Core Strategy

Sustainability Appraisal Adoption Statement

January 2012
If you need help to understand this information, please ask someone to phone 0161 912-2000 to let us know how we can best provide this information.

إذا كنت في حاجة إلى مساعدة لفهم هذه المعلومات الرجاء طلب من شخص
الاتصال برقم الهاتف: 000-9161 0161 لا اختبارنا عن كيفية تقديم هذه المعلومات
بأحسن طريقة.

ARABIC

如果您需要帮助才能看懂这份资料，可以请人致电：
0161 912-2000，告诉我们如何最好地给您 提供这些信息。

CHINESE

Si vous avez besoin d'aide pour comprendre ces informations, veuillez
demander à quelqu'un de téléphoner au 0161 912-2000 pour nous
informer de la meilleure façon pour fournir ces informations.

FRENCH

કેમ આપણે આ માહિતીમાં માફ કરી રહી છી હું તો કુશ્યાપ કરી કહી ું, આ 
માહિતીની સમયે ટેલીફોન સંખ્યા રીતે પૂછી પડી રહી હતી તે આપણે આમ જ હાથાવવા માટે, 0161 
912-2000 સંખ્યા પર ડલલ કરી.

GUJARATI

refer to the relevant section of the strategy document and
ask someone to phone 0161 912-2000 to let us know how we can best
provide this information.

POLISH

Haddii aad dooneeyso in lagaa taageero garashada macluumaadkaani,
fadlan qof uun ka codso inuu waco telefoonka 0161 912-2000 oo noo
sheego sida ugu fiican oo aanu macluumaadkaani kuugu soo gudbin
karno.

Somali

If you need help to understand this information, please ask
someone to phone 0161 912-2000 to let us know how we can best
provide this information.
Contents

1.0 Introduction .......................................................................................................................... 4

2.0 How environmental considerations have been integrated into the plan or programme .................................................................................................................. 5

3.0 Sustainability Appraisal at each stage of the Plan Process ........ 7
Sustainability Appraisal at Issues and Options Stage - July 2007 .......... 8
Sustainability Appraisal at Preferred Options Stage – July 2008 .......... 9
Proposals for Strategic Sites and Locations – January 2009 .......... 10
Developing the Preferred Option – May to July 2009 .......... 10
Further Consultation on Core Policies L2, L4, L5, W1, R5, November 2009 ................................. 11
Further Consultation on the Vision, Strategic Objectives and Delivery Strategy – March 2010 ........................................................................................................................................ 11
Sustainability Appraisal at Publication – September 2010 .......... 11
Public Examination Hearings March 2011 and Post Submission Changes ................................................................................................................................. 12
Public Examination Hearing September 2011 ................................ 17
Inspectors Report ..................................................................................................................... 17

4.0 The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan .......................................................................................................................... 17
Sustainability Appraisal Adoption Statement

1.0 Introduction

1.1 The Trafford Core Strategy was adopted on the 25th January 2012. Upon adoption of Development Plan Documents, Regulation 113 (3) and (4) of the Environmental Assessment of Plans and Programmes Regulations 2004 requires Councils to prepare a statement which sets out:

- how environmental considerations have been integrated into the plan or programme;
- how the environmental report has been taken into account;
- how opinions expressed in response to consultations have been taken into account;
- the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives considered; and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.

1.2 This adoption statement sets out the background to Sustainability Appraisal and then summaries the stages of the Core Strategy and sets out how the above requirements have been integrated into each of these stages. Together with the Core Strategy, the Inspector's Report, and the Sustainability Appraisal Report, it can be viewed on the Trafford website at www.trafford.gov.uk and at all Trafford libraries and at Access Trafford offices.

Background

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

1.4 The Core Strategy is the overarching element of the LDF and all other Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) prepared by the Council are required to be in conformity with it. The Core Strategy outlines the Council's vision for Trafford up to the year 2026, it sets out how the Council will manage the change necessary to realise this vision. Accordingly, it establishes a balance between growth, regeneration and environmental protection / improvement.
1.5 Sustainable development is the core principle underpinning the planning system and, as a consequence, sustainability is at the heart of the Core Strategy. In order to ensure that new plans and strategies contribute towards sustainable development, the Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal (SA) to be carried out on all new or revised DPDs.

