

Response to Jam's Statement on SA of 24 February 2011

Urban Vision

Quality of the SAs

1. The EA, NE, EH together with GONW and 4NW (both now disbanded) have had no criticisms of the Core Strategy's SAs. Comments from them and other respondents such as developers and landowners have been limited to a number of detailed comments (save for Royal London and Peel). There have been no other comments about its overall methodology.
 - In detail the SA reports comply with all the requirements of an SA (ODPM 2005):
 - There is a clear, rigorous assessment framework, providing scope for a full exposition of the likely effects of the policy/site on the sustainability objectives.
 - Clear summaries conclude each assessment and are then transposed into the main report.
2. The SA contains all the key features required by the regulations:
 - a. A non technical summary
 - b. How it complies with the SEA directive
 - c. Positive and negative effects of the appraisal
 - d. Recommendations for mitigation
 - e. Difference the process has made
 - f. Data limitations/ technical difficulties
3. The Further Sustainability Appraisal of Davenport Green Feb 2011 is 87 pages long; the Publication version SA 206 pages in total. Clearly others respondents do not have a problem with the level of detail. An SA is understood to be a broad document comprehensively embracing all facets of sustainability and providing general guidelines as to how to improve a plan's/policy's performance - to meet Jam's point in full would have meant reproducing much of the evidence base. This would have produced a SA that was neither understandable nor fit for purpose.

Scoping / SA of Issues and Options

4. The Council considers it has subjected all reasonable Strategies to SA through the preparation of the Core Strategy.
5. At Issues and Options stage 3 alternative options were considered with summary SA information being provided within the document. The SA on the Preferred Options was published in July 2008 (the SA of Spatial Options) and details how the Options evolved as a result of the SA process (CD 6.3.3 Appendices 2,3 and 4).
6. Although the SA did not reject a specific option it is clear that the SA helped refine the different Strategies that were then subject to consultation in July 2008. A further report explaining how the options were refined was produced alongside The June 2009 Preferred Option as a Technical Appendix. (CD 6.3.10) This refers specifically to the SA in sections 3.27-3.29, 4.27-4.3, 5.27-5.29 and 6.25-6.27.

Assessment of Deliverability / Assumption of Deliverability

7. The recognition by Jam that SA is not a detailed site evaluation tool (para 2.6 24.02.2011) is welcomed.
8. This is supported by 'A Practical guide to the SEA Directive' ODPM Sept 2005 p15 2.24
9. "It is not usually appropriate in SEA, and is often impracticable, to predict the effects of an individual project-level proposal in the degree of detail that would normally be required for an EIA of a project".
10. OPDM Guidance 'SA of RSS & LDDs' Nov 2005 states in Appendix 11 'However, it is not the role of the SA to determine the option(s) to be chosen as the basis for the preferred option and the draft plan. This is the role of those who have to decide which strategy is appropriate. The role of the SA is to assist with the identification of the appropriate options, by highlighting the sustainability implications of each, and by putting forward recommendations for improvement'.
11. The assumption that all sites are deliverable represents a common sense approach to SA. The level of detail required to assess viability is not appropriate to a SA. The assumption of sites being deliverable in the SA doesn't mean the sites *are* deliverable. If the appropriate studies show there is a problem of deliverability with a particular site it will drop out of the plan irrespective of its SA score.
12. Information on viability and deliverability can be found in inter alia the Local Infrastructure Plan as well as in the Technical Note on Strategic

Locations and Site Selection (CD6.3.25), the Background Note on the 5 Proposed Strategic Locations (CD 12.12) and the Trafford Delivery Strategy & Mechanism for Growth DTZ(8.8.25). Further justification for the proposals in each location, particularly in terms of meeting development needs, are provided in the Trafford Park Masterplan Vision and Implementation Report (CD8.2.2), the Lancashire County Cricket Club Quarter Development Framework (CD8.2.4), the Trafford Quays Delivery Report (CD10.4.11) and the Carrington Delivery Statement (CD12.22).

