

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

**Review of TBC's Development Plan Document CD 12.72**

**Further work on the proposed inclusion of the Unitary  
Development Plan High Amenity Strategic Development Site at  
Davenport Green within the Green Belt, April 2011**

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# DRAFT

Davenport Green

Review of Trafford Metropolitan Borough Council's further work on the proposed inclusion of the Unitary Development Plan High Amenity Strategic Development Site at Davenport Green within the Green Belt

9 May 2011

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## Contents

1.0	Introduction	3
2.0	Further Work/Consultation	4
3.0	Clarification of the Stages undertaken in the Sustainability Appraisal Process to date	4
4.0	Format of the revised Sustainability Appraisals	4
5.0	Reappraisal of the February 2011 SA of Davenport Green	5
6.0	Re-appraisal of the SA of Policy R4 – Green Belt and Other Protected Open Land	6
7.0	Implications of the re-appraised SAs on the Trafford Core Strategy	7
8.0	Davenport Green and Protected Open Land Status	8
9.0	Davenport Green and the fit with the Economic Strategy	9
10.0	Manchester Core strategy – Airport City (Policy EC11)	10
11.0	Conclusions	10

## APPENDICES

1	<b>Review of Appendix A:</b> Stages undertaken in the SA process to date	A-2
2	<b>Review of Appendix B:</b> Comparative analysis of other District's SAs	A-7
3	Summary of results for Davenport Green (April 2011, Feb 2011, July 2010 and June 2009)	A-9
4	Summary of SA results for Davenport Green and SLs, April 2011	A-13
5	<b>Review of Appendix C:</b> SA Results and Commentary for Davenport Green, April 2011	A-18
6	Summary of SA results for Policy R4 Green Belt and Other Protected Open Land (April 2011, June 2010)	A-27
7	<b>Review of Appendix D:</b> SA Results and Commentary for Policy R4, April 2011	A-31
8	Delivery of the Employment Land Supply in the CS (CD 12.72, Para 6.2)	A-40
9	Analysis of the Council's Conclusions on the SA	A-48
10	Regulations and Guidance (for ease of reference)	A-51
11	Correspondence between RLAM and the Council/Urban Vision	A-62

This report follows the structure of CD 12.72.

## 1.0 Introduction

- 1.1 This report reviews the Council's further SA work and other matters in CD 12.72.
- 1.2 The re-appraisal of Davenport Green has resulted in far more positive results than in the previous SAs but, despite only one minor negative score, has still led to the conclusion that the site is unsuitable as a High Amenity Strategic Development Site. The reason given is the permanent loss of greenfield land and the lack of opportunity to reduce land contamination in the Borough. The Council has reached an unjustified conclusion from the SA.
- 1.3 The results of the SA therefore provide no sound basis to reject Davenport Green. On the contrary, the findings show that Davenport Green is a site which is suitable for allocation for development. Detailed commentary on CD 12.72 is given section 5 and 6 and Appendices 3-7 of this report.
- 1.4 In summary:
- (a) The revised SA presents a favourable outcome for Davenport Green
  - (b) The revised SA provides a basis for including Davenport Green as a Strategic Site
  - (c) The SA of Policy R4 is flawed and provides no basis for Davenport Green to be added to the Green Belt because:
    - (i) it only considers the option of adding Davenport Green to the Green Belt and fails to consider alternatives
    - (ii) it fails to acknowledge the loss of the potential benefits that development would provide
    - (iii) SA does not identify the 'exceptional circumstances' which necessitate altering the Green Belt boundary
    - (iv) the SA of Policy R4 is 'retrofitted' and not integrated as part of the plan making process - the option of not adding Davenport Green to the Green Belt should have been considered from the start
  - (d) The reappraisal work raises further issues with the judgments made in the SAs
  - (e) The proposed EZ and Government's 'Growth' agenda have implications for the SA and Core Strategy ("CS") as a whole, which should have been taken into consideration
  - (f) The SAs remain fundamentally flawed, and CS therefore remains unsound.

- (g) Key flaws include the following:
  - (i) Inadequate audit trail
  - (ii) Absence of the Issues and Options SA report and appropriate consultation
  - (iii) Failure to assess 'Business as Usual' and all 'reasonable alternatives'
  - (iv) Failure to link evidence to the assessment
  - (v) Not a transparent process
  - (vi) 'Retrofitting' with SA – not an integrated part of the plan making process
- (h) The proposed EZ reinforces the need to consider a southern spatial option for the Borough, which should be subject to SA

## 2.0 Further Work/Consultation

- 2.1 Paragraph 1.5, CD 12.72 is incorrect. The further work was necessary because Urban Vision had not received all of RLAM's documents, submitted in November 2010 (*CD 54.12 and Appendix 11*). In addition, the Council stated that it would consider carrying out an appraisal of Policy R4 in response to RLAM's representations.

## 3.0 Stages undertaken in the Sustainability Appraisal Process to date (CD12.72 Appendix A)

- 3.1 RLAM still has concerns including the audit trail and process in relation to compliance with the Regulations and guidance and in relation to the accuracy of the information that has been provided. (*Appendix 1*)
- 3.2 The recent High Court judgment in *Save Historic Newmarket Ltd v Forest Heath District Council* ([2011] EWHC 606 (Admin)) has demonstrated the importance of carrying out all the necessary stages of the SA process. In that case there had been a failure properly to consider reasonable alternatives in the SA and to consult upon them.

## 4.0 Format of the Revised Sustainability Appraisals

- 4.1 The examples given of other districts' SAs (CD12.72 para 4.1 and Appendix B) are not comparable, the CSs either do not contain strategic sites or locations or have not yet been subject to scrutiny and review through the Examination process. (*Appendix 2*)

- 4.2 The emphasis in SA is on quality rather than quantity (*EU Directive - Article 12 (2)*); it is not the number of references that it is important but that the references given are relevant to the assumptions made to show that they are backed up by facts. (*PINS Soundness Guidance, Feb 2010, 2.8, page 6*).
- 4.3 The Council considers that it is not appropriate to consider viability and deliverability in the SA. The delivery strategy is central to the CS (*PPS12, para 4.4*), and the SA is integral to the plan preparation (*PPS1 para 24 and PPS12, para 4.43*). If options are not deliverable then they will not be sustainable. The SA process cannot be divorced from the plan that is being prepared. Issues such as the ability to deliver necessary infrastructure within an appropriate timeframe are significant because they go to the sustainability and deliverability of the plan. The assumption that all development considered in the SA is deliverable is inappropriate. Evidence that relates to the sites should be used to demonstrate that the assumptions made in the SA are supported by facts (*SEA Guidance, ODPM 2005, 5.B.11 page 31*). The lack of consideration of viability and deliverability in the SA process can, self-evidently, lead to naïve and over positive assessment results.

## 5.0 Reappraisal of the February 2011 SA of Davenport Green

- 5.1 The reappraisal of Davenport Green has not only resulted in a much more positive outcome, but also in alterations being made to the results for the Strategic Locations ("SLs"). The information used for the SLs has not changed since the last appraisal; so there should be no need to alter the results. The full results for the SLs are not included and it is therefore difficult to identify the changes made and how the SLs compare to Davenport Green. The failure to include the full results for the SLs shows a lack of transparency and an attempt to 'retrofit' the assessment. (*EC Guidance on the Implementation of Directive 2001/42, para. 4.7*)
- 5.2 The reappraisal now makes reference to the evidence in relation to Davenport Green but fails to correct the errors of the previous SAs for the SLs: in particular, the lack of evidence to support the assumptions made. The reader is still unable to determine whether the results for the SLs are accurate, credible and based on facts.
- 5.3 The change in some of the results for the SLs raises further concerns regarding the evidence used in the previous assessments. E.g. the additional air quality information has been provided for Davenport Green; so CD12.72 recognises that all sites are either

close to or within an Air Quality Management Area (AQMA). The change implies that the previous assessment failed to use baseline information and evidence such as Trafford's Air Quality Action Plan (CD 8.4.2) as the basis for the assessment, contrary to the Regulations and guidance (*EU Directive Annex 1, Reg 12(3) Schedule 2*).

- 5.4 The one minor negative score referred to in the reappraisal relates to objective *E6 – 'Conserve land resources and reduce land contamination'*, which is incorrectly stated in para. 5.2 of CD 12.72. The reason given for the negative score is the permanent loss of greenfield land. Mitigation measures are proposed regarding appropriate density and the provision of a high quality environment but CD12.72 does not address whether the measures put forward for the development are likely to be successful (which they are).
- 5.5 The commentary makes no mention of the current site allocation in the UDP or the planning permission. No consideration is given to the benefits resulting from an allocation through landscape and ecological enhancements, although it is recognised that 21Ha of open space and a 99Ha of managed rural park would be provided. The positive implications of the lack of contamination for viability and deliverability are not recognised.
- 5.6 The Council has not drawn the SA together in a systematic manner in absolute or relative terms to provide an overview of the impacts of the different sites in order to assess their comparative performance. The results show that there is very little to choose between the six alternatives (*See Appendix 4*).
- 5.7 Conclusions on the Revised SA of Davenport Green are in paras 5.1 and 5.2 of CD 12.72. Appendix 9 provides an analysis of those conclusions. RLAM concludes that the revised SA does not provide grounds for rejecting Davenport Green as a Strategic Site.

## 6.0 Reappraisal of the SA of Policy R4 – Green Belt and other protected Open Land

- 6.1 The 'exceptional circumstances' that necessitate the alteration to the Green Belt (*PPG2, 2.7*) are not identified.
- 6.2 The SA only assesses the addition of Davenport Green to the Green Belt and not 'reasonable alternatives' to the change of the Green Belt boundary or the alternative uses to which the land might be put including its current allocation in the UDP. The

reader cannot compare the options for the site. The process is not transparent. (*EU Directive Article 5 (1)*)

6.3 RLAM has shown (*Appendix 8*) that the evidence to support the deliverability of land for employment (CD 12.72, para 6.2), at least in the first period of the CS, is very weak: the record of delivery in the last fifteen years is poor, the implementation proposals for the SLs leave many unanswered questions, the deliverability of Trafford Park Core (30% of the land supply in Table W1) has not been evaluated, and Carrington in particular seems unlikely to deliver its share of the required employment land.

6.4 Furthermore:

- There is confusion regarding the purposes and objectives of the Green Belt, which are distinct (PPG2, 1995, paras 1.5 and 1.6) . Whilst the Green Belt protects the openness of the land, adding Davenport Green to it cannot secure the recreational use of the land or ecological enhancement.
- The appraisal assumes that in order to prevent the site from being developed it must be Green Belt, and thus the benefits of not developing the site are attributed to the proposed Green Belt designation. In fact, the site could remain outside the Green Belt, simply as countryside.
- The appraisal fails to acknowledge that the impact of adding Davenport Green to the Green Belt will result in the permanent loss of the benefits of the proposed allocation.
- Not adding Davenport Green to the Green Belt retains flexibility of land supply and an allocation will result in economic and other benefits in line with PPS12 and the Government's 'Growth' agenda.

(*Appendices 6-7*)

## 7.0 Implications of the re-appraised SAs on the Trafford Core Strategy

7.1 The SA process is neither transparent nor robust and remains fundamentally flawed, as detailed in section 3-6 of this report.

7.2 The consideration of the issues in paragraph 7.3 of CD 12.72 should be part of the SA of the whole of the CS as they all have significant implications for the spatial options for the Borough. (*EU Directive Annex 1, Reg 12 (3) Schedule 2, EC Guidance on the Directive para 5.12, PPS12, para 4.26 – Appendix 10*). RLAM's views on the EZ and 'Planning for Growth' are in RLAM's response to Inspector's Note 5.



- 7.3 The failure to subject a spatial option, including employment development in the south of Borough, to SA in itself means that the CS is unsound.

## 8.0 Davenport Green and Protected Open Land Status

- 8.1 The Council says (CD12.72 para 8.1) that it took this matter to Members in July 2010. It was, however, only the time and financial implications of having to consider that possibility that were spelt out to Members. The substantive planning arguments for or against POL were not set out then, nor are they now in CD 12.72.
- 8.2 Consideration of Davenport Green as protected/safeguarded land was not subject to public consultation or included as part of the submission SA published in September 2010. Nor has the re-appraisal considered the option of protecting/ safeguarding the land at DG.
- 8.3 The Council, in the light of the proposed Manchester Airport EZ, seems for the first time prepared to consider the POL option for the land. However, the Council thinks that the 'tests' for safeguarded land (as set out in PPG2) are unlikely to be met, and that accordingly, the 'incongruous anomaly' of the Green Belt boundary can be rectified (paragraph 8.8). This is a non sequitur. The case for designating the land as POL must not be confused with exceptional circumstances that would necessitate changing the Green Belt boundary
- 8.4 The justification for changing the Green Belt boundary at Davenport Green must be based upon exceptional circumstances **that necessitate it**. Decisions made by the Council **not** to allocate this land as a strategic site or location, and/or **not** to designate it as POL, are not sufficient to necessitate such a change.
- 8.5 Paragraph 8.8 refers to the *Copas* case and argues (for the first time) that the Green Belt boundary represents an 'incongruous anomaly'.
- 8.6 In *Copas*, an appeal decision by the Secretary of State had the effect of rendering the land virtually, albeit not entirely, incapable of any substantial development without unacceptable harm to views and the setting of listed buildings, and yet, in Brown LJ's judgment, this still did not constitute the exceptional circumstances that necessitated a change the Green Boundary. The land thus remained outside the Green Belt, undesignated, but subject to policies of the Local Plan that protected the countryside.

- 8.7 In contrast, the ability of the DG site to be substantially developed has never been questioned. The Green Belt boundary at Davenport Green and the site's allocation as an Employment Site was endorsed by the Council as recently as 2006. There is no comparison between the circumstances of the two sites.
- 8.8 The Council has manifestly failed to test POL transparently as a 'reasonable alternative' within the SA process, contrary to the SA Regulations. Leaving the site undesignated has not been considered either. RLAM is, however, clear that in spite of the above alternative considerations, the only appropriate status for the Davenport Green site, in order to deliver the vision and objectives of the CS, is allocation as Strategic Site for Employment.

## 9.0 Davenport Green and the fit with the Economic Strategy

- 9.1 CD12.72 (section 9) points to the evolution of economic development policy and the consequent lack of a need for Davenport Green. RLAM's comments are:
- *'fundamental problems in its delivery'* (para 9.2): Knight Frank (November Representations Appx 15) referred to occupier controls and their inhibiting effect on demand. RLAM's proposal SS1 addresses this issue. This issue has been recognised as a block to development by Greg Clark MP in his Ministerial Written Statement dated 23/3/11.
  - The Economic Development Plan (EDP) 2006-9 makes no reference to Priority Employment Zones (para 9.3) and the places mentioned appear only in the description of the Borough, not in the Framework for Economic Growth; there is no spatial dimension to the Framework or Plan.
  - The EDP lists the *'sectors around the Airport'* as having a particular role to play in driving forward the City Regional economy. Para 9.4 presents a confusing picture of spatial economic development priorities in Greater Manchester in referring to:
    - RSS, which focused on the Regional Centre and Inner Areas but restricted non-operational development around the Airport, and to
    - A consistent future strategy, which includes sustainable economic growth around the Airport.
  - There has been a distinct shift of policy in the last two years, favouring:
    - Development where the demand arises (e.g. Ministerial Statement, Treasury's Plan for Growth, 2011 and MIER Reviewer's Report Recommendation 4) and

- The south of the conurbation (Airport City by Manchester CC, the proposed designation of an EZ in S Manchester and MIER Recommendation 4.)
- Para 9.5 refers to agglomeration economies but dismisses the potential for Davenport Green to play a part in such economies. However, there is huge potential in the development corridors adjacent to the Airport (one of which includes Davenport Green) for:
  - Linked economic development between a range of sites and economic generators: the Airport, the University Hospital of S Manchester and its planned Medipark, Roundthorn Industrial Estate and the planned EZ.
  - District wide sustainable infrastructure investment e.g. energy, district heating, waste, ICT, data centres, public transport and the movement of goods around the airport.

