

Trafford Council

Integrated Assessment of the Trafford Draft Local Plan: Draft Report

December 2020

Quality Management

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Prepared by	Claire Dobinson Booth	
Checked by	Martin Craddock	
Authorised by	Jackie Palmer	

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1 Introduction

- 1.1 Trafford Borough Council (“the Council”) is preparing a new Local Plan, which will be the main land use planning document for the Borough. The Local Plan will propose detailed planning policies, area designations and site allocations for specific types of development to guide and manage the Borough’s future growth and development needs up to at least 2037. These policies will be used as the basis for determining planning applications.
- 1.2 Preparing a Local Plan involves several stages. In summer 2018, the Council consulted upon a Local Plan Issues Paper that set out key issues covering economic growth, inclusive growth and environmental sustainability. The consultation sought views on whether the right issues have been considered and if there were any further evidence needed or available to help prepare the emerging Local Plan. At this time the Council also put out a “call for sites” invitation that allowed for stakeholders to identify those sites within the Borough that could be considered as potential development sites, sites to be protected, or for other purposes, such as town centre boundaries or green networks.
- 1.3 The Local Plan, when adopted, will replace the Trafford Core Strategy (adopted January 2012) and the Revised Trafford Unitary Development Plan (adopted June 2006). Following the adoption of the Local Plan, the Development Plan for Trafford will comprise :
- The Trafford Local Plan;
 - The Greater Manchester Spatial Framework (GMSF);
 - The Greater Manchester Joint Waste Plan (adopted April 2012);
 - The Greater Manchester Joint Minerals Plan (adopted April 2013); and
 - Any adopted Neighbourhood Plans. This currently includes the Altrincham Town Centre Neighbourhood Business Plan (adopted November 2017).
- 1.4 In July 2018 the Council also consulted upon an Integrated Assessment (IA) Scoping Report that was finalised in February 2020. The Scoping Report identifies the type, nature and extent of potential effects that should be

considered in assessing the sustainability of the emerging Local Plan. Scoping is the first stage in the IA process.

- 1.5 Capita has undertaken IA on the draft Local Plan policies prepared by the Council so far. An initial report was carried out in February 2020 that appraised first drafts of policies. These policies have been updated and this report discusses the assessment of those updated policies. The report additionally outlines the assessment of the range of potential development sites that are being considered at this time for inclusion in the Trafford Local Plan.

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2 Sustainability Appraisal/Integrated Assessment

- 2.1 Section 19 of the Planning and Compulsory Purchase Act 2004¹ requires Local Planning Authorities to carry out Sustainability Appraisal (SA) of each of the proposals in a plan during its preparation. Section 39 of the Act requires that at every stage, plans must be prepared “with the objective of contributing to the achievement of sustainable development”. SAs incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004² (commonly referred to as the “Strategic Environmental Assessment Regulations” or “SEA Regulations”). SA covers wider social and economic effects of plans, as well as the more environmentally focused considerations of SEA. It is common practice to cover the requirements of SEA within SA of Local Plans.
- 2.2 The Government states that the purpose of SA *“is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives”*³. It is an iterative process, which identifies and reports on the likely significant effects of the plan and the extent to which the implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined.
- 2.3 The planning system has an important role to play in promoting and enabling sustainable development, particularly through the plan making process. The legislation states that the function must be exercised with the objective of contributing to the achievement of sustainable development⁴. The NPPF⁵ sets out a “presumption in favour of sustainable development”, which runs through

¹ <http://www.legislation.gov.uk/ukpga/2004/5/contents>

² <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

³ Strategic environmental assessment and sustainability appraisal, Planning practice guidance, Ministry of Housing, Communities & Local Government, 2019 <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

⁴ Planning and Compulsory Purchase Act 2004, section 39 <http://www.legislation.gov.uk/ukpga/2004/5/contents>

⁵ National Planning Policy Framework, Ministry of Housing, Communities & Local Government, 2019 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

both plan-making and decision-taking. This involves three overarching objectives:

- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

2.4 SA of the emerging Local Plan will be joined by an assessment of the emerging Local Plan's predicted impact upon health and equality. Together this will be known as an Integrated Assessment (IA). The IA will include three separate but complementary assessments in order to inform the development of the Local Plan. These are:-

- SA: to assess the effects of the Local Plan across a range of environmental, social and economic issues.
- Health Impact Assessment (HIA): to assess the effects of the Local Plan on the health and well-being of the population and its ability to access health-related facilities and services. This also addresses equalities issues and has some overlap with Equalities Impact Assessment.
- Equalities Impact Assessment (EqIA): to assess the effects of the Local Plan in terms of equalities issues, with a particular focus on disadvantaged or

excluded groups of people. EqIA helps identify where equality of opportunity can be promoted.

2.5 HIA and EqIA are separate processes but are however linked to and are considered within the SA process. IA helps to ensure that the overlaps of each process (SA/SEA, HIA and EqIA) are considered and managed, that gaps are avoided, and that they are used to ensure a consistent evidence base and consistent assessment results.

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3 Scoping

- 3.1 The first step of the SA process is “scoping”. NPPG⁶ explains that the scoping stage should “set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and objectives”.
- 3.2 A draft Report setting out this process was produced by Capita for Trafford Borough Council and consulted upon from July 2018. The feedback received has been considered and relevant amendments have been made to an updated Report, published in February 2020⁷.
- 3.3 From this scoping exercise, 16 IA objectives were derived that were deemed appropriate indicators to test the emerging Local Plan proposals against to ensure they were addressing the issues that Trafford faces. They cover social, environmental and economic elements. As noted within this Report, HIA and EqIA can be integrated within an IA. To aid this, specific IA Objectives have been prepared that would allow for assessment of Local Plan proposals upon health (IA Objective 3) and equality (IA Objective 2).
- 3.4 To assist in the IA assessment, each IA Objective has a set of decision-aiding questions for policy assessment and a set for development allocation assessment, as set out at Appendix A.

⁶ Strategic environmental assessment and sustainability appraisal, Planning practice guidance, Ministry of Housing, Communities & Local Government, 2019 <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#Sustainability-appraisal-process>

⁷ Final Draft IA Scoping Report, Capita, 2020 <https://www.trafford.gov.uk/planning/strategic-planning/docs/Finalised-Scoping-Report.pdf>

4 Carrying out the Integrated Assessment

- 4.1 The scoping exercise also established a framework for carrying out the IA of the emerging Local Plan’s draft proposals. The established framework has been used to undertake IA on a set of draft policies and a series of potential allocations that have been prepared by the Council. The results can be found at Appendix B & C.
- 4.2 The suite of 16 IA Objectives was used to assess the draft policies and potential allocations using a matrix where the draft policy and site was “pitched” against the IA Objectives. To aid in transparency and consistency, the assessments were made using the decision-aiding questions that have been established for each IA Objective. The potential impact of implementing the draft policy over the short, medium and longer term was considered. For each, an outcome was noted using the colours and symbols in Table 5-1.

Symbol	Definition
++	Major positive effect
+	Positive effect
n	Neutral effect
-	Minor negative effect
--	Major negative effect
u	Unknown at this stage

Table 5-1: Assessment scoring system

- 4.3 During the assessment, a number of factors were considered to determine whether a predicted effect has the potential to be significant. These factors are listed in Table 5-2 below. The assessments include commentary to discuss these factors.

