
<p>Core Strategy Core Policies</p> <p>7.3 An assessment of the Core Strategy Core Policies will also need to be undertaken to reflect the findings of the SA of the strategic locations. The assessment should be linked to evidence and be consistent with the SA of the Strategic Locations. Where mitigation measures are being proposed through the Core Policies it would be helpful if these measures were reflected in the mitigation measures in the SA of the Strategic Locations.</p> <p>7.4 Once the SA has been undertaken it will be necessary to review the Core Strategy policies to see if any changes need to be made in light of the results.</p>	<p><i>This has already been undertaken and, as evidenced by the SA Report of the Core Strategy Publication document (CD 6.2.2), a clear improvement in the emerging strategy's performance against the sustainability objectives can be identified. It is therefore considered that it is not necessary to review the Core Policies.</i></p>		<p>It is evident from this statement that there was no intention to review the decision on the allocation of the land Davenport Green. If the SA had been carried out in an impartial manner it would have been recognised that a review of the Core Strategy Core Policies may be necessary depending on the outcome of the SA. If the SA had demonstrated that DG was a suitable location then the Core Strategy policy on the Green Belt would be incorrect. RLAM's rep. Appendix 17 also identified contradictions between the results for the SLs and the Core Strategy Policies, which have not been addressed.</p>

Appendix 2

Summary of SA Report Appendices results for Trafford Strategic Locations, February 2011, July 2010 and June 2009

Data Sourced from:

Trafford Council's Core Strategy: Sustainability Appraisal Revised Appendices Report, February 2011 (CD 12.37.2)
Trafford Council's Core strategy: Sustainability Appraisal Revised Appendices to June 2009, February 2011 (CD12.37.4)
Trafford Council's Core Strategy: Sustainability Appraisal of Davenport Green, July 2010
Trafford Council's DPD1 Core Strategy: Further Consultation on the Preferred Option – Sustainability Appraisal Report Appendices, June 2009
Urban Vision

Appendix 2: Summary of SA results for Davenport Green (Feb 2011, July 2010 and June 2009)

SA Objectives	Davenport Green Revised (SA Feb 2011)			Davenport Green Revised 2009 (SA Feb 2011)			Davenport Green (SA July 2010)			Davenport Green (SA June 2009)		
	S	M	L	S	M	L	S	M	L	S	M	L
S1 Achieving a better balance and mix in the housing market	0	0	0	0	0	0	0	0	0	0	0	0
S2 Improve Accessibility for all to services and facilities	0	0	0	0	0	0	0	0	0	0	0	0
S3 Enhance Transport infrastructure: improve accessibility and quality of life to all communities	+	+	+	-	-	-	?	?	?	-	-	-
S4 Reduce crime, disorder and the fear of crime	0	0	0	0	0	0	0	0	0	0	0	0
S5 Reduce poverty and social exclusion	?	?	?	?	?	?	?	?	?	?	?	?
S6 Encourage a sense of community identity and welfare and value diversity, improve equity and equality of opportunity	0	0	0	0	0	0	0	0	0	0	0	0
S7 Improve qualifications and skills of the resident population	0	+	+	0	+	+	0	+	+	0	+	+
S8 Improve the health and inequalities in health of the population	+	+	+	+	+	+	+	+	+	+	+	+
S9 Protect and improve local neighbourhood quality	0	0	0	0	0	0	0	0	0	0	0	0

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SA Objectives		Davenport Green Revised (SA Feb 2011)			Davenport Green Revised 2009 (SA Feb 2011)			Davenport Green (SA July 2010)			Davenport Green (SA June 2009)		
		S	M	L	S	M	L	S	M	L	S	M	L
E1	Reduce the effect of traffic on the environment	?	?	?	-	-	-	?	?	?	-	-	-
E2	Protect, enhance and restore open space, biodiversity, flora and fauna, geological and geomorphological features	?	+	+	?	+	+	?	+	+	?	+	+
E3	Reduce contributions to climate change	?	?	?	-	-	-	?	?	?	-	-	-
E4	Reduce impact of climate change	+	+	+	+	+	+	+	+	+	+	+	+
E5	Reduce the environmental impacts of consumption and production	0	0	0	0	0	0	0	0	0	0	0	0
E6	Conserve land resources and reduce land contamination	--	--	--	--	--	--	--	--	--	--	--	--
E7	Protect and improve water quality	0	0	0	0	0	0	0	0	0	0	0	0
E8	Protect and improve air quality	0	0	0	0	0	0	0	0	0	0	0	0
E9	Protect and enhance the diversity and distinctiveness of landscape and townscape character and cultural facilities	+	+	+	+	+	+	+	+	+	+	+	+