*(November Representation, Chap 2, the Profile; Chaps 8 & 18, Policies SL 1-5 and W1; and Appendix 8)*

- This agglomeration of sustainable business and infrastructure, including Davenport Green, creates an opportunity for Greater Manchester, which is not closing the GVA gap, to compete on a national and international scale with locations such as Duesseldorf and Amsterdam. The locations quoted by the Council do not compete in this league. Trafford has a key role to play in delivering a step change for Greater Manchester.

## 10.0 Manchester Core Strategy - Airport City (Policy EC11)

- 10.1 The MCC CS endorses the development corridor concept, which offers major benefits in terms of economic development, regeneration and large-scale sustainable infrastructure, potentially for both Trafford and Manchester.

## 11.0 Conclusions

- 11.1 The SA remains fundamentally flawed for the following reasons:
- (vii) Inadequate audit trail
  - (viii) Absence of the Issues and Options SA report and appropriate consultation
  - (ix) Failure to assess 'Business as Usual' and all 'reasonable alternatives'

- (x) No assessment of the 'reasonable alternatives' to Policy R4
- (xi) SA does not identify the 'exceptional circumstances' which necessitate altering the Green Belt boundary
- (xii) Failure to link evidence to the assessment
- (xiii) Not a transparent process
- (xiv) Attempts to 'retrofit' the SA of Policy R4 and options that should have been done at the outset of the process as an integrated part of plan preparation
- (xv) Ignores recent changes to Government policy regarding the 'Growth' agenda and EZ
- (xvi)** Failure to comply with the Regulations and guidance (*Article 5/1*) (*Reg. 12(3) Schedule 2 (2)*) and *EC Guidance on the Directive para. 5.12, PPS12 para 4.43 [see Appendices for further details]*

11.2 The defects identified by RLAM's previous representations remain. The level of inconsistency in the scoring and commentary, coupled with the lack of reference to appropriate evidence in the results, reveals a flawed and partial approach to the assessment. It is not possible to "retrofit" an appraisal of a policy. RLAM's review of the Council's conclusions from the SA shows that the SA is not a robust basis for dismissing Davenport Green as a Strategic Site.

11.3 The SA remains fundamentally flawed and thus the CS is unsound.

## APPENDICES

- Appendix 1 - Review of Appendix A: Stages in the SA process to date  
*Trafford Council's Core Strategy: Council's further work on the proposed inclusion of the UDP high amenity strategic development site at Davenport Green within the Green Belt. Appendix A (CD 12.72)*
- Appendix 2 - Review of Appendix B: Comparative analysis of other District's SAs  
*Trafford Council's Core Strategy: Council's further work on the proposed inclusion of the UDP high amenity strategic development site at Davenport Green within the Green Belt. Appendix A (CD 12.72)*
- Appendix 3 - Summary of SA results for Davenport Green (April 2011, Feb 2011, July 2010 and June 2009)  
*Trafford Council's Core Strategy: Council's further work on the proposed inclusion of the UDP high amenity strategic development site at Davenport Green within the Green Belt. Appendix C (CD 12.72)*
- Appendix 4 - Summary of SA results for Davenport Green and the SLs, April 2011,  
*Trafford Council's Core Strategy: Council's further work on the proposed inclusion of the UDP high amenity strategic development site at Davenport Green within the Green Belt. Appendix C (CD 12.72)*
- Appendix 5 – Review of Appendix C: SA results and commentary for Davenport Green, April 2011 –  
*Trafford Council's Core Strategy: Council's further work on the proposed inclusion of the UDP high amenity strategic development site at Davenport Green within the Green Belt. Appendix C (CD 12.72)*
- Appendix 6 – Summary of SA Results for Policy R4 Green Belt and Other Protected Open Land (April 2011, June 2010) –  
*Trafford Council's Core Strategy: Council's further work on the proposed inclusion of the UDP high amenity strategic development site at Davenport Green within the Green Belt. Appendix D (CD 12.72)*
- Appendix 7 – Review of Appendix D: SA Results & Commentary for Policy R4 Green Belt & Other Protected Open Land, April 2011  
*Trafford Council's Core Strategy: Council's further work on the proposed inclusion of the UDP high amenity strategic development site at Davenport Green within the Green Belt. Appendix D (CD 12.72)*

Appendix 8 - Delivery of the Employment Land Supply in the CS (DC 12.72, Para 6.2)

Appendix 9 - Analysis of the Council's Conclusions on the SA

Appendix 10 - Regulations and Guidance (for ease of reference)

Appendix 11 - Correspondence between RLAM and the Council/Urban Vision

## Appendix 1

### Review of Appendix A: Stages in the SA process to date

#### Data Sourced from:

Trafford Council's Core Strategy: Council's further work on the proposed inclusion of the UDP high amenity strategic development site at Davenport Green within the Green Belt. Appendix A (CD 12.72)

## Appendix 1: Review of Appendix A: Stages in the SA process to date

Ref. in CD 12.72	Key Issue	Reference in Reps	Regulations & Guidance
<b>Appendix A</b>	The SA does not comply with SEA requirements to produce an SA for each draft plan (i.e Issues and Options)		EU Directive Article 13(1) – Every draft plan
A.1.1	SA of RSS and LDD, November 2005 has now been withdrawn and replaced by the Plan making manual and PPS12. Reference should now only be made to the SEA guidance document, ODPM 2005 although very similar.		
A.2.1	Stages identified in Scoping report (6.6, 6.7 and 6.12) have not been followed – ‘Business and Usual’ and ‘Issues and Options’	Also not followed SCI Table 2, 2006 and 2010	EU Directive Article 13(1) – Every draft plan
A.2.2	SA objectives and sub-objectives were not used appropriately in previous SAs, in particular E3 and E5. It is not clear why particular reference is given by the Council to E1, E2 and E3 as no explanation is provided		
A.2.3	The Council may have been mindful of the comments received but did not issue the SA of the I&O so it is not possible to understand how the options were appraised.		Plan making manual – generation of options PINS Soundness guide, Feb 2010 para 2.8 p6 SEA Guidance ODPM 2005, 5.B.11 – evidence and transparency
A.2.5	The Issues and Options SA report was not produced as identified in Scoping report (6.6 and 6.7) SCI 2006 and SCI 2010, Table 2 pp16. Business as usual was not assessed (6.12 Scoping report)	Appendix 17 p13	EU Directive Annex 1(b) – current state of the environment/implementation without the plan SEA Guidance ODPM 2005, 5.B.5 – Business as Usual
A.2.6	The reason for not assessing Business as usual has not been given before. It is not clear why the policy was ‘no longer considered to be a realistic option’ given that there was a live planning application for DG until 2009. If this was considered to be the case the reasoning should have been set out in the SA in the selection and rejection of options – it was not.		EU Directive Annex 1 (h) EC guidance on Directive, para 5.12 ODPM SEA guidance 2005, 5.B.6 Plan Making manual PINS Soundness Guidance, August 2009, 2.9 PINS Soundness Guidance, February



			2010, 2.8
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Ref. in CD 12.72	Key Issue	Reference in Repls	Regulations & Guidance
A.2.7	The actions of the Council contradict the new reasoning given e.g. the request for DG to attend the Stakeholder workshop in Jan 2009 and submit information for use in the SA	February 2011, para 3.4, page 6	
A.2.8-A.2.9	This reasoning is not given in any of the SAs. The reasoning given here is attempting to provide post-rationalisation for decisions that were made. There is no evidence to support these statements.		EU Directive Annex 1 (h) EC guidance on Directive, para 5.12 ODPM SEA guidance 2005, 5.B.6 Plan Making manual
A.3.1	This statement is incorrect. Scoping report and SCI stated otherwise. The decision not to produce an SA is not stated in any of the documentation. The information in the Core Strategy only provided summary information.	November 2010, 3.2-3.3, pp14-18 February 2011, 5.4, page 10	
A.3.2	The options did not include any proposed change to the GB boundary or any assessment of such a change. An SA is required for every draft of the plan. The explanation for this decision is an attempt to justify the failure to comply with the statutory process. The process has not been transparent	November 2010, 3.2-3.3, pp14-18 February 2011, 5.4, page 10	EU Directive Article 13 (1) – Every draft plan SEA Guidance, ODPM 2005, 5.B.1 PPS12 para 4.20 – transparent and accessible
A.3.3	It is the responsibility of the LPA to comply with the regulations and not rely on consultation to identify defects in the process		
A.3.4	The purpose of the process is to identify the ‘reasonable alternatives’ that should be assessed	November 2010, 3.2-3.3, pp14-18 February 2011, 5.4, page 10	EU Directive Article 5 (1), Regulations 12 (2) EC Guidance on the Directive, para 5.11-5.14 PPS12, para 4.43, 4.52 Plan Making Manual – generation of options PINS Soundness guidance, Aug 2009, 2.9 PINS Soundness guidance, Feb 2010, 2.8
A.4.1	The SA showed a change to the GB boundary at DG but	November 2010, 3.3, pp17-18	As A.3.4

	the Policy was not changed		
Ref. in CD 12.72	Key Issue	Reference in Reps	Regulations & Guidance
A.4.3	This paragraph is inaccurate. DG still had a live planning consent until 2009 and the UDP policy designation had been saved and was still valid. The view that there was <i>'no realistic prospect of the development taking place'</i> and the reasons for this view are not given in the SA. The SA failed to consider all 'reasonable alternatives'.	November 2010, 4.9-4.11	As A.3.4
A.4.7	The comments received relate to the deliverability of the options even though the Council has stated on several occasions that deliverability is not a within the scope of the SA.		
A.5.1	<p>The Council do not explain why DG was included in this stage of the SA given that it had already been determined that it was not a realistic option.</p> <p>Page 2 of the Stakeholder Workshop document issued 24 Feb 2011, letter of 12 Dec 2008 from Dennis Smith contradicts the Council's justification for not including DG in the earlier stages of the SA.</p> <p><b><i>"We have determined a number of key strategic sites which are considered to be central to the CS on the basis that they are of sufficient scale, in the appropriate place and of an appropriate type to make a significant contribution to the delivery of the CS"</i></b></p> <p>These strategic sites included DG.</p>		
A.5.2	The information submitted by stakeholders included details of deliverability		
A.6.1	Again the reason why DG is now included at this stage in the process (having been removed from the earlier stages) is not given. UV has stated that they had not received the information on DG. The Council has confirmed that UV had received the information for all the other sites. The reason why the information on DG was not received was not given.		See Appendix 11 – Correspondence between the Council and RLAM

Ref. in CD 12.72	Key Issue	Reference in Reps	Regulations & Guidance
A.6.3	The section under PPG2 on the pro-forma set out the correct status of the land. The decision by the Council to change the status of the land had been made <b>prior</b> to this SA. Specific references are made within the draft CS regarding the status of land at DG. Given the specific references made, it is difficult to conclude that this mistake was a 'technical error'. In undertaking the SA, UV should have been aware of the appropriate policies and the decision to remove the site, which was a UDP designation and saved policy.	November 2010, 3.3.3, p17	
A.6.6	No comments on the misallocation of DG		
A.7.1	No comments received on the SA	June 2009 – Comment Form and Table 1	
A.8.3	Details of the comments received in the consultation from RLAM were not included in the published SA (Sep 2010), contrary to the regulations and again showing a lack of transparency. There was no attempt to correct any of the flaws identified in the process until directed to by the Planning Inspector in December 2010		EU Directive Article 8
A.8.5	The new work of July 2010 was not published for consultation or mentioned in the publication SA (Sep 2010) contrary to regulations		EU Directive Article 13 (1) – Every draft plan
A9	The final document was carried out before the further work was identified or undertaken in section A.8.3		
A10.1	RLAM did not agree the methodology used	February 2011 - Appendix 1	
A10.3	Despite references to RLAM's November representations within the SA, UV stated that not all the information had been received		See Appendix 11 – Details of information received by Urban Vision

## Appendix 2

### Review of Appendix B: Comparative analysis of other Districts' SAs

#### Data Sourced from:

Trafford Council's Core Strategy: Council's further work on the proposed inclusion of the UDP high amenity strategic development site at Davenport Green within the Green Belt. Appendix A (CD 12.72)

## Review of Appendix B: Comparative analysis of other districts' SAs

Ref. in CD12.72	Key Issue	Reference in Reps	Regulations & Guidance
<b>Appendix B</b>	<p>Comparator SAs. The SAs are not directly comparable.</p> <ul style="list-style-type: none"> <li>• <i>Bolton Core Strategy</i> – only considered the implications of a site within a Spatial Option. A separate site appraisal was not undertaken. Davenport Green was not included within a spatial option</li> <li>• <i>Lambeth Core Strategy</i> – does not identify any Strategic Sites/Locations</li> <li>• <i>Southwark Core Strategy</i> (prepared by Southwark Council with advice from Jam consult ltd) – does not identify any Strategic Sites/Locations</li> <li>• <i>Manchester and Wigan Core Strategies</i> – have not been subject to Examination in Public and it is therefore not known whether the SAs will be found legally compliant or the Core Strategies 'sound'.</li> </ul>	May 2011, section 4.0	
	<p>Criteria considered. The length and detail of the commentary shows 'quantity' not 'quality' of assessment.</p>		EU Directive Article 12 (2) – Quality PINS Soundness Guidance, Feb 2010, 2.8, page 6).
B.6.2	The consideration of geographical scale is arguable given that the early SAs did not even consider development in Manchester e.g. airport, Whythenshawe. The assumptions made are not backed up by evidence	November 2010, 3.4, pp 20-32 and 4.0 pp37-41	SEA Guidance ODPM 2005, 5.B.11
B.6.3	It is not the number of references to the evidence base that is important. The references should be relevant to assumptions made.	November 2010, 3.4, pp 20-32 and 4.0 pp37-41 February 2011, 3.4	SEA Guidance ODPM 2005, 5.B.11 PINS Soundness Guide Feb 2010, para2.8 Plan making manual
B.6.4/B.6.5	The fact that 2 of the five did consider deliverability shows that it is relevant. The SA should not be divorced from the CS. The plan must be deliverable. Evidence that relates to the sites should be used to demonstrate that the assumptions made in the SA are supported by facts.		PPS 12, para 4.4, 4.43 PPS 1, para 24 SEA Guidance ODPM 2005, 5.B.11

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## Appendix 3

### Summary of SA results for Davenport Green (April 2011, Feb 2011, July 2010 and June 2010)

#### Data Sourced from:

Trafford Council's Core Strategy: Council's further work on the proposed inclusion of the UDP high amenity strategic development site at Davenport Green within the Green Belt. Appendix C (CD 12.72)

**Appendix 3:** Summary of SA results for Davenport Green (April 2011, Feb 2011, July 2010 and June 2009)

SA Objectives		Davenport Green (SA April 2011)			Davenport Green (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
<b>Social</b>													
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
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	+	+
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

Davenport Green  
Sustainability Appraisal Review

SA Objectives		Davenport Green (SA April 2011)			Davenport Green (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
<b>Environment</b>													
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
E6	Conserve land resources and reduce land contamination	-	-	-	--	--	--	--	--	--	--	--	--
E7	Protect and improve water quality	+	+	+	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	+	+	+	+	+	+	+	+	+	+	+	+



Davenport Green  
Sustainability Appraisal Review

SA Objectives		Davenport Green (SA April 2011)			Davenport Green (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
<b>Economic</b>													
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	
	Results which have changed for DG
<b>S</b>	Short term (0-5 yrs)
<b>M</b>	Medium term (5-10 yrs)
<b>L</b>	Long term (10-15 yrs)
<b>++</b>	Strong positive effect
<b>+</b>	Positive effect
<b>0</b>	Neutral effect
<b>?</b>	Uncertain
<b>-</b>	Negative effect
<b>--</b>	Strong negative effect