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

2.0 How environmental considerations have been integrated into the plan or programme

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

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

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

2.3 While SA and SEA are distinct processes, many of their requirements overlap. As a consequence, the Government has prepared guidance¹

¹ Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents: Guidance for Regional Planning Bodies and Local Planning Authorities – ODPM, November 2005. This guidance
which advises that an integrated approach to SA and SEA should be pursued, so that the SA process also meets the requirements of the SEA Directive and Regulations. This involves extending the breadth of (predominantly environmental) issues required to be considered under SEA to cover the full range of aspects (including social and economic) for sustainability.

2.4 Trafford’s Core Strategy has been subject to SA at each stage of its production. As detailed in the Core Documents list, the following SA documents were produced before the Core Strategy was submitted to the Secretary of State in December 2010:

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

2.5 Since the Core Strategy was submitted to the Secretary of State in December 2010, and the Examination process began, a number of issues emerged which had implications for the contents of the Core Strategy.

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

2.7 The documents listed below include all the further SA work carried out and made available for consultation together with an Addendum Report which consolidated all the SA work into one report.

**Post Submission Sustainability Appraisal**

- Further SA of the Davenport Green Site (February 2011) CD 12.37.2
• Sustainability Appraisal of June 2009 Revised February 2011 CD12.37.3
• Sustainability Appraisal Appendices of June 2009 Revised February 2011 CD12.37.4
• Councils Further Work on the Proposed Inclusion of the Development Site, at Davenport Green, within the Green Belt (April 2011) CD12.72
• Proposed Changes to the Inner Areas Boundaries (June 2011) CD12.77
• Further Consultation on Revised Policy L5 – Sustainability Appraisal (June 2011) CD12.80.1
• Consultation Documents on the Proposed Amendments to Policy R4-Green Belt, Countryside and Other Protected Open Land and Policy W1 – Economy (July 2011) CD12.95
• Sustainability Addendum Report (October 2011) CD12.104.1
• Sustainability Addendum Report Appendices (October 2011) CD12.104.2

3.0 Sustainability Appraisal at each stage of the Plan Process

The following sections set out how the environmental report, opinions expressed in response to consultations and “alternatives” considered have been taken into account at each stage of the Plan process.


3.1 Trafford Council began the pre-production stage, identifying the initial scope of the SA, in June 2006. In conjunction with key stakeholders across the 11 sub-groups of the Trafford Partnership (Local Strategic Partnership), the Council identified and reviewed other relevant plans, policies and programmes that would affect and influence the Core Strategy; set out relevant social, environmental and economic baseline information; identified the key sustainability issues for the SA to address; established an SA Framework consisting of sustainability objectives, indicators and targets and; produced a Scoping Report for consultation on the scope of the appraisal. The Trafford Partnership sub groups were particularly involved in the wording of the objectives, sub objectives and inclusion of indicators.

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

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

Consultation Responses

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

Influence on the next Plan Stage

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

Sustainability Appraisal at Issues and Options Stage - July 2007

Alternatives Considered

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

    Option 1  Focus growth in and adjacent to the Regional Centre and in the remaining Regeneration Areas with restraint elsewhere.

    Option 2  Focus Growth initially across the whole of the north of the Borough, and secondly within the remaining Regeneration Areas, with restraint elsewhere.

    Option 3  Focus growth in the north of the Borough with restraint in the south of the Borough.

3.7 The Issues and Options Paper (July 2007, CD 6.4.2) sets out the sustainability issues. Here the link is made between issues identified in the Scoping Report and issues that arose from the spatial portrait of Trafford. Each Option summarised the potential outcomes created by the particular Option together with the SA implications for each under the headings social, environment and economic.

Consultation Responses

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

**Influence on the next Plan Stage**

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

**Sustainability Appraisal at Preferred Options Stage – July 2008**

3.10 An SA was carried out in February 2008 on a refined and more detailed version of the 3 options from the previous stage as draft Preferred Options. The SA was carried out using 3 panels of officers from across different Council Services using the framework set out in the SA Scoping Report and the additional evidence base documents listed on page 6 of the Core Strategy Preferred Options Document (CD6.3.1). The panels met to agree scores, comments and mitigation. These were taken on board in a revision of the Options developed in May 2008. A combined panel made up of members from the February panels met to rescore and comment upon the revised draft options. These appraisals were then subject to further comment from groups outside the Council. Final ratification of the scoring was made by the community chair of Trafford Partnership in agreement with senior Council Managers. No further alternatives were considered at this stage.