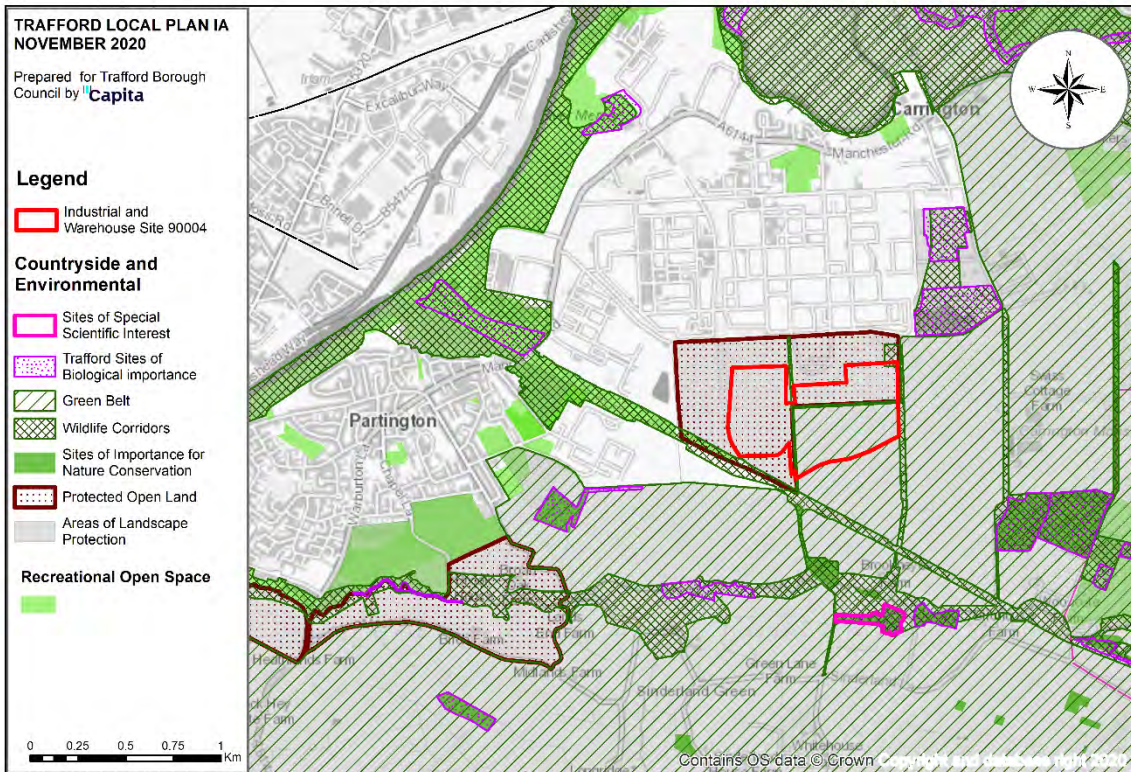
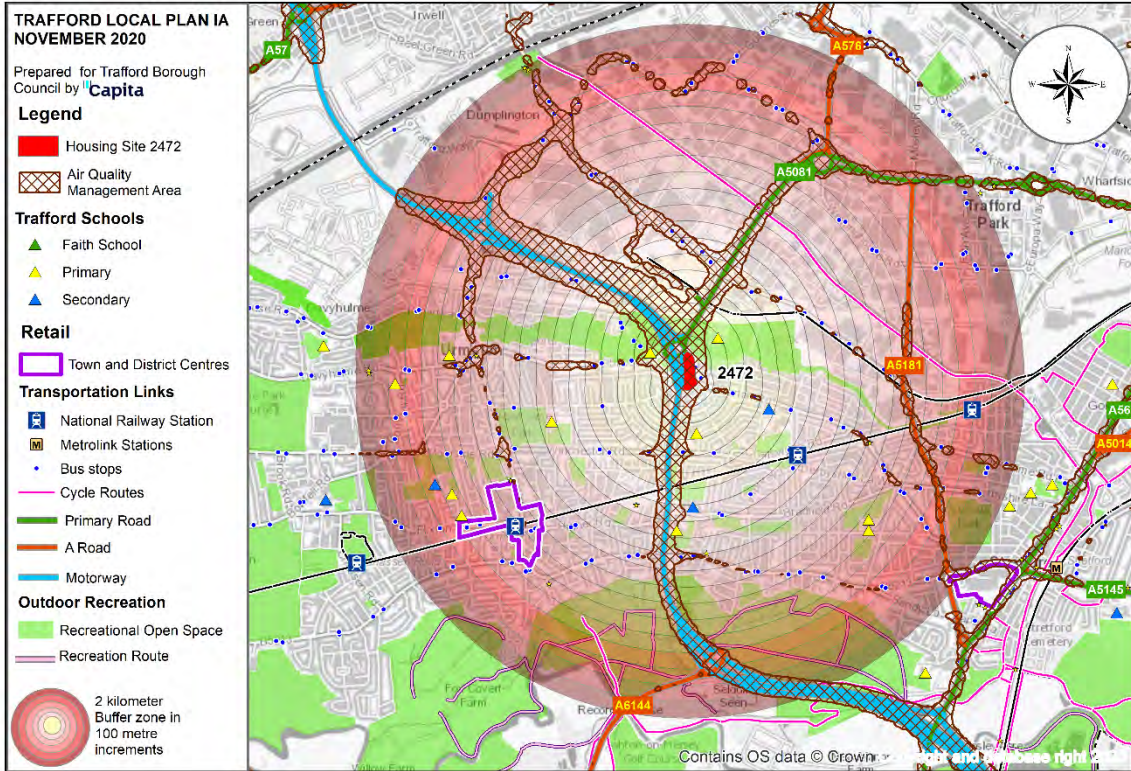
Issues for consideration	Details
Type of Effect	<ul style="list-style-type: none"> • Positive or Negative • Direct or Indirect • Cumulative, secondary, synergistic • Temporary or Permanent
Magnitude and Spatial Extent	<ul style="list-style-type: none"> • Where will it impact? Will it be within the Borough boundary or outside it?

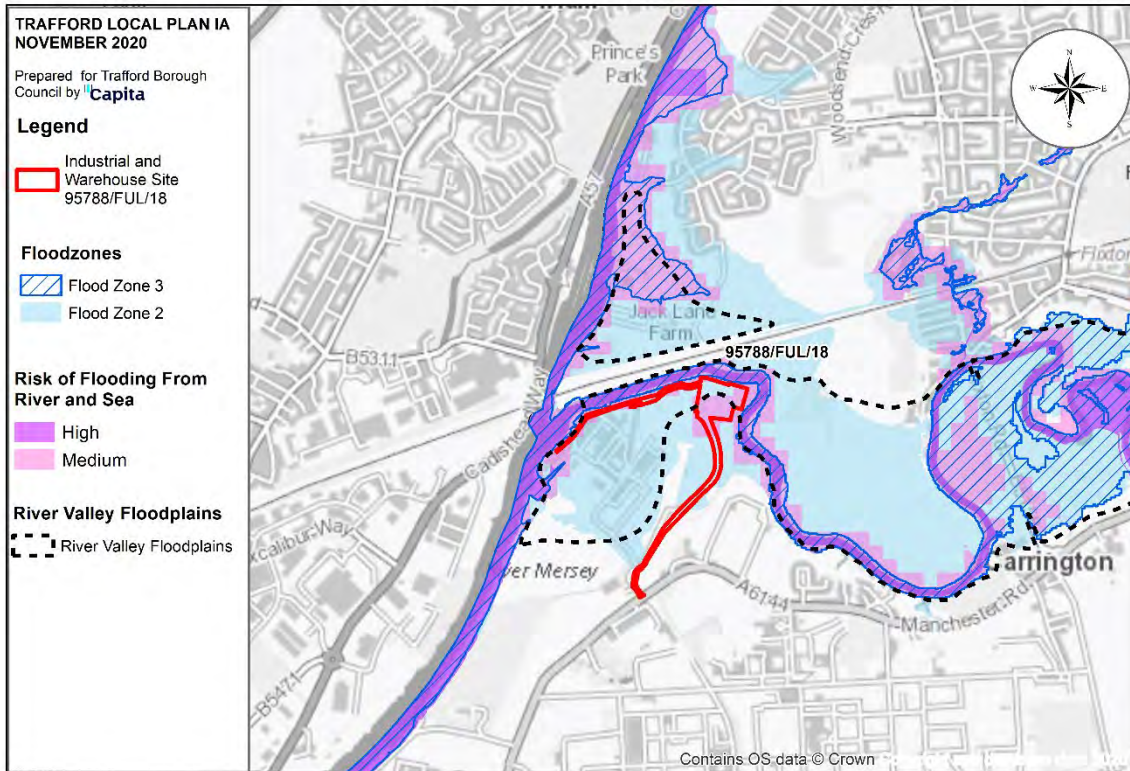
Issues for consideration	Details
	<ul style="list-style-type: none"> • Will it cause trans-boundary issues and impact on adjacent areas or regionally (GM) or nationally? • What is the geographical area and size of population likely to be affected?
Who it will affect, key groups or communities to be considered include:	<ul style="list-style-type: none"> • Old and young people • Socio economic groups (variable) • Women and men • Asylum seekers and refugees • Black and ethnic minority people (including Gypsy and Traveller communities) • Disabled people • Faith communities • Lesbian, gay, bisexual and transgender people
Vulnerability of Receptor	<ul style="list-style-type: none"> • Sensitivity of receptors • Special natural characteristics/areas or cultural heritage • Protected areas • Relative importance of the site, whether it is a nationally or internationally important feature or of local significance
Timing and Duration of the Effect	<ul style="list-style-type: none"> • Short-term: 0-4 years • Medium-term: 5-9 years • Long-term: 10+ years

Table 5-2: Factors considered in assessment

4.4 The assessment also considers opportunities to mitigate any negative effects or maximise those that were positive. Crucially, the IA process considers whether there are any measures that could be taken to better support the principles of sustainable development or to mitigate any adverse impacts of any proposal.