## Appendix 4

### Summary of SA Results for Davenport Green and the SLs April 2011

#### Data Sourced from:

Trafford Council's Core Strategy: Council's further work on the proposed inclusion of the UDP high amenity strategic development site at Davenport Green within the Green Belt. Appendix C (CD 12.72)

#### Appendix 4: Summary of SA Results for SLs April 2011

SA Objectives		Davenport Green (SA April 2011)			Pomona (SA April 2011)			Wharfside (SA April 2011)			LCCC Area (SA April 2011)			Trafford CR (SA April 2011)			Carrington (SA April 2011)		
Social		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	+	+	+	+	+	+	+	+	+	+	+	++	+	+	+	+	+	+
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	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	+	+	+	+	+	++	+	+	+	+	+	+	+	++	++

Davenport Green  
Sustainability Appraisal Review

SA Objectives		Davenport Green (SA April 2011)			Pomona (SA April 2011)			Wharfside (SA April 2011)			LCCC Area (SA April 2011)			Trafford CR (SA April 2011)			Carrington (SA April 2011)		
Environment		S	M	L	S	M	L	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 geo-morphological features	+	+	++	0	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	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
E6	Conserve land resources and reduce land contamination	-	-	-	+	++	++	+	++	++	+	+	+	?	?	?	+	++	++
E7	Protect and improve water quality	+	+	+	+	+	+	+	+	+	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	+	+	+	+	+	+	+	+	+	+	+	+	+	++	++	+	++	++

Davenport Green  
Sustainability Appraisal Review

SA Objectives		Davenport Green (SA Feb 2011)			Pomona (SA April 2011)			Wharfside (SA April 2011)			LCCC Area (SA April 2011)			Trafford CR (SA April 2011)			Carrington (SA April 2011)		
Economic		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
EC5	Improve the social and environmental performance of the economy	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+

KEY	
	The level of certainty for the SLs has been revised
	The impact for the SLs has been revised
	Results have changed for DG
<b>S</b>	Short term (0-5 yrs)
<b>M</b>	Medium term (5-10 yrs)
<b>L</b>	Long term (10-15 yrs)
<b>++</b>	Strong positive effect
<b>+</b>	Positive effect
<b>0</b>	Neutral effect
<b>?</b>	Uncertain

Davenport Green  
Sustainability Appraisal Review

-	Negative effect
--	Strong negative effect

## Appendix 5

### Review of Appendix C: SA Results and Commentary for Davenport Green April 2011

#### Data Sourced from:

Trafford Council's Core Strategy: Council's further work on the proposed inclusion of the UDP high amenity strategic development site at Davenport Green within the Green Belt. Appendix C (CD 12.72)

## Appendix 5: SA Results and Commentary for Davenport Green April 2011

SA Objectives		Davenport Green (SA April 2011)			Urban Vision	RLAM
		S	M	L	Summary of findings	Comments on findings
S1	Achieving a better balance and mix in the housing market	0	0	0	No significant impact	Agree no significant impact
S2	Improve accessibility for all to services and facilities	+	+	+	Minor positive impact given because the development proposals would result in significant improvements to accessibility. The level of certainty is low owing to the ancillary nature of the facilities and the distance from many of Trafford's more deprived areas	This score is now in line with the other SLs but the level of certainty is low because DG is well related to areas of deprivation outside the plan area (e.g. Wythenshawe and Manchester) but not well related to Trafford's more deprived areas. The objective refers to accessibility for 'all' not exclusively the deprived areas of Trafford.
S3	Enhance Transport infrastructure: improve accessibility and quality of life to all communities	+	+	+	Proposed transport improvements as set out in Appendix 6 and 7 of RLAM's November representations are now recognised. Certainty has been improved from 'low' to 'medium'.  The sites with significant existing public transport facilities have had the certainty of their scores upgraded to high	The score is now in line with the other SLs. The information for the other sites has not changed since the last appraisal therefore the results for the other SLs should not have altered. The full results for the other sites are not given the results are therefore not transparent.
S4	Reduce crime, disorder and the fear of crime	0	0	0	No significant impact	Agree no significant impact
S5	Reduce poverty and social exclusion	+	+	++	The impact has now been changed from uncertain to positive with a high level of certainty. It is recognised that DG is close to other areas of deprivation.  The mitigation proposed for DG is for the use of S106 agreements to secure the proposed training opportunities and for other permanent opportunities created by the development, which is now in line with the other SLs.  The level of certainty for LCCC has increased from 'medium' to 'high'. The scores for TCR and Carrington have not been changed and score the same level of certainty as the other SLs and DG, despite a less	The information for the other sites has not changed since the last appraisal therefore the results for the other SLs should not have altered. The full results for the other sites are not given the results are therefore not transparent. Mitigation measures are included for some sites but not for others showing an inconsistent approach.



					positive impact in the long term. Mitigation measures have not been included for either of these sites.	
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SA Objectives		Davenport Green (SA April 2011)			Urban Vision	RLAM
		S	M	L	Summary of findings	Comments on findings
S6	Encourage a sense of community identity and welfare and value diversity, improve equity and equality of opportunity	0	0	0	No significant impact. The commentary states that the sub-objectives are primarily based on a residential community and are not considered applicable to an employment-led development.	The sub-objectives do not mention 'residential' community but refer to involvement in the 'local area'. The benefits of the proposals to the local area have not been considered. RLAM's November representations set out the 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 significant facilities, opportunities and identity for the community. <b>The scores underestimate DG's positive impacts</b>
S7	Improve qualifications and skills of the resident population	+	+	+	The jobs and training opportunities, which will generated by the proposals have now been recognised, including in the short term	The benefits identified in the commentary contradict the results in Objective S6 that there will be no significant impact for the community.
S8	Improve the health and inequalities in health of the population	+	+	+	Benefits of rural park recognised in terms of need for open space in an area that is deficient in accessible green space as well as the benefits for sport and recreation.  The benefits of the Sustainable Transport Strategy are now recognised but the score remains as minor positive.	Again this commentary contradicts the results for Objective S6 that there will be no positive impact for the community.
S9	Protect and improve local neighbourhood quality	0	0	0	The commentary states that the sub-objectives are primarily based on a residential community and are not considered applicable to an employment-led development.  The commentary recognises that there is evidence of cars being torched and fires in the woodland areas but does not think that proposals would have a significant effect against this objective.	The sub-objectives refer to 'the quality of highway infrastructure' and 'reduction in the amount of litter, graffiti, fly posting and fly tipping' and do not make specific reference to the residential community.  The benefits of the proposals such as: managed rural park, improved landscape/ecological value, pedestrian and cycle routes, public transport etc. are not mentioned and will have a significant beneficial impact on local neighbourhood quality. <b>The scores underestimate DG's positive impacts</b>

SA Objectives		Davenport Green (SA April 2011)			Urban Vision	RLAM
Environmental		S	M	L	Summary of findings	Comments on findings
E1	Reduce the effect of traffic on the environment	+	+	+	The result has improved from uncertain to minor positive although the certainty is considered low. No mitigation is proposed, although reference to RLAM's Appendices 6 and 7 is included	The highway proposals for the planning consent (2006), which were considered appropriate, are not mentioned. It is unclear why no mitigation is proposed.  Carrington is given an uncertain score. The impact of providing new road infrastructure is seen purely as a positive impact. The potential negative impacts of providing new infrastructure (e.g. greater car use) are not mentioned.
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 for ecology, biodiversity and open space provision	DG is scored only marginally higher than LCCC and TCR despite the potential for a loss of biodiversity at these SLs although the certainty for LCCC has been reduced to low.  Carrington scores major positive in short, medium and long term despite need to build a new road and that ecological surveys have not yet been undertaken. The score for Carrington cannot be accurate. No reference is made to the location and extent of the Rural park making a major contribution to the sub-region's emerging green infrastructure strategy.  <b>The scores for the SLs are not consistent and the positive effects of DG are underestimated.</b>
E3	Reduce contributions to climate change	+	+	+	The score has improved from uncertain to minor positive. The certainty has been reduced by the limited amount of information available on energy consumption in construction and operation, which applies to all of the SLs.  Mitigation measures are now removed for DG inline with the other SLs.  Carrington is described as having a particularly positive impact because of the public transport improvements and the provision of the Mosslands as a carbon sink..	Details of the proposals for DG are given in the commentary including a commitment to a minimum of 'Excellent' BREEAM rating and a series of other energy initiatives  The commentary on energy consumption in construction and operation was only added to all the SLs following RLAM's November representations, 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. The energy efficiency measures for the other sites are not given showing a lack of transparency. The impacts of building new infrastructure at Carrington are not mentioned.

						<b>The scores show inconsistency and a failure to rely upon evidence.</b>
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SA Objectives		Davenport Green (SA April 2011)			Urban Vision	RLAM
Environmental		S	M	L	Summary of findings	Comments on findings
E4	Reduce impact of climate change	+	+	+	Positive impacts of the development are now recognised – low risk flood area, improved drainage, incorporation of SUDS, habitat creation	Agree
E5	Reduce the environmental impacts of consumption and production	?	?	?	<p>It is now recognised that all sites will have an impact upon consumption and production. The results remain uncertain because the detailed quantities are unknown.</p> <p>All the sites scores have now been changed to uncertain because quantities are unknown.</p>	<p>The recognition that all sites will have an impact upon consumption and production is a result of the information in RLAM's representations. UV noted in the February 2011 SA that RLAM's findings were in Appendix 8, although subsequently stated that Appendix 8 had not been received.</p> <p>The preliminary calculations in RLAM's representations show that the impact would be low without mitigation. The mitigation measures identified in the representations are not included.</p> <p>The Trafford Infrastructure Capacity study 2009 is now mentioned, however the sewerage capacity problems in a number of the strategic sites are still not mentioned.</p> <p><b>The results are not transparent and show a failure to rely upon evidence</b></p>

SA Objectives		Davenport Green (SA April 2011)			Urban Vision	RLAM
Environmental		S	M	L	Summary of findings	Comments on findings
E6	Conserve land resources and reduce land contamination	-	-	-	<p>The impact is reduced from major negative to minor negative because the site comprises entirely of greenfield land and will not reduce the amount of contaminated or under used land and will retain 21ha as open land and 99ha as a managed rural park.</p> <p>The mitigation measures proposed are that the development should be built to an appropriate density whilst providing an appropriate high quality environment. The commentary does not express a view on whether the proposed density and quality of the environment are considered appropriate.</p> <p>All sites score a positive impact with the exception of Trafford Quays, which includes a greenfield site. The result is considered uncertain.</p>	<p>There is still no mention given to the current land allocation in the UDP or the lapsed planning application, which show that appropriate development is considered acceptable on this greenfield land.</p> <p>No consideration is given to the current quality and use of the land or the benefits that the development will provide in terms environmental/landscape benefits. The fact that the site is not contaminated is seen a negative. No consideration is given to the fact that the site will not require remediation or the positive impacts of this upon viability and deliverability. The constraints of contamination upon the other SLs, particularly viability and deliverability, are not considered and no mitigation is identified.</p> <p><b>There is a lack of appropriate analysis of the status of the land, the impact of the development as a whole and the proposed mitigation measures.</b></p>
E7	Protect and improve water quality	+	+	+	<p>The score has changed from no significant impact (high certainty) to a minor positive impact (medium certainty) The reason for the change in results is not given.</p> <p>Pomona, Wharfside and Carrington still get positive impacts despite the contamination on the site.</p>	<p>Even though UV has used the same information in this SA as last time (Appendix 11) the reasons for the change in the results are not given but now reflect the information provided.</p> <p>It is assumed that remediation of the other SLs will result in improved water quality. Details of how this will be done are not given.</p> <p><b>The results are not linked to evidence and are not transparent</b></p>

SA Objectives		Davenport Green (SA April 2011)			Urban Vision	RLAM
Environmental		S	M	L	Summary of findings	Comments on findings
E8	Protect and improve air quality	0	0	0	<p>The mitigation measures have now been removed for DG. The commentary states 'The additional information provided on DG has provided more detail on the implication of major built development for air quality'. The results for the other SLs have therefore been revised.</p> <p>It is now recognised that the locations are all either close or within an AQMA. The positive results for SLs have now been changed to no significant impact as it is considered that 'the public transport improvements are likely to mean that air quality is protected'.</p> <p>LCCC in AQMA but no specific mitigation attached to site. 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>It is not clear what the level of detail refers to. Information held by the Council or UV?</p> <p>UV made reference to Appendix 12 of RLAM's representations in the Feb SA but later stated it had not been received.</p> <p>The commentary shows the failure of the SA to use the baseline information and evidence (e.g. Trafford Air Quality Action Plan (Doc 8.4.2) and Progress reports) as the basis for the assessment. It was only through RLAM's reps that UV was alerted to the AQMAs.</p> <p><b>Whilst the score for DG is considered to be correct the commentary shows a lack of transparency and consistency in the SA process and a failure to rely on evidence to support results.</b></p>
E9	Protect and enhance the diversity and distinctiveness of landscape and townscape character and cultural facilities	+	+	+	<p>Score has not changed and commentary now refers to proposals. No mitigation proposed.</p> <p>Refer to loss of open fields and strip fields 'perhaps the most historically significant landscapes in the Borough'.</p>	<p>Interestingly the evidence regarding open fields and strip fields has not been mentioned before even though the report mentioned is dated 2008. The development area does not affect any strip fields associated with pre-enclosure open fields and or ridge and furrow. In any event, only 40% of the development area will be developed. The retention of landscape features and hedgerows is entirely consistent with the GMAU recommendations, which clearly envisage the development of such areas.</p> <p><b>The inclusion of this information at such a late stage again shows a lack of transparency and raises doubts regarding the use of evidence in the SA.</b></p>

SA Objectives		Davenport Green (SA April 2011)			Urban Vision	RLAM
Economic		S	M	L	Summary of findings	Comments on findings
EC1	Enhance Trafford's high performance and sustainable economy to provide a powerful contribution to regional growth	+	++	++	DG is now considered to have a major positive impact in line with the other SLs.	The major positive results for Carrington and TCR are given to reflect the potential for these sites to build on the established strengths of Trafford Park. This is considered a reasonable assumption for TCR but not Carrington as the site is remote and unrelated to Trafford park.
EC2	Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage	+	+	++	<p>The scores have been revised from uncertain to positive/major positive. Recognise proximity to areas of deprivation outside the plan area.</p> <p>Benefits to transport now recognised</p> <p>Carrington's score has been reduced to a minor positive in the medium term to reflect the need for remediation and to provide infrastructure</p>	<p>This is the first time the impact of these issues on deliverability has been mentioned in the SA process. The Council and UV have several times stated that Viability and deliverability are not within the scope of the SA. The commentary contradicts this assumption. DG scores the same as Carrington even though it does not require remediation or the major infrastructure needed at Carrington.</p> <p><b>The alteration of the results at this late stage again shows that the SA was not carried out using the appropriate evidence and shows a lack of transparency in the results.</b></p>
EC3	Enhance Trafford's image as a business and tourism destination	+	++	++	<p>Commentary now reflects benefits of office accommodation and rural park.</p> <p>Carrington has been revised in same way as EC2 above</p>	<b>As EC2 above</b>