**Consultation Responses**

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

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

**Influence on the next Plan Stage**

3.13 Because the SA was carried out in two stages, it helped further refine the Options and improve their performance against the sustainability objectives. The SA highlighted the issues around evidence and requirements within the developments to provide for infrastructure that needed to be addressed more fully in the next stage of the iterative process.
Proposals for Strategic Sites and Locations – January 2009

3.14 Specific work began in January 2009 on potential Strategic Sites and/or Locations. Key stakeholders, and land owners were invited to suggest suitable land for large scale development. As part of this process, and to inform the Council’s Preferred Option stage, they were asked to provide site information, details of the proposed development, policy fit, deliverability and a self assessed sustainability appraisal.

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

Developing the Preferred Option – May to July 2009

3.16 In May 2009, the Council commissioned consultants Urban Vision to undertake a sustainability appraisal of the Core Strategy Preferred Option which included for the first time Strategic Sites and Locations. There were no appropriate “alternatives” to the proposed Spatial Strategy to consider at this stage. The SA was carried out for the Delivery Strategy, Core Policies and all 14 locations and 6 sites that emerged out of the Stakeholder consultation. Of the six sites appraised, only five were incorporated into the Plan. The SA was a contributing factor in the site selection process.

3.17 A further report explaining how the Options were refined, from the 3 consulted upon in 2008 to the chosen spatial option, was produced alongside the June 2009 Preferred Option document, as a Technical Appendix, (CD 6.3.10). This referred specifically to the SA in sections 3.27-3.29, 4.27-4.3, 5.27-5.29 and 6.25-6.27.

Consultation Responses

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

Influence on the next Plan Stage

3.19 The SA comments, mitigation suggestions and consultation responses helped to highlight further information both on the Sites and Locations and in the evidence base that was needed to inform the next stage of the Core Strategy. These included the incorporation of:

- appropriate levels of density;
- consideration of and, where necessary, appropriate mitigation in relation to flood risk, e.g. Sustainable Drainage System;
- adequate public transport provision, provided by way of the proposed developments;
- the need to value and protect historic buildings;
• the need to explore opportunities for the use of Combined Heat and Power Systems.

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

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

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

3.21 The SA of this stage (CD 6.3.23 and CD 6.3.30) showed more positive scores than previously because more information was provided on the chosen 5 Strategic Locations. These 5 locations had been chosen from the previous 5 Strategic Sites and 13 Strategic Locations, as published for consultation in 2009. With publication of the SFRA 2 in February 2010, there was more certainty on flood issues.

Consultation
3.22 For the first time representations were made challenging the soundness of the SA in relation to earlier stages and the SA process as set out in the Scoping Report. The representor also repeated objections that had been made to scoring in previous stages of SA and raised concerns over inconsistencies of scoring in the latest SAs. No other responses to the SA were made at this stage in the Plan preparation process.

Influence on the next Plan Stage
3.23 As a result of the comments made the Council commissioned further SA work in respect of Davenport Green.

3.24 This work, carried out in July 2010, informed the Council decision as to whether or not it should proceed with the Publication of the Core Strategy in September 2010. The Council concluded that there was very little change in the SA and this would not have effected how the SA, together with other evidence, was used to determine decisions in relation to Davenport Green.

Sustainability Appraisal at Publication – September 2010

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

Consultation Responses
3.26 In response to the Publication SA comments were restated from 1 representor challenging the soundness of the sustainability appraisal. In addition the representor submitted substantial new detailed information for a development proposal at Davenport Green. No other responses to the SA were made at this stage in the Plan preparation process.

Public Examination Hearings March 2011 and Post Submission Changes

3.27 The majority of the Policies and their accompanying SA were considered by the Inspector at the February and March Hearings. However following discussion at those hearing sessions, the Council decided to re-consider its approach to a number of Policies. Specifically the level of detail being proposed within the Core Strategy in relation to the Regional Centre and Inner Areas Boundary, the flexibility and effectiveness of Policy L5 and the evidence base in relation to Policy W1 and R4. In the light of this further work, the Council decided that it would be both positive and appropriate to undertake further consultations.

