

Representor 1211

Trafford Core Strategy Examination in Public

Representations on CD 12.95

**Dealing with the Council's suggested amendments to Policies R4
and W1**

Royal London Asset Management

5th September 2011

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1 INTRODUCTION

- 1.1 At the outset Royal London Asset Management (RLAM) applauds the Council's preparedness to react to the 'changing policy landscape' (1) (References are listed at the end of this Representation.) In particular RLAM welcomes the fact that the Council has reached two important and fundamental conclusions:
- (a) Davenport Green is recognised as a site for employment development in the Core Strategy;
 - (b) a change to the Green Belt boundary at Davenport Green would be inappropriate (2)
- 1.2 RLAM has given careful consideration to the latest evidence produced by the Council in support of its revised policy proposals. In the light of this evidence, RLAM has concluded that there are two options for policies to realise the acknowledged potential of Davenport Green to deliver new employment:
- (a) Identification of Davenport Green as a Strategic Location and focus for employment and B1 development.
 - (b) Amendments to the wording of the Council's newly proposed policies for the countryside (Policy R4) and employment (Policy W1)..
- 1.3 Either would redress what RLAM sees as the unsoundness (3) of the Plan, but RLAM will show in this Representation that the first option is the better option. This is because designation as a Strategic Location more properly reflects the evidence base presented by the Council and the evolving national policy context.
- 1.4 RLAM is submitting a proposal (Appendix F) which will balance the need for economic growth with the safeguarding, and indeed enhancement of, the countryside.
- 1.5 RLAM views the Council's countryside-based employment policy as innovative. But with innovation comes risk. In this instance, RLAM considers that the delivery of employment development will be compromised. RLAM wishes to avoid that risk, which is inconsistent with current Government policy and the approach to the encouragement of economic activity. Notwithstanding, it has responded constructively to the Council's policy initiative by setting out a number of changes to the wording of proposed policies R4 and W1.
- 1.6 We address each option in more detail and set out RLAM's rationale.

2 OPTION ONE: IDENTIFICATION OF DAVENPORT GREEN AS A STRATEGIC LOCATION FOR EMPLOYMENT AND USE CLASS B1 DEVELOPMENT

- 2.1 Having reviewed the evidence presented by the Council, RLAM considers that there is a robust case for Davenport Green to be identified in the Core Strategy as a location for employment development and a focus for B1 development. Without prejudice to our earlier representations in support of Davenport Green as a Strategic Site (the case for which has been **reinforced** by the Council's evidence), RLAM suggests, in order to fit with the strategic approach of the Core Strategy (no Strategic Sites, but five Strategic Locations), that Davenport Green should be identified as a Strategic Location. This would be the sixth in the Core Strategy.

2.2 Proposed Policy SL6 is set out in Appendix F. The key planning features are:

- (a) An overall area of about 36.4 hectares, within which:
 - (i) A built footprint of about 5.46 hectares for high quality, deliverable and sustainable Use Class B1 development (and ancillary services).
 - (ii) About 21.84 hectares for new and retained landscaping
 - (iii) About 9.1 hectares devoted to hard landscaping, car parking etc.
- (b) An opportunity that will deliver substantial new investment and employment to the sub-region.
- (c) It will contribute significantly to the achievement of the Council's regeneration priorities
- (d) The development area will be accessible by a range of alternative modes other than the private car.
- (e) About 99 hectares of adjacent land are devoted to the Rural Park (in support of, inter alia, CS Policies R3 and R5)

2.3 In summary, the proposal is designed to capitalise on the acknowledged unique qualities of the location and to deliver exceptional benefits for Trafford and the city-region.

2.4 The evidence for proposing that Davenport Green be identified as an SL in Chapter 8 (with consequential policy changes being made elsewhere in the Core Strategy) and in Policy W1, without any recourse to Policy R4, are summarised in the following paragraphs (Appendices A – E are provided to signpost the relevant parts of the evidence):

- (a) On the Council's evidence in the revised SA's appended to CD 12.95, Davenport Green is a highly sustainable location for employment and office development regardless of, and independently of, any proposals for development at Airport City or Medi-Park. We stress the importance of this evidence (Appendices A and B).
- (b) DTZ's evidence identifies the unique qualities of Davenport Green from the perspective of market demand; again these qualities exist in their own right, not because Davenport Green might be an adjunct to Airport City or Medi-Park. DTZ also stress the importance of sites being immediately available to meet occupier demand. Having acknowledged the handicaps imposed by the UDP/planning consent conditions, DTZ suggest their own (and unacceptable) restrictions by proposing that the site be reserved for a special inward investor and that the site be held for later release. RLAM recognises the importance of net additionality and suggests that the unique qualities of DG will secure this key economic attribute (Appendix C).
- (c) The Council's sequential test of office locations has been reviewed in the light of the new evidence provided by the Council and of the policy directions set out in the Draft National Planning Policy Framework. It shows that Davenport Green performs as favourably as other locations identified for office development in the

Core Strategy and that its rejection by the Council in CD 8.3.6 cannot be justified on the new evidence (Appendix D).

- (d) Appendix E reviews the Council's revised response to the Inspector's questions (MM4, CD 12.35.4.1). It reveals that the Airport City and Medi-Park proposals have distracted attention from the Inspector's key questions relating to Davenport Green, especially but not only MM 4.2, 4.5, 4.7, 4.8, 4.10, 4.11. The case against employment development at Davenport Green has not been adequately made.
- (e) In their separate response to Inspector's Note 7, RLAM draws attention to key sections of the Draft National Planning Policy Framework, inter alia, the urgency required in restructuring the national economy, the priority to be given to sustainable economic development, the need to avoid undue restrictions on development that render it unviable, and the abandonment of the sequential test in relation to offices. RLAM sees this as shifting the weighting that the Council has applied to the SA results and to their sequential test, in favour of sustainable development at Davenport Green.

2.5 RLAM considers the option of a Strategic Location as a sound policy solution and preferable to that proposed by the Council:

- (a) Strategic Location is an appropriate recognition of the importance of the proposal to the Vision and Objectives of the Core Strategy.
- (b) Any subsequent DPD could, if necessary, provide the opportunity for the details of the proposals to be developed flexibly in response to the needs of the market.
- (c) It provides certainty to prospective occupiers that the Council is committed to the principle of high quality (B1) employment development at this location.
- (d) It is appropriate that an employment site should be provided for expressly within Policy W1 rather than within a countryside policy.

3 OPTION TWO: AMENDMENTS TO THE WORDING OF THE COUNCIL'S NEWLY PROPOSED POLICIES FOR THE COUNTRYSIDE (POLICY R4) AND EMPLOYMENT (POLICY W1).

3.1 The Council proposes, in CD 12.95, to deal with its new conclusions about Davenport Green in paragraph 1.1 above through a '*locally distinctive designation*' within Policy R4.

3.2 RLAM considers that the approach, whilst innovative, may compromise the ability of the site to deliver new employment during the plan period. In itself, the policy embraces the prospect of development taking place at some point, responding to changes in economic circumstances.

3.3 In RLAM's view, however, the wording of Policy R4 and W1 (and the justification set out by the Council) does not do this sufficiently clearly, and does not properly reflect the first conclusion set out in paragraph 1.1 above. The appropriate balance between safeguarding the countryside on the one hand, and harnessing economic potential on the other, has not been struck.

3.4 RLAM believes, however, that a proper balance could, to some extent, be restored through a small number of wording changes. This would leave the policy more clearly

consistent with Government guidance and economic initiatives and the Council's own economic objectives and evidence base.

- 3.5 Accordingly, RLAM seeks to make a number of amendments to the Policies. These proposed changes accord with Government guidance on reducing the burdens on development (4) The suggested changes, together with corresponding changes to the written justification, are set out in Appendices G and H. We now address each amendment in turn.

Issue 1: Exceptionally High Quality Development

- 3.6 Policy R4.3 states that:

'The Council will protect the land at Davenport Green from development unless it can be demonstrated that it is required for an exceptionally high quality, deliverable and sustainable B1 business/office employment related development'.

RLAM seeks only the deletion of the word 'exceptionally' from this policy, the reasons for which are set out below.

- 3.7 RLAM has made it clear in its representations on this CS Examination that it is happy to be bound by development parameters that protect visual amenity and the landscape resource value of the site, and to commit to the laying out and management of a Rural Park (5). The sustainable quality of RLAM's proposed development has now been recognised in the Council's evidence, as signposted in Appendices A and B to this representation.
- 3.8 *Exceptionally* high quality was not a requirement of UDP policy. The bar has been unaccountably raised the effect of which is to introduce a new, subjective and uncertain requirement. This imprecision is undesirable in any policy, but particularly one which represents an important part of this Council's ability to respond to *'rapid shifts in demand and economic change'*.(6)
- 3.9 The reason why the Council has used the word exceptionally can only be conjectured, because no specific justification for it is offered:
- (a) The Council refers in the written justification for Policies R4.3 and R4.4 (7) to the exceptional circumstances which caused the UDP inspector to remove the land from the Green Belt in 1996. This provides no grounds for using the term "exceptionally" in the proposed policy: the site is not in the Green Belt, and no exceptional circumstances are required to justify the development.
 - (b) Neither does the quality of the site's landscape provide any grounds for the term "exceptionally". It was acknowledged to be poor at the UDP Inquiry. No material change has occurred in the intervening period (5).
 - (c) Equally the site's value 'in PPS7 terms' (8) does not provide any justification for the use of the term "exceptionally". There is no evidence to show that the site is important in these terms.
 - (d) No evidence is provided by the Council that exceptionally high quality development is necessary from the perspective of securing appropriate economic development on the site.

- 3.10 Whatever the asserted importance of the site itself, there is little doubt that the nature of the development proposed by RLAM, including the Rural Park and the planning parameters for the development area, will have positive benefits (9).
- 3.11 In RLAM's view, the requirement for exceptionally high quality of development is therefore unwarranted, and is unnecessary in view of the parameters that have been volunteered and the commitments that have been made. The Council's evidence (10) shows that Davenport Green has not merely exceptional but unique qualities, which will enable it to make a distinctive and high quality contribution to the choice of sites in the south of the conurbation.
- 3.12 RLAM invites the Inspector to delete the word 'exceptionally' from Policy R4.3. There would need to be corresponding changes to the justification and these are set out in Appendix G.

Issue 2: Future Expansion

- 3.13 The second criterion in R4.4 states that development will only be permitted when it can be demonstrated that:

there is a need for such development to support the future expansion of Airport City or the MediPark proposals at the University Hospital South Manchester or that a need has been generated by a significant change to the economic context of the region as a result of either the growth of Airport City or the MediPark;

- 3.14 RLAM seeks the removal of the words '*future expansion of*' from this criterion, for the reasons set out below.
- 3.15 Whilst the Council has acknowledged (11) that Davenport Green could come forward within the plan period, no evidence is given in CD 12.95 to explain why it will only come forward at the end of the plan period (ie 10 yrs +). It is an assumption that the Council makes nonetheless(12). Against this assumption DTZ's evidence (10) is that the site has unique characteristics now and the Council's SA of Davenport Green shows that the site is sustainable now (13). It is also at odds therefore with the advice of the Council's property consultants DTZ who declare that:

'the majority of occupier decisions are opportunity driven – right space available at the right time at the right price' (14)

- 3.16 Davenport Green is not only able to support the long term expansion of Airport City and MediPark, but to underpin their success. Davenport Green is a qualitative enhancement of the choice of sites and premises for Airport City and MediPark. It provides a distinctive offer to the occupier market, with singular benefits to the city region. It should be rendered capable of development at any point within the plan period.
- 3.17 RLAM respectfully asks the Inspector to remove the words "future expansion of".

Issue 3: Accordance with PPS4

- 3.18 The fourth criterion in R4.4 states that development will only be permitted when it can be demonstrated that:

It is in accordance with all relevant policies within PPS4 or its successor;

- 3.19 RLAM believes this criterion should be removed altogether, for the following reasons:
- (a) It is against government guidance to repeat government policy in development plans (15)
 - (b) The Council appears to have introduced the requirement in order to make proposals within the policy subject to sequential testing (16). Sequential testing needs, however, to be undertaken as the plan is prepared (17) and the Council has undertaken this testing (18). Once a site is identified within a plan that has been sequentially tested there is no requirement for further testing later on.
 - (c) The Council's current evidence and the Draft NPPF lead (if the sequential test were reviewed) to the conclusion that Davenport Green is sequentially acceptable and in any event is as preferential a location as others identified in the Core Strategy (19).
 - (d) Draft NPPF omits any need for offices to be subject to a sequential test (20).

3.20 RLAM therefore seeks the removal of this criterion.

Issue 4: The Focus of Employment Uses

- 3.21 Policy W1 has been amended by CD 12.95, but there is no specific mention of Davenport Green either in the policy wording or the justification. This, in RLAM's view, is a conspicuous omission.
- 3.22 RLAM seeks the specific identification of Davenport Green as one of the places where the Council will focus employment uses. This involves additional wording in Policies W1.3, W1.5 and W1.13, and corresponding additions to the justification.
- 3.23 The principal reason is that, in RLAM's view, there is absolutely no reason, given the current evidence base, why Davenport Green should not now appear alongside the already identified employment locations listed in W1.3, because:
- (a) its role as an employment site in relation to Airport City and Medipark is acknowledged by the Council, who have decided not to amend the Green Belt boundary at Davenport Green in order to facilitate that role
 - (b) Policy W1 is the appropriate place for provision to be made for the development of land for employment. Any developer or occupier would be deterred by the lack of such a reference, especially given the ambiguous reference to airport-related development at W1.10.
- 3.24 Taken as a whole, the SAs at Appendices C and D of CD12.95 show, unarguably, that Davenport Green performs well in sustainability terms. This performance contrasts with the negative attributes which *'outweighed'* the acknowledged advantages of Davenport Green in the sequential testing process, namely *'the loss of greenfield land, the poor accessibility of the area, and the uncertain effects on the tackling of deprivation'* (21) . Appendix D of this Representation shows how, in the light of new evidence produced by the Council and of the thrust of the Draft National Planning Policy Framework, Davenport Green performs as at least as preferential a site (in sequential test terms) as other sites identified for office development.

- 3.25 RLAM accordingly seeks the inclusion of the words *'Davenport Green (subject to Policy R4)'* within the list at Policy W1.3. Corresponding additions to paragraphs W1.5 and W1.13 are also suggested (Appendix H).

Issue 5: The Plan showing change to the Proposals Map

- 3.26 In view of the changes sought in preceding sections it is RLAM's view that there should be a corresponding change to the Proposals Map currently attached to Policy R4 (both the title and the legend).

- 3.27 The suggested amendments to the title are indicated in bold:

“Policy R4 [**and W1**] change to Proposals Map

Trafford Core Strategy – Policy R4 [**and W1**]– Land proposed for Countryside Designation [**pending Employment Development**]”

- 3.28 The suggested amendments to the legend are also indicated below:

“Land proposed for Countryside designation [**pending economic development**] (Policy R4 [**and Policy W1**])”

- 3.29 Other Wording Changes

RLAM considers that other aspects of the policy wording are unnecessary or unjustified:

- (a) R4.4, first bullet, is unnecessary: R4.4 has been prepared in the light of other policies in the plan and to the extent necessary and appropriate, has taken them into account.
- (b) R4.4, seventh bullet, is unnecessary: R4.4 has taken into account Policy L3 to the extent necessary and appropriate.

4 CONCLUSIONS RELATING TO SL6 AND WORDING OF POLICIES R4 AND W1

- 4.1 RLAM welcomes Trafford's recognition of Davenport Green as a site for employment development, and its decision not to add land to the Green Belt. RLAM applauds the Council's action following this recognition, including further public consultation.
- 4.2 RLAM has considered carefully the evidence base presented at the start of this period of public consultation. The fund has also studied the Council's innovative response to the evidence, which is to enable employment development at Davenport Green by means of countryside-based policies.
- 4.3 RLAM's analysis of the evidence base leads it to a different conclusion. It believes that there is a better option to balance the need for economic growth and to safeguard the countryside.
- 4.4 RLAM contends that Davenport Green should be designated as a Strategic Location. The Fund considers that its rationale for this option is sound, and will enable the Inspector to direct the Council towards this option.

- 4.5 RLAM has also proposed a different option. This responds directly to the Council's proposed Policies for R4 and W1 by way of suggested amendments. RLAM believes, however, that this would be a less effective means of Davenport Green delivering economic growth, the distinctive potential for which is set out in the evidence base.

Without Prejudice

- 4.6 These representations are submitted without prejudice to RLAM's earlier representations with regard to the soundness of the Core Strategy, and in particular its compliance with statutory requirements for SEA.
- 4.7 RLAM considers that there are flaws in the latest SAs which are quite separate from those identified in previous representations (and still unresolved), namely:
- the failure to produce an updated SA report, which explains the revisions to the policy and findings of the new appraisals
 - the lack of reference to the new CS policies and change in Government policy,
 - a lack of commentary on how the SA has influenced the CS etc.

The current SA's, whilst conveying important and valid evidence, have not cured the inherent flaws identified in RLAM's previous representations.

References

- (1) CD 12.35.4.1: paragraph 4.7.6, page 6
- (2) CD 12.35.5.1: paragraphs 5.1.5 and 5.1.6, page 4
- (3) RLAM Submission, November 2010
- (4) RLAM Response to Inspector Note 7, para 5, Planning Obligations
- (5) RLAM submission, November 2010: Proposed Policy SS1 & Appendix 12
- (6) RLAM Response to Inspector Note 7, para. 1, Support for Economic Development
- (7) CD 12.95, paras 24.9-24.10
- (8) CD 12.35.5.1: paragraph 5.1.6, page 4
- (9) Appendix A, SA Objectives E2, E6 and E9
- (10) Appendix C, The Unique Qualities of the Site
- (11) CD 12.95: paragraphs 24.11 – 24.14, page 10
- (12) CD 12.95: page 20 (Introduction to SA on Policy R4)
- (13) Appendix A, generally and Sustainability Summary
- (14) Appendix C, Occupier Decision-Making
- (15) PPS12, para 4.32
- (16) CD 12.95, paras 18.15-18.17
- (17) PPS4, EC 5.2
- (18) CD 8.3.6
- (19) Appendix D
- (20) RLAM Response to Inspector Note 7, para. 6, Sequential Test
- (21) CD 8.3.6, paragraph 6.23, page 12

Appendix A

The Council's Evidence Base in Support of RLAM's Proposals

The Council, in Appendices C – E of CD12.95, have re-appraised the SA's of Policy R4, Davenport Green and Policy W1. The vital importance of these re-appraisals for the consideration of Davenport Green as a focus for employment development, as proposed by RLAM, is that:

- In the re-appraisal of R4 (Appendix C), whilst the **Policy** makes a link between the development of Davenport Green and the expansion of Airport City or the Medipark (R4.4 second bullet), the **re-appraisal** generally scores and comments on Davenport Green favourably, independently and regardless of any connection with Airport City or Medipark.
- In the re-appraisal of Davenport Green (Appendix D) the site is again scored and commented positively on all but one objectives and independently and regardless of any connection with Airport City or Medipark.
- The re-appraisal of Policy W1 is neutral in that the amended policy makes no express reference to Davenport Green.

In RLAM's view it is this very clear evidence that should drive the policy provision for Davenport Green as a focus for employment development in the Core Strategy. Given its vital importance, we have summarised and signposted as briefly as possible in the following table the key references to the Appendices. To assist the Inspector and other interested parties we have also provided a separate Appendix B, comprising CD12.95 Appendices C and D with the relevant passages highlighted.