SA Objectives		Davenport Green (SA April 2011)			Urban Vision	RLAM
Economic		S	M	L	Summary of findings	Comments on findings
EC4	Encourage the long term sustainability of Trafford's Town Centres	?	?	?	Results changed to uncertain from no significant impact on the grounds that the PPS4 assessment showed that DG was not suitable for office development.  LCCC's impact considered not significant despite proposals for a superstore in an out of centre location.	The jobs created at DG would not be created in Town Centres as shown in TBC Town Centre Uses Study (CD 8.1.3). RLAM has demonstrated that 2800 indirect and induced jobs will be created, some of which will be suitable for Town Centre locations, especially Altrincham.  <b>The scores underestimate DG's positive impacts.</b>
EC5	Improve the social and environmental performance of the economy	+	+	+	The results changed from uncertain to minor positive	The results are now the same as the other SLs

KEY	
	The level of certainty for the SLs has been revised
	The impact for the SLs has been revised
	Results have changed for DG
<b>S</b>	Short term (0-5 yrs)
<b>M</b>	Medium term (5-10 yrs)
<b>L</b>	Long term (10-15 yrs)
<b>++</b>	Strong positive effect
<b>+</b>	Positive effect
<b>0</b>	Neutral effect
<b>?</b>	Uncertain
<b>-</b>	Negative effect
<b>--</b>	Strong negative effect

## Appendix 6

### Summary of SA Results for Policy R4 – Green Belt and other Protected Open Space (June 2010, April 2011) and Davenport Green April 2011)

#### Data Sourced from:

Trafford Council's Core Strategy: Council's further work on the proposed inclusion of the UDP high amenity strategic development site at Davenport Green within the Green Belt. Appendix D (CD 12.72)



**Appendix 6:** Summary of SA Results for Policy R4 – Green Belt and other Protected Open Space (June 2010, April 2011) and Davenport Green April 2011)

SA Objectives		Policy R4 (SA April 2011)			Policy R4 (SA June 2010)			Davenport Green (SA April 2011)		
		S	M	L	S	M	L	S	M	L
<b>Social</b>										
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	0	0	0	0	0	0	+	+	+
S4	Reduce crime, disorder and the fear of crime	0	0	0	0	0	0	0	0	0
S5	Reduce poverty and social exclusion	+	+	+	0	0	0	+	+	++
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
S7	Improve qualifications and skills of the resident population	0	0	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

Davenport Green  
Sustainability Appraisal Review

SA Objectives		Policy R4 (SA April 2011)			Policy R4 (SA June 2010)			Davenport Green (SA April 2011)		
Environment		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	?	?	?	0	0	0	+	+	+
E5	Reduce the environmental impacts of consumption and production	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	0	0	0
E9	Protect and enhance the diversity and distinctiveness of landscape and townscape character and cultural facilities	++	++	++	++	++	++	+	+	+

Davenport Green  
Sustainability Appraisal Review

SA Objectives		Policy R4 (SA April 2011)			Policy R4 (SA June 2010)			Davenport Green (SA April 2011)		
		S	M	L	S	M	L	S	M	L
<b>Economic</b>										
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	?	?	?
EC5	Improve the social and environmental performance of the economy	0	0	0	0	0	0	+	+	+

KEY	
<b>S</b>	Short term (0-5 yrs)
<b>M</b>	Medium term (5-10 yrs)
<b>L</b>	Long term (10-15 yrs)
<b>++</b>	Strong positive effect
<b>+</b>	Positive effect
<b>0</b>	Neutral effect
<b>?</b>	Uncertain
<b>-</b>	Negative effect
<b>--</b>	Strong negative effect

## Appendix 7

### Review of Appendix D: SA Results and Commentary for Policy R4, April 2011

#### Data Sourced from:

Trafford Council's Core Strategy: Council's further work on the proposed inclusion of the UDP high amenity strategic development site at Davenport Green within the Green Belt. Appendix D (CD 12.72)

## Appendix 7: SA Results and Commentary for Policy R4 April 2011

SA Objectives		Policy R4 (SA April 2011)			Urban Vision	RLAM
		S	M	L	Summary of Findings	Comments on Findings
S1	Achieving a better balance and mix in the housing market	+	+	+	The commentary refers to the benefits of the Green Belt in general and its impact upon housing. The relationship of DG to this objective is not discussed.	DG does not include housing so will not have a significant or direct impact on the policy
S2	Improve Accessibility for all to services and facilities	+	+	+	It is acknowledged that there is only limited certainty for this impact, as the policy will not in itself ensure that investment is well related to areas of deprivation.	The impact of extending the GB boundary to include DG and thereby prevent the positive impacts of the development in terms of improving the accessibility of services and facilities is not discussed. <b>An uncertain score would seem more appropriate</b>
S3	Enhance Transport infrastructure: improve accessibility and quality of life to all communities	0	0	0	No significant impact	The alteration of the GB boundary will mean that the transport improvements proposed at DG will not be realised. The implications of the change are not discussed.
S4	Reduce crime, disorder and the fear of crime	0	0	0	No significant impact	Agree no significant impact
S5	Reduce poverty and social exclusion	+	+	+	It is acknowledged that there is only limited certainty for this impact, as the policy will not in itself ensure that investment is well related to areas of deprivation.	The impact of extending the GB boundary to include DG and thereby prevent the positive impacts of the development in terms of job creation and access to services and facilities is not discussed. <b>An uncertain score would seem more appropriate</b>
S6	Encourage a sense of community identity and welfare and value diversity, improve equity and equality of opportunity	0	0	0	No significant impact. Certainty High.	The loss of the benefits of DG with regard to the community identity, provision of jobs, facilities, Rural park etc. is not discussed. <b>If the loss of the proposed development is not considered to be significant an explanation should be provided.</b>
S7	Improve qualifications and skills of the resident population	0	0	0	No significant impact. Certainty High.	The loss of the benefits of DG with regard to the provision of jobs and training opportunities is not discussed. <b>If the loss of the proposed development is not</b>

						considered to be significant an explanation should be provided.
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SA Objectives		Policy R4 (SA April 2011)			Urban Vision	RLAM
Social		S	M	L	Summary of Findings	Comments on Findings
S8	Improve the health and inequalities in health of the population	+	+	+	The policy will lead to the protection of areas within the GB and on other POL for recreation. It is recognised that by including DG within the GB the likelihood of the rural park being provided will be reduced, reducing the significance of the impact on this policy. It is considered that the protection of recreational opportunities on other sites within the GB will outweigh the reduced likelihood of the rural park being provided.	The loss of the Rural park by returning DG to the GB is a certainty not a possibility. The recreational opportunities elsewhere in the GB will continue regardless of the inclusion or not of DG. The loss of the rural park cannot be outweighed by their existence. The loss will be felt regardless of the protection of other sites and is a loss in absolute terms. GB policy can protect recreational opportunities but cannot guarantee implementation. The rural park, however, is a legal pre-requisite of the development at DG.  <b>The score does not reflect the loss of DG and the benefits that the allocation would bring.</b>
S9	Protect and improve local neighbourhood quality	+	+	+	It is considered that because the policy affords protection to areas of open land that there will be a positive impact on the quality of local environments in Trafford. The certainty given to this impact is High.	There appears to be confusion in the assessment between the openness of the GB, which can be secured by policy and its management and use, which cannot and is not a factor in either including or excluding land in GB (PPG2 1.7) The land at DG could revert to agricultural use under GB policy and no longer be available for the local community, which could not be controlled.  <b>The score does not reflect the loss of the proposed improvements in ecological and landscape quality or the provision of a managed rural park.</b>
Environmental		S	M	L	Summary of Findings	Comments on Findings
E1	Reduce the effect of traffic on the environment	+	+	+	The policy is considered to restrict urban sprawl and could therefore have a positive impact on traffic. However, it is also recognised that the resultant development could exacerbate the existing congestion in urban areas. The policy itself will also not ensure that development is directed to the most accessible locations.	The sustainable transport strategy that is proposed for DG, including improvements to public transport links, cycle and pedestrian routes will not be realised if DG becomes GB. As is recognised in the SA of DG the proposals are considered to have a minor positive impact on this objective.

SA Objectives		Policy R4 (SA April 2011)			Urban Vision	RLAM
Environmental		S	M	L	Summary of Findings	Comments on Findings
E2	Protect, enhance and restore open space, biodiversity, flora and fauna, geological and geo-morphological features	++	++	++	The assessment notes that the DG is identified as a Great Crested Newt Biodiversity Opportunity Area but that the ecological study produced by RLAM showed that some of this habitat has now been lost. It is also noted that by including DG in the GB the policy would reduce the likelihood of the rural park being provided which would have provided enhanced ecological habitats.	Given that the change in policy would result in the loss of the rural park and the enhancements to the ecology that would have resulted from the development. The loss will be felt regardless of the protection of other sites and is a loss in absolute terms. The GB policy is unable to control the management and use of the land, which could be achieved as part of the development.  <b>The score does not reflect the loss of the benefits that the allocation would bring.</b>
E3	Reduce contributions to climate change	+	+	+	The policy is considered to restrict urban sprawl and could therefore have a positive impact on traffic. However, it also recognised that the resultant development could exacerbate the existing congestion in urban areas. The policy itself will also not ensure that development is directed to the most accessible locations.	The sustainable transport strategy that is proposed for DG, including improvements to public transport links, cycle and pedestrian routes will not be realised if DG becomes GB. As is recognised in the SA of DG the proposals are considered to have a minor positive impact on this objective.
E4	Reduce impact of climate change	?	?	?	The policy is considered to help prevent development from taking places in some parts of the Borough that are at risk of flooding, however by preventing urban sprawl will lead to more development being concentrated in urban areas, many of which are at risk of flooding.	DG is not at risk of flooding, will improve drainage through the use of SUDS and will create new habitats. The benefits identified in the SA of DG will not be realised if DG becomes GB.  <b>The removal of DG as a development site could increase the pressure on areas at risk of flooding.</b>
E5	Reduce the environmental impacts of consumption and production	0	0	0	No significant impacts	Agree no significant impacts



SA Objectives		Policy R4 (SA April 2011)			Urban Vision	RLAM
Environmental		S	M	L	Summary of Findings	Comments on Findings
E6	Conserve land resources and reduce land contamination	++	++	++	It is noted that a key aim of the policy is to conserve land resources by providing lasting protection to the GB and other areas of POL. It is considered that the policy will result in investment being focussed in urban areas and new housing built on brownfield land.	<p>The land will be protected but there will be no control over the quality. The benefits offered by the rural park and landscape treatment of the development will be lost. Brownfield land can often be more difficult to develop owing to expensive remediation of contaminated land, which can also delay the delivery of development. There is no consideration of the amount of land available for employment, when it will be delivered and the impacts upon economic growth.</p> <p><b>The score does not reflect the loss of the benefits that the allocation would bring</b></p>
E7	Protect and improve water quality	0	0	0	No significant impacts	<p>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. will be lost.</p> <p><b>The loss of the benefits is not reflected in the assessment.</b></p>
E8	Protect and improve air quality	?	?	?	It is considered uncertain whether the concentrating of the development in urban areas, including AQMAs is a better approach than spreading the pollution more thinly across the Borough.	The fact that the proposals at DG are expected to have a negligible impact upon air quality is not mentioned.
E9	Protect and enhance the diversity and distinctiveness of landscape and townscape character and cultural facilities	++	++	++	It is considered that the policy will provide long-term protection against development that would have a detrimental impact on the diversity and distinctiveness of landscapes in the GB. The policy will also protect open fields and strip fields around DG.	<p>The benefits of the proposals at DG that will be lost if DG becomes GB are not considered, with regard to the rural park, landscape and ecological treatment of the site.</p> <p>The development area does not affect any strip fields associated with pre-enclosure open fields and or ridge and furrow. In any event, only 40% of the development area will be developed. The retention of landscape features and hedgerows is entirely consistent with the GMAU recommendations, which clearly envisage the development of such areas.</p>

SA Objectives		Policy R4 (SA April 2011)			Urban Vision	RLAM
Economic		S	M	L	Summary of Findings	Comments on Findings
EC1	Enhance Trafford's high performance and sustainable economy to provide a powerful contribution to regional growth	?	?	?	<p>It is recognised that the GB can restrict economic development opportunities but can also provide a high quality environment that attracts skilled workers.</p> <p>The appraisal notes that DG Commercial Review submitted by RLAM states that DG is the only site within Trafford capable of attracting large levels of investment from multi-national businesses and that many companies seeking new office buildings will not consider the SLs in the CS as appropriate.</p>	<p>The improvements to the environment at DG will not be realised if the land becomes GB. The proposed jobs and training opportunities as well as the improvements to public transport will also not be realised.</p> <p><b>The economic benefits of the allocation will be lost</b></p>
EC2	Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage	+	+	+	<p>By controlling development and preventing urban sprawl there is likely to be more investment in urban areas, which will have a positive impact on disparities in the Borough. The policy itself cannot ensure that development will occur in areas of deprivation.</p>	<p>The loss of the benefits of the development at DG is not considered, e.g. jobs, training, improved accessibility etc.</p> <p><b>The positive impact does not reflect the loss of the benefits that the allocation would bring and appears to place too much significance on the ability of the policy to affect the location of development.</b></p>
EC3	Enhance Trafford's image as a business and tourism destination	?	?	?	<p>It is stated that the policy could restrict economic development opportunities but that PPG2 stipulates that there is a presumption against inappropriate development in the GB.</p> <p>The commentary notes that DG is the only site within Trafford that is capable of attracting large levels of investment from multi-national businesses.</p>	<p>Moving DG to the GB will not enhance Trafford's image as a business and tourism destination as the development at DG will not occur.</p> <p><b>The economic benefits of the allocation will be lost.</b></p>

SA Objectives		Policy R4 (SA April 2011)			Urban Vision	RLAM
Economic		S	M	L	Summary of Findings	Comments on Findings
EC4	Encourage the long term sustainability of Trafford's Town Centres	+	+	+	It is recognised that the policy itself cannot ensure that development supports the vitality of Trafford's town centres and that there are insufficient suitable and available sites for office development in the town centres.	The loss of the development at DG if the land is returned to GB and the impact upon the supply of suitable sites for office accommodation is not discussed. <b>The commentary shows that the impact cannot be positive, as the situation is clearly uncertain.</b>
EC5	Improve the social and environmental performance of the economy	0	0	0	No significant impacts	<b>The positive impacts identified in the SA of DG are not considered and will be lost if DG becomes GB.</b>

KEY	
	The level of certainty for the SLs has been revised
	The impact for the SLs has been revised
	Results have changed for DG
<b>S</b>	Short term (0-5 yrs)
<b>M</b>	Medium term (5-10 yrs)
<b>L</b>	Long term (10-15 yrs)
<b>++</b>	Strong positive effect
<b>+</b>	Positive effect
<b>0</b>	Neutral effect
<b>?</b>	Uncertain
<b>-</b>	Negative effect
<b>--</b>	Strong negative effect



## Appendix 8

### Delivery of the Employment Land Supply in the CS (CD 12.72, Para 6.2)

#### Data sourced from:

This Appendix contains three notes which present existing evidence before the Examination to address the Council's claim in para 6.2 about the adequacy and deliverability of the land supply for employment in the first period of the Core Strategy:

1. Deliverability of the SLs and other Key Locations for Employment Land Supply (Infrastructure Issues and Planning Timetable)
2. Record of Non Delivery of SLs and Other Major Employment Locations
3. Planned and Emerging Developments in Carrington.

## Appendix 8: Trafford Core Strategy: Deliverability of the SLs and other Key Locations for Employment Land Supply (Infrastructure Issues and Planning Timetable); Response to para 6.2 of CD 12.72

RLAM conclude from the information set out below that the Council will not be able to deliver the 75 hectares of employment land set out in Table W1:

1. The areas account for 52 hectares or 69% of the land required in the first period of the CS.
2. A majority of the infrastructure items in the four SLs are not costed, making it impossible by the Council's own tests (CD 6.2.1, para 8.4, second bullet) to assess their deliverability.
3. A third or more of the infrastructure items are not phased, implying that it is unclear whether they will be required in the first period or not. Again this makes it impossible to assess deliverability, especially in the short term.
4. Six items of infrastructure are not costed but are required in the first period.
5. Trafford Park Core, which alone accounts for 30% of the employment land supply in the first period and is described as a key location for employment, is not an SL so has not even been evaluated to that degree; even greater uncertainty must surround its deliverability than the SLs.
6. The planning process creates in-built delays in the delivery of the SLs.