Regional Centre and Inner Areas Boundaries
Alternatives Considered

Regional Centre

3.28 The Council identified two potential options for the Regional Centre Boundary. The first was to define the Regional Centre, within Trafford, as Pomona and Wharfside, as allocated within the Revised Unitary Development Plan (UDP) (2006). The second option was that which was presented by the Council in the Publication version of the Trafford Core Strategy at Figure 1. This proposed boundary included Pomona and Wharfside, as allocated within the Revised UDP (2006), together with the Manchester United Stadium Area and its immediate environs, also as allocated in the Revised UDP (2006).

Inner Areas

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

The options for the Regional Centre and Inner Areas boundaries were presented in CD 12.70, subject to SA and made available for consultation.

Regional Centre
3.30 This SA concluded that the two options for the Regional Centre boundary would have a relatively similar impact on the sustainability objectives.

Inner Area
3.31 The SA considered that none of the options would have a negative impact on any of the objectives but a pattern of scores for the options was however clearly apparent with Options 1 and 2 having a positive impact on a considerably greater number of sustainability objectives.

Consultation Responses
3.32 No responses were received in relation to the SA.

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

3.34 In relation to the Inner Areas boundary, the SA assisted the Council by identifying Options 1 or 2 as the most sustainable options. Given this and the fact that the Trafford Centre Rectangle is identified as an area where a significant level of mixed development (including over 1000 dwellings) is proposed, the Council concluded that Option 2 was the most appropriate definition of the Inner Areas boundary due to it reflecting the definitions provided within RSS and also because this option would better enable Trafford to contribute to the overall growth in the economy of the Regional Centre. The Revised Policy was considered by the Inspector at a hearing session in May 2011.

Policy L5: Climate Change
3.35 The Policy was amended by simplifying the CO2 reduction targets and bringing in viability to demonstrate flexibility. The amended Policy L5, together with its accompanying SA, was made available for consultation in April 2011 (CD 12.71).

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

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

**Consultation Responses**

3.37 No responses were received in relation to the SA

**Influence on the Adopted Plan**

3.38 The SA showed the revised policy to be as sustainable as the Submitted version of the Policy. It did not anticipate that the amended Policy L5 would have a negative effect on any of the sustainability objectives nor did it consider that the Policy would have an uncertain impact on any of these objectives. The SA did not therefore recommend any changes to the amended Policy L5. The Revised Policy was considered by the Inspector at a hearing session in May 2011.

**Development Proposal at Davenport Green, Policy R4: Green Belt, Countryside and Other Protected Open Land Policy W1: Economy**

**February and April Consultations**

3.39 At the Pre Hearing Meeting the Inspector requested that the Council published for consultation the SA work it had commissioned in June 2010 showing Davenport Green as at 2009 in its correct position, outside the Green Belt. The Council duly published the SA of the Davenport Green proposals which reflected its status as being outside of the Green Belt for a period of public consultation in February 2011 (CD 12.37.2) and then for an additional period of consultation in April 2011 (CD 12.72) taking into account the further information on Davenport Green submitted by the landowner in November 2010. These further consultations sought to ensure that the SA for the Core Strategy was transparent and robust.

3.40 The appraisal of the Davenport Green proposals published in February 2011 (CD 12.37.2) considered that the proposals for Davenport Green would bring a number of benefits but also considered there to be a number of uncertainties. The fact that the land had been wrongly identified as Green Belt in 2009 made no change to the SA scores.

3.41 The re-appraisal of the development proposal at Davenport Green in April 2011 (CD 12.72) fully incorporated the substantial new information submitted in November 2010. This further appraisal resulted in a significant improvement in the performance of the Davenport Green proposals against the SA objectives.

3.42 However up until June 2011, as set out in CD 12.72, the Council did not consider that sufficient justification existed, in economic terms, to amend the Plan in relation to land at Davenport Green. Instead it continued to propose that the land be returned to the Green Belt.

**Consultation Responses**

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

**July Consultations**

3.44 As a result of changes to Government policy including the Budget Statement and “Plan for Growth”, together with the emergence of new evidence, the Council resolved to change its approach to land at Davenport Green in June 2011. The change related to the 36ha of land at Davenport Green, which remained outside of the Green Belt in the Revised UDP (2006), but that was proposed in the Submitted Core Strategy to be returned to the Green Belt. In summary, the Council proposed to amend Policy R4 in order that this land would continue to remain outside of the Green Belt but would be protected as “Countryside Land” with criteria to control the nature and extent of development which may be permitted and the circumstances in which such development could come forward. As a result of the changes to Policy R4 a number of consequential changes were also proposed to Policy W1 to provide clarity about the definition of Davenport Green as a potential employment site. These were made in order to ensure the plan retains sufficient flexibility to respond to changes in economic circumstances and the Government’s “Planning for Growth” agenda.