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SA Objectives	Davenport Green Revised (SA Feb 2011)			Davenport Green Revised 2009 (SA Feb 2011)			Davenport Green (SA July 2010)			Davenport Green (SA June 2009)		
	S	M	L	S	M	L	S	M	L	S	M	L
EC1 Enhance Trafford's high performance and sustainable economy to provide a powerful contribution to regional growth	+	+	+	+	+	+	+	+	+	+	+	+
EC2 Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage	?	?	?	?	?	?	?	?	?	?	?	?
EC3 Enhance Trafford's image as a business and tourism destination	+	++	++	+	++	++	+	++	++	+	++	++
EC4 Encourage the long term sustainability of Trafford's Town Centres	0	0	0	-	-	-	0	0	0	-	-	-
EC5 Improve the social and environmental performance of the economy	?	?	?	?	?	?	?	?	?	?	?	?

KEY	
	Key results which have changed
S	Short term (0-5 yrs)
M	Medium term (5-10 yrs)
L	Long term (10-15 yrs)
++	Strong positive effect
+	Positive effect
0	Neutral effect
?	Uncertain
-	Negative effect
--	Strong negative effect

Appendix 3 Summary of SA Report Appendices results for Trafford Strategic Locations, February 2011

Data Sourced from:

Trafford Council's Core Strategy: Further Sustainability Appraisal of Davenport Green, Appendix 1 Strategic Locations,
February 2011 (CD 12.37.2)
Urban Vision

Appendix 3: Summary Results for Strategic Locations: February 2011

SA Objectives	Davenport Green (SA Feb 2011)			Pomona (SA Feb 2011)			Wharfside (SA Feb 2011)			LCCC Area (SA Feb 2011)			Trafford CR (SA Feb 2011)			Carrington (SA Feb 2011)		
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
S1 Achieving a better balance and mix in the housing market	0	0	0	+	+	+	+	+	+	+	+	++	+	+	++	++	++	++
S2 Improve Accessibility for all to services and facilities	0	0	0	+	+	+	+	+	+	+	+	++	+	+	+	+	+	+
S3 Enhance Transport infrastructure: improve accessibility and quality of life to all communities	+	+	+	+	+	+	+	+	++	+	+	+	+	+	+	+	+	+
S4 Reduce crime, disorder and the fear of crime	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0
S5 Reduce poverty and social exclusion	?	?	?	+	++	++	+	++	++	+	+	++	+	+	+	+	+	+
S6 Encourage a sense of community identity and welfare and value diversity, improve equity and equality of opportunity	0	0	0	+	+	+	+	0	+	+	+	+	0	+	+	0	0	+
S7 Improve qualifications and skills of the resident population	0	+	+	0	0	0	+	+	+	+	++	++	+	+	+	+	+	+
S8 Improve the health and inequalities in health of the population	+	+	+	+	+	+	+	+	+	+	+	++	+	+	+	+	+	+
S9 Protect and improve local neighbourhood quality	0	0	0	+	+	+	+	+	++	+	+	+	+	+	+	+	++	++

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SA Objectives	Davenport Green (SA Feb 2011)			Pomona (SA Feb 2011)			Wharfside (SA Feb 2011)			LCCC Area (SA Feb 2011)			Trafford CR (SA Feb 2011)			Carrington (SA Feb 2011)		
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Environment																		
E1 Reduce the effect of traffic on the environment	?	?	?	+	++	++	+	+	+	+	+	+	+	+	+	?	?	?
E2 Protect, enhance and restore open space, biodiversity, flora and fauna, geological and geo-morphological features	?	+	+	-	0	+	0	0	0	+	+	+	+	+	+	++	++	++
E3 Reduce contributions to climate change	?	?	?	+	++	++	+	+	+	?	?	?	+	+	+	+	+	+
E4 Reduce impact of climate change	+	+	+	-	-	--	0	0	0	+	+	+	0	0	0	0	0	0
E5 Reduce the environmental impacts of consumption and production	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E6 Conserve land resources and reduce land contamination	--	--	--	+	++	++	+	++	++	+	+	+	+	?	?	?	++	++
E7 Protect and improve water quality	0	0	0	+	+	+	+	+	+	0	0	0	?	?	?	+	+	+
E8 Protect and improve air quality	0	0	0	+	+	+	+	+	+	?	?	?	+	+	+	?	?	?
E9 Protect and enhance the diversity and distinctiveness of landscape and townscape character and cultural facilities	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	++	++	++