<b>Location</b> References are to Core Strategy (CD 6.2.1)	<b>Planned Contribution to Table W1 Employment Land Supply, up to 2015/16 (hectares)</b>	<b>Infrastructure Items Required (CS Chap 8, Implementation)</b>	<b>Number and Percentage of Items not Costed</b>	<b>Number and Percentage of Items not Phased</b>	<b>Number of Items not Costed and Required by 2016</b>
SL1 Pomona Island (para 8.22)	4	9	6/66%	4/44%	1
SL2 Trafford Wharfside (para 8.32)*	3	16	9/56%	6/37.5%	2
SL4 Trafford Centre Rectangle (para 8.54)**	2	16	11/69%	9/56%	None
SL 5 Carrington (para 8.69)	25	14	7/50%	4/29%	3

Other locations: Trafford Park Core	18	This area accounts for 30% of the Phase 1 land supply and is described as having a key role to play in Policy W1: "Trafford Park Core will be a key location for industry and business activity within the Manchester City Region Inner Area and will be the principal location for employment development in the Borough."(CS para W 1.6; CD 6.2.1) yet it has not been tested for implementation or deliverability: the Core Strategy says nothing about what infrastructure will be required, how much it will cost, who will fund it or when it will be required. There are also major issues of land assembly to be resolved in order to deliver new infrastructure and development sites.
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\*SL 2.4 Development Requirements

In order for development at this (SL2) location to be acceptable, the following will be required:

- The provision of a new high frequency public transport system for the area.....

The Implementation Table indicates that this investment will be required by 2016. It has been a proposal since at least 1996 (Policy E15 of the UDP 1996) and it is not programmed at all currently.

\*\*SL4.4 Development Requirements refer in similar terms to integrated, frequent public transit system.

## Planning Timetables

Each of the SLs has to be put through the Land Allocations DPD (detailing and identification of site specific implications of proposals) or, in the case of Carrington, the Carrington Area Action Plan (CD 6.2.1: paras 8.5, SL 1.3, SL2.3, SL4.3, SL5.3), all of which are planned to be adopted in August 2014 (according to LDS, November 2010, CD 5.1.13), but which are likely to be delayed by the delay to the Core Strategy. Only on adoption of the relevant DPD's can the Council consider planning applications for development of the SLs. It seems unlikely that much development will take place within the first five years of the Core Strategy.

## Trafford Core Strategy Delivery Strategy

### Record of Non Delivery of SLs and Other Major Employment Locations, Response to para 6.2 of CD 12.72

The evidence set out below, which is drawn from existing sources, shows that:

- Much of the development and infrastructure investment provided for in the SLs has been planned since at least as far back as the 1996 UDP
- Very few of the developments and infrastructure investments planned in the SLs 1,2,4,5 (the main sources of employment land in the CS) have been implemented, in spite of being firm proposals for at least fifteen years.

Furthermore the previous note “Deliverability of the SLs and other Key Locations for Employment” has shown that the Core Strategy offers no greater assurance that the development and infrastructure in the SLs will be delivered in the next plan period.

Location	Previous Plan Designation (UDP 1996, generally carried over into UDP 2006 CD 12.18)	Comment
Trafford Park and Carrington	UDP Policy E7 Main Employment Areas: covers whole of Trafford Park and Carrington. The Justification for the Policy includes the words: “These employment areas are long established and have, or are best capable of developing, the necessary infrastructure to support a wide range of employment activity. They provide convenient and attractive locations for business of all types and sizes. Trafford Park, Carrington and Broadheath have the scope and have or are planned to have adequate facilities to accommodate a broad range and scale of developments.”	In spite of Carrington apparently being serviced or capable of being serviced for development, very little land has been developed to date. See Note in this Appendix: “Planned and Emerging Developments in Carrington, Response to para 6.2 of CD 12.72”
SL1 Pomona Island	UDP 1996 Policies E15 a, c, d, Area for Action: Trafford Park and Pomona. Pomona – development to provide office accommodation, waterside leisure and tourism facilities and housing	In spite of the site having been vacant for more than 20 years, the opening of the Metrolink route to Eccles with a station at Pomona and buoyant conditions in the property market, the site has not been developed.  Pomona Master Plan (June



		2008, CD 12.36.3.9) shows commercial development in Phases 2b and 4 but no dates are put to the Phases.
SL2 Trafford Wharfside	<p>UDP Policy E14 Other Strategic Development Sites; Major Urban High Amenity Site, UH1 – Wharfside – Trafford Park.          UDP Policy E15 a, c; Area for Action: Trafford Park.          Wharfside – development to provide the main business and commercial development for large and medium sized offices, high technology and light and general industrial firms, accompanied by prestige hotel and conference facilities and a local shopping centre</p>	Imperial War Museum North appears to be the only significant development since 1996.
SL4 Trafford Centre Rectangle	<p>UDP 1996 Policies E15 c, d,          Area for Action: Trafford Park and Pomona. Dumplington – Regional Indoor and Outdoor Sports and Leisure Complex.          OSR19 Regional Sports Complex – The Trafford Centre</p>	Extensive sports and leisure development has taken place. Also the Venus development providing 91,000 sq.ft. of offices near to the Trafford Centre.
SL5 Carrington	<p>E14 Other Strategic Development Sites (saved; replace with Land Allocations DPD); the Council release the following additional strategic sites for development during the Plan period:-.....</p> <ul style="list-style-type: none"> <li>• BP3 Manchester Road, Carrington (for Business Park Use; planning permission already granted in whole or part for anticipated development). Justification includes “assist the diversification and regeneration of the local and Greater Manchester economy.</li> </ul> <p>Policy T8 (saved; replace with Land Allocations DPD); the following highway improvements are proposed:</p> <ol style="list-style-type: none"> <li>1. Improvements to the Trunk and Primary Route Network:             <ul style="list-style-type: none"> <li>• Manchester Road Link and associated Spur Roads</li> </ul> </li> <li>2. Other improvements             <ul style="list-style-type: none"> <li>• A6144 Carrington Lane improvement</li> <li>• Manchester Road/Sinderland Road Link</li> </ul> </li> </ol> <p>In the Justification, the Council express an intent to add further schemes during the plan period: “In particular the Council is committed to examining the benefits of and identifying suitable alignments for a Carrington Spur extension, a Manchester Road Link extension and a Carrington/Irlam Canal crossing.”</p>	<p>A business park operates in the former Shell offices. This is the focus of the E14 proposal. Vacant, greenfield land to the north of the existing development was included in the Policy but has not been developed.</p> <p>The Implementation Table (para 8.69 of the CS, CD 6.2.1) indicates that none of the planned or intended improvements to access have taken place</p>



## Trafford Core Strategy Planned and Emerging Developments in Carrington, Response to para 6.2 of CD 12.72

The conclusion from the analysis below is that the only certain development for employment purposes in SL5 Carrington in the first Core Strategy period is the SAICA scheme which is under construction and which accounts for part of a 15.75 hectare site. This contrasts with an expectation in Table W1 that Carrington will deliver 25 hectares. There is no evidence that other sites will make up the shortfall.

Site within Carrington	Development Proposals and Progress
Shell (a) Summary Timescale	<ol style="list-style-type: none"> <li>1. EiP Hearings close 27/5/11</li> <li>2. Core Strategy adoption August 2011 (according to LDS, Nov 2010, CD 5.1.13) but likely to be delayed in view of adjournment, say October.</li> <li>3. Carrington Area Action Plan (AAP):               <ol style="list-style-type: none"> <li>a. Preparation and consultation: 2011-2012 (according to LDS, Nov 2010, CD 5.1.13) but likely to be delayed by delay to CS, with which it must be in conformity, say 2012-2013; need to demonstrate exceptional circumstances to justify (infrastructure) development in the Green Belt</li> <li>b. Adoption 8/2014 (according to LDS, Nov 2010, CD 5.1.13) but likely to be delayed by delay to CS, with which it must be in conformity, say beginning 2015</li> </ol> </li> <li>4. Planning applications for first phase development and for major infrastructure e.g. new link road from Carrington Lane to the existing A1 internal site road (a Phase 1 requirement, CD 6.2.1, para 8.69), 2015</li> <li>5. Earliest possible start on site, assuming applications are full not outline: 2016</li> </ol> <p>Issues to be resolved in order to produce viable AAP (according to DTZ, Shell Carrington, Delivery Statement, November 2009*, CD12.22)</p> <ul style="list-style-type: none"> <li>• Phasing of development and community facilities e.g. primary school in order to create viable communities from the outset (CD12.22, para 5.46, second bullet)</li> <li>• Improvements to public transport, which have yet to be defined or costed.</li> <li>• Dualling of the Carrington Spur</li> </ul> <p>*DTZ assume (para 4.6) that Carrington will be allocated as a Strategic Site in the Core Strategy, with consequent time savings in the later planning stages. The CS does not now allocate Carrington as a Strategic Site, so a further DPD is required i.e. the AAP.</p>
(b) Shell Development Proposals	Core Strategy Policy SL5 <ul style="list-style-type: none"> <li>• 1560 residential units</li> <li>• 75 hectares of land for employment uses</li> <li>• Infrastructure see RLAM Note in this Appendix: "Trafford Core Strategy: Deliverability of the SLs and other Key</li> </ul>

	Locations for Employment Land Supply (Infrastructure Issues and Planning Timetable)"
(c) Delivery Statement for Shell Carrington, CD 12.22	<p>RLAM now compare the text (para 3.10) and the Table (para 3.12) in the Shell Carrington Delivery Statement (CD 12.22) and the Council's Table W1 in the Core Strategy (CD6.2.1), the Council having quoted the Delivery Statement in support of the deliverability of the development proposals for the SLs (para 3.27.1 in the Council's Topic Paper 3, CD 4.6.4):</p> <ul style="list-style-type: none"> <li>• Para 3.10 of the Delivery Statement indicates that 480,000 sq.ft. of employment floorspace could be delivered in years 2013-2016, when account is taken of the preparation phase mentioned in para 3.9 (which itself is unrealistic, given that the Area Action Plan is not programmed for adoption until August 2014).</li> <li>• Para 3.12 of the Delivery Statement indicates that 750,000 sq.ft. of employment floorspace will be delivered in the period 2011-2016, which is inconsistent with the assumptions set out in paras 3.9 and 3.10.</li> <li>• The Core Strategy at Table W1 anticipates 25 hectares of employment land in Carrington in the first phase of the Core Strategy to 2016; this converts to 60 acres and on the same plot ratio assumption as used in the Delivery Statement (20,000 sq.ft. per acre) it equates to 1.2m.sq.ft. which, even allowing for some adjustment of gross to net, is inconsistent with the figures in the Delivery Statement.</li> </ul> <p>The conclusion from this brief analysis is that the evidence base for the delivery of employment land is far from robust, especially in the first period of the Core Strategy.</p>
Carrington (Gas Works Site; National Grid) Planning permission	<p>Granted in outline on 22/10/10 for:</p> <ul style="list-style-type: none"> <li>• Mixed employment development, maximum 94,295 sq.m.</li> <li>• Ancillary retail development</li> <li>• Engineering works to create replacement wildlife habitat</li> </ul> <p>subject to 27 conditions including</p> <ul style="list-style-type: none"> <li>• Office uses to ancillary only</li> <li>• Contaminated land Phase 1 Report, possible Phase 2 Report and any necessary remediation works</li> <li>• Other prior surveys and works relating to structural landscaping, new access to Manchester Road, scheme for replacement wildlife habitat, 10% renewable energy, bats, noise disturbance, flood risk/surface water drainage</li> <li>• Detailed applications within five years from 22/10/10 and commencement of development within two years of approval of reserved matters.</li> </ul> <p>Development could commence as late as 2017. Site area 26.7 has</p>
BP Terminal/SAICA Site	Recycled paper mill under construction on part of 15.75 ha site (TBC Planning Website)

## Appendix 9

### Analysis of the Council's Conclusions on the SA

#### Data Sourced from:

The Council's conclusions (paras 5.1 and 5.2) on the re-appraisal of the February 2011 SA of Davenport Green can be summarised:

1. Davenport Green shows long term sustainability benefits against the majority of the sustainability objectives.
2. It attracts one minor negative on grounds of loss of greenfield land
3. It is less certain in delivering benefits to Trafford's communities in relation to access to services and facilities
4. For various reasons it is less certain in reducing the effect of traffic on the environment than other SLs.

## Appendix 9:

Each of the above needs to be addressed:

1. The unstated implication of this is that the Council has scored Davenport Green less well in the short and medium terms. This fails to take account of the phasing commitments made by RLAM in SS1:
  - a. Early implementation of the employment development, which compares well with the timing of employment development on the other SLs (see table below)

	<b>D Green</b>	<b>Pomona</b>	<b>Wharfside</b>	<b>TCR</b>	<b>Carrington</b>
Empl't devt in plan period to 2015/6; % of total empl't dev't for given site or SL	30%	40%	30%	13%	33%
Cumulative % in second plan period	65%	80%	60%	53%	66%

- b. Commitment to lay out the rural park in advance of occupation of the first building.
  - c. Both key investments, the employment development and the rural park, will be in place or well advanced in the short and medium terms; consequently the acknowledged benefits to communities that flow from these investments (e.g. S5 (reduce poverty) and EC2 (reduce disparities)) will also arise in the short and medium terms.
  - d. The SA does not properly reflect this evidence.
  - e. RLAM have also provided substantial evidence elsewhere (RLAM response to CD 12.72, para 6.2 in Section 6 of this Response) that the evidence supporting the planned delivery of the SLs is unsound; the relative scoring of Davenport Green should again be improved to reflect this lack of evidence.
2. RLAM acknowledge the loss of greenfield land, which is 15 hectares. This is the only negative effect recorded in the SA, and a minor one.

3. On the one hand this objective is irrelevant to the proposals at Davenport Green in that the hotel, shops and restaurants are not designed to serve Trafford's communities. The irrelevance is similar to that of S1 (housing mix); the site is not intended to provide housing. On the other hand the one major facility that will be provided at Davenport Green is immediately adjacent to several Trafford communities, including Halebarns where there is an acknowledged open space deficiency (CD 12.72, Appendix D, S8).
4. The Council claim extensively that proximity to motorways is an advantage of the Borough's employment locations such as Trafford Park and Carrington (e.g. TBC Economic Development Plan, CD 8.3.8) and Altrincham CD 6.2.1, Altrincham Spatial Profile); it cannot be consistent to score Davenport Green down on that same count but not the SLs in Trafford Park and Carrington; it was also the Council who insisted that access to Davenport Green should be from the motorway (UDP 2006, Planning Brief, CD 12.18). Secondly the lack of a Metrolink connection is a feature shared with both Wharfside and TCR, for both of which the CS sets out a requirement for "a new high frequency public transport system for the area" (CD 6.2.1, paras SL 2.4 and SL 4.4). Finally under this heading the Council point to the distance from Trafford's communities in greatest need; whilst places such as Old Trafford may be close to Trafford Park, firstly there are major barriers to pedestrian and cycle movement between Trafford Park and the nearby communities and public transport to Trafford Park is poor, so car dependency may well be high, and secondly history shows (c.f. the 28,000 jobs created in Trafford Park during the life of the Development Corporation and the persistence of deprivation and unemployment in nearby Old Trafford) that proximity alone is insufficient to address issues of deprivation.