The Council in the re-appraisals has often delayed the occurrence of positive scores until later plan periods; RLAM see no justification for this delay, an issue which we address elsewhere. In this analysis we are concerned with how Davenport Green performs, or is capable of performing, in sustainability terms at any stage in the plan period.

| CD 12.95 Appendix C Re-Appraisal of SA of Policy R4 CD12.95 Appendix D Re-Appraisal of the SA of Davenport Green SA Objectives | RLAM Commentary and References to Relevant Extracts (addressing Appendix C then Appendix D) |
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| S2. Improve accessibility for all to services and facilities | Davenport Green is capable of achieving a positive score regardless of the Airport City/Medipark (AC/M) proposals (App. D, S2, Comments, first para, second sentence; second para; third para, final two sentences) |
| S3. Enhance transport infrastructure; improve accessibility and quality of life to all communities | Davenport Green is capable of achieving a positive score regardless of the AC/M proposals (App. C, S3, Comments, final sentence). Acknowledged that site not presently well served by public transport, but that RLAM proposals would produce positive impact. (App. D, S3, Comments, first para first sentence; second para, final sentence) |

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| S5. Reduce poverty and social exclusion | Significant positive impact (regardless of the AC/M proposals) which will be ensured by mitigation measures (App. C, S5, Mitigation; and Comments, second para, final sentence) Major positive impact with high certainty, based expressly on RLAM's proposals (App. D, S5, Certainty; Comments first and second paras.) |
| S8. Improve the health and, inequalities in health of the population | Positive impact, arising especially from meeting deficiency of greenspace in Hale Barns (App.C, S8, Comments, second para). Same positive impact based on RLAM's proposals (App. D, S8, Comments, first para) |
| E1. Reduce the effect of traffic on the environment | Positive impact albeit with low certainty (App. C, E1, Comments, third para, penultimate sentence) Positive impact albeit with low certainty, based expressly on RLAM's proposals (App. D, E1, Comments, second para, first two sentences; fourth para, first sentence) |
| E2. Protect, enhance and restore open space, biodiversity, flora and fauna, geological and geomorphological features | Major positive impacts throughout plan period due, inter alia, to the Rural Park proposals for Davenport Green (App. C, E2, Comments, second para, second sentence; third para, second and third sentences) Positive impact, major when Rural Park established, based on RLAM's proposals, (App. D, E2, Comments, third para, final sentence) |
| E3. Reduce contributions to climate change | Acknowledged that site capable of being made accessible by range of alternative modes than car and therefore producing positive impact (App. C, E3 , Comments, second para, final sentence; final para) Acknowledged that site not presently well served by public transport, but that RLAM proposals would produce positive impact, albeit with low certainty (App. D, Comments, third para, fourth sentence) |
| E4. Reduce impact of climate change | Positive impact resulting from RLAM proposals (App. D, E4, Comments, first para, final sentence) |
| E6. Conserve land resources and reduce land contamination | Major positive impacts reduced to positive impact when Davenport Green released for development, but acknowledgement that such loss is offset by the anticipated employment development (RLAM however see no need for the development to be "exceptionally" high quality) (App. C, E6, Comments, final two sentences) Negative impact attributed to loss of 14.5 hectares of greenfield land together with acknowledgement that 21 hectares of the development site will be retained as open land and a further 99 hectares managed as a Rural |

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| | Park (App. D, E6, Comments, first para, final two sentences) |
| E9. Protect and enhance the diversity and distinctiveness of landscape and townscape character and cultural facilities | <p>Certainty of major positive impacts reduced to reflect possible release of Davenport Green for employment development. Express acknowledgement that (RLAM) “evidence has been provided to demonstrate that a large scale employment-led development could be delivered in this location whilst still retaining key landscape features.” (App. C, E9, Comments, third para, final sentence)</p> <p>Positive impact attributed to RLAM’s proposals (App. D, E9, Comments, third para)</p> |
| EC1. Enhance Trafford’s high performance and sustainable economy to provide a powerful contribution to regional growth | <p>Scores positive not major positive impacts (c.f. App. D, E9 below) reflecting (?) the Council’s conclusion: “In conclusion, it is considered that policy would not unduly restrict employment opportunities.” (App. C, EC1, Comments, final para, first sentence). The clear position is that the policy does indeed restrict employment opportunities, albeit not unduly.</p> <p>Scores positive and major positive (the latter twice) i.e. higher scores than in Appendix C above, on the basis of RLAM’s proposals. (App. D, EC1, scores). Comments, para 1 endorses key features of the proposals for Davenport Green, the final sentence (“Furthermore....Medi-Park”) making it clear that these benefits can be delivered independently and regardless of the proposals for Airport City and Medi-Park:</p> <ul style="list-style-type: none"> • Considerable contribution to stock of office accommodation in Trafford • Creation of significant number of jobs • Ability to attract investment that would not otherwise consider Trafford’s proposed Strategic Locations • Attraction of south Manchester as a driver of the sub-regional economy • General view that Davenport Green attractive to market for employment development (c.f. DTZ’s view in “The Assessment of the Potential Opportunities and Impacts Relating to the Manchester Airport City Enterprise Zone and Davenport Green Study (June 2011), para 5.27, that “Majority of occupier decisions are opportunity driven” and emphasis in Draft National Planning Policy Framework on responding to market signals, Core Planning Principles, para 19, third bullet) • Potential to support |

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| | <ul style="list-style-type: none"> ○ need for jobs in Wythenshawe ○ the growth of the Airport (an MCC Strategic Site) ○ the objectives of the Airport Master Plan. <p>The Council concludes that, in spite of the Trafford Employment Land Study (2009), “The proximity of Davenport Green to Manchester Airport, which is a key driver of growth for the city region, means that it is anticipated that the development proposals have the potential to have a major positive impact on this objective in the medium and long term.” (App. D, EC1, Comments, third para). This conclusion is founded on RLAM’s development proposals; a link to AC/M is not essential to the beneficial effects enumerated or to the very positive conclusion.</p> |
| <p>EC2. Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage</p> | <p>Positive impacts and not dependent on the AC/M proposals (App. C, EC2, Comments, second para, final sentence).</p> <p>Positive and major positive impacts based expressly on RLAM’s proposals including those for job creation, relationship to deprived communities in Wythenshawe, engagement of deprived communities and transport improvements. Leads to recognition of significant positive impact (App. D, EC2, Comments, first para, final two sentences).</p> |
| <p>EC3. Enhance Trafford’s image as a business and tourism destination.</p> | <p>Positive impacts, apparently postulated on Davenport Green being released for development only under the terms of Policy R4. Council however provides no evidence that the link to AC/M is essential for the delivery of the recorded benefits (App. C, EC3, Comments, final para).</p> <p>Positive impacts, including two major positives. Recognition that RLAM’s development proposals “undoubtedly have the potential to provide a high quality employment development which would be visible from the motorway and could thereby boost the image of Trafford as a business destination.” (App. D, EC3, Comments, first para, third sentence). This assessment and the prospect of the Rural Park being provided lead to two major positive effects with medium certainty.</p> |
| <p>EC4. Encourage the long term sustainability of Trafford’s Town Centres</p> | <p>The Council record their finding that office development at Davenport Green would not be suitable in relation to the PPS4 sequential test; the impact has therefore not been assessed.</p> |

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| | <p>RLAM provide a critique of the PPS4 test at Appendix D (App. C, EC4, Comments, second para, second sentence)</p> <p>App. D, EC4 adopts the same stance as App. C, EC4. We note the Council’s comment that “The lack of definitive information on this means that the impact of the proposals against the objective is uncertain.” (App. D, EC4, Comments, third para, final sentence)</p> |
| <p>EC5. Improve the social and environmental performance of the economy</p> | <p>Unlikely to have any significant effects (App. C, EC5, Comments).</p> <p>Positive effects, based on RLAM’s proposals and supporting measures e.g. in relation to Rural Park, high standard of sustainability and accessibility of employment opportunities by public transport, including from areas of deprivation (App. D, EC5, Comments, first para).</p> |
| <p>Sustainability Summary</p> | <p>App. C records no negative effects of Policy R4. The Summary mentions a number of positive effects related to development at Davenport Green, none of which (with the exception of the qualification “exceptionally high” related to the quality of the development, with which RLAM disagrees) derive exclusively from the nature of the development proposed in R4; they could equally be delivered by RLAM’s proposals.</p> <p>App. D presents a long list of very significant positive effects of RLAM’s proposals against one negative effect on SA Objective E6 (Conserve land resources and reduce land contamination). Given the very strong emphasis on sustainable economic growth in the Draft National Planning Policy Framework (e.g. paras 10, 13, 19, 71, 72), the logical conclusion to draw from the SA evidence is that Davenport Green is a sustainable site for employment development.</p> |

Appendix C – Re-appraisal of the SA of Policy R4

The amended policy R4 would provide protection to land at Davenport Green but would lead to land being released at this location if it is required for an exceptionally high quality business/office development. The Assessment of the Potential Opportunities and Impacts Relating to the Manchester Airport City Enterprise Zone and Davenport Green Study (June 2011) concluded that there may be a need for such a development at Davenport Green in the medium to long term to support development at MediPark and the Enterprise Zone. For this reason, when undertaking this appraisal it has been assumed that if development will come forward at Davenport Green it will be during the latter stages of the plan period. The level of certainty is assumed to be medium unless evidence indicates otherwise. For the purposes of this appraisal the level of certainty ascribed assumes a medium level of certainty that the proposals at Davenport Green will be developed.

| R4: Green Belt, Countryside and Other Protected Open Land | | | | | | | | |
|--|-------------|--------------|-----------|------------------|--------------|------------|---|---|
| SA Objective | Timescale | | | Nature of Effect | | | | |
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic | Mitigation |
| Social | | | | | | | | |
| S1. Achieving a better balance and mix in the housing market | + | + | + | Medium | Borough wide | Long term | Enhances the vitality and viability of town centres | |
| <p><u>Comments:</u> Controlling development in the Green Belt, Countryside and other Protected Open Land can restrict the supply of housing. However, it assists in regeneration by enabling investment to be focused on urban areas and could thereby contribute to the sub objective of reducing the number of vacant properties. Furthermore, it is noted that Trafford's Strategic Housing Land Availability Assessment has demonstrated that there are sufficient suitable and developable housing sites in the Borough to meet its housing provision requirements without developing sites in the Green Belt for housing. In addition, the policy seeks to protect land in Warburton from all but essential development to ensure that this site can make the maximum potential contribution to housing needs beyond the Plan period.</p> <p>In conclusion, the policy will have a positive effect on the objective because the potential restriction on housing supply is more than offset by the adequacy of provision elsewhere in Trafford.</p> | | | | | | | | |
| S2. Improve accessibility for all to services and facilities | + | + | + | Low | Borough wide | Long term | Improved quality of life | Other policies in the Core Strategy will ensure that investment is directed to more accessible areas within Trafford. |

R4: Green Belt, Countryside and Other Protected Open Land

| SA Objective | Timescale | | | Nature of Effect | | | Mitigation |
|--|--|--------------|-----------|------------------|--------------|------------|--------------------------|
| | 0 - 5 years | 5 - 10 years | 10+ years | Certainty | Scale | Permanence | |
| | <p>Comments: By controlling development pressures in the Green Belt and other Protected Open Land the policy will prevent urban sprawl. As a result, there is likely to be more investment in urban areas. This could help ensure services and facilities are directed towards more accessible locations and thereby have a positive impact on the sub-objective relating to improving access to services from the most deprived parts of the Borough. The policy could prevent development that provides services and facilities in the Green Belt or on other Protected Open Land. It is however noted that access to these areas is poor from many of Trafford's more deprived areas where the need for jobs is greatest.</p> <p>In conclusion, it is considered that the policy will have a positive impact on this objective and its associated sub-objectives by ensuring investment is directed to the urban area and thereby helping to ensure services and facilities are provided in more accessible locations. It is however acknowledged that there is only limited certainty over this impact as the policy does not in itself ensure that investment is well related to areas of deprivation.</p> | | | | | | |
| S3. Enhance transport infrastructure; improve accessibility and quality of life to all communities. | 0 | 0 | + | Medium | Borough wide | Long term | |
| | <p>Comments: The policy is unlikely to have any significant impact on the objective during the first two five-year periods. However, during the latter stages of the plan period the policy could result in land being released at Davenport Green if it is required for an exceptionally high quality business/office development. The development criteria of the policy states that development on this land will only be permitted where it will be accessible by a range of alternative modes of transport other than the private car. It is therefore considered that in the longer term the policy has the potential to have a positive impact on the objective and its sub-objectives of providing efficient and inclusive public transport and improving participation in walking and cycling during the latter stages of the plan period.</p> | | | | | | |
| S4. Reduce crime, disorder and the fear of crime | 0 | 0 | 0 | High | N/A | N/A | |
| | <p>Comments: Unlikely to have any significant effects.</p> | | | | | | |
| S5. Reduce poverty and social exclusion | + | + | ++ | Low | Borough wide | Long term | Improved quality of life |
| | <p>Other policies in the Core Strategy will ensure that investment is well related to, and accessible from, areas of deprivation within Trafford.</p> | | | | | | |

R4: Green Belt, Countryside and Other Protected Open Land

| SA Objective | Timescale | | | Nature of Effect | | | | |
|---|---|--------------|-----------|------------------|--------------|------------|------------------------------------|------------|
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic | Mitigation |
| | <p>Comments: The policy seeks to control development pressures in the Green Belt and on other Protected Open Land. It should thereby ensure that investment is directed to urban areas, including potentially those that are characterised by relatively high levels of deprivation. This could reduce levels of poverty and social exclusion and contribute to the sub-objectives of reducing multiple deprivation and the number of low income households. The policy would restrict investment opportunities in parts of the Borough which could have implications for job creation. Nevertheless, it is noted that access to these areas is poor from many of Trafford's more deprived areas where the need for jobs is greatest. It is therefore considered that the policy will have a positive impact on this objective and its associated sub-objectives by ensuring that investment is directed to the urban areas, including potentially those that are characterised by relatively high levels of deprivation. However, it is acknowledged that there is only limited certainty over this impact as the policy does not in itself ensure that investment is well related to areas of deprivation.</p> <p>During the latter stages of the plan period, the policy could also lead to business/office development at Davenport Green if it is required for an exceptionally high quality business/office development. It is estimated that this development could create a high number of jobs for people directly employed at this location and the policy specifies that the development in this location must deliver substantial employment and contribute significantly to the achievement of the Council's regeneration priorities.. It is therefore considered that the impact of the policy on the objective could be particularly significant in the longer term.</p> | | | | | | | |
| S6. Encourage a sense of community identity and welfare and value diversity, improve equity and equality of opportunity | 0 | 0 | 0 | High | N/A | N/A | | |
| <p>Comments: Unlikely to have any significant effects.</p> | | | | | | | | |
| S7. Improve qualifications and skills of the resident population | 0 | 0 | 0 | High | N/A | N/A | | |
| <p>Comments: Unlikely to have any significant effects.</p> | | | | | | | | |
| S8. Improve the health and, inequalities in health of the | + | + | + | Medium | Borough wide | Long term | Improved quality of life | |

R4: Green Belt, Countryside and Other Protected Open Land

| SA Objective | Timescale | | | Nature of Effect | | | Mitigation |
|---|-------------|--------------|-----------|------------------|--------------|------------|--|
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | |
| <p>population</p> <p><u>Comments:</u> PPG2 recognises that the use of land in the Green Belt has a positive role to play in providing opportunities for outdoor sport and recreation near urban areas. The policy will lead to the protection of areas within the Green Belt and on other Protected Open Land that provide important areas for recreation, such as the Timperley Wedge. In addition, as shown in the Trafford Outdoor Sports Facilities study (2009), there are several outdoor sports facilities in the Borough that are within the Green Belt.</p> <p>The Trafford Green and Open Spaces Assessment of Need Update (2009) established that Hale Barns is an area deficient in accessible greenspace by 5.35 hectares. The policy would only allow development at Davenport Green where 99 hectares of land surrounding the development site will be protected, enhanced and managed for, inter alia, recreational access. This would have a positive impact on this objective and its sub-objective of increasing participation in, and access to, sport and physical activity facilities.</p> <p>In conclusion, the policy would provide protection to the recreational opportunities offered on all sites within the Green Belt, Countryside and on other Protected Open Land. It would only lead to land being released at Davenport Green if it is required for exceptionally high quality business/employment development and would result in the provision of a substantial rural park. It is therefore considered that the policy would have a positive impact on this objective.</p> | + | + | + | Medium | Borough wide | Long term | |
| <p>S9. Protect and improve local neighbourhood quality</p> <p><u>Comments:</u> Whilst the SA objectives and its sub-objectives are primarily concerned with issues such as the quality of highway infrastructure, litter, graffiti and fly tipping, the policy affords protection to areas of open land that contribute to the image of the Borough and provide a sense of place and local distinctiveness. The policy would also lead to the protection of land at Davenport Green and only release land at this location if it is required for an exceptionally high quality business/office development. In conclusion, it is therefore considered that the policy would have a positive impact on the quality of local environments in Trafford and there are no perceived drawbacks to this objective, hence the high level of confidence in this impact.</p> | + | + | + | Low | Borough wide | Long term | Secondary impacts on air quality and greenhouse gas emissions. |
| <p>Environment</p> <p>E1. Reduce the effect of traffic on the environment</p> <p>Other policies in the Core Strategy will ensure that development is directed to locations that are accessible by a choice of means of transport.</p> | | | | | | | |

R4: Green Belt, Countryside and Other Protected Open Land

| SA Objective | Timescale | | | Nature of Effect | | | Mitigation |
|--|---|--------------|-----------|------------------|--------------|------------|---|
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | |
| | <p>Comments: The policy will lead to the restriction of urban sprawl, which can result in unsustainable patterns of travel, and will instead lead to development being directed to the urban area which provides greater scope to manage and reduce traffic flows through the development of a more compact urban form that increases the viability of public transport.</p> <p>It would also result in land at Davenport Green only being released for development if it is required for an exceptionally high quality business/office development which is accessible by a range of alternative modes of transport other than the private car. The policy could thereby have a positive impact on the sub-objectives of reducing motorised traffic and traffic related emissions. It is however recognised that the resultant development in urban areas could exacerbate existing congestion as identified by the Greater Manchester LDF Transport Modelling Report. In addition, the policy does not in itself ensure that development is directed to the most accessible locations within the urban area.</p> <p>In conclusion, it is considered that, on balance, by restricting urban sprawl, and its associated unsustainable patterns of commuting, the policy would lead to the development of an urban form that provides more scope to introduce measures to reduce the effect of traffic on the environment. It is therefore considered that the policy should have a positive impact on this objective. However, as the policy does not in itself ensure that development is directed to the most accessible locations within the urban area, it is considered that the certainty of this impact is only low.</p> | | | | | | |
| E2. Protect, enhance and restore open space, biodiversity, flora and fauna, geological and geo- | ++ | ++ | ++ | Medium | Borough wide | Long term | Improve habitat of Green Belt. This will be secured by other policies in the Core Strategy. |

R4: Green Belt, Countryside and Other Protected Open Land

| SA Objective | Timescale | | | Nature of Effect | | | Mitigation |
|---|-------------|--------------|-----------|------------------|--------------|------------|--|
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | |
| <p>morphological features</p> <p><u>Comments:</u> A key aim of policy is to provide lasting protection to the Green Belt and other areas of protected open land. It is acknowledged that not all land in the Green Belt has ecological value. Nevertheless, the policy will support the protection of Carrington Mosslands which is identified as a priority site for habitat creation and repair by the Ecological Framework for Greater Manchester (2008). The policy would afford protection to land at Davenport Green but would allow development to come forward at this location if it is required for exceptionally high quality, deliverable and sustainable business/employment related development. Davenport Green is identified as a Great Crested Newt Biodiversity Opportunity Area in the Ecological Framework for Greater Manchester and the parts of the Borough around Dunham that are identified in this study as some of the most natural green spaces within Trafford. Great Crested Newts are identified in the Greater Manchester Biodiversity Action Plan (2009) as a species of conservation importance in Greater Manchester that requires action in order to conserve and protect them. It is however noted that the Ecology update (November 2010) produced on behalf of RLAM noted that some of the breeding habitat previously recorded for great Crested Newts at the Davenport Green site has now effectively been lost.</p> <p>The policy will also support the sub-objective of ensuring residents have access to high quality open space by leading to the protection of areas, such as Timperley Wedge, which provide important areas for recreation. In addition, the policy would only allow development to come forward at Davenport Green where 99 hectares of land surrounding the site would be protected, enhanced and managed for ecological interest, recreational access and farming as a rural park.</p> <p>In conclusion, the policy would lead to the protection of a number of important habitats in the Borough and would also protect areas that provide important recreation resources. The policy would also protect land at Davenport Green and would only allow development to come forward at this location where, amongst other things, it would involve 99 hectares of land surrounding the site would be protected, enhanced and managed for ecological interest, recreational access and farming. As such, it is considered that the policy would have a major positive impact on this objective.</p> | | | | | | | |
| E3. Reduce contributions to climate change | + | + | + | Medium | Borough wide | Long term | Other policies in the Core Strategy will ensure that development is directed to locations that are accessible by a choice of means of transport. |