Development plan designations and their status in the SA

13. The omission of the current development plan status (Green Belt and UDP allocation) as a consideration in undertaking the SA is a conscious one. It is hard to see how such designations can be considered under the SA objectives. A relevant SA Objective might be 'Is the site allocated in a previous development plan?' This is highly unlikely to be a relevant objective because one of the key purposes of a new development plan, particularly a Core Strategy, is to take a fresh look at the area.
14. The Green Belt policy designation is of far less importance than the fact that the site is green field for the SA analysis. All green field sites scored double negative in the 2009 SA against objective E6. Notwithstanding the fact that the proposals for Davenport Green also involve the creation of a rural park, the proposals would result in the permanent loss of a substantial area of green field land.
15. The SA of Policy R4 appraises the Green Belt, including covering the Davenport Green site which meets Jam's comment.
16. A similar approach is taken to the absence of a 'Business as Usual SA'. Advice in the original PAS Guidance on SA (page 27) states that it is optional:
"In some cases, the business-as-usual option can be included as a discrete alternative (for example, 'continue with the existing local plan policy'), although in some cases such an option will not be feasible (due, perhaps, to a change in government policy since the local plan was adopted)." In Trafford's case there was an emerging/new RSS to take into account.

The treatment of Davenport Green compared to other Strategic Locations in the SA.

17. The following illustrate that Davenport Green has not been discriminated against in the SA and to respond to detailed points made by Jam.

Mitigation

18. Davenport Green does not have more mitigation measures than all other sites. The number of mitigation measures for each Strategic Location in the Publication SA is as follows:
- Pomona – 5
 - Trafford Wharfside – 8
 - LCCC – 7
 - TCR – 2
 - Carrington – 5
 - Davenport Green – 8
19. This appears to be a reasonable distribution of results particularly as it would be expected for sites other than Davenport Green to have fewer mitigation measures as they have had a greater number of SA iterations and therefore a greater number of opportunities to improve the policy, hence the improvement in Carrington and Trafford Centre Rectangle. This explains the improvement in some Strategic Location scores from the Preferred Options stage to Publication. No mitigation has been proposed for public transport at Davenport Green because public transport is now part of the proposal.
20. Davenport Green was not included in the appraisal of policy W1 at Preferred Options because it was not named in the policy.
21. An explanation as to why Davenport Green was included in the Preferred Option (2009) SA is provided at para 4.3 of that appraisal.

E1

22. The scores for the Strategic Locations and Davenport Green (in the Preferred Options SA 2009) are said by Jam to be inconsistent, however, the three uncertain sites, including Davenport Green, all have uncertainties in reducing the effect of traffic on the environment or have existing local traffic conditions as indicated in the traffic model. The three scoring positively are because of the ease of implementing public transport proposals.

E1

23. Regard has been had to the Greater Manchester Transport Unit (GMTU) Strategic Model. The appraisals of Trafford Centre Rectangle and Carrington against this objective make specific reference to the potential for these Strategic Locations to generate unsustainable patterns of travel.

E1

24. The performance of policy W1 against this objective was improved from an uncertain result in June 2009 to a major positive in March 2010. This change in scoring reflected the fact that many of the Strategic Locations are accessible by public transport and, where the Locations are not presently well-served by public transport, the

proposals for the other Strategic Locations were amended from the Preferred Options stage to ensure that public transport enhancements are an integral part of the proposals. The amended scoring also reflected the fact that the policy was amended to specify that employment uses outside these named locations will only be permitted where they would be accessible by a choice of means of transport.

E3

25. The principle of building the amount of housing/employment land in the Core Strategy was established by the RSS. It was subject to Sustainability Appraisal as part of the preparation of the RSS and is accepted as part of implementing RSS, notwithstanding its impact on climate change.

E3

26. The appraisal of the Carrington Strategic Location against this objective acknowledges that the site has the potential to result in unsustainable patterns of travel. However, the appraisal also recognises that the development proposals include significant improvements to public transport, the use of the Manchester Ship Canal for freight transportation purposes and the protection and enhancement of the Carrington mosslands to act as a carbon sink to mitigate the effects of climate change. The appraisal therefore concludes that the development proposals have the potential to have a positive impact on objective E3, albeit with a low level of certainty over this potential impact.

E4

27. The improvement in scores for Wharfside, Trafford Centre Rectangle and Carrington since February 2010 (from major/minor negative to neutral) reflects the amendment to the site proposals to direct vulnerable uses (housing) away from the flood risk areas. Pomona remained negative because an extant planning permission provided housing in a flood risk zone 3a area.

E4, E5, EC4

28. Davenport Green performs as well as or better than other Strategic Locations with regard to these objectives.

E5

29. The neutral scoring for the Strategic Locations against this objective was arrived at using the Greater Manchester Waste DPD Needs Assessment (2010) that was prepared for the Sustainability Appraisal of the Joint Greater Manchester Waste DPD by Scott Wilson.

EC1

30. Davenport Green does not score a less positive result than the other Strategic Locations with regard to EC1. LCCC is the same and Pomona and Wharfside only differ in the long term.