4.5 Whilst both the draft policies and potential allocations have been assessed using the same methodology and against the same IA objectives a digital mapping exercise was undertaken to assist with the appraisal of the allocations. The allocations were layered over a series of constraints and the data was used to provide an accurate picture of the site surroundings to better judge impacts against the IA objectives. Samples of the maps can be seen below.





Flood risk Sequential Test

4.6 The National Planning Policy Framework advises in paragraph 155 that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”⁸ Local Plans should apply a sequential, risk-based approach to the location of development to avoid, where possible, flood risk to people and property and manage residual risk and taking account of the impacts of climate change. “They should do this, and manage any residual risk, by:

- applying the sequential test and then, if necessary, the exception test as set out below;

⁸ National Planning Policy Framework, paragraph 155

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;
- c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and
- d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.⁹

4.7 The overall aim of the sequential approach is to steer new development to low risk flood zone 1. Where there are no reasonably available sites in flood zone 1, the flood risk vulnerability of land uses and reasonably available sites in flood zone 2 should be considered, applying the exception test if required.

4.8 Only where there are no reasonably available sites in flood zones 1 and 2 should the suitability of sites in higher risk flood zone 3 be considered. This should take into account the flood risk of land uses and the likelihood of meeting the requirements of the exception test if required.

4.9 One of the key factors in the assessment of sites as part of this Integrated Assessment has been the level of flood risk associated with each site. Informed by data from the Greater Manchester Spatial Framework Strategic Flood Risk Assessment (2019 and 2020), the Manchester, Salford & Trafford Strategic Flood Risk Assessment (2011) and the most up-to-date Environment Agency flood maps each draft allocation has been mapped for risk of fluvial flooding, surface water flooding, groundwater flooding and whether or not the site falls

⁹ National Planning Policy Framework, paragraph 157

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

within a critical drainage area. The full results for the sequential test are given in Appendix D and summarised in section 6 below.

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5 Assessing Local Plan Objectives

5.1 The Draft Local Plan sets out nine strategic objectives that set out the key components required to meet the overarching vision of the Plan. They are as follows:-

1. Deliver the homes that Trafford needs
2. Make Trafford accessible and equal for all
3. Ensure Trafford's resilience and carbon neutrality
4. Secure successful, sustainable and healthy communities
5. Maintain Trafford's economic potential
6. Revitalise Trafford's town centres
7. Protect, improve and connect green assets
8. Reduce the need to travel
9. Enhance cultural, heritage and leisure assets

5.2 Whilst these Strategic Objectives are high level aims that will be expressed in more detail through the Local Plan's policies, it is beneficial to assess them at this stage to understand any potential significant adverse effects that could arise from their implementation.

5.3 Strategic Objectives tend to be overarching thematic aims and given their high-level nature, it is neither effective nor realistic to subject them to a full, detailed IA assessment. The Strategic Objectives have therefore been tested against each of the IA Objectives in the matrix below, using the colour scoring system set out under Table 5-1 above.

		IA Objectives															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Local Plan Strategic Objectives	1	++	+	+	++	n	n	u	n	u	u	n	u	u	u	u	u
	2	++	++	+	+	u	u	n	n	n	n	n	n	n	n	n	n
	3	n	n	+	n	+	n	n	+	++	+	+	+	+	++	++	++
	4	+	++	++	+	+	+	n	n	+	n	n	+	n	+	n	n
	5	++	+	+	++	+	+	n	+	u	n	n	u	u	u	u	u
	6	+	+	+	++	+	+	n	+	+	n	n	n	n	+	n	n
	7	u	+	n	++	n	+	++	+	++	+	+	++	n	+	+	+
	8	u	+	+	+	++	+	n	n	+	n	n	n	n	++	n	n
	9	u	+	n	+	n	+	++	++	n	+	n	n	+	+	n	n

5.4 The matrix did not identify potential for conflict between some IA Objectives and Strategic Objectives but did identify several “unknowns”. In those cases, there is the potential for negative, positive or neutral impacts, or a combination. This outcome tends to be related to those objectives related to housing and economic growth when considered against environmental objectives. In this respect, the matrix above serves as a useful tool in identifying where there are cases where direction may be required in the Local Plan policies to avoid, minimise or mitigate adverse effects and to enhance positive effects.

6 Integrated Assessment Outcomes

- 6.1 The full assessments for proposed policies are set out at Appendix B and the full assessments for all the potential site allocations are set out at Appendix C. A summary of the outcomes is provided below. The summary also discusses the potential for alternatives approaches where they may exist, in accordance with the SEA Directive.

Vision for Trafford

The policy sets out the overarching vision for Trafford over the Local Plan period. The vision is overwhelmingly positive from a point of view of sustainable development, with reduced need to travel, environmental improvements and a focus on existing centres with support for large scale development in line with the Greater Manchester Spatial Framework.

Without the policy there would be the concern that development would be more ad-hoc with adverse effects; this is not a reasonable approach.

Trafford's Places

TP1 – Trafford's Places

The policy's approach to ensuring Trafford is accessible and equal for all is in accordance with the NPPF. There is no reasonable alternative. The policy would have no negative impacts.

TP 2 - Trafford Wharfside and Pomona

Focusing on the area of Trafford Wharfside and Pomona this policy seeks to improve the economy of the area whilst improving green infrastructure and reduce the need to travel.

This has been assessed as a positive approach. Further attention could be given to the potential for flooding; however, this has been considered as far as possible without specific development sites identified. Generally speaking, to not include this policy or to take a different approach would not respond to the available evidence

and could result in less sustainable development, which would not be considered a reasonable approach.

TP 3 – Trafford Park

The area of Trafford Park is considered a major employment growth area in the region. This has been assessed as a positive approach. Further attention could be given to the potential for sustainable waste facilities. To not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.

TP 4 – Trafford Centre Rectangle

This area is a focus for residential and economic growth in addition to improving green infrastructure and sustainable transport. This has been assessed as a positive approach. Further attention could be given to the potential for flooding; however, this has been considered as far as possible without specific development sites identified. Generally speaking, to not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.

TP5 – Old Trafford

Old Trafford is a densely populated area with multiple issues such as lack of green infrastructure and high levels of deprivation. The policy supports improvements to green infrastructure, reducing the need to travel and positive growth in the area. This results in a positive assessment through the IA. To not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach. Whilst it is possible that the positive effects would be felt in the area by relying on the other, general, Local Plan policies the area policy can focus on specific issues in Old Trafford.

TP6- Carrington and Partington

This area has been identified for significant residential and employment development in the New Carrington strategic allocation in the GMSF; approximately 4,300 homes and up to 380,000 sqm of employment floorspace are planned for the

area. The policy supports improvements to green infrastructure, reducing the need to travel and positive growth in the area. This results in a positive assessment through the IA. To not include this policy or to take a different approach would not respond to the available evidence, including the GMSF, and could result in less sustainable development, which would not be considered a reasonable approach.

TP7 - Altrincham

The policy looks to balance strategic growth areas such as Timperley Wedge with the need to preserve the existing neighbourhood and heritage assets. This has been assessed as a positive approach. However, to not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.

TP8 – Sale

The policy for this area focuses development in the town centre and the strategic sites identified in the GMSF in addition to improving green infrastructure and sustainable transport. This has been assessed as a positive approach. Further attention could be given to the potential for flooding; however, this has been considered as far as possible without specific development sites identified. Generally speaking, to not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.

TP9 - Stretford

The Stretford area policy seeks to protect the town centre, improve green infrastructure and reduce the need to travel. This has been assessed as a positive approach. Generally speaking, to not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.

TP10 – Urmston

The Urmston policy seeks to protect and enhance the town centre, improve green infrastructure and reduce the need to travel. This has been assessed as a positive approach. Generally speaking, to not include this policy or to take a different

approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.

TP 11 - Mersey Valley

This policy seeks to enhance recreation and tourism in the area whilst protecting from other types of development. This has been assessed as a positive approach. Generally speaking, to not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.

TP 12 – Rural Communities

Almost two fifths of Trafford is countryside, the majority protected from development by Green Belt and other protected open land status. This policy seeks to enhance the environmental assets and promote suitable agricultural development. This has been assessed as a positive approach. Generally speaking, to not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.

Areas of Focus

AF1 – Pomona Island

The Pomona Island Area of Focus provides policy support for large scale development in the area and support for the masterplan. The policy has no assessed negative effects, although the full impact on the historic environment is currently unknown. National legislation and other Plan policies should provide sufficient protection for heritage when further details of proposals in the area are known.

AF2 – Trafford Wharfside

The policy has no assessed negative effects, although the full impact on the historic environment is currently unknown. National legislation and other Plan policies should provide protection for heritage assets when further details of proposals in the area are known.

AF3 – Trafford Park

Trafford Park is a key location for industry and business activity within the Manchester City Region and is a principal location for employment development in Trafford. The policy has no negative effects and there is no reasonable alternative to shape the area.