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SA Objectives	Davenport Green (SA Feb 2011)			Pomona (SA Feb 2011)			Wharfedale (SA Feb 2011)			LCCC Area (SA Feb 2011)			Trafford CR (SA Feb 2011)			Carrington (SA Feb 2011)		
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
EC1 Enhance Trafford's high performance and sustainable economy to provide a powerful contribution to regional growth	+	+	+	+	+	++	+	+	++	+	+	+	+	++	++	+	++	++
EC2 Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage	?	?	?	+	+	+	+	++	++	+	+	++	+	+	+	+	++	++
EC3 Enhance Trafford's image as a business and tourism destination	+	++	++	+	++	++	+	++	++	+	++	++	+	++	++	+	++	++
EC4 Encourage the long term sustainability of Trafford's Town Centres	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EC5 Improve the social and environmental performance of the economy	?	?	?	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+

KEY	
	Key results which have changed
S	Short term (0-5 yrs)
M	Medium term (5-10 yrs)
L	Long term (10-15 yrs)
++	Strong positive effect
+	Positive effect
0	Neutral effect
?	Uncertain
-	Negative effect
--	Strong negative effect

Appendix 4 SA Results for Davenport Green and Review of Commentary, 2011

Data Sourced from:

Trafford Council's Core Strategy: Further Sustainability Appraisal of Davenport Green, Appendix 1 Strategic Locations, February 2011 (CD 12.37.2)

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Appendix 4: SA Results and Commentary for Davenport Green

SA Objectives		Davenport Green (SA Feb 2014)			Summary of Findings		Summary of Findings	
		S	M	L	Urban Vision	RLAM (Appendix 13 Nov 2010)		
S1	Achieving a better balance and mix in the housing market	0	0	0	Unlikely to have any significant impacts. However, pp 13 of the SA report (comparative analysis) states that DG would be the only site not to have a positive impact on the housing market.	The site was allocated for employment uses and therefore does not include residential		
S2	Improve Accessibility for all to services and facilities	0	0	0	No reason given for the lack of impact	pp10 sets out the positive improvements to jobs, key facilities (e.g. Airport, Hospital) and transport improvements		
S3	Enhance Transport infrastructure: improve accessibility and quality of life to all communities	+	+	+	The score has improved from a minor negative to reflect the transport improvements that have been proposed	pp10-11 and Appendices 6 & 7 of RLAM's November representation		
S4	Reduce crime, disorder and the fear of crime	0	0	0	No significant impact	No significant impact		
S5	Reduce poverty and social exclusion	?	?	?	The uncertainty is attributed to DG not being accessible to the more deprived areas of Trafford. It is now recognised that DG is close to other areas of deprivation but it is considered that the methods that will be used to engage disadvantaged people with jobs is limited. DG is the only site given an uncertain score. Is RLAM's proposal more uncertain than others e.g. Carrington, TCR? Both receive a positive score with no mitigation proposed or details of any proposals, with a high level of certainty. The mitigation proposed for DG is for improved transport links to areas of deprivation and the need to provide more certainty over programmes.	pp11 Proximity is not the only factor in relation to access to jobs Such programmes would be set out as part of a detailed planning application and has not been required of the other locations.		
S6	Encourage a sense of community identity and welfare and value diversity, improve equity and equality of opportunity	0	0	0	No significant impact No reference to RLAM's reps	pp12 sets out benefits of proposals for high profile positive image for Trafford as well as creation of jobs, improvements to transport and facilities. The creation of a rural park will also provide facilities and identity for the community		