R4: Green Belt, Countryside and Other Protected Open Land

| SA Objective | Timescale | | | Nature of Effect | | | Mitigation |
|---|---|--------------|-----------|------------------|--------------|------------|---|
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | |
| | <p>Comments: The policy will lead to the restriction of urban sprawl, which can result in unsustainable patterns of travel and associated climate change emissions. The policy will instead lead to development being directed to the urban area which provides greater scope to manage and reduce traffic flows through the development of a more compact urban form that increases the viability of public transport. It would also result in land at Davenport Green only being released for development if it is required for an exceptionally high quality business/office development that is accessible by a range of alternative modes other than the private car. The policy could thereby have a positive impact on the sub-objective of reducing carbon emissions. It is however recognised that the resultant development in urban areas could exacerbate existing congestion as identified by the Greater Manchester LDF Transport Modelling Report. In addition, the policy does not in itself ensure that development is directed to the most accessible locations within the urban area. In conclusion, it is however considered that, on balance, by restricting urban sprawl, and its associated unsustainable patterns of commuting, the policy would lead to the development of an urban form that provides more scope to tackle congestion and associated carbon dioxide emissions.</p> <p>The policy would provide protection of land at Davenport Green but would lead to land being released at this location if it is required for an exceptionally high quality business/office development. The construction and operation of this development would inevitably result in some carbon emissions. Nevertheless, it is noted that the policy would require the site to be accessible by a range of alternative modes other than the private car.</p> <p>In conclusion, it is therefore considered that the policy should have a positive impact on this objective.</p> | | | | | | |
| E4. Reduce impact of climate change | ? | ? | ? | Medium | Borough wide | Long term | Core Strategy policy L5 will ensure appropriate measures are taken to reduce the risk of flooding |
| E5. Reduce the environmental impacts of consumption and production | <p>Comments: The policy will help prevent development from taking place in some parts of the Borough that are at risk of flooding from, for example, the River Mersey, the River Bollin and Sinderland Brook as identified by the Level 2 SFRA. By preventing urban sprawl, the policy will however result in more development being focussed on urban areas and the Level 2 SFRA has demonstrated that some parts of the urban area, particularly in the north east of the Borough, that are at risk of flooding. In conclusion, the impact of the policy on this objective and its sub-objective of minimising the risk of flooding are uncertain.</p> <p>Comments: Unlikely to have significant effects.</p> | | | | | | |
| E6. Conserve land resources and reduce land contamination | ++ | ++ | + | Medium | Borough wide | Long term | |

R4: Green Belt, Countryside and Other Protected Open Land

| SA Objective | Timescale | | | Nature of Effect | | | Mitigation |
|--|---|--------------|-----------|------------------|-------|------------|---|
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | |
| | <p><u>Comments:</u> PPG2 states that a key purpose of the Green Belt is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. A key aim of policy is to conserve land resources by providing lasting protection to the Green Belt and other areas of protected open land. The policy will also result in investment being focused on urban areas, which should increase the likelihood of contaminated land within the urban area being remediated. The policy will also support the sub-objective of increasing the proportion of new homes built on previously developed land. It is therefore concluded that the policy will have a major positive impact on this objective during the first two five-year periods. The policy could however facilitate development coming forward on a significant greenfield site at Davenport Green during the latter stages of the plan period which reduces the impact of the policy on this objective during this part of the Plan period. Nevertheless, it is acknowledged that development would only be permitted at Davenport Green if it is required for an exceptionally high quality, deliverable and sustainable B1 business/office employment related development.</p> | | | | | | |
| E7. Protect and improve water quality | 0 | 0 | 0 | Medium | N/A | N/A | |
| <p><u>Comments:</u> Unlikely to have any significant effects.</p> | | | | | | | |
| E8. Protect and improve air quality | ? | ? | ? | Low | Local | Long term | Other policies in the Core Strategy will ensure that measures are taken to direct investment to accessible locations and to increase the usage of public transport. |

R4: Green Belt, Countryside and Other Protected Open Land

| SA Objective | Timescale | | | Nature of Effect | | | | Mitigation |
|---|---|--------------|-----------|------------------|--------------|------------|------------------------------------|------------|
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic | |
| | <p><u>Comments:</u> The policy will lead to the restriction of urban sprawl which can result in unsustainable patterns of travel. It is however recognised that the resultant investment in urban areas could exacerbate existing congestion as identified by the Greater Manchester LDF Transport Modelling Report and thereby have a negative impact on air quality in these areas, which include areas that are already designated as Air Quality Management Areas.</p> <p>The policy would provide protection of land at Davenport Green but would lead to land being released at this location if it is required for an exceptionally high quality business/office development. Davenport Green is located in an area that is defined as being within the least accessible parts of the Borough by the Developer Contributions to Highway and Public Transport Schemes SPD. The site is presently not well served by public transport and is located in close proximity to the motorway network. In addition, as noted in the Davenport Green Air Quality study (Appendix 10) prepared on behalf of RLAM, part of the site is also within an Air Quality Management Area for Nitrogen Dioxide associated with the M56 motorway. Nevertheless, evidence has been submitted to demonstrate that a large scale employment-led development could be delivered in this location without having an unacceptable impact on air quality. In addition, the policy requires development at this location to be accessible by a range of alternative modes of transport other than the private car. It is therefore considered that releasing land at Davenport Green for a high quality business/office development is unlikely to have a significant impact on air quality.</p> <p>In conclusion, although the appraisal has concluded that the policy has the potential to have a positive impact on objectives E1 and E3, it is considered to be uncertain whether concentrating development in the urban area, including areas designated as AQMAs, is a better approach for protecting air quality than spreading the pollution more thinly across the Borough because the impact on air quality of the additional traffic generated and from the development itself is unknown.</p> | | | | | | | |
| E9. Protect and enhance the diversity and distinctiveness of | ++ | ++ | ++ | Medium | Borough wide | Long term | Improved perceptions of Trafford | |

R4: Green Belt, Countryside and Other Protected Open Land

| SA Objective | Timescale | | | Nature of Effect | | | Mitigation |
|---|-------------|--------------|-----------|------------------|--------------|------------|--|
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | |
| <p>landscape and townscape character and cultural facilities</p> <p>Comments: The policy will provide long-term protection against development that would have a detrimental impact on the diversity and distinctiveness of landscapes in the Green Belt, Countryside and on and other Protected Open Land. The policy is therefore likely to support the sub-objective of restoring, protecting and enhancing landscape character.</p> <p>PPG2 states that a key purpose of including land within the Green Belt is preserve the setting and special character of historic towns. The policy will preserve the setting and special character of a number of conservation areas in Trafford, including those in Dunham Town, Dunham Woodhouses and Warburton. The policy will also protect the setting of several listed buildings and will result in the protection of open fields and strip fields, which are concentrated within Trafford around Warburton and Davenport Green, and which are identified as being perhaps the most historically significant landscapes in the Borough by the Trafford Urban Historic Landscape Characterisation Report (2008). The policy will also provide protection to other historic landscape types identified in this report, including piecemeal enclosure and agglomerated fields. It is therefore considered that the policy has the potential to have a positive impact on the SA objective and its sub-objectives.</p> <p>The policy could however result in development coming forward at Davenport Green. This reduces the level of certainty that the policy would have a major positive impact on this objective. It is however acknowledged that development would only be permitted at Davenport Green if it is required for an exceptionally high quality, deliverable and sustainable B1 business/office employment related development. Furthermore, evidence has been provided to demonstrate that a large scale employment-led development could be delivered in this location whilst still retaining key landscape features.</p> | | | | | | | |
| Economic | | | | | | | |
| <p>EC1. Enhance Trafford's high performance and sustainable economy to provide a powerful contribution to regional growth</p> | + | + | + | Medium | Borough wide | Long term | <p>Other policies in the Core Strategy will ensure that sites are brought forward to ensure an appropriate supply of sites and premises.</p> |

R4: Green Belt, Countryside and Other Protected Open Land

| SA Objective | Timescale | | | Nature of Effect | | | Mitigation | |
|--|--|--------------|-----------|------------------|--------------|------------|--------------------------|--|
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | | Secondary, cumulative, synergistic |
| | <p>Comments: The maintenance of a Green Belt can restrict economic development opportunities but can also provide a high quality environment that attracts skilled workers to Trafford. In addition, PPG2 notes that a purpose of the Green Belt is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p> <p>The policy will protect agricultural land as an important resource for the local economy. It would also protect land to the South of Sheil, Carrington, from all but essential development to ensure the site can make the maximum potential contribution to economic development needs beyond the Plan period.</p> <p>The policy would however provide protection to land at Davenport Green that was previously allocated for employment uses in the UDP. The Davenport Green Commercial Review submitted on behalf of RLAM in November 2010 states that Davenport Green is the only site within Trafford that is capable of attracting large levels of investment from multi-national businesses and that many companies seeking new office buildings will not consider the Strategic Locations contained within the Core Strategy as being appropriate for their business. It should however be recognised that areas such as Salford Quays have demonstrated that former industrial areas that have been perceived to be undesirable to the market can be successfully transformed to areas attractive to office development and that the Davenport Green Commercial Review (Appendix 15) prepared on behalf of RLAM has demonstrated that the absence of this site has not prevented office development in South Manchester in recent years.</p> <p>It is also noted that the Trafford Employment Land Study (2009) indicated that a sufficient supply of suitable and developable employment sites exist to meet the Borough's contribution to the requirements suggested in the Greater Manchester Employment Land Position Statement of August 2009 without the need to retain the UDP allocation for an employment site at Davenport Green. This suggests that the policy would not have a negative impact on the sub-objective of creating conditions for sustainable growth through ensuring the supply of appropriate sites and premises. In addition, Trafford's PPS4 assessment of office floorspace in the Borough (2010) concluded that the site was not suitable for office development in relation to the tests in PPS4. However, the Assessment of the Potential Opportunities and Impacts Relating to the Manchester Airport City Enterprise Zone and Davenport Green study (June 2011) recognises that development at Davenport Green has the potential to support the proposals for Airport City and the MediPark. Accordingly, the policy has been amended so that it would now allow development to come forward in this location if it is required for an exceptionally high quality development and, amongst other things, there are no sequentially preferable sites in PPS4 terms that are capable of supporting the future expansion of Airport City or the MediPark.</p> | | | | | | | |
| EC2. Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage | <p>In conclusion, it is considered that policy would not unduly restrict employment opportunities. Furthermore, the policy has also been amended so that development can come forward at Davenport Green if it is required for an exceptionally high quality development which complied with the criteria set out in the Policy it is therefore considered that the policy would have a positive impact on this objective.</p> | | | | | | | |
| | + | + | + | Low | Borough wide | Long term | Improved quality of life | Other policies in the Core Strategy will ensure that investment is well related to, and accessible from, areas of deprivation within Trafford. |

R4: Green Belt, Countryside and Other Protected Open Land

| SA Objective | Timescale | | | Nature of Effect | | | Mitigation |
|--|--|--------------|-----------|------------------|--------------|------------|---|
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | |
| | <p>Comments:</p> <p>The policy seeks to control development pressures in the Green Belt and on other Protected Open Land. It should thereby ensure that investment is directed to urban areas, including potentially those that are characterised by relatively high levels of deprivation. This could reduce levels of poverty and social exclusion and contribute to the sub-objectives of reducing multiple deprivation and the number of low income households. The policy would restrict investment opportunities in parts of the Borough which could have implications for job creation. Nevertheless, it is noted that access to these areas is poor from many of Trafford's more deprived areas where the need for jobs is greatest. It is therefore considered that the policy will have a positive impact on this objective and its associated sub-objectives by ensuring that investment is directed to the urban areas, including potentially those that are characterised by relatively high levels of deprivation. However, it is acknowledged that there is only limited certainty over this impact as the policy does not in itself ensure that investment is well related to areas of deprivation.</p> <p>During the latter stages of the plan period, the policy could also lead to business/office development at Davenport Green if it is required for an exceptionally high quality business/office development linked to the proposals for Airport City/Medi Park. It is estimated that this development could create a significant number of jobs for people directly employed at this location and the policy specifies that the development must contribute significantly to the achievement of the Council's regeneration priorities. A range of measures could also be taken to engage deprived communities and individuals in the benefits of the construction phase and the long term business activities at Davenport green. It is therefore considered that the impact of the policy on the objective could be particularly significant in the longer term.</p> | | | | | | |
| EC3. Enhance Trafford's image as a business and tourism destination | + | + | + | Medium | Borough wide | Long term | Other policies in the Core Strategy will ensure that sites are brought forward to ensure an appropriate supply of sites and premises. |

R4: Green Belt, Countryside and Other Protected Open Land

| SA Objective | Timescale | | | Nature of Effect | | | Mitigation |
|---|-------------|--------------|-----------|------------------|-------|------------|--|
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | |
| <p>EC4. Encourage the long term sustainability of Trafford's Town Centres</p> | + | + | + | Low | N/A | N/A | Other policies in the Core Strategy will ensure that development supports Trafford's town centres. |
| <p>Comments: The policy could have a positive impact on Trafford's image as a tourism destination by leading to the protection of the setting of Dunham Massey hall and garden which is identified as an important tourist destination by the indicators for this SA objective. The maintenance of a Green Belt could also provide a high quality environment that can attract skilled workers to the area. It can however also restrict economic development opportunities. Nonetheless, it is recognised that policy on Green Belts contained within PPG2 stipulates that there is a presumption against inappropriate development in the Green Belt.</p> <p>The policy would however provide protection to land at Davenport Green that was previously allocated for employment uses in the Trafford UDP. The Assessment of the Potential Opportunities and Impacts Relating to the Manchester Airport City Enterprise Zone and Davenport Green (June 2011) recognises that development at Davenport Green has the potential to support the proposals for Airport City and the Medi-Park. In addition, the Davenport Green Commercial Review submitted on behalf of RLAM in November 2010 states that Davenport Green is the only site within Trafford that is capable of attracting large levels of investment from multi-national businesses and that many companies seeking new office buildings will not consider the Strategic Locations contained within the Core Strategy as being appropriate for their business. It should however be recognised that areas such as Salford Quays have demonstrated that former industrial areas that have been perceived to be undesirable to the market can be successfully transformed that the absence of this site has not prevented office development in South Manchester in recent years.</p> <p>Moreover, the Trafford Employment Land Study (2009) indicated that a sufficient supply of suitable and developable employment sites exist to meet the Borough's contribution to the requirements suggested in the Greater Manchester Employment Land Position Statement of August 2009 without the need to retain the UDP allocation for an employment site at Davenport Green. This suggests that the policy would not have a negative impact on the sub-objective of creating conditions for sustainable growth through ensuring the supply of appropriate sites and premises. In addition, Trafford's PPS4 assessment of office floorspace in the Borough (2010) concluded that the site was not suitable for office development in relation to the tests in PPS4 and the Assessment of the Potential Opportunities and Impacts Relating to the Manchester Airport City Enterprise Zone and Davenport Green Study (June 2011) concluded that the proposals for Davenport Green could be developed in various locations within Trafford and Manchester. Furthermore, the policy has been amended so that development can come forward in this location if it is required for exceptionally high quality business/office employment related development and, amongst other things there are no sequentially preferable sites in PPS4 terms that are capable of supporting the future expansion of Airport City or the MediPark.</p> <p>In conclusion, it is envisaged that the policy has the potential to have a positive impact on the sub-objective of increasing Trafford's role as a tourist destination. In addition, the policy would allow for some development in the Countryside if it is required for exceptionally high quality development in line with the criteria set out in the policy. It is therefore considered that the policy would have a positive impact on this objective.</p> | | | | | | | |

R4: Green Belt, Countryside and Other Protected Open Land

| SA Objective | Timescale | | | Nature of Effect | | | Mitigation |
|--|--|--------------|-----------|------------------------------------|-------|-----------|------------|
| | 0 – 5 years | 5 – 10 years | 10+ years | Permanence | Scale | Certainty | |
| | <p>Comments: Controlling development in the Green Belt can ensure investment is focused on urban areas, including town centres. It is therefore concluded that the policy is likely to have a positive impact on this objective. However, the policy itself will not ensure that development supports the vitality of Trafford's town centres. In addition, it is noted that the Trafford Other Town Centre Uses Study highlights that there are insufficient suitable and available sites for office development in Trafford's town centres.</p> <p>The policy would also lead to the protection of land at Davenport Green and only release land at this location if it is required for an exceptionally high quality business/office development. The development proposals for Davenport Green would result in a significant amount of B1 office development taking place in an out of centre location and, whilst there is likely to be insufficient suitable and available sites in Trafford's town centres to meet the Borough's needs for office development, Trafford's PPS4 assessment of office floorspace in the Borough concluded that Davenport Green was not suitable for office development in relation to the tests in PPS4 and therefore its potential impact on the Borough's town centres was not assessed. Nevertheless, the policy would only permit development in this location if there are no sequentially preferable sites in PPS4 terms that are capable of supporting the future expansion of Airport City or the MediPark proposals at the University Hospital South Manchester.</p> <p>As a result, it is considered that the policy as a whole would have a positive impact on this objective by ensuring investment is focused on urban areas, including town centres. There is however only limited certainty about the impact of the policy on this objective due to the policy in itself not ensuring that development supports the vitality of Trafford's town centres.</p> | | | Secondary, cumulative, synergistic | | | |
| EC5. Improve the social and environmental performance of the economy | 0 | 0 | 0 | High | N/A | N/A | |
| <p>Comments: Unlikely to have any significant effects.</p> | | | | | | | |

Sustainability Summary

Policy R4 Green Belt, Countryside and Other Protected Open Land performs well against a number of sustainability objectives. The key potential benefits of the policy relate to protecting, enhancing and restoring biodiversity and open space. In addition, by providing long-term protection against development that would have a detrimental impact on landscapes in the Green Belt, including those identified as being historically significant landscapes by the Trafford Urban Historic Landscape Characterisation Report, and by preserving the setting and special character of a number of conservation areas in Trafford, including those at Dunham Town, Dunham Woodhouses and Warburton, the policy would also have a major positive effect on the objective of protecting the diversity and distinctiveness of landscape and townscape character.

The policy will afford protection to areas of open land that contribute to the image of the Borough and will thereby have a positive impact on the objective relating to protecting local neighbourhood quality. The policy will also have a positive impact on health by affording protection to open spaces that provide important areas for recreation, such as Timperley Wedge. The certainty of this impact is improved by the fact that the policy would only allow development at Davenport Green if 99 hectares of land surrounding the development site will be protected, enhanced and managed for, inter alia, recreational access. By restricting urban sprawl which can result in unsustainable patterns of travel, the policy could also have a positive impact on the objectives of reducing the effect of traffic on the environment and reducing contributions to climate change. It is however recognised that the resultant development in urban areas could exacerbate existing congestion as identified by the Greater Manchester LDF Transport Modelling Report, which reduces the level of certainty that the policy would have a positive impact on these objectives.

By controlling development pressures in the Green Belt and preventing urban sprawl the policy is likely to increase the levels of investment in urban areas. This could have a positive impact on the objectives relating to improving accessibility for all to services and facilities; reducing poverty and social exclusion; and reducing disparities. It is however acknowledged that there is only limited certainty over this impact as the policy does not in itself seek to ensure that investment is well related to, and accessible from, areas of deprivation. The policy would also have a positive impact on the objective relating to the long term sustainability of Trafford's town centres although it is acknowledged that policy does not in itself seek to ensure that development supports the vitality of Trafford's town centres.