## Appendix 10

### Relevant Legislation and Guidance

#### Data Sourced from:

EU Directive 2001/42/EC  
Environmental Assessment of Plans and Programmes 2004 (SI 2004 No1633)  
EC Guidance on the Implementation of Directive 2001/42  
Planning Policy Statement 1: Delivering Sustainable Development, 2005  
Planning Policy Guidance 2: Green Belts, 2006  
Planning Policy Statement 12: Local Spatial Planning, 2008  
Plan Making Manual, CLG  
The Planning Inspectorate – Local Development Frameworks: Examining Development Plan Documents – Soundness Guidance, August 2009 and February 2010  
A Practical Guide to the Strategic Environmental Assessment Directive, ODPM, 2005



## Appendix 10: Relevant Legislation and Guidance

<b>Relevant Section</b>	<b>EU Directive 2001/42/EC</b>
EU Directive 2001/42/EC Preamble para. 4	<i>Environmental assessment is an important tool for integrating environmental considerations into the preparation and adoption of certain plans and programmes which are likely to have significant effects on the environment in the Member States, because it ensures that such effects of implementing plans and programmes are taken into account during their preparation and before their adoption</i>
EU Directive 2001/42/EC Preamble para. 14	<i>Where an assessment is required by this Directive, an environmental report should be prepared containing relevant information as set out in this Directive, identifying, describing and evaluating the likely significant environmental effects of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme; Member States should communicate to the Commission any measures they take concerning the quality of environmental reports.</i>
EU Directive 2001/42/EC Preamble para. 15	<i>In order to contribute to more transparent decision making and with the aim of ensuring that the information supplied for the assessment is comprehensive and reliable, it is necessary to provide that authorities with relevant environmental responsibilities and the public are to be consulted during the assessment of plans and programmes, and that appropriate time frames are set, allowing sufficient time for consultations, including the expression of opinion.</i>
EU Directive 2001/42/EC Article 1 Objective	<i>The objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.</i>
EU Directive 2001/42/EC, Article 2 (b)	<i>'environmental assessment' shall mean the preparation of an environmental report, the carrying out of consultations, the taking into account of the environmental report and the results of the consultations in decision-making and the provision of information on the decision in accordance with Articles 4 to 9;</i>
EU Directive 2001/42/EC, Article 4	<i>1. The environmental assessment referred to in Article 3 shall be carried out during the preparation of a plan or programme and before its adoption or submission to the legislative procedure.</i>
EU Directive 2001/42/EC, Article 5	<ol style="list-style-type: none"> <li><i>1. Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.</i></li> <li><i>2. The environmental report prepared pursuant to paragraph 1 shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.</i></li> <li><i>3. Relevant information available on environmental effects of the plans and programmes and obtained at other levels of decision-making or through other Community legislation may be used for providing the information referred to in Annex I.</i></li> <li><i>4. The authorities referred to in Article 6(3) shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report.</i></li> </ol>

Relevant Section	EU Directive 2001/42/EC
EU Directive 2001/42/EC Article 6 (1 and 2)	<p><b>Consultations</b></p> <ol style="list-style-type: none"> <li>1. <i>The draft plan or programme and the environmental report prepared in accordance with Article 5 shall be made available to the authorities referred to in paragraph 3 of this Article and the public.</i></li> <li>2. <i>The authorities referred to in paragraph 3 and the public referred to in paragraph 4 shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme or its submission to the legislative procedure.</i></li> </ol>
EU Directive 2001/42/EC Article 8	<p><i>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</i></p>
EU Directive 2001/42/EC Article 12(2)	<p><i>Member States shall ensure that environmental reports are of a sufficient quality to meet the requirements of this Directive and shall communicate to the Commission any measures they take concerning the quality of these reports.</i></p>
EU Directive 2001/42/EC Annex 1	<p><b>Information referred to in Article 5(1)</b></p> <p><i>The information to be provided under Article 5(1), subject to Article 5(2) and (3), is the following:</i></p> <ol style="list-style-type: none"> <li><i>(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;</i></li> <li><i>(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;</i></li> <li><i>(c) the environmental characteristics of areas likely to be significantly affected;</i></li> <li><i>(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;</i></li> <li><i>(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;</i></li> <li><i>(f) the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;</i></li> <li><i>(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</i></li> <li><i>(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</i></li> <li><i>(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;</i></li> <li><i>(j) a non-technical summary of the information provided under the above headings.</i></li> </ol>

Relevant Section	EU Directive 2001/42/EC
Regulation 12	<p><b>Preparation of environmental report</b></p> <p>(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.</p> <p>(2) The report shall identify, describe and evaluate the likely significant effects on the environment of— (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.</p> <p>(3) The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of—</p> <ul style="list-style-type: none"> <li>(a) current knowledge and methods of assessment;</li> <li>(b) the contents and level of detail in the plan or programme;</li> <li>(c) the stage of the plan or programme in the decision-making process; and</li> <li>(d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.</li> </ul> <p>(4) Information referred to in Schedule 2 may be provided by reference to relevant information obtained at other levels of decision-making or through other Community legislation.</p> <p>(5) When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies.</p> <p>(6) Where a consultation body wishes to respond to a consultation under paragraph (5), it shall do so within the period of 5 weeks beginning with the date on which it receives the responsible authority's invitation to engage in the consultation.</p>
Regulation 13	<p><b>Consultation procedures</b></p> <p>(1) Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying environmental report (“the relevant documents”) shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.</p> <p>(2) As soon as reasonably practicable after the preparation of the relevant documents, the responsible authority shall—</p> <ul style="list-style-type: none"> <li>(a) send a copy of those documents to each consultation body;</li> <li>(b) take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental Assessment of Plans and Programmes Directive (“the public consultees”);</li> <li>(c) inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, or from which a copy may be obtained; and</li> <li>(d) invite the consultation bodies and the public consultees to express their opinion on the relevant documents, specifying the address to which, and the period within which, opinions must be sent.</li> </ul> <p>(3) The period referred to in paragraph (2)(d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.</p> <p>(4) The responsible authority shall keep a copy of the relevant documents available at its principal office for inspection by the public at all reasonable times and free of charge.</p>

	<i>(5) Nothing in paragraph (2)(c) shall require the responsible authority to provide copies free of charge; but where a charge is made, it shall be of a reasonable amount.</i>
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Relevant Section	EU Directive 2001/42/EC
<p><b>Schedule 1 –</b> Criteria for determining the likely significance of effects on the environment Regs. 9(2)(a) and 10(4)(a)</p>	<p><b>1. The characteristics of plans and programmes, having regard, in particular, to—</b>  <i>(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;</i>  <i>(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;</i>  <i>I the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;</i>  <i>(d) environmental problems relevant to the plan or programme; and</i>  <i>(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (E.g., plans and programmes linked to waste management or water protection).</i></p> <p><b>2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—</b>  <i>(a) the probability, duration, frequency and reversibility of the effects;</i>  <i>(b) the cumulative nature of the effects;</i>  <i>I the transboundary nature of the effects;</i>  <i>(d) the risks to human health or the environment (E.g., due to accidents);</i>  <i>(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);</i>  <i>(f) the value and vulnerability of the area likely to be affected due to—</i>  <i>(i) special natural characteristics or cultural heritage;</i>  <i>(ii) exceeded environmental quality standards or limit values; or</i>  <i>(iii) intensive land-use; and</i>  <i>(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.</i></p>

Relevant Section	Environmental Assessment of Plans and Programmes 2004 (SI 2004 No1633)
<p><b>Schedule 2 –</b> Information for Environment reports Regs. 12(3)</p>	<ol style="list-style-type: none"> <li>1. <i>An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.</i></li> <li>2. <i>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</i></li> <li>3. <i>The environmental characteristics of areas likely to be significantly affected.</i></li> <li>4. <i>Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(10) and the Habitats Directive.</i></li> <li>5. <i>The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.</i></li> <li>6. <i>The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as—</i> <ol style="list-style-type: none"> <li>(a) <i>biodiversity;</i></li> <li>(b) <i>population;</i></li> <li>(c) <i>human health;</i></li> <li>(d) <i>fauna;</i></li> <li>(e) <i>flora;</i></li> <li>(f) <i>soil;</i></li> <li>(g) <i>water;</i></li> <li>(h) <i>air;</i></li> <li>(i) <i>climatic factors;</i></li> <li>(j) <i>material assets;</i></li> <li>(k) <i>cultural heritage, including architectural and archaeological heritage;</i></li> <li>(l) <i>landscape; and</i></li> <li>(m) <i>the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).</i></li> </ol> </li> <li>7. <i>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</i></li> <li>8. <i>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</i></li> <li>9. <i>A description of the measures envisaged concerning monitoring in accordance with regulation 17.</i></li> <li>10. <i>A non-technical summary of the information provided under paragraphs 1 to 9.</i></li> </ol>

Relevant Section	EC Guidance on the Implementation of Directive 2001/42
Para 4.2	<p><b>Article 4(1)</b>  <i>As a matter of good practice, the environmental assessment of plans and programmes should influence the way the plans and programmes themselves are drawn up. While a plan or programme is relatively fluid, it may be easier to discard elements which are likely to have undesirable environmental effects than it would be when the plan or programme has been completed. At that stage, an environmental assessment may be informative but is likely to be less influential. Article 4(1) places a clear obligation on authorities to carry out the assessment during the preparation of the plan or programme.</i></p>
Para 4.6	<p><i>If certain aspects of a plan or programme have been assessed at one stage of the planning process and the assessment of a plan or programme at a later stage of the process uses the findings of the earlier assessment, those findings must be up to date and accurate for them to be used in the new assessment. They will also have to be placed in the context of that assessment. If these conditions cannot be met, the later plan or programme may require a fresh or updated assessment, even though it is dealing with matter which was also the subject of the earlier plan or programme.</i></p>
Para 4.7	<p><i>It is clear that the decision to reuse material from one assessment in carrying out another will depend on the structure of the planning process, the contents of the plan or programme, and the appropriateness of the information in the environmental report, and that decisions will have to be taken case by case. They will have to ensure that comprehensive assessments of each element of the planning process are not impaired, and that a previous assessment used at a subsequent stage is placed in the context of the current assessment and taken into account in the same way. In order to form an identifiable report, the relevant information must be brought together: it should not be necessary to embark on a paper-chase in order to understand the environmental effects of a proposal. Depending on the case, it might be appropriate to summarise earlier material, refer to it, or repeat it. But there is no need to repeat large amounts of data in a new context in which it is not appropriate.</i></p>
Para 5.3	<p><i>The provisions on the environmental report are mainly expressed in Article 2 (Definitions), Article 5 (Environmental Report) and Annex I. In addition, the environmental report must be subject to consultation as provided for in Articles 6 and 7; it must be taken into account during the preparation of the plan or programme (Article 8) and, when the plan or programme is adopted, information must be made available on how this was done (Article 9); and it must be of sufficient quality to meet the requirements of the Directive (Article 12).</i></p>
Para 5.11	<p><b>Alternatives:</b> <i>The obligation to identify, describe and evaluate reasonable alternatives must be read in the context of the objective of the Directive which is to ensure that the effects of implementing plans and programmes are taken into account during their preparation and before their adoption.</i></p>
Para 5.12	<p><i>In requiring the likely significant environmental effects of reasonable alternatives to be identified, described and evaluated, the Directive makes no distinction between the assessment requirements for the drafted plan or programme and for the alternatives. The essential thing is that the likely significant effects of the plan or programme and the alternatives are identified, described and evaluated in a comparable way. The requirements in Article 5(2) concerning scope and level of detail for the information in the report apply to the assessment of alternatives as well. It is essential that the authority or parliament responsible for the adoption of the plan or programme as well as the authorities and the public consulted, are presented with an accurate picture of what reasonable alternatives there are and why they not are considered to be the best option. The information referred to in Annex I should thus be provided for the alternatives chosen. This includes E.g. the information for Annex I (b) on the likely evolution of the current state of the environment without the implementation of the alternative. That evolution could be another one than that related to the plan or programme in cases when it</i></p>

	<i>concerns different areas or aspects.</i>
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<b>Relevant Section</b>	<b>EC Guidance on the Implementation of Directive 2001/42</b>
Para 5.13	<i>The text of the Directive does not say what is meant by a reasonable alternative to a plan or programme. The first consideration in deciding on possible reasonable alternatives should be to take into account the objectives and the geographical scope of the plan or programme. The text does not specify whether alternative plans or programmes are meant, or different alternatives within a plan or programme. In practice, different alternatives within a plan will usually be assessed (e.g. different means of waste disposal within a waste management plan, or different ways of developing an area within a land use plan). An alternative can thus be a different way of fulfilling the objectives of the plan or programme. For land use plans, or town and country planning plans, obvious alternatives are different uses of areas designated for specific activities or purposes, and alternative areas for such activities. For plans or programmes covering long time frames, especially those covering the very distant future, alternative scenario development is a way of exploring alternatives and their effects. As an example, the Regional Development Plans for the county of Stockholm have for a long time been elaborated on such a scenario model.</i>
Para 5.14	<i>The alternatives chosen should be realistic. Part of the reason for studying alternatives, is to find ways of reducing or avoiding the significant adverse environmental effects of the proposed plan or programme. Ideally, though the Directive does not require that, the final draft plan or programme would be the one which best contributes to the objectives set out in Article 1. A deliberate selection of alternatives for assessment, which had much more adverse effects, in order to promote the draft plan or programme would not be appropriate for the fulfilment of the purpose of this paragraph. To be genuine, alternatives must also fall within the legal and geographical competence of the authority concerned. An outline of the reasons for selecting the alternatives dealt with is required by Annex I (h).</i>
<b>Relevant Section</b>	<b>Planning Policy Statements and Guidance</b>
PPS1, para 3	<i>Sustainable development is the core principle underpinning planning</i>
PPS1, para 24	<i>Planning authorities should ensure that sustainable development is treated in an integrated way in their development plans. In particular they should carefully consider the <b>inter-relationship</b> between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development.</i>
PPG2, para 1.7	<i>The extent to which the use of land fulfils these objectives is however not itself a material factor in the inclusion of land within a Green Belt or its continued protection. E.g., although Green Belts often contain areas of attractive landscape, the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection.</i>
PPG2, para 2.7	<i>Where existing local plans are being revised and updated, exiting Green Belt boundaries should not be changed unless alterations to the structure plan have been approved, or other exceptional circumstances exist, which necessitate revision.</i>
PPS12, para 4.20	<i>The production of core strategies should follow the Government's principles for community engagement in planning. Involvement should be:</i> <ul style="list-style-type: none"> <li>• <i>appropriate to the level of planning;</i></li> <li>• <i>from the outset – leading to a sense of ownership of local policy decisions;</i></li> </ul>

	<ul style="list-style-type: none"> <li>• <i>continuous – part of ongoing programme, not a one-off event, with clearly articulated opportunities for continuing involvement;</i></li> <li>• <i>transparent and accessible – using methods appropriate to the communities concerned; and</i></li> <li>• <i>planned – as an integral part of the process for making plans.</i></li> </ul>
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<b>Relevant Section</b>	<b>Planning Policy Statements and Guidance</b>
PPS12, para 4.39	<i>The SA required by S19 (5) of the Planning and Compulsory Purchase act 2004 should be an appraisal of the economic, social and environmental sustainability of the plan.</i>
PPS12, para 4.43	<i>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.</i>
PP12, para 4.52	<p><i>For a DPD to be ‘justified’ it needs to be:</i></p> <ul style="list-style-type: none"> <li>• <i>founded on a robust and credible evidence base</i></li> <li>• <i>the most appropriate strategy when considered against reasonable alternatives</i></li> </ul>
Plan Making Manual - generation of options	<p><i>To make it easier for the public to understand, the council should try to simplify its comments on options by indicating the performance of different options in the sustainability appraisal. People can then see (with the benefit of technical evidence) how different options fare. This will, in turn, assist their own feedback on the options.</i></p> <p><i>To help establish the soundness of the development plan document, councils will need to show a clear trail of:</i></p> <ul style="list-style-type: none"> <li>– <i>options generation</i></li> <li>– <i>appraisal</i></li> <li>– <i>selection or rejection</i></li> <li>– <i>the role that sustainability appraisal and community engagement have played in this process.</i></li> </ul>
PINS Soundness Guidance, August 2009, 2.9 page 6	<p><i>Key Questions – Alternatives</i></p> <ul style="list-style-type: none"> <li>• <i>Can it be shown that the LPA’s chosen approach is the most appropriate given the reasonable alternatives?</i></li> <li>• <i>Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</i></li> <li>• <i>Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why these decisions were taken?</i></li> <li>• <i>Does the Sustainability Appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</i></li> <li>• <i>Does the DPD adequately expand upon regional guidance rather than simply duplicate it? Does the strategy take forward the regional context reflecting the local issues and objectives?</i></li> </ul>