AF4 – Trafford Centre Rectangle

The Trafford Centre Rectangle Area of Focus is a key strategic part of Trafford, forming the western part of Trafford Park and including a Regional Shopping Centre and other major visitor attractions. The policy has no assessed negative effects, although the full impact on the historic environment is currently unknown. National legislation and other Plan policies should provide protection for heritage assets when further details of proposals in the area are known.

AF5 – Civic Quarter

The Area Action Plan establishes how opportunities in the Civic Quarter area can be realised, establishing a vision and strategic objectives for how the area will change up to 2037 and beyond. The policy has no assessed negative effects, although the full impact on the historic environment is currently unknown. National legislation and other Plan policies should provide protection for heritage assets when further details of proposals in the area are known.

AF6 – Town Centres

Trafford’s town centres are key drivers for economic prosperity and remain the focus of continued development as commercial, retail, leisure and residential hubs. The policy has no negative effects and there is no reasonable alternative to shape the area.

Inclusive places

IP1 – Inclusive Growth

This policy sets out how Trafford will reduce inequalities, create inclusive sustainable communities and help make Trafford accessible to all. The policy includes a series of cross references to other policies within the draft Local Plan. As a result of this the policy scores very positively against the IA objectives.

IP2 - Presumption in favour of sustainable development

The proposed policy sets out an overall positive approach that would support environmental, economic and social objectives. Whilst there is the potential for risk where no policy exists or the policy is out-of-date, and development would be dealt with in accordance with the NPPF, the general approach is positive and no reasonable alternative is possible.

IP3 – Health and well-being

This policy seeks to support proposals for health facilities and require Health Impact Assessment for certain other proposals. Where development might have a detrimental impact on health, it will not be supported. The policy has a positive impact overall and no reasonable alternative.

IP4 – Education and skills

Policy IP4 provides detail as to how the Local Plan will meet the demand for educational facilities now, and in the future. The policy also supports the upskilling of Trafford's residents. The policy is positive in its impact and responds to local evidence and therefore no reasonable alternative is offered.

IP5 – Design

Policy IP5 offers guidance and policy around good quality design, accessibility, amenity, security, and functionality. Whilst the policy does score positively in some aspects, the policy is silent on designing in other aspects such as sustainable drainage systems, climate change resilience and energy efficiency. Other aspects of the plan do consider these but strengthening the links might be beneficial.

IP6 - Digital connectivity

This policy supports high quality and high-speed digital infrastructure in Trafford. The policy impacts are largely neutral, but it does have a very positive impact on economic objectives.

IP7 – Community Facilities

This policy offers support for new community facilities and gives criteria for when the loss of facilities would be acceptable. The policy impacts are largely neutral, but it does have a very positive impact on social objectives.

Land for new homes

HO1 - Scale, phasing and distribution of new housing development

This policy sets out the quantum of housing development over the plan period, how this development will be phased and the broad locations of development. Whilst this has obvious positive effects on social and economic development such a level of development could have negative effects on the environmental IA objectives. Without exact development locations it is not possible to be certain of the impact. However, the suite of Local Plan policies, along with national legislation, should provide effective mitigation against any impacts.

HO2 – Land release for new residential development

Policy HO2 will set out the final housing allocations. The allocations themselves will be subject to individual appraisals which will look more closely at impacts from each site. Similar to the appraisal of policy HO1, this policy scores well against social and economic policy but without mitigation would have a negative impact.

HO3 – Release of other land for residential development

In addition to policies for housing on allocated sites the Local Plan provides criteria, in policy HO3, for addressing housing proposals on unallocated sites. The policy has generally positive or neutral impacts on the IA objectives.

Meeting housing need

HN1 – Dwelling size, type and tenure

The policy sets out how Trafford will deliver a range of housing types and sizes. This has been assessed as a positive approach. Generally speaking, to not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.

HN2 – Affordable Housing

Policy HN2 sets out the Council's approach to affordable housing; type, quantum and location. This has been assessed as a broadly positive approach. Generally speaking, to not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.

HN3 - Older persons accommodation

This policy requires developers to demonstrate how their proposal will be capable of meeting, and adapting to, the long term needs of this specific group of people. This has been assessed as a broadly positive approach. Generally speaking, to not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.

HN4 - Gypsy, Roma and traveller communities and travelling showpeople

Policy HN4 allocates a site for the anticipated need for 17 further pitches and provides criteria for assessing any additional proposals. This has been assessed as a broadly positive approach. Generally speaking, to not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.

HN5 – Other housing needs

Whilst this policy sets out the Council's approach to student housing and self-build plots it does not allocate sites to meet the full housing need for these types. The policy would benefit from finding ways to provide Self-build homes faster and introducing sites designated to student development. The full suite of housing policies in the Local Plan will provide support for other housing types and mix.

HN6 – Adaptable and Accessible Housing

The final housing need policy sets out the requirements for accessible and adaptable housing in Trafford. This has been assessed as a broadly positive approach. Generally speaking, to not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.

Climate Change and Low Carbon

CC1 - Climate Change

The Council is committed to mitigating and adapting to the challenges of climate change. The policy requires development to minimise resource and energy consumption as well as carbon emissions through sustainable design and construction. It also seeks development to be resilient and adaptable to the future climatic changes such as extreme weather events. This will have a positive effect felt across the Borough and beyond. There is no reasonable alternative. The policy would have no negative effects.

CC2 – Low carbon and renewable energy

The policy supports the development of renewable energy schemes within the Borough providing it meets a set of criteria concerning its impact on the surrounding area. It also requires all new development to minimise carbon emissions with targets for major residential developments. Certain areas will also be required to provide the infrastructure to enable connection to a decentralised energy network. There is no reasonable alternative. The policy would have no negative effects.

Sustainable transport and accessibility

ST1 - Sustainable transport and accessibility

The policy aims to provide an improved sustainable and integrated transport network that would encourage more journeys by various modes of sustainable travel. This is in accordance with the NPPF. The policy does identify some potential short-term negative impacts on the biodiversity and nature conservation, but overall the impact of the policy would be positive. There is no reasonable alternative.

ST2 – Highway Network

The Policy seeks to ensure that development will provide appropriate transport provision to the highway network and includes a number of strategic highway improvement routes to be safeguarded. There is no reasonable alternative. The policy would have a short term negative impact on the aim to reduce greenhouse gas emissions, but the suite of transport policies in the plan supports other forms of

sustainable transport and in the medium to long term the policy would have no negative effects.

ST3 - Active travel, walking and cycling

The policy targets the importance of active travel to the Council and by working with partners it will provide a network of cycle and pedestrian routes that are attractive to users across Trafford with the aim to increase the number of active travel journeys. The policy does identify some potential short-term negative impacts on some sensitive areas of nature conservation, but the impact is likely to be temporary as mitigation becomes effective and the overall the impact of the policy would be positive. There is no reasonable alternative.

ST4 - Public transport network

The policy will support the development of an integrated public transport network with improved frequency and reliability. Extensions and targeted sections for improvement are identified that draw upon the long-term vision of the Greater Manchester Transport Strategy and certain public transport routes are to be safeguarded to improve future connectivity. The policy does identify some potential negative impacts on soils and land contamination, but the overall the impact of the policy would be positive. There is no reasonable alternative.

ST5 - Freight transport network

The policy aims to promote and improve the freight transport network, with an emphasis on supporting movement by rail and/or water. There is no reasonable alternative. The policy would have no negative effects.

ST6 - Car parking standards

The policy will be informed by the Greater Manchester Accessibility Layers to ensure car parking is reflective of its proximity to sustainable and accessible locations. The policy also promotes the provision of off-street parking and electric charging points. There is no reasonable alternative. The policy would have no negative effects.

ST7 - Other parking provision

The policy addresses parking for other non-residential development so that it would be appropriate to its location, factoring in its proximity to public transport. The policy

has specific reference to off-air port car parking and lorry management. The policy would have a negative impact on the objective to reduce greenhouse gas emissions and being resilient to climate change as they would increase dependency on road travel but overall, the policy is neutral when assessed against the objectives. Other Plan policies such as CC1 and CC2 would go some way to mitigating harmful effects to greenhouse gas emissions.

Trafford's Economy

EC1 - Economic development

This policy sets out, in broad terms, how the Local Plan will help maintain and support economic growth within Trafford. The policy scores positively in terms of social and economic IA objectives, however, the policy does not include any detail on how it will protect Trafford against negative impacts on air quality and increases in greenhouse gases. Whilst this mitigation is included elsewhere in the plan, the policy would benefit from mention of environmental factors, particularly around paragraph EC1.7.