The policy will provide a high quality environment that can attract skilled workers to the Borough, assist in urban regeneration by enabling investment to be focused on key regeneration areas and provides protection to land that is not included in the Green Belt in Warburton (south of Partington) and to the south of Shell, Carrington, to ensure this land makes the maximum potential contribution to housing and economic development needs beyond the Plan period. The policy would however provide protection to land at Davenport Green that was previously allocated for employment uses in the Trafford UDP. The Trafford Employment Land Study (2009) has indicated that a sufficient supply of suitable and developable employment sites exist to meet the Borough's requirements without the need to retain the allocation of Davenport Green as an employment site and Trafford's PPS4 assessment concluded that the site was not suitable for office development in relation to the tests in PPS4. Nevertheless, the Commercial Review submitted on behalf of RLAM in November 2010 states that Davenport Green is the only site within Trafford that is capable of attracting large levels of investment from multi-national businesses and it is recognised that development at Davenport Green has the potential to support the proposals for Airport City and the Medi-Park. The policy does however now allow for development at Davenport Green where it is required for exceptionally high quality business/office employment related development. As a result, it is considered that policy would have some positive impact on the objectives relating to Trafford's economic performance and its image as a business destination.

It is anticipated that the policy would not have any negative effects on the sustainability objectives. Nevertheless, the policy would have an uncertain impact on a number of sustainability objectives. Although the appraisal has concluded that the policy has the potential to have a positive impact on objectives E1 and E3, it is considered to be uncertain whether concentrating development in the urban area, including areas designated as AQMAs, is a better approach for protecting air quality than spreading the pollution more thinly across the Borough. It is therefore concluded that the policy would have an uncertain impact on air quality. The impact of the policy on the objective of reducing the impact of climate change is also uncertain due to the levels of flood risk within the urban area as identified by the Level 2 SFRA.

Key for effects

++ major positive; + minor positive; 0 neutral; - minor negative; -- major negative; ? uncertain

Appendix D – Re-appraisal of the SA of Davenport Green

| Davenport Green | | Timescale | | | Nature of Effect | | | Mitigation |
|---|--|--|--------------|-----------|------------------|-----------------|------------|--|
| | | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | |
| SA Objective | | 0 | 0 | 0 | High | N/A | N/A | |
| Social | | | | | | | | |
| S1. Achieving a better balance and mix in the housing market | | <p><u>Comments:</u> The proposals for Davenport Green do not include a housing element and are therefore unlikely to have any significant effects on this objective. Adequate provision for housing has been made elsewhere in the borough by the Core Strategy.</p> | | | | | | |
| S2. Improve accessibility for all to services and facilities | | + | + | + | Low | More than local | Long term | Reduced social exclusion and improved quality of life. |
| | | <p><u>Comments:</u> The development proposals include the provision of a limited range of A1 – A5 uses and unspecified D1 uses (non-residential institutions). Given the limited scale of this provision, these services and facilities are likely to be ancillary to the development and would primarily serve the needs of the on-site workers. Whilst Davenport Green is well related to areas of deprivation outside of the plan area (Wythenshawe, Manchester), it is not well-related to many of Trafford's more deprived areas. Consequently, due to the likely ancillary nature of these facilities and the fact that Davenport Green is not well related to the most deprived areas of the Borough, it is considered that the provision of these on-site facilities is unlikely to have a significant impact on the sub-objective of improving access to services from the most deprived areas of the Borough.</p> <p>Nevertheless, as highlighted in the Davenport Green Highways Study (Appendix 6) and the Davenport Green Sustainable Transport Strategy (Appendix 7), the development proposals would result in significant improvements to the accessibility of the site through, for example, connecting the development to existing public transport interchanges and by providing new and improved pedestrian and cycle links. In addition, the Davenport Green Sustainable Transport Strategy (Appendix 7) states that the bus route from Altrincham to Davenport Green and the Airport could feasibly be routed close to Wythenshawe Hospital, which would provide Trafford residents with better access to this important facility.</p> <p>In conclusion, it is considered that although the limited range of on site facilities would be accessible due to proposed public transport measures, the likely ancillary nature of these facilities coupled with their distance from many of Trafford's more deprived areas means that the provision of these on-site facilities is unlikely to have a significant impact on the sub-objective of improving access to services from the most deprived areas of the Borough. Nevertheless, the public transport improvements have the potential to enhance access to Wythenshawe hospital for Trafford residents although the proposals only provide limited certainty that access to the hospital would be improved. It is therefore considered that the development proposals have the potential to have some positive impact on this objective but that the certainty of this impact is low.</p> <p>In light of the above, the appraisals of the Strategic Locations contained within the Core Strategy have been reviewed and the overall minor positive scores for these locations are considered to be consistent as they are accessible to areas of deprivation within Trafford and each of them include a broader range of community services and facilities. As a result, the proposals for these sites have a similar score to Davenport Green against this objective but with a higher degree of certainty.</p> | | | | | | |

Davenport Green

| | | Timescale | | | | Nature of Effect | | | |
|---|--|-------------|--------------|-----------|-----------|------------------|------------|---|------------|
| | | 0 - 5 years | 5 - 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic | Mitigation |
| SA Objective | Enhance transport infrastructure; improve accessibility and quality of life to all communities. | + | + | + | Medium | More than local | Long term | Secondary impacts on air quality and greenhouse gas emissions | |
| | <p>Comments: The site is not presently well served by public transport and is located in close proximity to the motorway network. Consequently, development in this location has the potential to result in unsustainable patterns of travel and augment congestion. Nevertheless, as noted in the Davenport Green Highways Study (Appendix 6) and the Davenport Green Sustainable Transport Strategy (Appendix 7), a range of measures are proposed to improve linkages to existing public transport interchanges. For instance, Appendix 7 notes that two new high frequency bus services would be introduced to link Davenport Green to the interchanges at Altrincham, which is a major transport hub for bus, rail and Metrolink services, and Manchester Airport, which offers direct rail connections to Manchester city centre, is well served by a wide range of existing bus services and will be served by Metrolink from 2016. The proposed route of the western loop to the Metrolink extension serving the Airport and South Manchester would also be safeguarded. However, it is noted that this route has no funding and is not contained with LTP3 which contains works up to 2026. It is therefore considered that the development proposals would support the sub-objective of providing efficient and inclusive public transport.</p> <p>Davenport Green is within 500m of the orbital cycle route around Manchester Airport and Appendix 7 demonstrates that there is an established network of Sustrans cycle routes surrounding the location. The development proposals would also provide new and improved pedestrian and cycle links. As a result, it is considered that the development proposals would have a positive impact on the sub-objective of improving participation in walking and cycling. Appendix 7 also states that a Travel Plan will be produced to raise awareness of public transport, walking and cycling and car share options. In conclusion, it is considered that the range of measures highlighted above will enhance the local transport infrastructure and improve accessibility. It is therefore considered that the proposed development would have a positive impact on this objective.</p> <p>The additional information taken into account on Davenport Green has resulted in the level of certainty increasing from low to medium. However, it is considered that the Strategic Locations with significant existing public transport facilities provide a higher level of certainty of achieving this objective than Davenport Green which is accessed so easily by car.</p> <p>In light of the above, the appraisals of the Strategic Locations contained within the Core Strategy have been reviewed and the overall scores found to be consistent. However, the level of certainty that the proposals for Pomona, Trafford Wharfedale and LCCC area would have a positive impact on this objective has been upgraded to high to reflect the fact that the developments will improve/augment existing transport facilities and have a higher level of certainty of achieving this objective. The level of certainty for Trafford Centre Rectangle and Davenport Green is considered to be medium as both sites offer the opportunity to improve linkages from existing public transport interchanges. Notwithstanding its distance from existing public transport infrastructure, the level of certainty for Carrington is also considered to be medium due the transport facilities that would be created as part of the development proposals and the opportunities presented by the development to create a relatively self-contained community.</p> | | | | | | | | |
| S4. Reduce crime, disorder and the fear of crime | | 0 | 0 | 0 | High | N/A | N/A | | |
| <p>Comments: Unlikely to have any significant effects. Policy L7 in the Core Strategy will ensure that all new development is designed in a way that reduces opportunities for crime.</p> | | | | | | | | | |

Davenport Green

| SA Objective | Timescale | | | Nature of Effect | | | Mitigation |
|--|-------------|--------------|-----------|------------------|--------------|------------|--|
| | 0 - 5 years | 5 - 10 years | 10+ years | Certainty | Scale | Permanence | |
| S5. Reduce poverty and social exclusion | + | + | ++ | High | Borough wide | Long term | Reduced social exclusion and improved quality of life. |
| <p>Comments: The proposals for Davenport Green would result in the creation of a significant number of jobs both during the construction and operation of the development, including an estimated 4470 jobs for people directly employed at this location. The site is not well-related to many of Trafford's more deprived areas where the need for jobs is greatest, particularly Clifford and Gorse Hill. Davenport Green is however well related to areas of deprivation outside of the plain area, such as Wythenshawe which is identified in the Manchester Core Strategy Publication document as an area characterised by high levels of deprivation and worklessness. It is however noted that Manchester Core Strategy Publication document proposes to provide 55ha of employment land in Wythenshawe within their own plan area in order to help address deprivation and economic inactivity.</p> <p>As highlighted in the Davenport Green Sustainable Transport Strategy (Appendix 7), a range of transport improvements are proposed to connect Davenport Green to the wider public transport network, which would improve the accessibility of the employment opportunities available in the area. The development proposals also seek to engage deprived communities and individuals in the benefits of the construction phase, the long term business activities and the rural park. In recognition of these benefits, it is concluded that the development proposals for Davenport Green are likely to have a positive impact on this objective in the short to medium term and a major positive impact in the long term.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and their scores against this objective have been found to be consistent. Trafford Centre Rectangle and Carrington were considered to offer similar opportunities to reduce poverty and social exclusion to Davenport Green. Pomona, Trafford Wharfedale and the LCCC area are all located immediately adjacent to areas of deprivation within Trafford and in close proximity to, and accessible from, areas of deprivation in Salford. As a result, the level of certainty that the proposals for the LCCC area would have a positive impact on this objective has been adjusted to reflect this.</p> | | | | | | | |

| | | | | | | | |
|---------------------------------|---|---|---|------|-----|-----|-----|
| S6. Encourage a sense of | 0 | 0 | 0 | High | N/A | N/A | N/A |
|---------------------------------|---|---|---|------|-----|-----|-----|

Davenport Green

| Davenport Green | | | | | | | |
|--|-------------|--------------|-----------|------------------|-----------------|------------|--|
| SA Objective | Timescale | | | Nature of Effect | | | |
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Mitigation |
| community identity and welfare and value diversity, improve equity and equality of opportunity | | | | | | | |
| <p>Comments: The sub objectives are primarily based on a residential community and are not considered to be as applicable to an employment-led development, such as Davenport Green. As a result, it is considered that the development proposals are unlikely to have any significant effects on this objective.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and their scores against this objective have been found to be consistent. The other Strategic Locations score positively where community facilities are offered to an existing or developing residential community. The level of certainty that the Trafford Centre Rectangle proposals would have a positive impact on this objective has however been adjusted to medium to ensure that the appraisals are consistent.</p> | | | | | | | |
| S7. Improve qualifications and skills of the resident population | + | + | + | Medium | Borough wide | Long term | Improved quality of life and reduced levels of deprivation and social exclusion. |
| <p>Comments: New jobs and training opportunities will be created during the construction and operation of the development. In addition, the development requirements set out in Proposed Policy SS1 make a specific reference to developing programmes to assist disadvantaged people to access the jobs created and to engaging deprived communities and individuals in the benefits of both the construction phase and the long term business activities. Furthermore, the rural park will also offer opportunities for education and skills development in relation to the management of the natural environment. In recognition of these benefits, it is concluded that the development proposals for Davenport Green are likely to have a positive impact on this objective. The reference to involvement of local people in construction of the development has resulted in the scoring being altered so that the development proposals are now considered to have a positive impact on this objective in the short term.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and their scores against this objective have been found to be consistent.</p> | | | | | | | |
| S8. Improve the health and, inequalities in health of the | + | + | + | Medium | More than local | Long term | Increased opportunities and quality of life |

Davenport Green

| | | Timescale | | | Nature of Effect | | | |
|---|---|---|--------------|-----------|------------------|-----------------|------------|---|
| | | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic |
| SA Objective | population | <p>Comments: The development proposals have the potential to result in improvements to health by providing access to a new and extensive rural park. The Trafford Green and Open Spaces Assessment of Need Update (2009) established that Hale Barns is an area deficient in accessible greenspace by 5.35 hectares. Therefore the provision of a rural park has the potential to have a positive impact on the sub-objective of increasing participation in, and access to, sport and physical activity facilities.</p> <p>In addition, the Davenport Green Sustainable Transport Strategy (Appendix 7) states that the bus route from Altrincham to Davenport Green and the Airport could feasibly be routed close to Wythenshawe Hospital, which would provide Trafford residents with better access to this important facility. In recognition of these benefits, it is concluded that the development proposals are likely to have a positive impact on this objective.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and their scores against this objective have been found to be consistent.</p> | | | | | | |
| | S9. Protect and improve local neighbourhood quality | 0 | 0 | 0 | High | Local | Long term | |
| | | <p>Comments: The objectives are primarily based on a residential community and are not considered to be as applicable to an employment-led development, such as Davenport Green. However, one of the sub-objectives relates to fly tipping and it is noted that the Green Belt and Landscape Implications Study (Appendix 12) states that there is evidence of cars being torched and fires being set in the woodland areas despite attempts to restrict vehicular access. It is considered that the proposed development offers the opportunity to tackle these issues to the benefit of the quality of the local environment. In conclusion, whilst the reduction in fly tipping would be helpful it is not likely to have a significant effect on the performance of the proposals against this objective.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and found to be consistent.</p> | | | | | | |
| Environment | | | | | | | | |
| E1. Reduce the effect of traffic on the environment | | + | + | + | Low | More than local | Long term | Secondary impacts on air quality and greenhouse gas emissions |

Davenport Green

| SA Objective | | Timescale | | | Nature of Effect | | | | |
|--|--|--|--------------|-----------|------------------|-------|------------|------------------------------------|---|
| | | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic | Mitigation |
| <p>E2. Protect, enhance and restore open space, biodiversity, flora and fauna, geological and geomorphological features</p> | | <p>Comments: Davenport Green is located in an area that is defined as being within the least accessible parts of the Borough by the Developer Contributions to Highway and Public Transport Schemes SPD. The site is presently not well served by public transport and is located in close proximity to the motorway network. Consequently, it is considered that development in this location has the potential to result in unsustainable patterns of travel and augment congestion. Davenport Green was not included on the GMTU transport model so specific data on the impact of the proposal on the highway network is not available. Nevertheless, RLAM's Appendix 13 acknowledges that the highway network is already suffering the effects of congestion.</p> <p>A range of measures would however be taken to improve the accessibility of the site by public transport, walking and cycling forms of transport. For instance, the Davenport Green Sustainable Transport Strategy (Appendix 7) states that linkages to existing public transport interchanges would be improved through the introduction of two new high frequency bus services to link Davenport Green to Altrincham, which is a major transport hub for bus, rail and Metrolink services, and Manchester Airport, which offers direct rail connections to Manchester city centre, is well served by a wide range of existing bus services and will be served by Metrolink from 2016. The development proposals would safeguard the proposed route of the western loop to the Metrolink extension serving the Airport. However, it is noted that this route has no funding and is not contained with LTP3 which contains works up to 2026. It is therefore considered that the development proposals would have a positive impact on the sub-objective of managing traffic flows and congestion.</p> <p>The Davenport Green Highways Study (Appendix 6) states that new road infrastructure to relieve congestion would also be provided in the form of capacity expansions at Junction 6 of the M56. Whilst this would not necessarily support the shift to more sustainable modes of transport, it may have a positive impact on the sub-objective of managing traffic flows and congestion. Davenport Green is within 500m of the orbital cycle route around Manchester Airport and Appendix 7 demonstrates that there is an established network of Sustrans cycle routes surrounding the location. The development proposals would also provide new and improved pedestrian and cycle links. As a result, it is considered that the development proposals have the potential to have a positive impact on the sub-objective of reducing motorised traffic.</p> <p>In conclusion, the measures that would be taken to improve the accessibility of the site by public transport and by non-motorised traffic should ensure that the proposals have some positive impact on the sustainability objective and its associated sub-objectives. Nevertheless, the peripheral location of the site, coupled with its proximity to the motorway network, reduces the level of certainty of this impact.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and their scores against this objective have been found to be consistent. The presence of existing traffic congestion, as highlighted in the GMTU transport model, results in a low level of certainty in the scores and access to existing public transport facilities results in higher levels of confidence in the scores.</p> | | | | | | | |
| | | + | + | ++ | Medium | Local | Long term | Improved image of Trafford | Amend development requirement (i) of Proposed Policy SS1 to include biodiversity. |

Davenport Green

| SA Objective | | Timescale | | | Nature of Effect | | | |
|--|--|-------------|--------------|-----------|------------------|----------|------------|------------------------------------|
| | | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic |
| <p>Comments:</p> <p>The development proposals would result in 40% of the 36.42ha site being used for built development. Accordingly, the proposals would lead to the loss of approximately 14.5ha of greenfield land. The Ecological Framework for Greater Manchester identifies Davenport Green as a Great Crested Newt Biodiversity Opportunity Area. It is also noted that the Greater Manchester Biodiversity Action Plan (2009) identifies great crested newts as a species of conservation importance in the city region that requires action in order to conserve and protect them. Nevertheless, it is noted that the Ecology Update (Appendix 14) produced on behalf of RLAM notes that some of the breeding habitat previously recorded for great crested newts at the Davenport Green site has now effectively been lost. It therefore concludes that the presence of Great Crested Newts may now no longer be a constraint to development. Appendix 14 does note that the establishment of rank grassland fields with scattered scrub and large patches of ruderal vegetation would improve the suitability of habitat in the northern part of the site for reptiles (if present in the locality) and the terrestrial phases of amphibians, such as Great Crested Newts. Nevertheless, it also implies that moving the animals from the development footprint prior to development could mitigate any adverse impact on this species. As a result, there is some uncertainty over the impact of the development proposals on Great Crested Newts and, by extension, the sub-objective of conserving and enhancing species diversity.</p> <p>The development proposals would result in the creation of a substantial area of woodland within the rural park. The proposals would thereby make a positive contribution to the sub-objective of ensuring residents have access to high quality open space. The Ecology Update (Appendix 14) produced on behalf of RLAM also states that the rural park that would be created would provide enhanced habitats for reptiles and an array of other fauna, including birds, badgers and bats, and would thereby ensure that significant ecological net gains would be realised as part of the overall scheme. The proposals offer the potential to enhance Sites of Biological Importance and the development proposals state that no development would take place within 30m of the northern edge of the Davenport Green Wood SBI.</p> <p>Furthermore, the Ecology Update (Appendix 14) and Green Belt and Landscape Implications study (Appendix 12) produced on behalf of RLAM both note that the key landscape features of the site, many of which contribute to its habitat value, would be retained. It is therefore considered that the proposed development would have a positive impact on the sub-objectives of conserving and enhancing the natural environment; conserving and enhancing habitat diversity; and conserving and enhancing species diversity. In conclusion, it is considered that development proposals are likely to protect biodiversity, flora and fauna and, over the long term, have the potential to have a positive impact on the recreational value of the site once the rural park has become established.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and revised. The impact of the proposals for Pomona on this objective in the short term has been changed to neutral to reflect the fact that the site has largely already been cleared and, as a result, any biodiversity value of the site is likely to have already been lost. It is considered that the proposals for Pomona do still however have the potential to have a positive impact on this objective in the long term. The level of certainty that the LCCC proposals would have a positive impact on this objective have been reduced to low because of the potential for the proposals to result in the cumulative erosion of the habitat. The proposals for Carrington would have a major positive impact on this objective as they would lead to the protection of the Mosslands which comprise of lowland raised bog, which is a UK BAP priority habitat that is also included in the list of protected habitats in Annex 1 of the European Habitats Directive. However, there is only a low level of certainty over the impact of the proposals for Carrington on this objective as the development proposals for the site acknowledge the need for further ecological surveys to be undertaken.</p> | | + | + | + | Low | National | Long term | |
| E3. Reduce contributions to | | + | + | + | Low | National | Long term | |