3.45 This different approach was supported by the SA which demonstrated that the proposals for Davenport Green had the potential to have a positive impact on a wide range of sustainability objectives. The further SA on the amended Policies R4 and W1 was made available for public consultation in July 2011 (CD 12.95), together with the Council’s revised policy position.

**Alternatives Considered**

3.46 Due to the current uncertainty/fluidity in relation to the future expansion of Airport City and/or the MediPark proposals at the University Hospital South Manchester, the Council recognised, at its meeting on 27th June 2011, that there was a need for the Core Strategy to be sufficiently flexible to respond to changes in economic circumstances. In particular, the Council acknowledged that there was a potential need for a high quality, greenfield site to be retained in close proximity to Manchester Airport which could provide additional land to support proposals at Airport City or for Medipark at the University Hospital South Manchester in the future. Given the findings of the DTZ report in relation to the required attributes of such a site, it was concluded that the requirement could not be met by sites within Trafford’s town centres or on alternative sites, to Davenport Green, that are outside of the Green Belt. This conclusion was also supported by the PPS4 study (CD8.3.6).

3.47 Based upon the findings of the work undertaken on behalf of the Council in relation to the proposed Enterprise Zone at Airport City (CD 12.86), the Council considered that there were three alternative spatial options in relation to the Core Strategy and the future of Davenport Green:
1. Continue to recommend the site’s inclusion in the Green Belt;
2. Amend the status of the site to some other protected land designation;
3. Propose a change to the Core Strategy to include a Strategic Site at Davenport Green;

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

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

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

3.51 The Council therefore concluded that the only appropriate option would be to designate the land at Davenport Green as “Countryside” with criteria (as set out in R4.4) to control the nature and extent of development which may be permitted and the circumstances in which such development could come forward. The revised Policies R4 and W1 were subject to further SA and then put out for a 6 week consultation period.

Consultation Responses
3.52 As part of the July consultation comments acknowledged that Davenport Green performed well in sustainability terms but considered that the reappraisal scored favourably independently, and regardless of any connection with Airport City and MediPark. Other detailed comments were also received querying the accuracy of the SA.

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

**Public Examination Hearing September 2011**

3.54 At the Hearing sessions in September 2011 the Inspector considered the revisions to Policy W1 and Policy R4 and the further SA work carried out. Following these sessions revisions were made to the Plan, these were considered to be relatively minor and as such were supported by the existing SA. However, to aid readers understanding of the SA process and for clarity, the Council published an Addendum Report on the SA together with the suggested changes to Policies proposed since May 2011. These documents were the subject of a 2 week consultation period.

**Consultation Responses**

3.55 Two responses were received on the Addendum SA, one welcoming the report and one seeking clarification to specific wording in the Policy. Following the closure of the consultation period, the Inspector considered that no further hearing sessions would be necessary and that no further work was required.

**Inspectors Report**

3.56 The Council received the Inspectors report on the 28th November 2011. The Inspector found the Core Strategy to be sound and the SA to be adequate.

**4.0 The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.**

4.1 The Council will monitor and publish on the Councils website the significant environmental effects of the implementation of the Core Strategy through the Councils Annual Monitoring Report (AMR).

4.2 Section 28 of the Core Strategy sets out how the policies will be monitored. Table 3 lists all the individual policies against targets for the implementation of those policies and the monitoring indicators that will be used to assess achievement of these targets alongside where the information will be made available. Many of these indicators reflect the indicators identified in the SA Scoping Report to monitor the individual Sustainability Objectives.

4.3 The AMR will seek to highlight whether and where there have been deviations from expected Core Strategy or Sustainability Appraisal outcomes and therefore whether and where action will be required to adjust the means of implementing the agreed policy framework or bring forward some alteration to some or all of the content of that policy framework.

4.4 The monitoring findings of the AMR will be assessed and discussed with Council Officers, Members, the Trafford Partnership and other agencies
as appropriate to determine and agree the appropriate policy action to be pursued.