EC2 – Key employment areas

Policy EC2 allocates and focuses employment development in key areas of Trafford. The policy also lists criteria where development other than employment uses would be acceptable. The policy scores positively in terms of social and economic IA objectives, however, the policy does not include any detail on how it will protect Trafford against negative impacts on air quality and increases in greenhouse gases. Whilst this mitigation is included elsewhere in the plan, the policy would benefit from mention of environmental factors, or links to wider policies within an introductory section or within the policy itself.

EC3 – Local Employment Areas

This policy allocates smaller, local areas of employment and similar to policy EC2 offers criteria for the loss of employment land. The policy scores positively in terms of social and economic IA objectives, however, the policy does not include any detail on how it will protect Trafford against negative impacts on air quality and increases in greenhouse gases. Whilst this mitigation is included elsewhere in the plan, the

policy would benefit from mention of environmental factors, or links to wider policies within an introductory section or within the policy itself.

EC4 – Non-designated employment areas

This policy offers protection to employment areas not within designated sites and gives criteria for when other uses would be acceptable. The policy scores positively in terms of social and economic IA objectives, however, the policy does not include any detail on how it will protect Trafford against negative impacts on air quality and increases in greenhouse gases. Whilst this mitigation is included elsewhere in the plan, the policy would benefit from mention of environmental factors, or links to wider policies within an introductory section or within the policy itself.

EC5 – Broadheath Employment Area

Broadheath is the principal location for employment development in the south of Trafford, it is an established and sustainable location for employment development. Policy EC5 seeks to protect and enhance this area whilst respecting adjacent green belt areas.

The policy scores positively in terms of social and economic IA objectives, however, the policy does not include any detail on how it will protect Trafford against negative impacts on air quality and increases in greenhouse gases. Whilst this mitigation is included elsewhere in the plan, the policy would benefit from mention of environmental factors, or links to wider policies within an introductory section or within the policy itself.

Town centres and retail

TC1 - Development within designated centres

The policy identifies the town centres, district centre and local centres within Trafford and the need for them to be protected and enhanced. The policy seeks to promote main town centre uses in its designated town centres, but principally retail development, that serves local community's needs in the district and local centres. There is no reasonable alternative. The policy would have no negative effects.

TC2 Primary Shopping Areas

The policy seeks to retain a retail hub in the Primary Shopping Area of Altrincham.

Through maintaining and enhancing continuous active ground floor frontages that may also support other service uses, it seeks to retain retail as the dominant use for this part of town. There is no reasonable alternative. The policy would have no negative effects.

TC3 – Out of Centre development

The policy reaffirms the sequential and impact test of national guidance with the emphasis on a town centre first approach to direct new retail and leisure development to the designated centres. The policy includes a locally set impact threshold and recognises the existing significant out of centre retail and leisure developments within Trafford, but any future town centre development on these sites would need to be in line with the tests outlined in national planning guidance and other policies in the Local Plan. There is no reasonable alternative. The policy would have no negative effects.

Historic Environment

HE1 – Historic environment

The protection and enhancement of the historic environment would not have any negative effects. The conservation of the historic environment is in accordance with the NPPF. There is no reasonable alternative.

HE2 – Conservation areas

This policy links to the policies map where conservation areas will be identified and the policy provides criteria for development in the conservation areas. The protection and enhancement of the historic environment would not have any negative effects. The conservation of the historic environment is in accordance with the NPPF. There is no reasonable alternative.

HE3 – Heritage assets

The protection and enhancement of the historic environment would not have any negative effects. The conservation of the historic environment is in accordance with the NPPF. There is no reasonable alternative.

HE4 - The historic environment and new development

This final heritage policy sets out a series of requirements for development to, or near, heritage assets. The protection and enhancement of the historic environment would not have any negative effects. The conservation of the historic environment is in accordance with the NPPF. There is no reasonable alternative.

Culture and Tourism

CT1 – Culture and Tourism

Tourism contributes to Trafford's economy and vitality. Supporting and protecting tourism uses is therefore in line with the requirements of the NPPF. There is no reasonable alternative to this approach. The policy ensures that tourism uses would not result in adverse effects. Whilst, additional traffic and noise are unlikely to be avoidable the policy includes mitigation for this.

Green Trafford

GT1 - Green infrastructure

The policy is a strategic approach by the Council to protect, enhance and manage Trafford's Green Infrastructure. This would provide a range of benefits and across a network of connected green and blue spaces, such as recreation, flood mitigation and wildlife habitat. There is no reasonable alternative. The policy would have no negative effects.

GT2 – Green Belt

The policy seeks to prevent urban sprawl by keeping land permanently open, but there are two strategic deletions proposed through the Greater Manchester Spatial Framework which would have a negative impact on the townscape and character of Trafford and its heritage assets. However, the impact will reduce over time as the new development evolves and overall, the policy is neutral or positive when judged against the other objectives and there is no reasonable alternative.

GT3 – Agricultural Land

The policy supports agricultural development as well as diversification proposals provided it meets a set of criteria, which includes the protection of the ecology and landscape setting of an area. The support for agricultural diversification has

identified negative impacts for some objectives by increasing travel to more remote areas, but overall, the policy is neutral when judged against the other objectives and there is no reasonable alternative.

Natural environment

NE1 – Natural Environment

The policy aims to protect and enhance the natural environment. This is in accordance with the NPPF. The policy also identifies Biodiversity Opportunity Areas to support nature recovery networks. There is no reasonable alternative. The policy would have no negative effects.

Open space, sport and recreation

OS1 - Open space

Policy OS1 sets out various ways the Council will provide, connect and protect a high quality, multi-functional network of open spaces across Trafford. This is in accordance with the NPPF and the evidence base. There is no reasonable alternative. The policy would have no negative effects.

OS2 – Indoor leisure

The Council will protect existing indoor sport facilities. In addition, the policy sets out how the Council will deal with proposals for new facilities, the loss of facilities and how it expects developers to contribute to facilities. This is in accordance with the NPPF and the evidence base. There is no reasonable alternative. The policy would have no negative effects.

OS3 - Outdoor sports facilities

The Council will protect existing playing pitches and outdoor sport facilities allocated on the policies map. In addition, the policy sets out how the Council will deal with proposals for new facilities, the loss of facilities and how it expects developers to contribute to facilities. This is in accordance with the NPPF and the evidence base. There is no reasonable alternative. The policy would have no negative effects.

Natural Resources

NR1 - Waste

This policy promotes the waste hierarchy and development on waste sites identified within the Greater Manchester Joint Waste DPD. There is no reasonable alternative. The policy has no assessed negative effects.

NR2 – Minerals

The policy's approach to mineral extraction accords with NPPF and available evidence, though the assessment does raise some potential negative effects in terms of geodiversity. Mitigation could include consideration of proposals for minerals extraction in conjunction with other policies of the Plan to maximise creation of future habitat and safeguard the most sensitive habitats from harm.

Water and flood management

WF1 – Flood risk and water management

The policy's approach to flood risk is in accordance with the NPPF. There is no reasonable alternative. The policy has no assessed negative effects.

WF2 – Safeguarding areas for flood management

The policy's approach to protection of flood storage areas is in accordance with the NPPF. There is no reasonable alternative. The policy has no assessed negative effects.

Environmental protection

EP1 - Land contamination

Where contaminated land could be an issue to a development this policy requires site investigations and risk assessment to be completed to ensure the impacts are considered. There is no reasonable alternative. The policy would have no negative effects.

EP2 – Noise

The policy requires noise assessments to consider the impact of a new development upon the surrounding area. This should include mitigation measures if necessary,

but without putting unreasonable restrictions on existing businesses. There is no reasonable alternative. The policy would have no negative effects.

EP3 – Air Quality

The policy sets out a range of measures to improve air quality in Trafford with the aim to reduce the need to travel by car and increase journeys by public transport, walking and cycling. There is no reasonable alternative. The policy would have no negative effects.

EP4 - Hazardous installations

The policy seeks to control the development of hazardous installations or new development within the vicinity of an existing hazardous installation so that the risks are considered to people and the impacts on the economy and the quality of the environment is considered. There is no reasonable alternative. The policy would have no negative effects.

Planning obligations

PO1 – Planning Obligations

The policy sets out the different contributions the Council may seek to mitigate specific adverse impacts generated by a development. The policy refers to the three statutory tests from government regulations and the types of infrastructure that may be sought whilst allowing for reduced contributions due to issues of viability. There is no reasonable alternative. The policy would have no negative effects.

Site Allocations

- 6.2 The following table gives an overview of the result of the IA for the potential housing allocations. Please note this only includes the score for the long-term impact following mitigation using Local Plan policies and other methods. For a full understanding of each site please refer to Appendix C which gives a score for short, medium and long-term and discusses the required mitigation.