Davenport Green

| Davenport Green | | Timescale | | | Nature of Effect | | | |
|-----------------|----------------|---|--------------|-----------|------------------|--------|------------|------------------------------------|
| | | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic |
| SA Objective | climate change | <p>Comments: Davenport Green is located in an area that is defined as being within the least accessible parts of the Borough by the Developer Contributions to Highway and Public Transport Schemes SPD. The site is presently not well served by public transport and is located in close proximity to the motorway network. Consequently, it is considered that development in this location has the potential to result in unsustainable patterns of travel and augment congestion. Although Davenport Green was not included on the GMTU transport model, RLAM's Appendix 13 acknowledges that the highway network is already suffering the effects of congestion.</p> <p>A range of measures would however be taken to improve the accessibility of the site by public transport and non-motorised forms of transport. For instance, the Davenport Green Sustainable Transport Strategy (Appendix 7) states that linkages to existing public transport interchanges would be improved through the introduction of two new high frequency bus services to link Davenport Green to Altrincham, which is a major transport hub for bus, rail and Metrolink services, and Manchester Airport, which offers direct rail connections to Manchester city centre, is well served by a wide range of existing bus services and will be served by Metrolink from 2016. The development proposals would safeguard the proposed route of the western loop to the Metrolink extension serving the Airport. However, it is noted that this route has no funding and is not contained with LTP3 which contains works up to 2026.</p> <p>The woodland planting proposed as part of the rural park and the protection of existing areas of woodland could contribute to the sequestration of carbon. The development would also aim to be built to exemplary sustainability standards, with RLAM's Proposed Policy SS1 stating that the built development would achieve an Excellent BREEAM rating and would aim to achieve an Outstanding BREEAM rating where feasible. RLAM's Proposed Policy SS1 also states that a series of initiatives to address climate change would be introduced, such as a cordon charge for vehicles entering the site. In conclusion, the measures that would put in place to improve the accessibility of the site by public transport and non-motorised forms of transport, together with the standards of building and the sequestration value of the proposed woodland planting, ensure that the proposals would have a positive impact on the objective. Nevertheless, the peripheral location of the site, coupled with its proximity to the motorway network, reduces the level of certainty of this impact. The certainty of the impact is also reduced by the limited amount of information available on energy consumption during both the construction and operation of the development, something which applies to all of the Strategic Locations contained within the Core Strategy.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and their scores against this objective have been found to be consistent. In undertaking this it is recognised that all development will inevitably contribute to climate change and that Core Strategy policy L5 will require comparable standards of energy efficiency in buildings. Carrington would have a particularly positive impact on this objective because it would not only result in public transport enhancements, but would also lead to the protection and enhancement of the Mosslands as a carbon sink and the use of the Manchester Ship Canal for freight transportation purposes.</p> | | | | | | |
| | | E4. Reduce impact of climate change | + | + | + | Medium | Local | Long term |

Davenport Green

| Davenport Green | | | | | | | | |
|---|--|--------------|-----------|------------------|-----------------|------------|------------------------------------|--|
| SA Objective | Timescale | | | Nature of Effect | | | | |
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic | Mitigation |
| | <p>Comments: Davenport Green is within a Critical Drainage Area and the Level 2 SFRA demonstrates that parts of the site have some susceptibility to surface water flooding. Davenport Green is considered to be at a low risk of flooding as demonstrated by the Flood Risk and Drainage Study (Appendix 11) prepared on behalf of RLAM. Appendix 11 also demonstrates that Davenport Green is suitable for the use of SUDs. As a result, it is considered that development proposals would have a positive impact on the sub-objective of minimising the risk of flooding and increasing the use of SUDs. The development proposals would also help to mitigate the effects of climate change by providing additional habitat for species through the creation of a rural park. In addition, the commitment to achieve an Excellent BREEAM rating should ensure that the proposals have a positive impact on the sub-objective of minimising water consumption. In conclusion, the proposals would reduce the impact of climate change by ensuring that development is directed away from areas at risk of flooding and by leading to the creation of additional habitat for species.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and their scores against this objective have been found to be consistent. In undertaking this it is recognised that policy L5 will require comparable water efficiency standards to be incorporated in buildings.</p> | | | | | | | |
| E5. Reduce the environmental impacts of consumption and production | ? | ? | ? | Low | More than local | Long term | | |
| | <p>Comments: Development on the site will inevitably result in impacts upon consumption and production as a result of construction and operation. Issues relating to the capacity of waste management facilities, the likely quantities of waste generated during construction and operation and the amount of waste treatment needed are considered in the Greater Manchester Waste DPD. Appendix 8 of RLAM submission 2010 estimates the amount of waste that will be generated by the development. In conclusion, notwithstanding the evidence provided for this site, the performance of the proposals against the objective is uncertain because detailed quantities are not known.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and revised to make them consistent with the approach taken to Davenport Green. It is noted that the Trafford Infrastructure Capacity Study (2009) identifies the necessary infrastructure requirements for each Strategic Location and a contribution towards the provision of additional utility capacity is a requirement of the development proposals. Notwithstanding the evidence provided for the Strategic Locations, the performance of each of the proposals for the Strategic Locations against this objective have been changed to uncertain because detailed quantities are not known.</p> | | | | | | | |
| E6. Conserve land resources and reduce land contamination | - | - | - | High | Local | Long term | | To minimise the need to release additional greenfield sites development should be built to an appropriate density whilst still providing for appropriate high quality environment. |

Davenport Green

| SA Objective | | Timescale | | | Nature of Effect | | | | |
|--|--|---|--------------|-----------|------------------|-----------------|------------|------------------------------------|------------|
| | | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic | Mitigation |
| | | <p>Comments: The development site comprises entirely of greenfield land. The proposals would result in 40% of this 36.42ha site being used for built development. Accordingly, the proposals would lead to the loss of 14.5ha of greenfield land. RLAM's Appendices 13 and 15 note that the site has a low risk of being contaminated. As a result, the development proposals are unlikely to offer the opportunity to reduce land contamination in the Borough and are therefore unlikely to have any significant impact on the sub-objective of reducing the amount of contaminated, derelict and underused land. In conclusion, as a result of the loss of a significant area of greenfield land, the development proposals are considered to have some negative impact on this objective. However, 21ha of the site would be retained as open land and a further 99ha would be managed as a rural park, the level of significance of this negative impact on the objective has been reduced.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and their scores against this objective have been found to be consistent. The high scoring sites share the characteristics of being previously developed, contaminated land that are proposed for housing and will thereby have a positive impact on the sub-objectives of reducing the amount of contaminated, derelict and underused land and increase the percentage of homes built on previously developed land. LCCC area has a lower score because the explicit references to addressing potential contamination have not been made in Policy SL3. Trafford Centre Rectangle comprises principally of previously developed land and the proposals would help reduce the amount of contaminated, derelict and underused land in the Borough. Nevertheless, part of the location comprises of a greenfield site and it is therefore considered that the impact of the proposals for this location on the objective is uncertain.</p> | | | | | | | |
| E7. Protect and improve water quality | | + | + | + | Medium | Local | Long term | Secondary impacts on biodiversity | |
| | | <p>Comments: RLAM's Flood Risk and Drainage Study (Appendix 11) and their Appendix 13 notes that the site is suitable for the use of SUDs. It also states that the application of these sustainable drainage techniques could protect and potentially uplift the water quality of existing watercourses, including the Timperley and Fairwell Brooks, by providing high levels of attenuation and infiltration of storm water. In conclusion, the development proposals are considered to have a positive impact on this objective and its sub-objectives.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and their scores against this objective have been found to be consistent. The proposals for LCCC are considered to be neutral due to the locations distance from watercourses. The proposals for Trafford Centre Rectangle on this objective were considered to be uncertain because the proposals would result in a significant amount of development being directed to a canal-side area which has the potential to adversely affect water quality unless adequate mitigation measures are adopted.</p> | | | | | | | |
| E8. Protect and improve air quality | | 0 | 0 | 0 | Low | More than local | Long term | | |

Davenport Green

| SA Objective | Timescale | | | Nature of Effect | | | | |
|------------------------------------|--|--------------|-----------|------------------|-------|------------|------------------------------------|------------|
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic | Mitigation |
| | <p>Comments:</p> <p>Davenport Green is located in an area that is defined as being within the least accessible parts of the Borough by the Developer Contributors to Highway and Public Transport Schemes SPD. The site is presently not well served by public transport and is located in close proximity to the motorway network. In addition, as noted in the Davenport Green Air Quality study (Appendix 10) prepared on behalf of RLAM, part of the site is also within an Air Quality Management Area for Nitrogen Dioxide associated with the M56 motorway. Consequently, it is considered that development in this location has the potential to result in unsustainable patterns of travel and that have a detrimental impact on the air quality in the local area and on an Air Quality Management Area. This is particularly significant given that the Greater Manchester Air Quality Action Plan Progress Report has highlighted that road transport remains the largest source of emissions of Nitrogen Oxides in the sub-region.</p> <p>Nevertheless, a range of measures would be implemented to improve the accessibility of the site by public transport and non-motorised forms of transport. For instance, the Davenport Green Sustainable Transport Strategy (Appendix 7) states that linkages to existing public transport interchanges would be improved through the introduction of two new high frequency bus services to link Davenport Green to Altrincham, which is a major transport hub for bus, rail and Metrolink services, and Manchester Airport, which offers direct rail connections to Manchester city centre, is well served by a wide range of existing bus services and will be served by Metrolink from 2016. The development proposals would safeguard the proposed route of the western loop to the Metrolink extension serving the Airport and would link the site with the orbital cycle route around Manchester Airport and other established cycle routes surrounding the location. However, it is noted that the western loop of the Metrolink extension is not contained with LTP3 which contains works up to 2026.</p> <p>Furthermore, the proposed woodland planting could potentially have a positive impact on air quality in the local area. It is also noted that the Davenport Green Air Quality Study (Appendix 10) prepared on behalf of RLAM states that the relative change in pollutant concentrations as a result of the proposed development is expected to be negligible for both PM10 and Nitrogen Dioxide and, as a result, the impact of the development upon air quality is considered to be negligible. In conclusion, the measures that would be taken to improve the accessibility of the site by public transport and by non-motorised traffic should ensure that the proposals have some positive impact on the sustainability objective. Nevertheless, the peripheral location of the site, coupled with its proximity to an established AQMA, reduces the level of certainty of this impact.</p> <p>The additional information provided on Davenport Green has provided more detail on the implication of major built development for air quality. It is considered that these effects are equally applicable to the other Strategic Locations. In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and revised. In undertaking this it is recognised that all of the locations are close to or within an AQMA, the proposals for each of the locations include measures to reduce car use and that the relevant motorway accesses for the locations already suffer from congestion. The performance of the proposals for Pomona, Trafford Wharfedale and Trafford Centre Rectangle have been changed to neutral as the public transport improvements are likely to mean that air quality is protected. In the case of LCCC area the uncertain score reflects the existing congestion in the area and the development of major trip generating uses in the area. In the case of Carrington, the uncertain score reflects the fact that the site is located in an area that is defined as being within the least accessible parts of the Borough by the Developer Contributors to Highway and Public Transport Schemes SPD, is not particularly well-related to an established public transport interchange and public transport infrastructure will need to be provided in the area to improve its accessibility.</p> | | | | | | | |
| E9. Protect and enhance the | + | + | + | Medium | Local | Long term | Improved perceptions of the area | |

Davenport Green

| SA Objective | Timescale | | | Nature of Effect | | | | |
|---|-------------|--------------|-----------|------------------|-------|------------|------------------------------------|------------|
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic | Mitigation |
| <p>diversity and distinctiveness of landscape and townscape character and cultural facilities</p> <p>Comments: The development proposals would result in 40% of the 36.42ha site being used for built development. Accordingly, the proposals would lead to the loss of approximately 14.5ha of greenfield land. The development proposals have the potential to result in some loss of open fields and strip fields, which are identified as being perhaps the most historically significant landscapes in the Borough by the Trafford Urban Historic Landscape Characterisation Report (2008). This would have a negative impact on the sub-objective of protecting and enhancing landscape character.</p> <p>However, it is noted that the Ecology Update (Appendix 14) and Green Belt and Landscape Implications study (Appendix 12) produced on behalf of RLAM both state that the key landscape features of the site, including substantial hedgerows and three woodland blocks, would be retained as part of the development proposals. The proposals also involve the creation of a rural park which will provide opportunities to enhance the landscape. In addition, RLAM's Green Belt and Landscape Implications study (Appendix 12) notes that building heights will be restricted and that the built development would not be located where the adjacent communities are most vulnerable to coalescence. Proposed Policy SS1 also makes a specific reference to protecting, and where possible enhancing, the setting of nearby listed buildings on Shay Lane and Roaring Gate Lane. In addition, the representations submitted by RLAM in March 2010 note that the site of a medieval moated farmhouse exists within the land that would be a rural park and that the design and management of the rural park could aid in its interpretation. It is therefore considered that the proposals could have some positive impact on the sub-objective of protecting and enhancing sites of archaeological importance.</p> <p>In conclusion, whilst the development does present some threats to a historically significant landscape, it is considered that the potential positive impact of the rural park on landscape character together with the protection afforded to key landscape features and the setting of nearby listed buildings has the potential to outweigh this impact. It is therefore concluded that the proposals would have a positive impact on this objective and its sub-objectives of restoring, protecting and enhancing landscape character and protecting and enhancing listed buildings.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and their scores against this objective have been found to be consistent. As regeneration proposals all of the Strategic Locations are expected to have some positive impact on townscape character. In the case of Trafford Centre Rectangle the higher scores reflect the potential for the development proposals to enhance the setting of the Barton-upon-Irwell Conservation Area, deliver improvements to the Barton Bridge Swing Aqueduct (Grade II* listed) and protect and enhance the setting of Pugin's Grade I listed church of All Saints and the Grade II Presbytery. In the case of Carrington, the major positive impact reflects the potential for the proposals to lead to the redevelopment of an under-utilised brownfield site, the protection to the setting of the listed Church of St George and the proposed production of an Area Action Plan to guide the development of Carrington and ensure that the proposed growth is delivered in a well-planned, coordinated manner.</p> | | | | | | | | |

Economic

| | | | | | | | |
|------------------------------|---|----|----|--------|---------|-----------|--------------------------------------|
| EC1. Enhance Trafford's high | + | ++ | ++ | Medium | GM wide | Long term | Contributing to overall pool of jobs |
|------------------------------|---|----|----|--------|---------|-----------|--------------------------------------|

Davenport Green

| | | Timescale | | | | Nature of Effect | | | |
|--|--|-------------|--------------|-----------|-----------|------------------|------------|------------------------------------|------------|
| | | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic | Mitigation |
| SA Objective | | | | | | | | | |
| performance and sustainable economy to provide a powerful contribution to regional growth | <p>Comments:</p> <p>The proposals would make a considerable contribution to the stock of office accommodation in Trafford and result in the creation of a significant number of jobs. The Davenport Green Commercial Review submitted on behalf of RLAM in November 2010 considers that Davenport Green is the only site within Trafford that is capable of attracting large levels of investment from multi-national businesses and considers that many companies seeking new office buildings will not consider the Strategic Locations contained within the Core Strategy as being appropriate for their business. The MIER review highlighted the attractiveness of south Manchester as one of the drivers of the sub region's economy with its accessibility from a highly skilled labour pool in Cheshire. In addition, the Trafford Employment Land Study (2009) noted that there is a general view amongst stakeholders that Davenport Green is attractive to the market for employment development. Given its location, the development proposals also have the potential to support the need for jobs in Wythenshawe, the growth of the airport, which is identified as a Strategic Site in the Manchester Publication Core Strategy and the objectives of the Manchester Airport Masterplan. Furthermore, development at Davenport Green has the potential to support the proposals for Airport City and the Medi-Park.</p> <p>It is noted, however, that the Trafford Employment Land Study (2009) indicated that a sufficient supply of suitable and developable employment sites exist to meet the Borough's contribution to the requirements suggested in the Greater Manchester Employment Land Position Statement of August 2009 without the need for the site at Davenport Green. In addition, Trafford's PPS4 assessment in the Borough (2010) concluded that the site was not suitable for office development in relation to the tests in PPS4. It should also be recognised that areas such as Salford Quays have demonstrated that former industrial areas that have been perceived to be undesirable to the market can be successfully transformed to areas attractive to office development and that the Davenport Green Commercial Review (Appendix 15) prepared on behalf of RLAM has demonstrated that the absence of this site has not prevented office development in South Manchester in recent years. Moreover, the Assessment of the Potential Opportunities and Impacts Relating to the Manchester Airport City Enterprise Zone and Davenport Green (June 2011) concluded that the trend in office market demand over the last 15 years has shifted focus toward city centres and larger town centres and that the proposals for Davenport Green could be developed in various locations within Trafford and Manchester. The Manchester Core Strategy is also proposing 55ha of employment land at Wythenshawe.</p> <p>In conclusion, although the Trafford Employment Land Study (2009) indicated that a sufficient supply of suitable and developable employment sites exist to meet the Borough's requirements, the development proposals for Davenport Green offer the potential to create an attractive employment development that makes a positive contribution to Trafford's high economic performance. The proximity of Davenport Green to Manchester Airport, which is a key driver of growth for the city region, means that it is anticipated that the development proposals have the potential to have a major positive impact on this objective in the medium and long term.</p> <p>In light of the above, the appraisal of other Strategic Locations has been reviewed and revised. For consistency, the level of certainty of Trafford Rectangle has been reduced to medium and the impact of Carrington on this objective in short term has been reduced to minor positive. The major impact at Carrington and Trafford rectangle reflect the potential for these sites to build on the established strengths of Trafford Park.</p> | | | | | | | | |

Davenport Green

| | | Timescale | | | Nature of Effect | | | | | |
|---|--|-------------|--------------|-----------|------------------|--------------|------------|--|---|--|
| | | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic | Mitigation | |
| SA Objective | | + | + | ++ | Medium | Borough wide | Long term | Increased opportunities and quality of life. | Use of s106 agreements to secure the proposed training opportunities in the construction trades during the development period and for other permanent opportunities created by the development. | |
| <p>Comments:</p> <p>The proposals for Davenport Green would result in the creation of a significant number of jobs both during the construction and operation of the development, including an estimated 4470 jobs for people directly employed at this location. The site is not well-related to many of Trafford's more deprived areas where the need for jobs is greatest, particularly Clifford and Gorse Hill. Davenport Green is however well related to areas of deprivation outside of the plan area, such as Wythenshawe which is identified in the Manchester Core Strategy Publication document as an area characterised by high levels of deprivation and worklessness. Although it is noted that the Manchester Core Strategy Publication proposes to identify 55ha of employment land within their own plan area to meet the needs of Wythenshawe. Furthermore, as highlighted in the Davenport Green Sustainable Transport Strategy (Appendix 7), a range of transport improvements are proposed to connect Davenport Green to the wider public transport network. The development proposals also seek to engage deprived communities and individuals in the benefits of the construction phase, the long term business activities and the rural park. It is therefore considered that the development proposals could have a significant positive impact on the sub-objective of targeting interventions to tackle barriers to work, address basic skills issues and link workless people to vacancies. In recognition of these benefits, it is concluded that the development proposals for Davenport Green are likely to have a positive impact on this objective.</p> <p>In light of the above, the appraisal of other Strategic Locations has been reviewed and revised. The impact of Carrington on this objective in the medium term has been reduced to a minor positive to reflect the timeframe for the implementation of the proposals and the need to remediate / provide infrastructure. Trafford Wharfside gets a major positive in the medium term due to its proximity to areas of deprivation and the education facilities that would be provided.</p> | | | | | | | | | | |
| EC3. Enhance Trafford's image as a business and tourism destination | | + | ++ | ++ | Medium | Borough wide | Long term | Improved perceptions of Trafford | Other policies in the Core Strategy will ensure that high standards of design are achieved in new development. | |