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SA Objectives		Davenport Green (SA Feb 2014)			Summary of Findings		Summary of Findings	
		S	M	L	Urban Vision		RLAM (Appendix 13 Nov 2010)	
S7	Improve qualifications and skills of the resident population	0	+	+	There is the possibility of providing training opportunities		pp12 New jobs, skills and training will be provided through construction and operation, rural park, partnerships with local firms and educational establishments	
S8	Improve the health and inequalities in health of the population	+	+	+	Benefits of rural park recognised		Does not mention benefits of job creation and sustainable transport	
S9	Protect and improve local neighbourhood quality	0	0	0	The development will create a rural park and result in the loss of greenfield land		pp 13 Other benefits of development not mentioned	
Environmental								
E1	Reduce the effect of traffic on the environment	?	?	?	The result has improved from minor negative to uncertain, but still considers the development could result in unsustainable patterns of commuting TCR given a positive score Carrington given an uncertain score despite the need to provide new road infrastructure		pp13 RLAM suggested a minor negative impact in the short term which will be addressed through new and improved transport infrastructure and sustainable transport strategy	
E2	Protect, enhance and restore open space, biodiversity, flora and fauna, geological and geo-morphological features	?	+	+	Recognise the benefits of the woodland and rural park and improvements to Sites of Biological Importance DG is scored lower than LCCC and TCR despite the potential for a loss of biodiversity at these SLs Carrington scores major positive despite need to build a new road and that ecological surveys have not yet been undertaken		Given that RLAM say pp14 that the location and extent of the Rural park will enable it to make a major contribution to the sub-region's emerging green infrastructure strategy it is interesting that no reference to this is made.	

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SA Objectives	Davenport Green (SA Feb 2014)			Summary of Findings	
	S	M	L	Urban Vision	Summary of Findings
E3 Reduce contributions to climate change	?	?	?	<p>The score has improved from minor negative to uncertain. The certainty is reduced by the lack of information available on energy consumption in construction and operation.</p> <p>This statement has been added to all the Strategic locations following RLAM's rep., which identified that the emissions from the built environment had not been considered. None of the scores have been changed to reflect the lack of information or suitable mitigation measures added. Mitigation measures are attached to DG but not the other SLs. DG is regarded as the most uncertain alongside LCCC.</p> <p>All development will inevitably contribute to climate change. The results are inaccurate.</p>	<p>RLAM (Appendix 13 Nov 2010)</p> <p>Details of RLAM proposals given on page 15 including BREEAM excellent and zero carbon by 2019 etc.</p>
	+	+	+	No change, not at risk of flooding	pp 17 and Appendix 11
E4 Reduce impact of climate change	0	0	0	Unlikely to have significant effects as set out in RLAM Appendix 8.	pp 17-20 and Appendix 8. RLAM submission implies more uncertain with mitigation.
E5 Reduce the environmental impacts of consumption and production				New results have now been added to this section for each SL in response to RLAM's rep. explaining that development would have impacts. The results remain no significant impact. The LIP identifies sewerage capacity problems in a number of the strategic sites, which is not mentioned or regarded as a potential impact. All sites are scored no significant impact with the same commentary. The findings of the LIP are not discussed. No mitigation proposed.	