	IA Objectives – Site summary															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Site 1455: Trafford Press Site, Chester Road	+	+	++	-	N	N	+	+	N	+	N	N	-	-	-	N
Site 1503: Stretford Memorial Hospital, Seymour Grove	+	+	++	+	++	++	+	-	N	+	-	+	-	-	N	N
Site 1510: Land East Of Partington Shopping Centre, Off Central Road, Partington	+	+	N	+	N	+	-	N	N	-	N	N	-	-	N	N
Site 1530: Former Mosedale's Brickwork S4, Ends Lane	+	+	N	+	+	N	++	N	N	+	N	-	-	-	--	N
Site 1552: Higher Road Depot And Adjoining Site	+	+	+	+	++	++	++	N	N	+	N	N	-	-	N	N
Site 1564: Land At Stokoe Avenue	+	+	N	+	N	+	N	N	N	+	-	-	-	-	-	N
Site 1566: Land At The Gorse	+	+	N	+	N	N	N	N	N	-	N	-	-	-	N	N
Site 1585: Oakfield Road/Balmoral Road	+	+	+	+	++	++	+	N	N	+	N	N	-	-	N	N
Site 1586: Mayors Road/Manor Road	+	+	+	+	++	++	+	N	N	+	N	N	-	-	N	N
Site 1601-00: Civic Quarter AAP	+	+	++	--	++	-	++	U	N	+	N	N	-	-	-	N
Site 1601-03: City Point, 701 Chester Road, Stretford	+	+	++	N	++	+	+	U	N	+	N	N	-	-	N	N
Site 1607: Former Bakemark Uk, Skerton Rd, Old Trafford	+	+	++	+	++	++	++	N	N	+	N	N	-	-	N	N
Site 1608: Former Boat Yard, Edge Lane, Stretford	+	+	+	+	++	++	++	U	N	+	N	N	-	-	N	N
Site 1609-00: Wharfside, Trafford Park	+	+	++	-	++	+	++	N	N	+	N	N	-	-	--	N
Site 1619: Land Adj Flixton Station, Flixton Road	+	+	N	+	++	+	+	N	N	+	N	+	-	-	-	N
Site 1623: 289 Hale Road, Halebarns	+	+	N	+	N	+	+	N	N	+	N	+	-	-	N	N
Site 1675: Land At And Adjacent To Katherine Lowe House, Davyhulme	+	+	+	+	N	+	-	N	N	+	N	+	-	-	-	N
Site 1732: Land At Avondale Road	+	+	N	+	+	++	+	N	N	+	N	+	-	-	N	N
Site 1823-05: Land At Heath Farm Lane, Partington	+	+	N	+	N	N	++	U	N	+	N	+	-	-	N	N
Site 1888: Globe Trading Estate, 88-118 Chorlton Road	+	+	+	+	N	+	+	-	N	+	N	N	-	-	N	N
Site 1918: 1 To 19, Washway Road,	+	+	+	-	++	++	+	-	N	+	N	N	-	-	N	N
Site 1934-2: Land Off Bold Street, Old Trafford	+	+	+	+	N	N	++	U	N	+	N	+	-	-	N	N
Site 1944: 19,25,27,33,35 Edge Lane, Stretford	+	+	+	+	++	++	+	U	N	+	N	N	-	-	N	N
Site 1601-07: 39 Talbot Road, Old Trafford	+	+	+	-	++	+	+	N	N	+	N	N	-	-	N	N
Site 1978: Stretford Mall, Chester Road	+	+	+	--	++	-	++	U	N	+	N	N	-	-	N	N
Site 1980: Essoldo Cinema, Edge Lane	+	+	+	+	++	++	++	U	N	+	N	N	-	-	N	N
Site 1981: Land At Newton St/Lacy St	+	+	+	+	++	++	++	U	N	+	N	N	-	-	N	N
Site 1983: The Square, Town Square, Sale	+	+	+	--	++	-	++	N	N	+	N	N	-	-	N	N

	IA Objectives – Site summary															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Site 1985: Victoria Parade, Urmston Town Centre	+	+	+	++	++	++	++	N	N	+	N	N	-	-	N	N
Site 1986: Land At Station Rd/Urmston Railway Station, Urmston Town Centre	+	+	+	-	++	++	-	N	N	+	N	N	-	-	N	N
Site 2082: Trafalgar House, Manchester Road	+	+	+	+	+	+	+	N	N	+	N	+	-	-	N	N
Site 2084: Mansion House, Manchester Road	+	+	+	+	+	+	N	U	N	+	N	+	-	-	N	N
Site 2085: Claremont Centre, Claremont Road, Sale	+	+	+	+	++	+	N	-	N	+	N	N	-	-	N	N
Site 2086: Britannia Road, Industrial Estate	+	+	+	+	++	++	++	N	N	+	N	+	-	-	N	N
Site 2096: Land At Oak Road, Partington	+	+	N	+	N	N	-	N	N	-	N	N	-	-	N	N
Site 2121: Land Between 182/182a Park Road, Stretford	+	+	N	+	+	+	+	N	N	+	N	N	-	-	-	N
Site 2144: Clarendon House, Stamford New Road, Altrincham	+	+	+	+	++	++	+	U	N	+	N	N	-	-	N	N
Site 2187: Bollin Private Hotel, 58 Manchester Road, Altrincham	+	+	+	+	+	+	N	U	N	+	N	N	-	-	N	N
Site 2234: Petrol Station And Adj. Land At 499 Chester Road	+	+	+	N	+	N	++	U	N	+	N	N	-	-	N	N
Site 2252: Lynnfield House/Hamilton House, Church Street Altrincham	+	+	+	+	++	++	++	U	N	+	N	N	-	-	N	N
Site 2293: The Dome, Grafton House, Stamford New Road	+	+	+	N	++	++	+	U	N	+	N	N	-	-	N	N
Site 2369: Trafford Magistrates' Court, Ashton Lane, Sale	+	+	+	+	++	++	+	U	N	+	N	N	-	-	N	N
Site 1601-08: Chester House, 1 Boyer Street, Stretford	+	+	+	-	++	+	++	-	N	+	N	N	-	-	N	N
Site 2389: Altrincham Leisure Centre Site And Adjoining Land Oakfield Road	+	+	+	+	++	++	N	U	-	+	N	N	-	-	-	N
Site 2581: Land Off Brunswick Street, Stretford	+	+	+	+	+	++	+	N	N	+	N	-	-	-	N	N
Site 2605-01: Crossford Court, Dane Road, Sale	+	+	+	+	++	+	+	N	N	+	N	N	-	-	N	N
Site 2666-00: Stretford AAP	+	+	+	-	++	-	++	U	N	+	N	N	-	-	-	N

7 Overview of Flood risk sequential test

7.1 The flood risk sequential test has highlighted several sites that have a level of flood risk that would benefit from further investigation. These are as follows:

	Flood Zone 3	Flood Zone 2	Surface Water 1in 1000 event	Surface Water 1in 100 event	Surface Water 1in 30 event
Wharfside, Trafford Park (Site 1609-00)	1%	53%	11%	1%	0%
Stretford AAP (Site 2666-00)	2%	7%	12%	2%	1%
Former Mosedales Brickwork (Site 1530)	0%	27%	7%	2%	0%
Land Between 182/182A Park Rd (Site 2121)	0%	26%	71%	71%	0%
Trafford Press Site (Site 1455)	0%	0%	21%	21%	0%
Land adj Flixton Station (Site 1619)	0%	0%	22%	22%	0%
Land at Katherine Lowe House (Site 1675)	0%	0%	28%	17%	7%
Altrincham Leisure Centre (Site 2389)	0%	0%	33%	8%	1%

Wharfside, Trafford Park (Site 1609-00)

7.2 The Wharfside at Trafford Park is a priority development site in the draft Local Plan. However, more than 50% of the site lies within flood zone 2 which is not surprising due to its canal side location. Given the intended uses for the site are mixed it should be possible to put less vulnerable uses on the area of flood zone 2. A full Flood Risk Assessment of the site will be required and should residential be placed in areas of flood zone 2, the exception test will need to be considered.

Stretford AAP (Site 2666-00)

7.3 This large site contains small areas of flood zone 2 and 3 which should be avoided when developing the site. A site of this size will require a Flood Risk Assessment at an application stage.

Former Mosedale Brickwork (Site 1530)

7.4 Around 27% of this small site is within flood zone 2, which is significant for a site of this size. This area will need to be avoided through site design or a less vulnerable use developed on site. If this cannot be achieved, then an exception test will need to be passed.

Land Between 182/182A Park Rd (Site 2121)

7.5 Around 26% of this small site is within flood zone 2, which is significant for a site of this size. This area will need to be avoided through site design or a less vulnerable use developed on site. If this cannot be achieved, then an exception test will need to be passed.