Davenport Green

| SA Objective | Timescale | | | Nature of Effect | | | Mitigation |
|--|---|--------------|-----------|------------------|-----------------|-----------|------------|
| | 0 – 5 years | 5 – 10 years | 10+ years | Permanence | Scale | Certainty | |
| <p>EC4. Encourage the long term sustainability of Trafford's Town</p> | <p><u>Comments:</u> The Davenport Green Commercial Review (Appendix 15) prepared on behalf of RLAM states that Davenport Green has the potential to become one of the UK's premier office-led business parks. It is also recognised that development at Davenport Green has the potential to support the proposals for Airport City and the Medi-Park and provide agglomeration benefits. The development proposals undoubtedly have the potential to provide a high quality employment development which would be visible from the motorway and could thereby boost the image of Trafford as a business destination. It is however recognised that the Assessment of the Potential Opportunities and Impacts Relating to the Manchester Airport City Enterprise Zone and Davenport Green (June 2011) concluded that the trend in office market demand over the last 15 years has shifted focus toward city centres and larger town centres and that the proposals for Davenport Green could be developed in various locations within Trafford and Manchester.</p> <p>The development proposals would also result in the provision of a rural park that will form a new visitor destination for informal recreation, education and nature conservation. The rural park could therefore provide a new local tourist attraction. In recognition of these benefits, it is concluded that the development proposals are likely to have a positive impact on this objective.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and revised. The performance of Carrington against the objective in the short term has been reduced to a minor positive to reflect the timeframe for the implementation of the proposals and the need to remediate the site / provide appropriate infrastructure. Whilst Carrington does not presently have the same degree of visibility as the other Strategic Locations, the development proposals will address this by resulting in more activity in the area. There is a high level of certainty that the proposals for LCCC area and Trafford Centre Rectangle would have a positive impact on this objective due to the fact that there are major tourist attractions within/immediately adjacent to these locations.</p> | | | | | | |
| | ? | ? | ? | Low | More than Local | Long term | |

Davenport Green

| | | Timescale | | | Nature of Effect | | | |
|--------------|--|--|--------------|-----------|------------------|--------------|------------|------------------------------------|
| | | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic |
| SA Objective | Centres | <p>Comments: The development proposals would result in a significant amount of B1 office development taking place in an out of centre location. Nevertheless, a need for office development in the Borough was identified by the Trafford Employment Land Study (2009) and the Trafford Other Town Centre Uses Study (2010) established that there are likely to be insufficient suitable and available sites in Trafford's town centres for office development. It is however noted that Trafford's PPS4 assessment of office floorspace in the Borough concluded that Davenport Green was not suitable for office development in relation to the tests in PPS4.</p> <p>The other town centre uses that would be provided at Davenport Green would be ancillary to the development and, as noted in RLAM's Appendix 13, would not be in direct competition with Trafford's town centres. Furthermore, Core Strategy policy W2 should ensure that the proposal would do not have a detrimental impact on Trafford's town centres.</p> <p>In conclusion, whilst there is likely to be insufficient suitable and available sites in Trafford's town centres to meet the Borough's needs for office development which this site has the potential to provide, Trafford's PPS4 assessment of office floorspace in the Borough concluded that Davenport Green was not suitable for office development in relation to the tests in PPS4 and therefore its potential impact on town centres was not assessed. The lack of definitive information on this means that the impact of the proposals against the objective is uncertain.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and their scores against this objective have been found to be consistent. However, the level of certainty that the proposals for Trafford Centre Rectangle would have a neutral impact on the objective have been reduced to medium for consistency. The level of certainty that the proposals for Carrington would have a neutral impact on the objective remains high due to distance of the Strategic Location from Trafford's Town centres and the level of certainty for the LCCC proposals remains low due to them involving the provision of a superstore in an out of centre location.</p> | | | | | | |
| | EC5. Improve the social and environmental performance of the economy | + | + | + | Medium | Borough wide | Long term | |
| | | <p>Comments: The development proposals would result in the provision of a rural park and measures would be implemented to ensure the built development achieves a high standard of sustainability and that the employment opportunities available are accessible by public transport and from areas of deprivation. It is therefore considered that the proposals for Davenport Green have the potential to have a positive impact on the social and environmental performance of the economy and it is concluded that they would have a positive impact on this objective.</p> <p>In light of the above, the appraisals of the other Strategic Locations contained within the Core Strategy have been reviewed and revised. The performance of the development proposals for Trafford Centre Rectangle against this objective have been changed to minor positive to reflect the fact that they will result in the provision of employment opportunities in an accessible location that is well-related to areas of deprivation and will also enhance access to Trafford Park.</p> | | | | | | |

Sustainability Summary

The proposals for Davenport Green would have a positive impact on a number of sustainability objectives. In particular, by resulting in the provision of a high quality business park in an area that is attractive to market, visible from the motorway closely related to Airport City and the Medi-Park, it is considered that the development proposals have the potential to have a major positive impact on the objectives relating to enhancing Trafford's high economic performance; and enhancing Trafford's image as a tourism destination. Although Davenport Green is not well-related to many of Trafford's more deprived areas where the need for jobs is greatest, it is well-related to areas of deprivation outside of the plan area, such as Wythenshawe. Measures would also be taken to improve the accessibility of the site from areas of deprivation and the proposals also seek to engage deprived communities and individuals in the benefits of the construction phase, the long term business activities and the rural park. It is therefore considered that in the long term the development proposals also have the potential to have a major positive impact on the objectives relating to reducing poverty and social exclusion; and reducing disparities. By protecting existing biodiversity on site and improving the ecological and recreational value of Davenport Green through the creation of a rural park, it is considered that the proposals also have the potential to have a major positive impact on the objective relating to open space, biodiversity, flora and fauna.

Davenport Green is located in an area that is defined as being within the least accessible parts of the Borough by the Developer Contributions to Highway and Public Transport Schemes SPD. The site is presently not well served by public transport and is located in close proximity to the motorway network. Nevertheless, a range of measures would be implemented to improve the accessibility of the site by public transport and non-motorised forms of transport. The proposed transport infrastructure would also have a positive impact on the objective relating to enhancing transport infrastructure and improving accessibility. In addition, it is considered that the proposed measures have the potential to have some positive impact on the objectives relating to reducing the effect of traffic on the environment and reducing contributions to climate change, and should ensure that the development proposals have no significant impact on the objective of protecting and improving air quality. Nevertheless, the peripheral location of the site, coupled with its proximity to the motorway network, reduces the level of certainty of this impact on these objectives.

Davenport Green is at a low risk of flooding and is considered to be suitable for a full range of sustainable drainage techniques. As a result, it is considered that the development proposals would also have some positive impact on the objectives relating to reducing the impact of climate change; and protecting and improving water quality. The provision of a rural park, together with the protection of the setting of nearby listed buildings and the retention of key landscape features, should ensure that the proposals have a positive impact on the objective of protecting and enhancing landscapes and townscape character. In addition, the provision of the rural park should have some positive impact on the objective relating to improving health and its sub-objective of increasing participation in, and access to, sport and physical activity facilities. The proposals would also have some positive impact on the objectives relating to improving qualifications and skills; and local neighbourhood quality.

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

Key for effects

++ major positive; + minor positive; 0 neutral; -- minor negative; -- major negative; ? uncertain

Appendix E – Re-appraisal of the SA of Policy W1

| W1: Economy | | | | | | | | | | |
|---|-------------|--------------|-----------|------------------|---------|-------------|------------------------------------|------------|--|--|
| SA Objective | Timescale | | | Nature of Effect | | | | Mitigation | | |
| | 0 – 5 years | 5 – 10 years | 10+ years | Certainty | Scale | Permanence | Secondary, cumulative, synergistic | | | |
| Social | | | | | | | | | | |
| S1. Achieving a better balance and mix in the housing market | 0 | 0 | 0 | High | N/A | N/A | | | | |
| <u>Comments:</u> Unlikely to have any significant effects. | | | | | | | | | | |
| S2. Improve accessibility for all to services and facilities | 0 | 0 | 0 | High | N/A | N/A | | | | |
| <u>Comments:</u> Unlikely to have any significant effects. | | | | | | | | | | |
| S3. Enhance transport infrastructure; improve accessibility and quality of life to all communities. | + | + | + | High | GM wide | Long term | Reduced congestion | | | |
| <u>Comments:</u> The policy requires improvements to be made to public transport infrastructure in Trafford Park in order to provide an integrated, frequent public transit system linking the location with surrounding residential and commercial areas. The policy also seeks to direct employment development to a number of accessible locations within the Borough, such as Pomona and Trafford's town centres, and states that employment uses will only be permitted on sites outside of the locations identified by Policy W1 and the Land Allocations DPD where the development would, inter alia, be accessible by a range of alternative modes other than the private car. | | | | | | | | | | |
| S4. Reduce crime, disorder and the fear of crime | 0 | 0 | 0 | Medium | N/A | N/A | | | | |
| <u>Comments:</u> Unlikely to have any significant effects. | | | | | | | | | | |
| S5. Reduce poverty and social | + | + | ++ | Medium | GM wide | Medium term | Improved quality of life | | | |

Appendix C

Critique of CD 12.86, Assessment of Potential Opportunities and Impacts Relating to Manchester Airport City Enterprise Zone and Davenport Green, June 2011, DTZ

This Report was the additional work that the Council commissioned in response to the publication of the Government's Plan for Growth (CD 12.92, March 2011), which included a proposed Enterprise Zone at Manchester Airport. The Council also wanted to take account of the proposal for a Medi-Park associated with the University Hospital of South Manchester. The brief for DTZ was to consider the opportunities and impacts for Trafford, especially in relation to the future development of Davenport Green. The Council has relied on the Report in reaching its conclusions in CD 12.95.

In the interests of brevity we have not commented on the whole of the Report, but have focused on central argument that led to the recommendations relating to Davenport Green; we have not for example dwelt on the nature of Enterprise Zones and only briefly on the nature of the Airport City EZ proposals.

The Nature of RLAM's Proposals

At para 3.18 DTZ suggest that the proposals for Davenport Green are less distinctive, the employment being only one of a mix of uses, with a risk (a wild speculation on the part of DTZ, since the planning issues would be very different) that RLAM would later seek consent for residential development and retail food superstores. This ignores the fact that RLAM described their proposal as an exemplar development of business space with supporting services (Policy SS1). This misunderstanding of RLAM's proposals leads DTZ to consider that the proposals would pose a threat to the regeneration of Altrincham (paras 6.15 and 6.16). The Council recognise that the proposals are a genuine mixed use scheme focused on employment with limited supporting uses, which would primarily serve the needs of on-site workers (CD 12.95, App. D, S2, Comments, first two sentences). It follows that they would be unlikely to have a negative effect on Altrincham town centre.

The Unique Qualities of the Site

In para 6.12, when reviewing the potential of the site, DTZ still start from the premise that RLAM's proposals are "for more general employment, leisure and retail uses". They do however describe the assets of the site in forthright terms: "location within South Manchester market, proximity to the Airport, greenfield site within high quality landscape setting and in single ownership". In reviewing alternative uses for the site (para 6.13) they enlarge on its strengths as a quality office location: "there is no doubt that one of the options for the site should be employment but given its unique assets the focus should be on higher end occupiers who require quality environments rather than general office occupiers....."

This description provides a very neat summary of why Davenport Green offers **unique** assets:

- Location in favoured S Manchester market, which is very important given the emphasis in the Draft National Planning Policy Framework on facilitating a rapid response to changes in economic circumstances (para 73).
- Proximity to the Airport
- Greenfield site, which is counted by DTZ as a major positive feature (not a negative effect as counted by the Council in CD 12.95, App.D, SA Objective E6)

- In single ownership, which is a major advantage for the delivery of development on the site.

None of these qualities applies to the Strategic Locations identified in the Draft Core Strategy, either singly (except perhaps Pomona which is mainly in one ownership) or certainly not in combination. It is clear from DTZ's analysis that Davenport Green offers a quality of site that is not matched elsewhere in Trafford (and no evidence has been offered of comparable alternatives elsewhere in Greater Manchester).

Furthermore this quality of offer matches very well the "significant gap in the Manchester business offer identified in the independent Large Employment Sites study led by the Business Leadership Council" (undated letter from Sir Howard Bernstein, Chief Executive, Manchester City Council, inviting landowners to respond to KPMG Consultation Document, Greater Manchester's Enterprise Zone, Airport City Enterprise Area, 12th August 2011). This letter set out the potential for Airport City to fill the identified gap. However Trafford Council, in not putting Davenport Green forward for inclusion in the Enterprise Zone, have recognised that Davenport Green has unique qualities that should not be put at risk through the simplified planning regime that is an essential feature of Enterprise Zones. There is therefore a distinctive and complementary role for Davenport Green in providing choice for potential occupiers. Single ownership of the site provides the opportunity for RLAM to work with the Council in ensuring that the site delivers an appropriately high quality development.

Occupier Decision-Making

At para 5.27 DTZ recognise that the "Majority of occupier decisions are opportunity driven – the right space available at the right time at the right price" and that "Davenport Green is an opportunity in an accessible attractive location". They then record that the previous planning consent had frustrated development of the site (para 5.28), a point that has been made forcibly by Knight Frank in their evidence on behalf of RLAM (see Appendix 15 of RLAM's Representation on Publication Draft Core Strategy, November 2010).

Further Frustration of Development

DTZ then make two recommendations that will perpetuate the frustration of development on a unique site that can deliver real additional employment and investment for the sub-region:

- The site should be kept for a "special inward investor" (para 6.14), a proviso that can only be delivered by very constraining conditions, which would match or exceed those of the UDP/planning consent.
- Release of the site should wait until a critical momentum has been achieved around the Airport and potentially the Medi-Park (para 6.14). RLAM see no foundation for this uncertain waiting period, given that, as DTZ record (in paras 5.2 seq) a development momentum has been established in South Manchester since the 1970's and given the positive outcomes for Davenport Green in the Council's latest SA documents.

Net Additionality

A consistent theme of economic development, which is reflected in the Government's approach to Enterprise Zones, is the desirability of avoiding displacement of firms and economic activity from one part of the local economy (say the sub-region) to another. Such moves may have benefits in terms of increased operating efficiencies and higher competitiveness, but the greater goal, especially if Government support is being provided, is seen as being the generation of net additional activity in the sub-regional economy; this might involve attraction of an inward investor or it could mean the retention of a firm that might otherwise move outside the sub-region. RLAM see the force of this case and recognise the opportunity for Davenport Green to contribute, bearing in mind its unique and distinctive characteristics and offer in the market place.

The Way Forward

RLAM conclude from this appraisal of the additional work commissioned from DTZ that:

1. The site should be released for employment development subject to the safeguards proposed in SL6
2. The site could, and should, with benefit be released for employment in the Draft Core Strategy. Its unique qualities exist now, the need for economic restructuring is now and urgent (Draft NPPF, para 71), the regional centre is well established as a major office location and not under threat. There is cross-boundary policy recognition of the benefits to be gained from development in South Manchester (as recorded in the latest SA's).

Appendix D

Critique of Council's PPS4 Sequential Test of Davenport Green (CD 8.3.6)

1. The Council, in reaching its conclusion that it will not support RLAM's proposals for Davenport Green (CD 12.95, para 2.1, last two sentences), relies on the "additional work" (CD12.86, Assessment of the Potential Opportunities and Impacts Relating to the Manchester Airport City Enterprise Zone and Davenport Green, June 2011, DTZ, which we address in Appendix C) and on the PPS4 Assessment for B1 Office Floorspace in Trafford, September 2010 (CD 8.3.6). It is appropriate, in the light of the new evidence that the Council has produced in the Sustainability Appraisals of Policy R4 and of Davenport Green (Appendices C and D of CD 12.95, which we have reviewed in our present Appendices A and B), to review the findings of that sequential test.
2. The timing of the PPS4 Assessment, September 2010, the same date as the Publication Draft of the Core Strategy, indicates that there was little or no scope for the outcome of the assessment to influence the content or direction of the Core Strategy. Indeed the Council confirms in para 1.1 that the Assessment "supports the spatial strategy set out in the Trafford Core Strategy – Publication version, in particular the proposals in the 5 Strategic Locations and Policy W1 and the distribution of land for employment in Table W1." The Council had at that stage already decided not to provide for employment development at Davenport Green.
3. An important finding in the assessment of quantitative need is: "A significant increase in B1 office demand is predicted for Trafford due to its strong predicted growth in financial / business services and knowledge intensive sector jobs." The importance of this lies in the emphasis that the Draft National Planning Policy Framework, July 2011, gives to supporting clusters or networks of knowledge driven, creative or high technology industries (para 73), to which the Inspector has drawn attention in her Note 7 (CD 12.97) and which we address in Appendix F.
4. The sequential test for office development is applied to the residual need for land outside town centres in Section 6 of CD 8.3.6. The Council acknowledge, referring to Trafford Other Town Centre Uses Study, CD 8.1.3, that there is a low number of suitable and available sites in town centre locations (para 6.1 of CD 8.3.6). They then make an unjustified (in PPS4) and prejudged statement that "it may be necessary to consider further sites situated in regeneration areas of the Borough (in accordance with PPS4)". PPS4 does not make any general assumption that development outside town centres should be "in regeneration areas"; it does, amongst "other considerations" include "regeneration benefits of developing on previously developed sites" (para EC 5.1 d) and para EC 5.3 sets out that, other factors being equal, sites that best serve the needs of deprived areas should be given preference. Neither of these amount to an assumption that only sites in regeneration areas should be considered, which is the Council's stated position.
5. The Council acknowledge (para 6.4, in line with PPS4 para EC 5.2 c) that preference should be given to sites which are **or will be** well served by a choice of means of transport (our emphasis). They also acknowledge that none of the sites assessed are close to an existing centre nor is there any likelihood that they can form meaningful links with any centre in line with PPS4 EC 5.2 c (para 6.8).

6. In the comparative assessment of the locations considered (Table 8, page 13) and in the summary relating to Davenport Green (para 6.23) the Council concludes:

“In conclusion, Davenport Green scores well against some of the criteria in PPS4 Policy EC5.1e, EC5.2c and EC5.3, particularly in terms of employment generation and investment in an area. However, this is outweighed by the loss of Greenfield land, the poor accessibility of the area and the uncertain effects on tackling deprivation. As such, it is considered to be not suitable for office development in relation to the tests in PPS4.”

7. RLAM contend that these conclusions are poorly founded, partly in terms of the analysis undertaken at the time the Assessment was published and partly in terms of the evidence that the Council has produced in CD 12.95:
 - a. The Council attach undue weight to the greenfield status of the land (in spite of DTZ’s evidence that greenfield is one of the unique qualities of the site):
 - i. They showed a predisposition to consider only regeneration sites at the outset (para 6.1)
 - ii. They state (para 6.21) that Davenport Green’s greenfield status “is not consistent with the first criteria in PPS4 Policy EC 5.1 e”. However the factors listed in EC 5.1 e are not binding criteria but “other considerations” which “may be material to the choice of appropriate locations for development”.
 - b. The Council assessed the accessibility of Davenport Green wrongly at the time of the Assessment, a position that has now been confirmed in the evidence produced in CD 12.95:
 - i. The Council state at para 6.22 that “there are no current or planned bus routes through the area”; this statement fails to recognise that the Council had been satisfied in the UDP allocation of Davenport Green as a major high amenity site for employment that the site could be made accessible by a choice of means of transport (UDP, Planning Brief for Davenport Green, para 2.6, Public Transport). There was no evidence that similar provision could not be made in 2010.
 - ii. The Council has recognised repeatedly in the evidence provided in the Sustainability Appraisals of Policy R4 and of Davenport Green that RLAM’s proposals will result in the site being well served by a choice of means of transport (Appendix A of this representation, SA Objectives S2, S3, E1 and E3).
 - iii. Table 8 provides a Summary of the Assessment, including that relating to Accessibility; however the scoring of accessibility (Most Accessible, Accessible, Least Accessible) derives from the Council’s SPD1: Developer Contributions to Highway and Public Transport Schemes, Adopted March 2007, CD 7.2.30 (paras 4.5-4.15 and Appendix 4), which refers only to current levels of accessibility. It therefore fails to take account of PPS4 EC 5.2 c which states that preference among out of centre sites should be given to those which are or will be well served by a choice of means of transport (our emphasis).
 - iv. RLAM contend, in the light of the Council’s evidence and of a proper application of the PPS4 test in relation to accessibility, that Davenport Green should not be downrated with respect to the accessibility of the site; it should receive a positive score in line with the SA’s.
 - c. The Council state at para 6.22 that “The extent to which development here would contribute to the objectives relating to poverty and social exclusion and reducing disparities is however considered to be uncertain.” This contradicts the latest SA of Davenport Green (CD 12.95, Appendix D, SA Objective S5), which accords high certainty to reducing poverty and social exclusion. No evidence is provided to support this “uncertain” view. RLAM contend that Davenport Green should score “High” against the criterion of social inclusion potential:
 - i. The Council have scored High for other locations on the simple basis of their physical proximity to areas of deprivation: Pomona, Wharfside and Carrington; in the first

two cases the areas concerned include ones outside the Borough (Ordsall in Salford), as is the case for Davenport Green. At least the Newall Green area of Wythenshawe is within safe cycling and walking distance of Davenport Green whereas there are significant barriers to pedestrian movement between Pomona and Wharfside and their respective areas of deprivation.