<p>PINS Soundness Guidance, Feb 2010, 2.8 page 6</p>	<p><i>PPS12 provides that to be 'justified' a DPD needs to be:</i></p> <ul style="list-style-type: none"><li>• <i>founded on a robust and credible evidence base involving:</i><ul style="list-style-type: none"><li>- <i>evidence of participation of the local community and others having a stake in the area</i></li><li>- <i>research/fact finding – the choices made in the plan are backed up by facts</i></li></ul></li><li>• <i>the most appropriate strategy when considered against reasonable alternatives.</i></li></ul>
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Relevant Section	A Practical Guide to the Strategic Environmental Assessment Directive, ODPM 2005
Para 5.B.1, page 30	<p><i>It is desirable for the Responsible Authority to predict and evaluate the effects of elements of the evolving plan or programme, including alternatives, while they are working on them. Where adverse effects are seen to be likely, possibilities for mitigation must be considered. Aspects of Stage B may need to be carried out more than once in the course of a plan's or programme's development.</i></p> <p><i>While the activities at Stage A can be carried out before work begins on the plan or programme, those at Stage B are integral to the plan or programme preparation process and cannot be done effectively in isolation from it.</i></p>
Para 5.B.6, page 31	<p><i>At this stage it may be possible to drop some alternative from further consideration and document the reasons for eliminating them. Justifications for these choices will need to be robust, as they can affect decisions on major developments.</i></p>
Para 5.B.11, page 31	<p><i>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 the reason for their decision to a quantitative or qualitative approach to prediction of effects for each predicted impact.</i></p>
Para 5.B.14, page 33	<p><i>The point of the assessment is not to fill in the matrix, but to ensure that the proposal or alternative is as environmentally beneficial or sustainable as possible. The table is only a tool for doing this. The actual assessment of effects uses appropriate qualitative and quantitative and evaluation techniques. The matrix presents a format for summarising the assessment findings, accompanied by an explanation of the key findings and the assumptions underpinning these, including links to baseline information where this is possible.</i></p>

## Appendix 11

### Correspondence between JAM and Trafford Council/Urban Vision



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**Strategic Planning & Developments First Floor, Waterside House, Sale Waterside, Sale M33 7ZF**

**Fax:** 0161 912 3128  
**Website:** [www.trafford.gov.uk](http://www.trafford.gov.uk)

**Please ask for:** Clare Taylor-Russell  
**Email:** [strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)  
**Telephone:** 0161 912 4475  
**Our Reference:** CS/Further SA  
**Date:** 18<sup>th</sup> April 2011

Dear Jane,

**Re: Further SA Work – April 2011**

Thank you for your email to Clare Taylor-Russell, dated 13<sup>th</sup> April 2011.

Thank you for clarifying the new information that you consider was raised by way of the Hearing session held on March 3rd.

I am sorry that you were still unclear in respect of the documentation that Urban Vision had. For clarity I can confirm that Urban Vision did receive the information from the Council's Stakeholder Workshop of January 2009 prior to the previous Sustainability Appraisals.

Yours sincerely

Dennis Smith  
Head of Strategic Planning and Housing Services

---

**Subject:** RE: Reappraisal of SA of Core Strategy  
**Date:** Wednesday, April 13, 2011 17:23  
**From:** Taylor-Russell, Clare <Clare.Taylor-Russell@trafford.gov.uk>  
**To:** Jane Mulcahey <jane@jamconsult.com>  
**Conversation:** Reappraisal of SA of Core Strategy

Thank you for this.

Clare Taylor-Russell  
Senior Regeneration Officer

Tel: 0161 912 4496

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**From:** Jane Mulcahey [mailto:jane@jamconsult.com]  
**Sent:** 13 April 2011 16:30  
**To:** Taylor-Russell, Clare  
**Cc:** Phillips, Malcolm; Franklin, Lesley; Osborne, Elizabeth; Ian McDonald; Goodwin, Oliver  
**Subject:** Reappraisal of SA of Core Strategy

Clare,

Thank you for your letter of 7th April in response to my letter to Malcolm Phillips of 31st March. With regard to your request for further clarification of the issues that were raised at the recent Hearing under Matter 3, I can confirm that this encompasses all new information regarding the Strategic Sites/Locations that has been produced in representations since June 2010. Such information will, therefore, not have been considered in the former SAs that were undertaken and should be considered in the reappraisal as part of the evidence base. This information includes matters such as residential development and flood risk zone land etc.

With regard to the information that Urban Vision had not received I note that Urban Vision has confirmed receipt of all the RLAM documents, however, I am still not clear whether the information from the Council's Stakeholder Workshop of January 2009 had been received prior to

the previous assessments. For clarity, please can you confirm the information which Urban Vision had received when undertaking the previous assessments for the Strategic Sites/ Locations?

I look forward to hearing from you.

Regards

Jane

Jane Mulcahey

**jam**

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**Website:** [www.trafford.gov.uk](http://www.trafford.gov.uk)

**Please ask for:** Dennis Smith  
**Email:** [strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)  
**Telephone:** 0161 912 4475  
**Our Reference:** CS/Further SA  
**Date:** 7<sup>th</sup> April 2011

Dear Jane,

**Re: Further SA Work – April 2011**

Thank you for your letter to Malcolm Phillips of 31<sup>st</sup> March which he forwarded to the Council team and it has been decided that it would be more appropriate for the Council to respond, in consultation with Malcolm.

I can confirm that, as set out in CD 12.66, the following work will be carried out by way of this further work, in relation to Davenport Green:

- Re appraise the February SA of Davenport Green using all the information submitted by RLAM, incorporating a more detailed commentary to address concerns raised by RLAM in their November submission and their response to the February SA consultation (CD 12.43.3).
- Reappraise the SA of Policy R4 - Green Belt and Other Protected Open Land, taking into account impacts of returning Davenport Green to the Green Belt.
- Clarify the chronology of decisions made in relation to Davenport Green with regard to the evolution of the Core Strategy Options.
- Clarify the stages undertaken in the Sustainability Appraisal process with particular emphasis on the Council's conclusion in relation to land at Davenport Green.

I note your comments in relation to the early stages of the SA process, including the assessment of a "business as usual" case. However, as you rightly state this is a reiteration of RLAM's previous comments and this matter was the subject of discussion under the Inspector's Main Matter 1.

I wish to clarify that the further SA work being carried out at present will:

- Apply a consistent approach;
- Use the sub-objectives and indicators as references;
- Reference evidence within the SA commentary.

In relation to the matter of viability and deliverability, as discussed previously with you and your client, both the Council and Urban Vision consider that these matters are outside the scope of a Core Strategy SA. However, 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.

In undertaking this further work I can assure you that Urban Vision will be mindful of all comments received in the past, not just those submitted on behalf of RLAM.

In relation to the SA of Policy R4 I can confirm that the purpose of this work is to assess the impact of returning the land at Davenport Green to the Green Belt, reflecting the explicit statement that was included within the Publication version of the Plan. This new SA work is being carried out in direct response to the issues raised by you, on behalf of RLAM in February 2011.

One of the outcomes of this further SA work may be the identification of areas for improvement in policy. A review of the Core Strategy Policy R4 will, therefore, be carried out in the light of this SA work. This process has been common practice for the Council at every stage of the Plan.

I can confirm that as part of the additional further work being carried out at this time it will be necessary to consider the impacts of policy change on other aspects of the Plan.

With reference to the list of RLAM documents, I can confirm that Urban Vision have received all the documentation listed in your letter of 31<sup>st</sup> March 2011.

I note that you make reference to important new information that came to light at the recent Hearings under Matter 3, although you have not been specific. Therefore, in order that both the Council and Urban Vision are clear about the specifics of this information, I would be grateful if you could provide further clarity on this matter, preferably no later than Friday 8<sup>th</sup> April 2011.

As I am sure that both you and your client are aware, the Council has not further revised its timetable for publishing this further work or the resumed Examination Hearing sessions. This decision was taken based on an assurance from Urban Vision that they will be able to produce the necessary work within that timeframe.

We were advised by the Inspector that it is normal practice for this type of mid-Examination consultation to run for a period of two weeks (10 working days). However in order to take account of the Bank Holidays in April/May the decision was taken to extend that "normal" period by one week, thus giving 11 working days. Additionally the Council has published the consultation dates well in advance of the consultation period itself to enable interested parties to organise their work schedules.

Finally, I can assure you that following the conclusion of this consultation period, there will be sufficient time to undertake an internal review of the consultation responses, including if necessary, the involvement of Members of the Council.

Yours sincerely



Dennis Smith  
Head of Strategic Planning and Housing Services



Malcolm Phillips  
Associate Planning Consultant  
Urban Vision Partnership Ltd  
Emerson house  
Albert Street  
Eccles  
Salford M30 0TE



**By e-mail**

110331/077/jem/DG

31 March 2011

Dear Malcolm,

**Re: Re-appraisal of Trafford Council's SA of the Core Strategy**

Following the scope of work issued by Trafford Council on 17 March 2011 (CD 12.66) for the re-appraisal of the SA to be carried out in relation to the Core Strategy and my response of 18 March 2011 by email, I thought it would be helpful to draw together the views expressed in my previous representations and subsequent correspondence, which you may find useful when undertaking the reappraisal of the SA including:

- The issues raised in our teleconference of 15 March 2011 and subsequent correspondence
- RLAM's representations of 24 February 2011 and related correspondence regarding methodology
- RLAM's representations of November 2010

Clearly the Inspector's spotlight is now focused on the SA and it is in all our interests to avoid another hiccup in the progress of the EiP. In that spirit, I thought it appropriate to set out our understanding of Regulations and guidance in relation to the further work to be done. As a consequence, some fundamental issues will need to be addressed such as the absence of a reasonable alternative strategy as well as consideration of the new SA findings for the Core Strategy itself, which could have significant implications for your proposed timetable.

**Methodology**

The specific concerns regarding the flaws identified in the SA process were summarised in my email of 18 March (attached to this letter for ease of reference), in response to the outline of proposed work issued by Trafford Council. Lesley Franklin's response to my email (24/3) confirmed that a review of the earlier stages of the SA process would be undertaken by Urban Vision.

With specific reference to the review of the early stages of the SA process, there is still a fundamental concern that the flaws that were set out in our representations of April 2010, November 2010 and February 2011 have not been addressed appropriately. Whilst the clarification of the chronology and stages of the SA undertaken, will no doubt be helpful, it will not rectify the defects that RLAM has identified.

Of considerable significance was the absence of the Issues and Options stage of the appraisal, including the assessment of 'Business as Usual' (i.e. The UDP) and an assessment of all 'reasonable alternatives' as required by the SEA regulations (Article 5/1). Clearly this work could result in the need to re-consider the Core Strategy policies in the light of the SA findings and should be included within the proposed timetable.

In addition to the issues set out above, the new work should also seek to address the other flaws identified by RLAM, including:

- a consistent approach must be taken in the assessment e.g. the need for mitigation measures
- the sub-objectives and indicators set out in the scoping report should be used as a reference for the type of information that needs to be provided when undertaking the appraisal in relation to each sustainability objective
- evidence should be referenced within the SA commentary so it is clear why assumptions have been made and where further information can be reviewed, to provide transparency to the reader on the decisions taken
- information on viability, deliverability and timescales should be included for all the strategic sites/locations.

With regard to the re-appraisal of Davenport Green, please see Appendix 1 – *'Response to Appendix iii – Jam's proposed methodology'* of RLAM's response to the February consultation, which details the proposed methodology and includes comments on the flaws in that process. Cross-references to the other representations submitted by RLAM are also provided within this document. Reference should also be made to the *'Review of TBC's SA, February 2010'* in particular sections 2, 3 and 4, which identify the key failings of the assessments. *'Appendix 17 – Review of TBC's SA of the Core Strategy, November 2010'* - provides the detailed comments on the SAs up to September 2010.

#### SA of Policy R4

When undertaking the re-appraisal of the SA of Policy R4 – Green Belt and Other Protected Open Land – the Regulations and guidance indicate that this work should include:

- An assessment of the 'reasonable alternatives' considered with regard to the alteration of the Green Belt boundary
- An SA commentary that sets out clearly the 'exceptional circumstances' that have been identified to justify altering the Green Belt boundary
- A review of the Core Strategy policy in view of the SA findings.

## SA of Policy L5

It will also be necessary to consider any changes in relation to the review of Policy L5 - Climate Change - that could have an impact on the results of the re-appraisal of Davenport Green, the other Strategic Sites/Locations and Policy R4 - Green Belt and Other Protected Open Land.

## Strategic Sites/Locations Evidence

With reference to the list of RLAM documents that you had not received when undertaking the previous SAs, I note that Urban Vision had not received item 5 on our list of information '*Comments to the Council regarding proposed assessment criteria for Key Strategic Sites following the workshop on 14 January 2009 (16 Jan 2009)*'.

Can you also confirm whether you had received the following:

- The Strategic Site Assessment submitted following the stakeholder workshop in January 2009 in relation to Davenport Green with regards to deliverability and sustainability
- The Strategic Sites Assessments submitted by other stakeholders in relation to other Strategic Sites/Locations following the stakeholder workshop of 2009 with regards to deliverability and sustainability
- The Council's document issued on 24 February 2011, following RLAM's request, which collates all the above information entitled '*Key Strategic Sites Assessment submitted following Stakeholder Workshop - January 2009*'

If the information that was missing only related to Davenport Green please could you (or the Council) explain how this came to be omitted? If none of the information in relation to the workshop was received please can you confirm that the information will be revisited when undertaking the re-appraisal and that all the strategic sites/locations will be re-appraised? As RLAM did not have access to this information when our last representations were prepared, it will be necessary for us to review this information in the context of your re-appraisal to ensure that the findings reflect the information submitted.

Important new information also came to light at the recent Hearings for the Examination in Public with regard to the Strategic Locations (Main Matter 3, 2 March 2011), which should be taken into consideration when re-assessing the Strategic Locations.

## Timescale

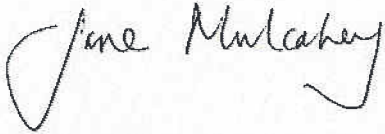
From the above, my judgement is the amount of work is considerable and I have serious doubts as to whether this can be achieved in the timescale proposed by the Council. We would therefore ask you to review the time needed for this work and consider whether you can agree my proposed timetable, as set in my email of 16/3/11 (copy attached for ease of reference), in particular:

- 8 weeks to re-appraise the SA
- 4 weeks consultation
- 4 weeks for internal review and consultation with Members to assess whether the Core Strategy needs to be amended in the light of the new SAs.

Squire Sanders Hammonds will be writing separately to the Inspector to express this view on the timetable.

I hope you will find the above information helpful when undertaking the re-appraisal in order to ensure that the appropriate quality of work is achieved and to prevent any further delays in the proceedings. If I can be of any further assistance please do not hesitate to contact me. I look forward to hearing from you as soon as possible.