Trafford Press Site (Site 1455)

7.6 Whilst this site is not at risk of fluvial flooding it does contain areas at risk of surface water flooding during storm events. Should this site be allocated, a note requesting a Flood Risk Assessment could be placed against the site to ensure flood risk is effectively considered.

Land adj Flixton Station (Site 1619)

7.7 Around 22% of this small site is vulnerable to surface water flooding. This should be carefully considered before allocating a site of this size as avoidance and mitigation will be difficult.

Land at Katherine Lowe House (Site 1675)

7.8 Just over a quarter of this brownfield site is at risk from surface water flooding. It may be possible to avoid this area through site design or place less vulnerable uses on this area such as car parking. Given its size a Flood Risk Assessment will be required at planning application stage.

Altrincham Leisure Centre (Site 2389)

7.9 A third of this brownfield site is at risk from surface water flooding. It may be possible to avoid this area through site design or place less vulnerable uses on

this area such as car parking. Given its size a Flood Risk Assessment will be required at planning application stage.

8 Overview of IA Outcomes

General

- 8.1 This section discusses the assessed impacts of the draft Local Plan policies and allocations.
- 8.2 Policies and allocations tend to “score” well when assessed against the IA objectives. The unmitigated conclusions can be neutral or even negative at times but suggested mitigation measures tend to improve this outcome. It is usually the case that the suggested mitigation is mandatory as part of the planning process and therefore will be implemented. For example, flood mitigation and high standards of design are often cited as mitigation measures that should be pursued; these are mandatory elements of development as set out in national planning policy guidance and in the draft Local Plan.
- 8.3 As most policies have been prepared in accordance with the NPPF and relevant evidence, there is generally no reasonable alternative policy approach.
- 8.4 For potential allocations, it is generally the case that the proposed development generally can be considered sustainable given the appropriate mitigation and/or compensation is pursued. There are, of course, examples where adequate mitigation/compensation becomes more difficult to achieve, often due to a site’s particular environmental sensitivity.
- 8.5 The outcomes of the IA assessments are very important in providing, in a transparent manner, an understanding of the potential sustainability of proposals, policies and allocations, and the degree to which the effects of the draft Local Plan can effectively be mitigated. However, it is important to understand that the IA itself cannot singularly determine a particular direction the Local Plan must take. The Local Plan fits into a hierarchy of planning

documents, and is therefore influenced by national planning policy that has also been subject, in some cases, to some form of IA. In addition, the Local Plan is guided by a suite of evidence that sets out and takes into account matters such as the aspirational objectives of Trafford, balanced against the realism and viability of the Plan being delivered. It is also the case that public consultation will play a role in the eventual adoption of policies and allocations of sites.

- 8.6 The SEA Directive requires the consideration of the temporal nature of proposals. These are looked at as part of the IA assessments at Appendices B and C. There is also the requirement for the consideration of the secondary, cumulative and synergistic effects of plans and their geographical effect. These are discussed below as part of an outline of the main outcomes of the IA assessments.

[How does the plan assist in the objective to provide housing of an appropriate mix of sizes, types, tenures in locations to meet identified needs and reduce disparity?](#)

- 8.7 The draft Local Plan reflects the housing requirement set out within the Greater Manchester Spatial Framework (GMSF) for Trafford, of at least 18,547 dwellings over the plan period of 2020 to 2037. Addressing the supply of land for development allows for the provision of a sufficient amount of housing, which would facilitate a suitable mix of housing and aid affordability.
- 8.8 The positive economic strategy set out in the Plan supports prosperous residents thus improving affordability.
- 8.9 There are some policies within the Plan that restrict housing development or could act as a constraint that could prevent housing development (for example, green belt). These policies are not considered to represent a significant issue to housing delivery due to the availability of more suitable locations across Trafford.

8.10 It is considered that cumulatively, the Plan's policies work well together to meet Trafford's housing need, which would also have a positive effect at a regional level addressing the wider housing market area. Policies on securing required infrastructure, including affordable housing, and on plan implementation and monitoring will assist in ensuring that in its implementation the Plan is fulfilling its vision.

How does the plan promote equality of opportunity and reduce levels of deprivation and disparity?

8.11 Reducing deprivation and disparity is a crucial strand of the growth strategy the draft Local Plan seeks to deliver. Areas of focus policies and Trafford Place policies in particular offer real opportunities to increase opportunities for all residents. It will be important to closely monitor the effectiveness of these policies in providing homes and jobs for every resident.

How does the plan support improved health and wellbeing of the population and reduce health inequalities?

8.12 The overall growth strategy for Trafford seeks to increase access to homes and jobs and also to improve access to green infrastructure and sustainable transport options. Indirectly this will have a positive impact on the health of the population in Trafford.

8.13 Policy IP3 – Health and well-being offers direct positive effects on the health and well-being of the population by ensuring health impacts are considered through the development management process.

How does the plan ensure sustainable economic growth and job creation?

8.14 The overall growth strategy for Trafford set out in the draft Local Plan consists of concentrating development in existing built-up locations to provide enough population growth to potentially encourage employers to relocate or remain in those areas and benefit from the increased economy. Policies regarding housing allocations require improved transport links and connections with local

employers, making accessibility to jobs easier and more attractive to prospective workers and potential new employers who may be encouraged to locate in the area.

- 8.15 The Plan allocates sufficient employment land to allow for economic growth in the area. Employment land allocations are within established employment site locations and include strategic sites, allocated by the GMSF. These sites specialise in advanced engineering, manufacturing, new technology and general office space; growth in these sectors is seen as an important approach in diversifying and strengthening the economy and widening the employment opportunities within the area. The benefits would be at a regional level as the strategic sites do attract workers from outside of Trafford.
- 8.16 The economic benefits of viable town and other centres are recognised in the Plan, with new town centre uses being directed towards existing centres, thus benefitting from established infrastructure and local customers.
- 8.17 The accessibility to and within Trafford is essential in allowing customers to reach town and other centres, residents to reach services, and workers to reach their jobs. Without a range of accessibility options, shopping, visiting and working within an area would be less attractive and would encourage people to go elsewhere for such wants and needs. The Plan's transport policies set out a strategic aim of improving road and rail connections, public transport services, and protection, improvement and promotion of public rights of way, walking and cycling networks. This is coupled with development management requirements that will be considered as part of planning application determination.
- 8.18 Overall, the policies and allocations of the draft Local Plan are highly compatible with this objective and are likely to give rise to a cumulatively positive impact. In the long term, the Plan will create and sustain high quality employment opportunities.

How does the plan ensure that there is sufficient coverage and capacity of sustainable transport and utilities to support growth and development?

8.19 The draft Local Plan spatial strategy has a highly positive approach with regards to this IA Objective. The development of new homes, services, facilities and employment opportunities within existing settlements will help to reduce the need to travel by car and promote the use of more sustainable modes of transport such as public transport, walking and cycling.

8.20 The Plan's suite of transport policies set out a strategic aim of improving road and rail connections, public transport services, and protection, improvement and promotion of public rights of way, walking and cycling networks. Policies relating to development proposals set out specific accessibility requirements for sites to address the particular opportunities or constraints at those locations. Together, along with the Plan's requirements for securing developer contributions for infrastructure, the policies should deliver a good level of accessibility.

8.21 Given the scale of road and rail networks and the movement of people for shopping, working and visiting, the positive effects would have a regional scope.

How does the plan improve the accessibility of the Borough by equitable means to community facilities, services and other needs?

8.22 The overall spatial strategy of the draft Local Plan aims to concentrate development within existing sustainable areas to assist in the retention of existing or the provision of new and improved services and facilities and to improve transport to existing services. Without the strategy, there could be the possibility of unmanaged development sprawl that would not allow for easy access to or provide viability for services and facilities.

8.23 The Plan contains a number of policies that would both directly and indirectly support this objective. The prosperity created by new homes and jobs in the

area would indirectly support this objective through increased spending and support for services and facilities. Directly, policy IP7 – Community Facilities encourages the development of new facilities and offers protection to those already in existence.

How does the plan conserve and enhance landscape, townscape, and the character of the Borough?

8.24 The spatial strategy that directs most development to established settlements is considered a positive approach with regards to this IA objective, especially with regards to protecting landscape. Without this strategy, development could become an unmanaged sprawl that could likely have a detrimental effect.

8.25 Some housing allocations are planned for the edge of settlements. Whilst upon greenfield land, the edge of settlement location would mean that the impact upon openness and landscape would not be significant and certainly less so than out-of-settlement locations. Employment land allocations are within established employment areas and so additional employment development within those areas would be appropriate to its established character.

8.26 Nevertheless, any development has the potential to impact upon the built and natural environment, positively, negatively or neutrally. This would be determined at the detailed design stage and managed through the development management process. The Local Plan includes positive policies on landscape, character and design, which aim to avoid negative effects and promote positive effects.