- ii. It is widely recognised that physical proximity is insufficient on its own to ensure that deprived communities benefit from additional economic development and employment (unemployment persisted at a similarly high level in Old Trafford in spite of the creation of over 28,000 jobs in Trafford Park during the life of the Development Corporation). RLAM have therefore indicated (Proposed Policy SS1) that they would participate in programmes to assist deprived people to access the jobs created. RLAM have an advantage in delivering such measures in that they are the sole owner and developer of the site. There is no evidence that any such measures would be taken in relation to the other locations assessed in CD 8.3.6.
 - iii. The Council have recognised in the SA's of R4 and Davenport Green that RLAM's proposals would have major positive impacts, for example:
 - S5. Reduce poverty and social exclusion: major positive impact with high certainty, based expressly on RLAM's proposals (CD 12.95, App. D, S5, Certainty; Comments first and second paras.)
 - EC2. Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage: Positive impacts and not dependent on the Airport City/Medipark proposals (CD 12.95, App. C, EC2, Comments, second para, final sentence).
 - EC2. Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage: Positive and major positive impacts based expressly on RLAM's proposals including those for job creation, relationship to deprived communities in Wythenshawe, engagement of deprived communities and transport improvements. Leads to recognition of significant positive impact (CD 12.95, App. D, EC2, Comments, first para, final two sentences).
8. In addition to the above, which alone should put Davenport Green on a par with, or ahead of, other locations as an appropriate location for office development, RLAM see that the Draft National Planning Policy Framework, July 2011, provides further strong grounds for re-weighting the assessment that has been carried out by the Council. Draft NPPF contains numerous references to the role of the planning system in promoting sustainable economic growth e.g. "Therefore, significant weight should be placed on the need to support economic growth through the planning system" (Draft NPPF, para. 13). Other directly relevant references are provided in the first line of RLAM's representation relating to Inspector's Note 7. The Government would not have emphasised these points to this extent if they had not wanted to see an increase in the weight attached to sustainable economic development.
9. RLAM's assessment also responds well to Advice produced by the Planning Inspectorate for use by its Inspectors on the National Planning Policy Framework: Consultation Draft (revised 30 August 2011)(para.3) where PINS state that Draft NPPF "gives a clear indication of the Government's 'direction of travel' in planning policy and ... is capable of being a material consideration"

10. Finally Draft NPPF omits any requirement to apply the sequential test to office development; the requirement is limited to retail and leisure development.

11. In summary RLAM conclude that, in the light of the Council's approach to and implementation of the sequential test, of the new evidence provided by the Council relating to the sustainable performance of RLAM's proposals for Davenport Green and of the changing policy emphasis being sought by the Government, Davenport Green should not only not be dismissed as a location for offices but furthermore be acknowledged as at least on a par with the other locations identified for office development in the PPS4 Assessment.

Appendix E

Critique of Council's Further Response to Main Matters, Issues and Questions, Main Matter 4, July 2011, CD 12.35.4.1

The Council has provided a Further Response to Main Matter 4 in CD 12.35.4.1; Royal London Asset Management (RLAM) is concerned that neither the Council's original response (CD 12.35.4) nor the present Further Response provide adequate answers to the Inspector's questions especially but not only MM 4.2, 4.5, 4.7, 4.8, 4.10, 4.11. In the light of the evidence now produced by the Council, RLAM have reviewed the Council's Further Response in this Appendix.

| Main Matter No. | RLAM Commentary |
|------------------------|---|
| MM 4.2 | Given the view of DTZ in CD 12.86 that Davenport Green has unique quality as an employment site (Appendix C of this Representation, section headed "The Unique Qualities of the Site"), the Council's provision for employment development subject to "strict criteria" and at some uncertain time in the future is an inadequate response to the Inspector's question whether "this approach will provide sufficient choice of land and sites for developers to compete with regional, national and international alternatives". The Council has made no assessment of the regional, national or international alternatives. In the context of Draft NPPF (for example paras 10, 13 and 71) which stresses the urgent need to restructure the economy, a delayed response subject to strict criteria is inappropriate. |
| MM 4.3 | RLAM have from the outset in their representations (RLAM Reps on Publication Draft Core Strategy, re Chaps 8 and 18, and Policies SL 1-5 and W1, "The Exceptional Qualities of the Site", November 2010) stressed the failure of the Council to consider adequately the major nearby (but in some cases outside Trafford) residential areas and the important sources of labour and skills that they represent: the high quality housing in the south of the Borough and in East Cheshire and the large pool of varied skills in Wythenshawe and less prosperous parts of Trafford, such as Sale West and parts of Sale Moor. The Council has not addressed the opportunity for reducing travel to work presented by potential employment development at Davenport Green. |
| MM 4.5 | As set out above (MM 4.2) the Council's further |

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| | <p>work has demonstrated that Davenport Green has unique quality as an office employment location. However the Council’s proposed policy changes do little to provide “certainty that they will deliver the required amount, quality and choice of B1 sites” (MM 4.5):</p> <ol style="list-style-type: none"> 1. Policy W 1.5 makes no reference to Davenport Green as an office employment location; this is a severe deterrent to any occupier or developer contemplating investment in Davenport Green. 2. The provisions in Policy R 4 (strict criteria) are so restrictive that they effectively negate the deliverability of the site; in a highly competitive regional, national and international market place for mobile investment these terms are sufficient to discount Davenport Green as a development or occupancy opportunity. |
| MM 4.6 | <p>Whilst it is appropriate for subsequent allocations or proposals for office development to be subject to the sequential test, the proposed locations for office development in Policy W1 have already been tested (CD 8.3.6); furthermore that test included Davenport Green. RLAM have shown in Appendix D to this Representation that, in the light of the Council’s approach to and implementation of the sequential test, of the new evidence provided by the Council relating to the sustainable performance of RLAM’s proposals for Davenport Green (in the Appendices to CD 12.95) and of the changing policy emphasis being sought by the Government, Davenport Green should not only not be dismissed as a location for offices but furthermore be acknowledged as at least on a par with the other locations identified for office development in the PPS4 Assessment.</p> <p>RLAM contend that it is inappropriate to make the R4 policy provision for Davenport Green subject to the sequential test, but also that there are robust grounds for making Davenport Green a focus for office development on a par with the other locations listed in W 1.5.</p> |
| MM 4.7 | <p>It is important to note the clear wording of the Inspector’s question: “justification for not identifying land at Davenport Green as a major focus for office development, given its importance in the current development plan?”</p> |

The Council does not address this question:

1. In para 4.7.2 the Council refer to a lack of justification for the development “as presented by RLAM”
2. In paras 4.7.4-4.7.5 the Council assert the failure of RLAM’s proposals to meet the criteria for “a Strategic Site”

The Inspector’s question does not relate to either RLAM’s proposals or to a Strategic Site.

In response to the issue of the current development plan the Council (para 4.7.3) acknowledge that non-development of the site “was largely due to the very tight restrictions set by the UDP policy” but perversely take this as support for not rolling forward the UDP Policy (N.B. the UDP Policy was not the burden of the Inspector’s question, but a major focus for B1 office development).

Far from there being “evidence” to justify “not identifying Davenport Green as a major focus for B1 office development” RLAM have shown that there is robust evidence to support such an identification:

1. Appendix A to this Representation shows that Davenport Green is a highly sustainable location for office development, according to the evidence provided by the Council in Appendices C and D to CD 12.95.
2. Appendix C to this Representation shows that DTZ in CD 12.86 have attested to the unique quality of the site for office development, a quality that obtains regardless of the proposals for Airport City or Medi-Park.
3. Appendix D shows that a re-appraisal of the Council’s sequential test of Davenport Green demonstrates that the site is at least equally preferential to the foci for office development identified in W 1.5.

The Council’s response to provide for development at Davenport Green subject to strict criteria including a sequential test runs completely counter to the thrust of Draft NPPF which refers to (our emphasis):

- Every effort should be made to identify and meet the housing, business, and other development needs of an area, and **respond positively** to wider opportunities for growth(19)

| | |
|---------|--|
| | <ul style="list-style-type: none"> • there is an urgent need to restructure the economy (71) • plan proactively to meet the development needs of business and support an economy fit for the 21st century (72) • set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth (73) • identify and plan for new or emerging sectors likely to locate in their area (73) • positively plan for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries (73). |
| MM 4.8 | <p>Flexibility is an essential feature of the effectiveness and soundness of development plans (PPS12, paras 2.5, 4.44, 4.52), a requirement that is reinforced in Draft NPPF:</p> <ul style="list-style-type: none"> • Policies should be flexible enough to accommodate requirements not anticipated in the plan and to allow a rapid response to changes in economic circumstances (73) <p>Draft NPPF adds: To enable a plan to be deliverable, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened (39).</p> <p>Effectively the Council’s proposed policy changes provide little or no “flexibility in the Core Strategy employment land portfolio”:</p> <ol style="list-style-type: none"> 1. There is no provision for Davenport Green in the employment policies of the Core Strategy. 2. Development of the site is tied to the very uncertain timing of the expansion of two specific developments (Airport City and Medi-Park): when does that expansion reach the point when development of Davenport Green can be justified and how long will it take to establish that, whilst potential occupiers seek alternative locations that are readily available? 3. Policy R4 imposes a number of other restrictions on the development of the site which further negate any apparent flexibility. |
| MM 4.10 | The inconsistency to which the Inspector refers |

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| | <p>remains:</p> <ol style="list-style-type: none"> 1. Policy W1, as the key employment land policy of the Core Strategy, does not provide for either Davenport Green as an employment site or for any other economic activity associated with the Airport. 2. The Council's proposed amendments to paras W 1.9 and W 1.10 are sufficiently ambiguous as to at least provide grounds for dispute (and real uncertainty in the mind of an occupier or developer), for example in relation to whether the bulleted conditions in W 1.10 apply to any developments (including Davenport Green) "outside of these places" |
| MM 4.11 | <p>RLAM have shown above (MM 4.5, MM 4.8, and MM 4.10) that the real effect of the Council's proposed changes is to maintain a "restrictive approach..... towards airport associated development ". The fact that the Council has made changes indicates that there is no justification for a restrictive approach. Furthermore the fact that Davenport Green is recognised as a development opportunity in Manchester City Council's Wythenshawe Strategic Regeneration Framework (West Wythenshawe Development Corridor) and similarly in the Airport's Master Plan, both of which are recognised in the City Council's Publication Draft Core Strategy, indicates that development of the site is seen by major neighbouring agencies as consistent with their economic strategies.</p> |
| MM 4.12 | <p>The Council has proposed that development at Davenport Green should be subject to further review (under the terms of proposed Policy R4). In the light of the new evidence the Council has presented in Appendices C and D of CD 12.95, of the Government's approach to sustainable development set out in Draft NPPF and of the findings of the Council's further work in CD 12.86, RLAM has made two proposals in this current representation:</p> <ol style="list-style-type: none"> 1. That in any event most of the restrictions applied to the future development of Davenport Green in proposed Policy R4 should be removed. 2. That there is a robust case for the site to be designated a major focus for office development in Policy W1. |

| | |
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| | <p>The Council has not answered the Inspector's questions in relation to the R4 restrictions, which are in effect restrictions on employment land. RLAM's view is that the answer to each of the three questions is negative: they are not necessary and there is inadequate justification for them; they are not sufficient clear to enable effective implementation; and they are not reasonable, consistent with national policy or reasonably restrictive.</p> |
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Appendix F, Proposed Policy SL6, its Justification and Consequential Policy Changes

SL6 - Davenport Green

.Policy SL6 – Strategic Location: Davenport Green

The Strategic Location comprises some 36.4 hectares of land at Davenport Green (the Development Area). It is identified to accommodate an exemplar development of business space (Use Classes B1 (a) – (c)) with supporting uses and infrastructure.

Pending the implementation of an appropriate development proposal, the land will be protected from development as countryside outside the Green Belt (Policy R4.3 (as proposed to be amended in this Appendix))

The proposals will support the emerging initiatives of the Greater Manchester Enterprise Zone and Airport City and the Medi-Park and development proposals related to the University Hospital of South Manchester. They are designed to integrate progressively with the wider strategy for airport-related development and regeneration (the arc/corridor of development identified in the Airport Master Plan, Manchester CC Draft Core Strategy and in the Wythenshawe Strategic Regeneration Framework). Adjacent land in the same ownership, some 99.1 hectares (about 245 acres), will be devoted to a Rural Park, which will be created before any buildings are occupied on the Development Area.

Careful planning parameters (see below), designed to protect the adjacent Green Belt, to create a very high quality development and landscape setting, and to enhance bio-diversity, result in the following land use breakdown:

| | % | Has | Acres |
|---------------------------------|-----|-------|-------|
| SL6 Development Area | 100 | 36.4 | 90 |
| Within which | | | |
| Retained & new landscape | 60 | 21.84 | 53.9 |
| Building footprint | 15 | 5.46 | 13.5 |
| Car parking, hard landscape etc | 25 | 9.1 | 22.5 |
| Total | 100 | 36.4 | 90.0 |
| Rural Park | | 99 | 245 |

Overall hard development will occupy only 40% of the development area and the building footprint only 15%.

In addition implementation will deliver:

- a. The 99 hectares of land surrounding the development site will be protected, enhanced and managed for ecological interest, recreational access and farming as a rural park (see accompanying plan),
- b. New and improved pedestrian and cycle links.
- c. New and extended bus services, including links to nearby regeneration areas in Trafford and Manchester, to Altrincham transport interchange and to the Airport, which is a major interchange for buses, coaches, trains, taxis and proposed Metrolink as well as national and international flight connections.
- d. Access to the site will be via the existing Thorley Lane bridge over the M56; capacity will be expanded at Junction 6 and on other local roads.

- e. Car parking to appropriate sustainable standards (lower provision than anticipated in TBC standards).

The boundary of the Location is shown on the attached plan (reproduced from the UDP 1996 and marked E13), together with the boundary of the associated Rural Park (edged blue but excluding the E13 area).

Development Requirements

In order for development at this Location to be acceptable the following will be required:

- Evidence that the proposals will produce a high quality, deliverable and sustainable B1 business employment related development (including ancillary services), including:
 - Exemplary sustainability standards – Excellent BREEAM, aiming for Outstanding where feasible
 - Development of a type and quality capable of competing with international, national and regional alternative locations
 - Assessment of the potential for initiatives, especially in cooperation with other major local developments and activities in the development corridor, for addressing climate change (e.g. transport provision, energy, waste, SUDS); integration of viable proposals into the proposed development.
 - Compliance with parameters (see below) to safeguard the amenity of the Green Belt, establish an attractive development edge, support Green Belt objectives, and protect/enhance landscape quality and bio-diversity generally.
 - Sensitive treatment of landscape and buildings
 - Protection of existing hedgerows and woodland within the development area for their own sake and in order to assimilate development into the landscape.
 - Protection and, where possible enhancement of the settings of nearby (off-site) listed buildings.
 - The opportunity will deliver substantial new investment and employment to the sub-region and will contribute significantly to the Plan's objectives, including the sustainable economic growth of the sub-region, achievement of which will be promoted by the competitive quality of the development of the Location as a whole
 - It will contribute significantly to the achievement of the Council's regeneration priorities and to those of the wider south Manchester area, which will include:
 - Development of (and/or participation in existing) programmes to assist disadvantaged people to access the jobs created;
 - Commitment to appropriate programmes, including support for the Council's programme for the regeneration of Altrincham town centre (*Altrincham Forward*).
 - Examination of new ways of engaging deprived communities and individuals in the benefits of the construction phase, the long term business activities and the rural park; this will include working with local partners e.g. the Council, local schools, other employers such as the Airport. Implementation of appropriate and viable measures.
- There is a comprehensive scheme for the development of the whole Location.
- Laying out and management of the rural park to support the purposes and objectives of the Green Belts and the Council's policies for open spaces and countryside.
- Environmental Impact Assessment
- As part of the EIA process an assessment of ecology and biodiversity must be carried out prior to development and appropriate sites for nature conservation must be provided to compensate for any loss.
- The development area will be accessible by a range of alternative modes other than the private car through appropriate improvements to public transport infrastructure/services and development of a site travel plan.

- Improved pedestrian and cycle routes
- Satisfactory (to the Highways Agency and the local highway authorities) access to the development area, which is expected to be from the M56 via the existing Thorley Lane bridge over the motorway; capacity will be expanded at Junction 6 and on other, local roads.
- The provision of appropriate ancillary services (e.g. retail, catering and meeting facilities) to support those people using the development and reduce their need to travel.
- Any necessary contributions towards the provision of additional utility capacities

| Development Area Phasing, subject to detailed phasing and subject to market demand) (hectares, by phase and cumulative)* | | | | |
|---|------------------------|-----------------------|-----------------------|-------|
| | (1) 2011/12- 2015/6 | (2) 2016/7- 2020/1 | (3) 2021/2- 2025/6 | Total |
| By phase | 12 | 12 | 12.4 | 36.4 |
| Cumulative | 12 | 24 | 36.4 | 36.4 |
| *Dates assume adoption of the Core Strategy in 9/2011; dates to be reviewed. | | | | |

Implementation

Implementation will be through private sector development initiatives with support from infrastructure providers where necessary.

Infrastructure Requirements / Funding Sources (subject to detailed review)

| Project | Status | Estimated Costs | Phasing | Responsibility | Funding Source |
|---------------------------------|--|--|----------------|--|-----------------------|
| Local road works | Required for Phase 1 | £6.05m | 2011/12-15/16 | Trafford BC and Manchester CC | RLAM s.106/s.278 |
| Rural Park | To be laid out before occupation of first building | £2.5m | 2011/12-15/16 | RLAM | RLAM s.106 |
| Additional utility capacity | Required for Phase 1 | No abnormal costs anticipated | 2011/12-15/16 | Various | RLAM s.106 |
| Bus infrastructure improvements | Implemented with phasing, some elements required for Phase 1 | £3m | 2011-12-2016/7 | RLAM, MAG, Trafford BC and Manchester CC | RLAM S.106 |
| New bus services | Required for all phases, with increasing frequency/coverage | Up to £450k pa 'kickstart' funding, then commercially viable | 2011/12-2020/1 | RLAM, bus operators, | RLAM S.106 Fares |

| | | | | | |
|--|----------------------|--------|---------------|-----------------|------------------|
| | | | | | |
| M-way and trunk road works: Phase1 | Required for Phase 2 | £1.85m | 2016/7-2020/1 | Highways Agency | RLAM s.106/s.278 |
| M-way and trunk road works: Phase2 | Required for Phase 3 | £1.4m | 2020/1-2025/5 | Highways Agency | RLAM s.106/s.278 |
| *Dates assume adoption of the Core Strategy in 9/2011; dates to be reviewed. | | | | | |

Relevant highway and transport agencies are supportive of the proposals (subject to more detailed checking) and they see no significant barriers to implementation.

Land Ownership

The majority of the Location is in a single ownership, that of Royal London Asset Management, the Fund having acquired the balance of 50% of the interest in December 2009.