Kind regards



**Jane Mulcahey**  
Director  
jam consult ltd

c.c. Lesley Franklin, Trafford Borough Council  
enc: email of 16/3 - timescales  
email of 18/3 - scope of work

**Subject: RE: Trafford SA**  
**Date:** Thursday, March 24, 2011 09:55  
**From:** Franklin, Lesley <lesley.franklin@trafford.gov.uk>  
**To:** Jane Mulcahey <jane@jamconsult.com>, "Phillips, Malcolm" <malcolm.phillips@urbanvision.org.uk>  
**Cc:** "Osborne, Elizabeth" <lizzie.osborne@ssd.com>, "Goodwin, Oliver" <oliver.goodwin@ssd.com>, "Taylor-Russell, Clare" <Clare.Taylor-Russell@trafford.gov.uk>  
**Conversation:** Trafford SA

Dear Jane

Further to your email last week I can confirm the further work will set out the full audit of the SA process undertaken showing the reasoning behind the approach taken and how the SA was taken into account in the decision making process of the Core Strategy. It will also contain a review by Urban Vision of the early stages of the SA process prior to their involvement.

Regards

Lesley

*Lesley Franklin*

Senior Regeneration Officer  
Trafford Metropolitan Borough Council  
Strategic Planning and Developments  
Waterside House  
Sale  
Cheshire  
M33 7ZF

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---

**From:** Jane Mulcahey [mailto:jane@jamconsult.com]  
**Sent:** Friday, March 18, 2011 10:19 AM  
**To:** Franklin, Lesley; Phillips, Malcolm  
**Cc:** Osborne, Elizabeth; Goodwin, Oliver  
**Subject:** Trafford SA

Lesley,

Thank you for your email setting out your draft outline for new work. I can confirm that the first two bullet points reflect our conversation on Tuesday. The following two bullet points were not specific requests within that conversation but we note that the Council will undertake this work.

It is understood that the reappraisal of the February 2011 SA of Davenport Green and Policy R4 will address the issues raised by Urban Vision regarding the information (submitted by RLAM) that they had not received from the Council and the need to reappraise Policy R4. However, the proposed work does not suggest that the further flaws identified in RLAM's representations of April 2010, November 2010 and February 2011 will be addressed. Given that Urban Vision has now confirmed that they had not had sight of the majority of RLAM's representations until after the hearing was adjourned, it would seem appropriate that there should be the opportunity for these representations to be fully considered in the review of the SA work undertaken. The clarification of the chronology and stages undertaken, whilst no doubt helpful, will not rectify the defects that RLAM has identified in the earlier stages of the SA process. Of particular significance was the absence of the Issues and Options stage of the appraisal, including the assessment of 'Business as Usual' (i.e. The UDP) and an assessment of all 'reasonable alternatives' as required by the SEA regulations (Article 5/1).

Furthermore as discussed in our call on Tuesday, we consider that the new work should seek to address the flaws identified by RLAM, particularly (but not limited to):

- a consistent approach must be taken in the assessment e.g. the need for mitigation measures
- the sub-objectives and indicators set out in the scoping report should be used as a reference for the type of information that needs to be provided when undertaking the appraisal in relation to each sustainability objective
- evidence should be referenced within the SA commentary so it is clear why assumptions have been made and where further information can be reviewed, to provide transparency to the reader on the decisions taken
- information on viability, deliverability and timescales should be included

I would be grateful if you could confirm whether the earlier stages of the SA will be reviewed as part of this exercise. Please could you also provide me with the proposed timetable for the work and the likely consultation periods that you intend to issue to the Inspector as soon as possible. I look forward to hearing from you.

Regards

Jane Mulcahey

**jam**

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**Subject: RE: Trafford SA**

**Date:** Wednesday, March 16, 2011 16:25

**From:** Franklin, Lesley <lesley.franklin@trafford.gov.uk>

**To:** Jane Mulcahey <j.mulcahey@btinternet.com>

**Cc:** "Osborne, Elizabeth" <lizzie.osborne@ssd.com>, "Goodwin, Oliver"

<oliver.goodwin@ssd.com>, "Le Fevre, Jane" <Jane.LeFevre@trafford.gov.uk>, "Taylor-Russell,

Clare" <Clare.Taylor-Russell@trafford.gov.uk>, "Phillips, Malcolm"

<malcolm.phillips@urbanvision.org.uk>

**Conversation:** Trafford SA

Dear Jane

Further to Malcolm's email and the telephone conversation yesterday I set out below a draft outline for new work in relation to Davenport Green along the lines we discussed. We are still considering the timetable for consultation dates and the hearing sessions and you will be informed when the inspector has confirmed the dates.

- Re appraise The February SA of Davenport Green using all the information submitted by RLAM, incorporating a more detailed commentary to address concerns raised by RLAM in their November submission and their response to the February SA consultation (CD 12.43.3).
- Reappraise the SA of Policy R4 taking into account impacts of returning Davenport Green to the Green Belt.
- Clarify the chronology of decisions made in relation to Davenport Green with regard to the evolution of the Core Strategy Options.
- Clarify the stages undertaken in the Sustainability Appraisal process with particular emphasis on the Councils conclusion in relation to land at Davenport Green.

I hope you will agree this is a fair summation of our recent dialogue on the matter

Regards

Lesley



*Lesley Franklin*

Senior Regeneration Officer  
Trafford Metropolitan Borough Council  
Strategic Planning and Developments  
Waterside House  
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---

**From:** Jane Mulcahey [mailto:j.mulcahey@btinternet.com]  
**Sent:** Wednesday, March 16, 2011 8:35 AM  
**To:** Franklin, Lesley; Phillips, Malcolm  
**Cc:** Osborne, Elizabeth  
**Subject:** Trafford SA

Dear Malcolm and Lesley,

Thank you for the helpful discussion yesterday. Given the limited time we now have to liaise with each other before you respond to the Inspector I thought it would be helpful if I set out my views following yesterday's call.

It was indicated that, in light of the substantial amount of evidence on Davenport Green (1st November representations) not having been taken into account in the February 2011 SA, you may be minded to re-run that SA, in addition to carrying out a fresh SA of Policy R4. It was also mentioned, during the early part of the conference call, that you envisaged publishing the further SA in Mid-April and concluding the consultation on the new SA of Policy R4 and any further amendments shortly before the hearing session on 11th May. In that regard, my experience is that there's a considerable amount of work involved in producing such an SA, that won't be able to be done thoroughly, as you suggest, by mid April. Just as an indicator, it is now some two weeks since the issue was raised at the Examination and you've yet to conclude your review of the full set of representations and reach conclusions regarding the further SA work that needs to

be done as a result, perhaps understandably.

I suggest, therefore, a period of eight weeks to carry out all the revisions and any new work to the SA followed by four weeks of consultation (given that the consultation for a Core Strategy document is a minimum of six weeks). This takes us to 13th June (allowing for some extra time for Easter and the bank holidays). Further, as has been pointed out, the purpose of the SA is to inform the Core Strategy. I, therefore, urge that a comfortable period is allowed, after the consultation period, for consideration of any matters that may need to be considered internally through your Committee cycle as well as any changes that may need to be made to the Core Strategy before resumption of the Examination. I suggest that this should be at least a month, taking us to Mid-July. Failure to build this into the programme would tend to indicate that the Council has made up its mind in advance that it won't be making any changes to the Core Strategy, in which case the SA process is an empty exercise.

I hope you feel able to recommend a period to the Inspector along these lines, in which you would have my support. I look forward to receiving your draft proposals by email today and we will liaise by email or telephone thereafter and before your submission to the Inspector, as agreed.

Please note my server seems to be down today so could you please copy all my messages to [j.mulcahey@btinternet.com](mailto:j.mulcahey@btinternet.com) in case the situation is not rectified. Could you also copy to Lizzie Osborne: [lizzie.osborne@ssd.com](mailto:lizzie.osborne@ssd.com) just in case I can't retrieve emails from my BT account.

Thanks and I look forward to hearing from you.

Kind regards  
Jane

Jane Mulcahey

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Thanks for this Jane. We'll have a look at it when we review Davenport Green.

Regards,

Malcolm.

Malcolm Phillips  
Associate Planning Consultant  
Urban Vision Partnership Ltd  
Emerson house  
Albert Street  
Eccles  
Salford M30 0TE

Tel: 0161 604 7790  
Mob: 07515 188 506  
Fax: 0161 779 6002  
email: malcolm.phillips@urbanvision.org.uk

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**From:** Jane Mulcahey [mailto:jane@jamconsult.com]  
**Sent:** 22 March 2011 11:19  
**To:** Phillips, Malcolm; Franklin, Lesley  
**Cc:** Osborne, Elizabeth; Goodwin, Oliver; Ian McDonald  
**Subject:** SA review - Deliverability and Chronology

Malcolm,  
Further to my emails of last week, I thought it would be helpful to direct you to specific pieces of information in our representations of November 2010 that are of relevance for the SA review with regard to the issues of deliverability and the chronology of events.

**Deliverability** – R/LAM considers that there are significant implications in relation to deliverability for the strategic locations with regard to the infrastructure and land assembly hurdles, which should be taken into account in the sustainability appraisal review. Please see the section of the representation that relates to Chapters 8 and 18, Policies SL1-5 and W1. In particular, the section entitled 'No strategic Sites and Lack of Competitive sites for B1 (a) and (b) use. Please also see the section on 'Lack of evidence to Justify Reversal of the Council's Position on Davenport Green 1996 and 2006.'


**Chronology** – Appendix 18 of our representations November 2010 sets out the chronology of documents in relation to Davenport Green.

I hope that you will find the above useful.  
Regards  
Jane

Jane Mulcahey

**jam**

sustainability + planning  
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Jane,

Thanks for the email and the useful discussion yesterday.

I have now completed my review of your evidence and have made a series of proposals for Trafford Council to consider to address these issues.

I have checked through the Evidence List you sent on 15th March and confirm that I now have all the items. I attach a copy of the list. The items in red are the ones UV had at the time of the February 2011 Davenport Green SA.

Kind regards,

Malcolm

Malcolm Phillips  
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**From:** Jane Mulcahey [mailto:j.mulcahey@btinternet.com]  
**Sent:** 16 March 2011 08:35  
**To:** Franklin, Lesley; Phillips, Malcolm  
**Cc:** Osborne, Elizabeth  
**Subject:** Trafford SA

Dear Malcolm and Lesley,

Thank you for the helpful discussion yesterday. Given the limited time we now have to liaise with each other before you respond to the Inspector I thought it would be helpful if I set out my views following yesterday's call.

It was indicated that, in light of the substantial amount of evidence on Davenport Green (1st November representations) not having been taken into account in the February 2011 SA, you may be minded to re-run the SA, in addition to carrying out a fresh SA of Policy R4. It was also mentioned, during the early part of the conference call, that you envisaged publishing the further SA in Mid-April and concluding the consultation on the new SA of Policy R4 and any further amendments shortly before the hearing session on 11th May. In that regard, my experience is that there's a considerable amount of work involved in producing such an SA, that won't be able to be done thoroughly, as you suggest, by mid-April. Just as an indicator, it is now some two weeks since the issue was raised at the Examination and you've yet to conclude your review of the full set of representations and reach conclusions regarding the further SA work that needs to be done as a result, perhaps understandably.

I suggest, therefore, a period of eight weeks to carry out all the revisions and any new work to the SA followed by four weeks of consultation (given that the consultation for a Core Strategy document is a minimum of six weeks). This takes us to 13th June (allowing for some extra time for Easter and the bank holidays). Further, as has been pointed out, the purpose of the SA is to inform the Core Strategy. I, therefore, urge that a comfortable period is allowed, after the consultation period, for consideration of any matters that may need to be considered internally through your Committee cycle as well as any changes that may need to be made to the Core Strategy before resumption of the Examination. I suggest that this should be at least a month, taking us to Mid-July. Failure to build this into the programme would tend to indicate that the Council has made up its mind in advance that it won't be making any changes to the Core Strategy, in which case the SA process is an empty exercise.

I hope you feel able to recommend a period to the Inspector along these lines, in which you would have my support. I look forward to receiving your draft proposals by email today and we will liaise by email or telephone thereafter and before your submission to the Inspector, as agreed.

Please note my server seems to be down today so could you please copy all my messages to j.mulcahey@btinternet.com in case the situation is not rectified. Could you also copy to Lizzie Osborne: lizzie.osborne@ssd.com just in case I can't retrieve emails from my BT account.


Thanks and I look forward to hearing from you.

Kind regards  
Jane

Jane Mulcahey

**jam**

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## RLAM's submissions on Trafford's Core Strategy

### 1 Representations on DPD1: Trafford Core Strategy: Publication Document, September 2010 (1 November 2010)

#### 1. Overview

#### 2. Attachments to the Overview

- Policy SS1 – Davenport Green and Proposals Map extract
- Selected Executive Summaries of Representations on the CS
- Guide to the Structure of Representations by RLAM on the Core Strategy in TMBCs format

#### 3. Full submission of representations within TMBC's Format (CD 10.7.5)

##### Chapter 2: The Profile

##### Chapters 3,4 and 5: Core Strategy Vision and Objectives

##### Alternative Strategies Considered

##### Chapter 8, para 8.2, identification of Strategic Locations, SL1, 2, 4, 5

##### Chapter 8. Restoring Soundness to the CS

##### Chapter 18 – Policy W1: Economy Chapter 24 – Policy R4 Green Belt and Other

#### Protected Open Land

##### Sustainability Appraisals by TMBC

##### Appendices:

- 1 Arup and Buchanan: critique of TMBC Strategic Locations: highways, public and other non-car transport
- 2 Arup: Critique of TMBC Strategic Locations: Utilities
- 3 Arup: Critique of TMBC Strategic Locations: Flood Risk and Drainage
- 4 Arup: Critique of TMBC Strategic Locations: Air Quality
- 5 Knight Frank: Critique of TMBC Strategic Locations; Commercial Viability (extract from Knight Frank; Davenport Green Commercial Review, Appendix 15)
- 6 Arup: Davenport Green: Highways
- 7 Arup: Davenport Green: Sustainable Transport Strategy
- 8 Arup: Davenport Green Utilities
- 9 Arup: Davenport Green: Environmental Sustainability Strategy
- 10 Arup: Davenport Green: Air Quality
- 11 Arup: Davenport Green: Flood Risk and Drainage Review
- 12 Duncan Thomas: Green Belt and Landscape Implications of Identifying 36.4ha (90ac) of Development Area at Davenport Green as a Strategic Site
- 13 JAM: Appraisal of the Sustainability of TMBC's CS with the inclusion of Davenport Green (not a formal SA)
- 14 Ecology Solutions: Davenport Green: Ecology Update
- 15 Knight Frank: Davenport Green: Commercial Review
- 16 SPA: Summary of previous representations on CS
- 17 JAM: Review of TMBC's Sustainability Appraisal of the CS.

- 18 SPA: Chronology of provision for Davenport Green in Planning Documents
- 2 **Review of TBC's Revised Sustainability Appraisals of the Core Strategy 2011 (24 February 2011) (CD 12.43.3)**
- 3 **Further Representations in response to Main Matters 1-5 raised by the Inspector on 4 January 2011 (3 February 2011) (CD.12.36.2)**
- 4 **Representations on the Trafford Core Strategy: Further Consultation on the Vision, Strategic Objectives and Delivery Strategy (30 April 2010)**
- 5 **Comments to the Council regarding proposed assessment criteria for Key Strategic Sites following the Workshop on 14 January 2009 (16 January 2009)**
- 6 **Representations on the Trafford Core Strategy Preferred Options, July 2008**
- 7 **Representations on the Draft Land Allocations Development Plan Document, which was issued for informal consultation in September 2007**
- 8 **Representations on the DPD1: Core Strategy, Issues and Options Paper, July 2007**

14 March 2011