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SA Objectives	Davenport Green (SA Feb 2014)			Urban Vision Commentary	RLAM Commentary (Appendix 13 Nov 2010)
	S	M	L		
Environmental				Urban Vision	RLAM (Appendix 13 Nov 2010)
E6 Conserve land resources and reduce land contamination	--	--	--	<p>The site comprises entirely of greenfield land. Development should be built to an appropriate density.</p> <p>No mention is given to the status of the land in the UDP or the lapsed planning application. No reference to the creation of the rural park and the benefits that this will provide. No mention is given to the fact that the site is not contaminated and is therefore viable and deliverable</p> <p>The constraints of contamination upon the other SLs, particularly viability and deliverability, are not considered and no mitigation is identified. All sites score a positive impact with the exception of Trafford Quays which includes a greenfield site</p>	<p>pp 20 RLAM states that no more than 15% of the development area will be occupied by buildings. 60% of DG will be retained and managed as open land. 99.14 ha will be managed as Rural Park. Low risk of contamination and remediation. Site suitable for SUDS. Positive impact upon viability and deliverability. Use of green roofs</p>
E7 Protect and improve water quality	0	0	0	<p>No significant impact. High certainty. Refers to RLAM Appendix 11. Pomona, Wharfside and Carrington all get positive impacts despite the contamination on the site. It is assumed that remediation will result in improved water quality. Details of how this will be done are not given. The results are not linked to evidence.</p>	<p>pp 20-21 sets out the positive impacts of the development on water quality through the provision of improved drainage in the area through the management of the Rural Park, SUDS, green roofs, swales etc.</p>
E8 Protect and improve air quality	0	0	0	<p>Although the score is recorded as no significant impact and RLAM's Appendix 10 is referred to further mitigation measures are added to DG.</p> <p>TW gets a positive score despite the Transport modelling results which show the potential to exacerbate congestion. No mitigation is given.</p> <p>LCCC in AQMA but no specific mitigation attached to site unlike DG. TCR also within AQMA but gets a positive result (previously negative) because of public transport measures proposed. No mitigation</p> <p>Carrington gets an uncertain result despite the existing poor air quality, lack of public transport and proposed new road. Mitigation measures very broad.</p> <p>Lack of evidence to support results</p>	<p>pp 21 the changes in pollution are regarded as imperceptible and therefore the impact upon air quality negligible</p>

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SA Objectives	Davenport Green (SA Feb 2014)			Urban Vision Commentary	RLAM Commentary (Appendix 13 Nov 2010)
	S	M	L		
Environmental				Urban Vision	RLAM (Appendix 13 Nov 2010)
E9 Protect and enhance the diversity and distinctiveness of landscape and townscape character and cultural facilities	+	+	+	No reference to RLAM submission	pp 22 and appendix 12 and 14
EC1 Enhance Trafford's high performance and sustainable economy to provide a powerful contribution to regional growth	+	+	+	It is unclear why DG is less positive than the other SLs. No reference to RLAM submission but does now mention the Airport Carrington scores a major positive because the site utilises brownfield land. The commentary fails to explain why it is considered that Carrington will be suitable as a key economic driver. Again there is no link to evidence to support the decisions taken.	pp 23-24 explains why the location of DG will fill a gap in the market for the sub-region. DG will have significant benefits in the long term. DG will meet demand for business development in the south of the conurbation, attracting investment and jobs to the sub-region
Economic					
EC2 Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage	?	?	?	No reference made to RLAM submission. Uncertain score given because of lack of detail on the programmes to assist disadvantaged people and that DG sits outside the Regional Centre and Inner Area. The improvements to the public transport system are not recognised. ALL SLs – score a positive result. Mitigation suggests S106 agreements to secure training opps. Not sure why this cannot be applied to DG. Carringtons score a major positive impact despite accessibility issues. Again lack of evidence to support results. No mention of deliverability	pp 24 sets out benefits.
EC3 Enhance Trafford's image as a business and tourism destination	+	++	++	Fail to recognise the benefit of the office development as well as the rural park	pp 24 and RLAM rep on Core strategy Chapter 8
EC4 Encourage the long term sustainability of Trafford's Town Centres	0	0	0	Results now improved from minor negative to no significant impact	pp 25

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SA Objectives	Davenport Green (SA Feb 2011)			Urban Vision Commentary		RLAM Commentary (Appendix 13 Nov 2010)	
	S	M	L	Urban Vision		RLAM (Appendix 13 Nov 2010)	
Economic							
EC5 Improve the social and environmental performance of the economy	?	?	?	<p>The results state that there is a significant degree of uncertainty over whether the proposals would improve the social performance of the economy</p> <p>Apart from TCR, the other SLs are given a positive score. The reasons seem to be the proximity of the development to areas of deprivation. No evidence of the type of social benefit is given to show why a higher score is appropriate. Carrington is also given a positive score despite access issues.</p>		<p>pp 25 DG provides a significant opportunity through the provision of jobs, skills, training, recreation, leisure, education, improved transport etc.</p>	

KEY	Results which have changed since 2009
S	Short term (0-5 yrs)
M	Medium term (5-10 yrs)
L	Long term (10-15 yrs)
++	Strong positive effect
+	Positive effect
0	Neutral effect
?	Uncertain
-	Negative effect
--	Strong negative effect