Site Constraints

- a. Pending planning permission for compliant development the land will be protected as countryside by Policy R4.3.
- b. The effect on the adjacent Green Belt needs to be carefully managed through planning controls to ensure that the visual amenity of the Green Belt (PPG2 paragraph 1.5) is not prejudiced and that an attractive and defensible new edge to the development is created (PPG2 para B4).
- c. The land use objectives of the adjacent Green Belt (PPG2 paragraph 1.6) need additionally to be strongly supported by the development. The establishment and management of a Rural Park on 99ha (245ac) of land west of Roaring Gate Lane, and including Davenportgreen Wood, will be a fundamental requirement in the DPD. There is an opportunity to investigate different ways of managing the Park, and to increase substantially its recreational and bio-diversity value as a result.
- d. The development parameters for the development area have been reviewed and they are summarized:

| Parameter description | | Comment |
|--------------------------------------|--|---|
| Protection of Key Landscape Features | <p>Seven features individually identified,</p> <p>The desirability of retaining all of the principal hedgerows within the site to be considered.</p> <p>Buffer zones defined, where necessary, to protect landscape features and hedgerows.</p> <p>No development shall take place that impacts directly upon the retained landscape features or encroaches on defined buffer zones.</p> | <p>This parameter will have the effect of defining a 'net developable area' within the Development Area.</p> <p>Built development will be strictly confined to the area so defined.</p> |

| | | |
|------------------------|--|---|
| <p>Built Footprint</p> | <p>Overall built footprint (buildings, car parking and hard landscaping) not to exceed 40%, within which:</p> <p>Building footprint not to exceed 15%</p> <p>Car parking areas not to exceed 25%</p> <p>Car parking to be provided at a ratio of not greater than 1:32 gross floorspace.</p> <p>Each phase of the development to demonstrate, by reference to a Masterplan for the whole site, how it is compliant with these parameters, and how it does not prejudice the compliance of subsequent phases.</p> | <p>This maintains 60% of the Development Area to accommodate retained landscape features and new structural landscaping.</p> <p>The footprint parameters to allow flexibility over the life of the project.</p> |
| <p>Building Height</p> | <p>Not to exceed 13.9m as measured from the existing ground level.</p> | <p>This will control the most important component of visual impact, and reflects the earlier height ceiling</p> |
| <p>New Landscaping</p> | <p>Structural landscaping is required to reinforce boundaries of the development area, form an extension of Brooks Drive, protect the setting of listed buildings, and provide native woodland.</p> <p>Landscaping of the highest quality is also required elsewhere within the development.</p> <p>Specifically, parking areas shall be laid out to gross a density of no less than 300 spaces/ha (33m² gross per space) to ensure space for landscaping to the highest standard.</p> | <p>The scheme will still be landscape led, and designed to the highest standards</p> |

e. The land contains substantial hedgerows and three woodland blocks. These will be specifically protected and used to assimilate the development into the landscape, and protect the network of wildlife corridors that connect with the landscape beyond the site. The management of these features will be secured through appropriate s106 obligations. The site and the Rural Park lie within the Red Rose Forest area and present a major opportunity to establish new woodland and thereby further the Green Infrastructure objectives of this regional initiative.

- f. Davenportgreen Wood borders the site. The woodland is a Site of Biological Importance and there should be no development within 30m of its northern edge.
- g. Other habitats within the site include unimproved grassland and small ponds, although informal recreational use, and invasive bramble and thorn scrub has reduced their value. A re-assessment of the site's ecology should be undertaken to inform and update the Development Brief.
- h. There are no listed buildings on the site, but the setting of nearby listed buildings on Shay Lane and Roaring Gate Lane, needs to be carefully considered, protected and, where possible, enhanced.
- i. The site, apart from that portion south of Thorley Lane, is no longer in agricultural use. None of the soils anywhere within the site fall within the higher ALC grades. There are thus no agricultural or soil quality constraints to the development of the site.
- j. A public footpath (FP26) runs across the northern part of the site connecting Newall Green with Roaring Gate Lane. The amenity of that route needs to be protected.
- k.. New access needs to be provided for public transport and road vehicles.
- l. In other respects the site is subject to few development constraints.

Existing Infrastructure

- a. In terms of public transport, the major public transport interchange at Manchester Airport, the second largest in the City Region, is located approximately 2 kms to the south east of the Strategic Location and there is a large number of bus routes serving adjacent areas. Direct rail services from Manchester Airport connect to the City Centre, Sheffield, York, Newcastle, Leeds, Huddersfield, Bolton, Preston, Chester and (via Manchester Piccadilly) to London, Birmingham and many other national destinations. There is also a proposed Metrolink extension to the airport.
- b. In relation to utility services it is not anticipated that any abnormal increases in capacity will be required; as recently as 2003, when planning permission for 500,000 sq.ft. of B1 space was renewed, the Council acknowledged that sufficient infrastructure capacity existed or could viably be created.

Justification

The Council's further work related to the emerging Enterprise Zone and Medi-Park initiatives has shown that Davenport Green is singularly well placed to address the expressed sustainable development needs and ambitions of Trafford and Greater Manchester; furthermore those qualities exist independently of such proposals; they enable development at Davenport Green to complement other development in the south of the conurbation by enlarging the choice of sites available to potential occupiers, especially those who, by the nature of their business activities, could choose from a range of locations beyond the conurbation :

1. It will contribute to the regional, sub-regional and local objectives of improving their economic performance and narrowing the gap in GVA per head between Greater Manchester and the rest of the country.
2. It is in the south of the conurbation which has long been recognized, in a complementary capacity to the city centre, as the most attractive location within Greater Manchester for business investment.
3. It gives good access to the Airport public transport interchange, the second most important interchange in the conurbation. It builds on existing (and proposed in the case of Metrolink) investments and assets in the conurbation.
4. It has good access to the high quality housing markets of south Trafford and Cheshire, which in turn provides good access to skilled professional and managerial staff.
5. It is immediately adjacent to Wythenshawe, a very large area of deprivation, close to smaller areas of deprivation in Trafford (e.g. around Broomwood Primary School) and readily accessible (with planned transport improvements) to areas such as Sale West.
6. It is adjacent to the Airport and would integrate well with Manchester Airport's Master Plan, Manchester City Council's draft Core Strategy, the Wythenshawe Strategic Regeneration

- Framework and the West Wythenshawe Local Plan, which are promoting a comprehensive approach to economic development, the development of the Airport, improvements in public transport and environmental performance and regeneration.
7. It will support the objectives of Green Belt in relation to the adjacent Green Belt land, by creating a new rural park for a range of community benefits for example community food production, nature conservation and public recreation.
 8. The Trafford Other Main Town Centre Uses Study (2009) concluded that due to a low number of suitable and available sites in town centre locations, it may be necessary to consider further sites outside town centres. However those sites will not be deliverable and competitive for the quality of regionally significant investment that Davenport Green will attract. The proposals complement potential development in Trafford's town centres and the developers will work with the Council to support *Altrincham Forward*, the Council's programme for the regeneration of the town centre.
 9. The Council with the site owners are looking to create an exemplar scheme and will be examining new ways of addressing some of the challenges that have persisted in the Borough and the adjacent areas, for example:
 - New ways of engaging deprived communities and individuals in the benefits of the construction phase, the long term business activities and the rural park; this will include working with local partners e.g. the Council, local schools, other employers such as the Airport.
 - A series of initiatives to address climate change (which will also be a priority for the class of occupier being targeted) e.g. car use demand management, energy, waste, SUDS.
 - Working with local communities in both Trafford and Manchester to identify ways to engage local people in the creation and use of the rural park.

Policy Justification – National / Regional

- a. The proposal is highly supportive of the policies and objectives of PPS4 in which the Government's overarching objective is described as "sustainable economic growth". The Draft National Planning Policy Framework (2011) has reinforced the Government's emphasis on the priority and urgency attaching to restructuring the national economy and to responding flexibly to opportunities for sustainable economic development. The proposal is also supportive of the Budget Statement (March 2011) in which the Government emphasised the importance of promoting development.
- b. The proposal also responds well to Advice produced by the Planning Inspectorate for use by its Inspectors on the National Planning Policy Framework: Consultation Draft (revised 30 August 2011)(para.3) where PINS state that Draft NPPF "gives a clear indication of the Government's `direction of travel' in planning policy and is capable of being a material consideration"
- c. An exemplar development is supported through general policies and principles defined within PPS1: Delivering Sustainable Development (2005), including the policies relating to climate change.
- d. The B1 development is compatible with the locational policies of PPS4 in that the Council's Other Town Centre Uses Study has demonstrated the lack of attractive sites within the Borough's town centres for significant office development. Evidence produced since the sequential test of office development in the Borough indicates that Davenport Green is at least as preferred a location for office development as other out-of-centre locations identified for office development.
- e. The hotel, retail and catering component is in accordance with recommendations in PPS4 in that it is designed principally to serve the users of the new development with facilities within walking distance, reducing the need to travel.

| Contribution to Sustainable Community Strategy and Core Strategy Objectives Which Objective(s) delivered by this | Reference Number(s) |
|---|----------------------------|
|---|----------------------------|

| | |
|---------------------------------------|---|
| Strategic Location/Policy | |
| Key Objective(s) of the Refreshed SCS | 18, 20, 22, 24, 25, 26, 27, 29, 30, 31, 32, 34, 35, 37, 38, 40, 40, 41, 42, 43. |
| Core Strategy Strategic Objective(s) | <u>SO2, SO3, SO5, SO6, SO7</u> |
| Core Strategy Place Objective(s) | <u>OTO9, STO7, SAO10, ALO4, ALO10, ALO11, AO17, 17, ALO18, ALO19, ALO20, ALO25, ALO26, ALO27.</u> |

Consequential Amendments

Para 2.14: Delete first sentence and insert: *Recent changes in Government policy (e.g. Draft National Planning Policy Framework) and the Council’s review of the economic development opportunities in the south of the conurbation have indicated a need for high quality employment development in this area.*

Altrincham Spatial Profile (page 14): Add to final para, headed “Key issues facing Altrincham are the need to:” *Review the employment development opportunities presented by the land allocated for a high amenity site in the UDP.*

Altrincham and Neighbouring Communities, Place Objectives (page 27). Add new objective: *To maximise, subject to appropriate safeguards, the employment potential of land at Davenport Green for the benefit of the local community, the Borough and the city region.*

Key Diagram: add star to indicate SL6 Davenport Green (diagram and key)

Para 8.2: amend to indicate “6 Strategic Locations” and add “Davenport Green (SL6)” to the bulleted list.

Para 8.14: Delete 5 and insert 6 in title
Delete SL5 in line 1 and insert SL6
Add new sentence at end of para: *In the case of Davenport Green, the infrastructure proposals have been related to the phasing of development.*

Policy L4.1, page 81 Insert at end of (d): *and those locations capable of being made accessible by a choice of modes of transport.*
Insert in (e) after the word Strategic Locations: *Davenport Green,*

Policy W1: as proposed to be amended by the Council (CD12.95)

Policy W1.3: Add *Davenport Green* to the list of places to focus employment uses.

Policy W1.4: Insert after the first sentence: *Employment development is planned at Davenport Green in addition to that shown in Table W1 in order to expand the qualitative choice of sites and premises available.*

Policy W1.5: Insert after (Pomona and Wharfside), *Davenport Green*

Policy W1.9: Delete words “or R4”

Policy W1.10: delete phrase in brackets.

W1.13: Add sentence to end of paragraph: *Employment development is planned at Davenport Green in addition to that shown in Table W1 in order to expand the qualitative choice of sites and premises available.*

Paragraph 18.4, add new item to list of growth sectors: *airport-related economic development*; add new paragraph: *Provision has been made for employment development at Davenport Green in order to enable the Council, through the Core Strategy, to respond flexibly to the enhanced prospects for economic growth in the city region that have been identified in the south of the conurbation, including those related to the proposed Enterprise Zone and Medipark. The proposal also responds to Government policy which emphasises urgent and flexible attention to economic restructuring and to the promotion of sustainable economic development. The Council's evidence indicates that Davenport Green will enlarge the choice of sites available and that it is a sustainable location and acceptable in sequential test terms for B1 development.*

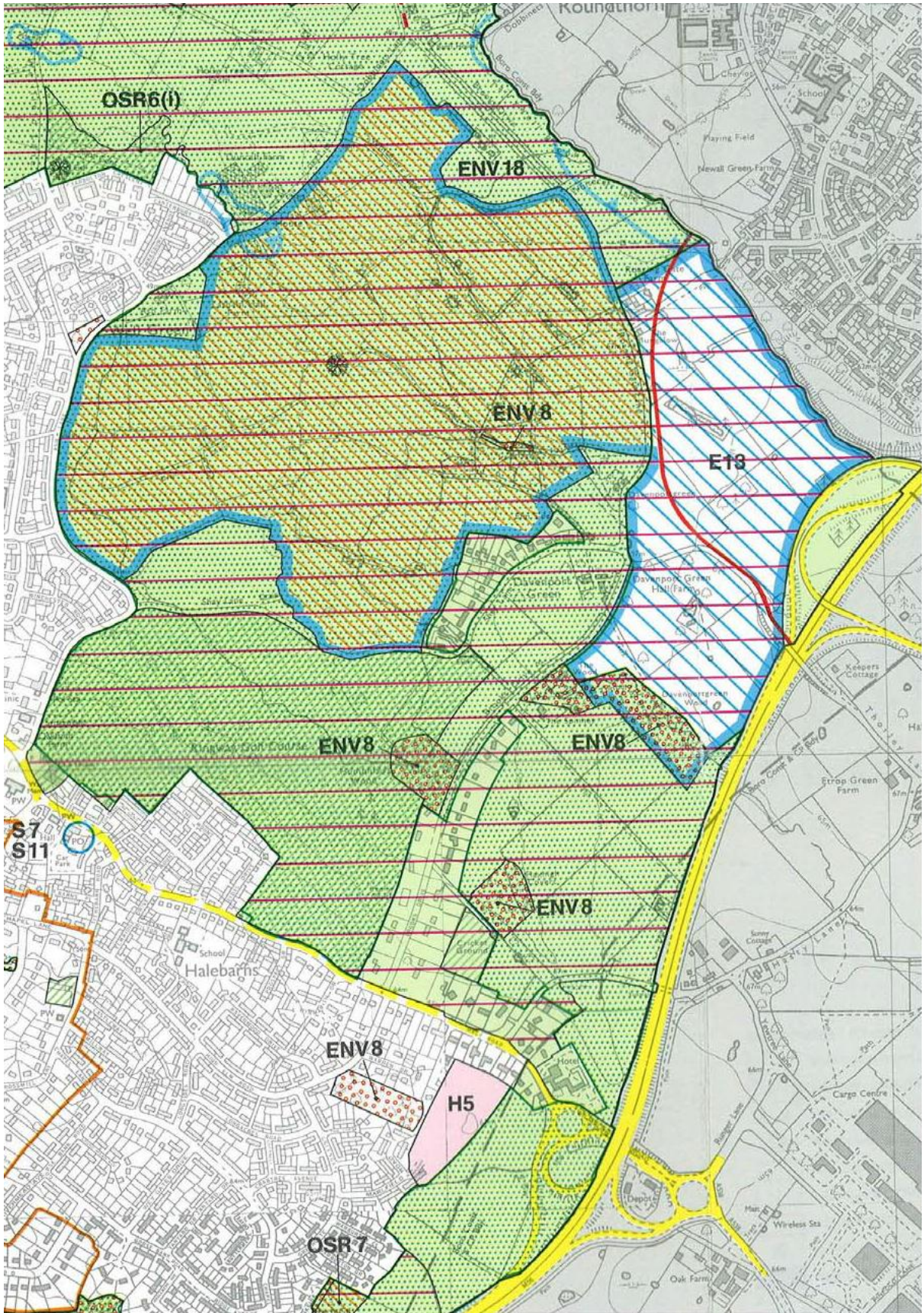
Paragraph 18.6: delete the words "without the need.....site at Davenport Green" and add *Additional land for employment development is provided at Davenport Green in order to offer a flexible supply, as set out above in paragraph 18.4.*

Para 18.7: Delete sentence "The amount of land proposed for new employment.....to changing economic circumstances." And insert *However subsequent work by the Council and evolving Government policy towards sustainable economic development have indicated a need to add qualitatively to the choice of sites and premises, especially in the favoured south of the conurbation; the Council has responded by identifying Davenport Green in addition to the sites identified in Table W1 as a Strategic Location and focus for employment development.*

Para 18.16: In first sentence insert Davenport Green as follows: *identified for additional office development in the Core Strategy are Pomona, Wharfside and Davenport Green.* In the second sentence delete the word "these" and insert *the former*. Add new final sentence to paragraph: *Davenport Green has been identified as a main area for office development in recognition of its distinctive characteristics and ability to offer a wider choice of locations to the market.*

Policy R4.3: delete and replace with: The Council will protect the land at Davenport Green as countryside outside the Green Belt until permission is granted for development complying with Policy SL6 is granted.

R4.4 (the para relating to development at Davenport Green): delete.



APPENDIX G

RLAM suggested changes to Policies R4.3 and R4.4, and to the justification

The text is as proposed in CD12.95 by the Council.

Countryside Land outside the Green Belt at Davenport Green

R 4.3 Delete the word “exceptionally”

R4.4 Delete bullets 1, 4 and 7; in bullet 2 delete the words “future expansion of”

Justification to read as follows:

PPG2 states that Green Belt boundaries in development plans should be altered only exceptionally and should not normally be needed to be altered at the end of the plan period.

Annex B of PPG2 details that “Safeguarded land comprises areas and sites which may be required to serve development needs in the longer term, i.e. well beyond the plan period.

There is uncertainty/fluidity in relation to the future expansion of Airport City and/or the MediPark proposals at the University Hospital South Manchester and Davenport Green is well positioned to support that expansion. However, the timing of any such support is indeterminate. The Council therefore intends to protect the land at Davenport Green from development until such time as the demand for it is demonstrated.

By protecting the land as Countryside, outside the Green Belt, the Council is reflecting the existing designation, whilst retaining protection against development unless strict criteria are met.

In this way the Council is maintaining its approach to delivering a balance of growth and regeneration which is entirely consistent with the thrust of the Government’s “Plan for Growth” document and the duty incumbent upon local planning authorities to work with developers.

Paragraph 26 of PPS7 recognises that there are areas of countryside around urban areas that are outside of Green belt designation, that are highly valued locally, are important to those who live [in urban areas] and provide the nearest and accessible Countryside for urban residents.

Accordingly, any development meeting the strict criteria in economic terms will also be required to deliver concurrently the existing proposal for a 99 ha rural park to

protect, enhance and manage the land surrounding the development site for ecological interest, recreational access, and farming.

APPENDIX H

RLAM suggested changes to Policy W1 and to the justification

The text is as proposed in CD12.95 by the Council.

Policy

Policy W 1.3: add words *Davenport Green (subject to Policy R4)* to bulleted list of places for employment.

Policy W1.4: Insert after the first sentence: *Employment development is planned at Davenport Green in addition to that shown in Table W1 in order to expand the qualitative choice of sites and premises available.*

Policy W1.5: Insert after (Pomona and Wharfside), *Davenport Green.*

W1.13: Add sentence to end of paragraph: *Employment development is planned at Davenport Green in addition to that shown in Table W1 in order to support proposed development at Airport City and Medipark (including development of the Enterprise Zone and that related to University Hospital of South Manchester) and to expand the qualitative choice of sites and premises available.*

Amendments to Justification

Para 18.4: *Add new sentence to end of paragraph: Provision has been made for employment development at Davenport Green in order to enable the Council, through the Core Strategy, to respond flexibly to the enhanced prospects for economic growth in the city region that have been identified in the Council's further evidence on employment development proposals in the south of the conurbation, including the proposed Airport City/Enterprise Zone and the proposed Medipark. Terms for the release of the land for development are set out in Policy R4.*

Paragraph 18.6: delete the words "without the need.....site at Davenport Green" and add *Additional land for employment development is provided at Davenport Green in order to offer a flexible supply, as set out above in paragraph 18.4.*

Para 18.7: Delete sentence "The amount of land proposed for new employment.....to changing economic circumstances." And insert *However subsequent work by the Council and evolving Government policy towards sustainable economic development have indicated a need to add qualitatively to the choice of sites and premises, especially in the favoured south of the conurbation; the Council has responded by identifying Davenport Green in addition to the sites identified in Table W1 as a focus for employment development.*

Para 18.16: In first sentence insert Davenport Green as follows: *identified for additional office development in the Core Strategy are Pomona, Wharfside and*

Davenport Green. In the second sentence delete the word “these” and insert *the former*. Add new final sentence to paragraph: *Davenport Green has been identified as a main area for office development in recognition of its distinctive characteristics and ability to offer a wider choice of locations to the market.*