8.27 Therefore, the Plan's approach to its spatial strategy, allocations and development management policies works cumulatively to have a positive effect on this IA objective. In considering the importance of Trafford's character, townscape and landscapes, the effects would be at a local, national and international level.

How does the plan conserve and enhance the historic environment?

8.28 The Plan sets out a comprehensive policy for the conservation and enhancement of the historic environment through draft policy HE1. A number of potential development sites also provide opportunities for enhancement of heritage assets. In places managing development and potential intensification of uses in historic locations may provide challenges for achieving this outcome. However, the Plan would put an appropriate framework in place to ensure the significance of assets is identified and decisions reflect national planning policy and advice and guidance of Historic England. As such, the Plan would effectively conserve and enhance the historic environment.

How does the plan improve air quality?

8.29 Given that the Plan provides for an increase in local population and growth in employment, there is the potential for a wider national impact in terms of the generation of pollution and greenhouse gas emissions resulting from increased traffic movements which will in turn have an impact on air quality in Trafford. The negative effect of pollution is one mainly caused by cumulative impact, with a particularly negative impact during the construction phase. The effects will have a wide geographical scope; from local to national given CO2 emission targets are set nationally.

8.30 The draft Local Plan spatial strategy, allocations and policies together work well in aiming to minimise negative effects. Development will be concentrated in the most sustainable locations, as close to existing facilities and services as possible, minimising the need to travel. A proactive strategy for improving transport and access throughout Trafford, including the provision of sustainable transport routes, is included in the Plan.

8.31 Overall, it is considered the proposals within the draft Local Plan could have a cumulative negative impact on this objective. Whilst the Plan contains many ways in which to lessen, avoid or mitigate negative effects, some aspects such as loss of greenfield land and generation of pollution are inevitabilities of

growth. Policies must be well implemented, monitored and mitigated if required to keep negative impacts as low as possible.

How does the plan conserve and protect land and soils, whilst reducing land contamination?

8.32 The Plan's spatial strategy directs development to established settlements.

Without the strategy, there could be the possibility of unmanaged development sprawl that would negatively impact upon land and protected soils. The sites that have been allocated for potential residential development are within, or at the edge of settlements, and not within areas of high agricultural land categories. Whilst every effort has been made to allocate brownfield land, invariably some greenfield land will be lost to development.

8.33 Together with wider legislation, policy EP1 – *Land contamination* will provide current and future residents protection from contaminated land and ensure any contaminants are dealt with effectively.

How does the plan protect and improve the quality and availability of water resources?

8.34 Levels of development proposed in the Local Plan will understandably place further pressure on the availability of water resources and the quality of existing water. The Plan, and other legislation, provides protection against damage to watercourses and water quality.

How does the plan conserve and enhance biodiversity and promote nature conservation?

8.35 The Plan sets out a positive approach to the protection and enhancement of habitats, species and geodiversity through a number of policies to be applied at the development management stage.

8.36 The Plan's spatial strategy directs development to established settlements.

Without the strategy, there could be the possibility of unmanaged development

sprawl that would negatively impact upon habitats and species. The sites that have been allocated for potential residential development are within, or at the edge of settlements, and not designated for their biodiversity and geodiversity interest. Sites invariably will have the potential for some biodiversity interest and this would need to be explored and addressed accordingly. All allocations have the ability to design-in measures to protect, mitigate or enhance biodiversity and the Plan's policies are in place to secure this.

How does the plan promote sustainable consumption of resources and support the implementation of the waste hierarchy?

- 8.37 Given that the Plan provides for an increase in local population and growth in employment, there is the potential for a wider national impact in terms of the increased consumption of resources and increased quantity of waste.
- 8.38 Policy NR1 – Waste provides support for the waste sites identified through the Greater Manchester Joint Waste Development Plan Document (2012) subject to compliance with the waste hierarchy and the other policies within the draft plan.
- 8.39 The combination of policies within the draft Local Plan and within the GM Joint Waste Development Plan Document will provide sufficient support for achieving this IA objective.

How does the plan reduce per capita greenhouse gas emissions?

- 8.40 Cumulatively, the Plan's proposals relating to housing growth, employment and tourism are likely to increase pollution including CO₂ emissions. CO₂ emissions targets are measured at a national level. It is expected that through implementation of the Plan's policies which directly and indirectly manage climate change, this negative impact would be reduced so that it would not be significant.

How does the plan reduce the consequence of flooding?

8.41 Trafford does have several areas that suffer from flood risk. Using available evidence, the Council through its selection process and this IA has identified development allocation sites that generally have lower risk. Risk cannot be completely eliminated however, and development growth, as proposed in the Plan, is likely to increase water run-off.

8.42 The Plan therefore includes Policy WF1 to ensure that flood risk issues are fully addressed in the development management process. This would include the requirement to prepare a site-specific Flood Risk Assessment in areas that could represent risk. Planning applications must include details of suitable foul and surface water drainage schemes. This allows for development to incorporate avoidance and mitigation measures to avoid negative effects that would have a local scope.

How does the plan ensure communities, developments and infrastructure are resilient to the other effects of expected climate change?

8.43 The Plan's spatial strategy indirectly, positively impacts upon climate change due to the proposed location of allocations, reducing the need for travel, and the approach to delivering sustainable modes of transport. The Plan directly targets climate change through Policy CC1: Climate Change that expects development proposals to demonstrate a positive approach to designing in climate change resilience and minimising energy consumption.

9 Identifying Indicators to Monitor the Local Plan

Introduction

- 9.1 The SEA Directive requires the significant environmental effects of implementing the plan or programme to be monitored in order to identify unforeseen adverse effects and to be able to undertake remedial action.
- 9.2 The significant effects indicators should be developed to ensure a robust assessment of policy implementation. The IA monitoring will cover significant social, economic and environmental effects.
- 9.3 Monitoring should assess whether:
- the assessment's predictions of sustainability effects are accurate;
 - the Local Plan is contributing to the achievement of the desired SA objectives and targets;
 - if mitigation measures are performing as well as expected;
 - if there are any adverse effects and whether these are within acceptable limits or remedial action is desirable.
- 9.4 There is a need for integration between the monitoring report and IA, including indicators which enable a link to be established between implementation of the Local Plan and the significant effects being monitored.
- 9.5 The responsibilities for carrying out the monitoring programme lie with the local planning authority. The Council already has a comprehensive monitoring framework and publishes a suite of Local Plan monitoring reports on an annual basis.
- 9.6 Local planning authorities are responsible for responding to any significant negative environmental effects of implementation of their plans. Similarly, local planning authorities are responsible for identifying and responding to unforeseen adverse effects of the implementation of the plan, with help from the other bodies subject to the Duty to Co-operate.

Monitoring Framework

9.7 A full monitoring framework will be provided in later stages of the Local Plan process. Synergy will be required between indicators to monitor the Local Plan itself and indicators that will specifically monitor effect on the IA objectives.

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10 NEXT STEPS

10.1 The draft Local Plan is being published for comments from February 2021. This IA will be included as part of that consultation. Representations received from the consultation will be used to inform further iterations of the Local Plan for Trafford. Comments received directly in response to the Trafford Local Plan IA would additionally be considered and taken into account as appropriate for future assessments.

10.2 All further iterations of the policies and allocations, leading up to final adoption, will again be subject to the IA process.

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11 Appendix A

Objective	1. Provide housing of an appropriate mix of sizes, types, tenures in locations to meet identified needs and reduce disparity		
IA Topic	Population, Equality and Housing	Consistency with GMSF IA Objectives	1
Assessment Criteria: Will the Local Plan...			
Ensure an appropriate mix of types, tenures and sizes of properties in order to meet current and projected housing needs?			
Support a reduction in the disparity of housing quality across the Borough?			
Ensure housing land is well-connected with employment land, centres and green space or co-located where appropriate?			
Support improvements in the energy efficiency and resilience of the housing stock?			
Ensure the number of houses meets that of demand by meeting affordable housing needs in line with growth and income?			
Assessment Criteria: Will the proposed development allocation...			
Ensure an appropriate mix of types, tenures and sizes of properties in order to meet current and projected housing needs?			
Support a reduction in the disparity of housing quality across the Borough?			
Ensure housing land is well-connected with employment land, centres and green space or co-located where appropriate?			
Support improvements in the energy efficiency and resilience of the housing stock?			
Ensure the number of houses meets that of demand by meeting affordable housing needs in line with growth and income?			
Objective	2. Promote equality of opportunity and reduce levels of deprivation and disparity		
IA Topic	Population, Equality and Housing	Consistency with GMSF IA Objectives	4, 5, 7, 8

Assessment Criteria: Will the Local Plan...			
Ensure equality of opportunity and equal access to facilities / infrastructure for all?			
Avoid differential negative impacts based on 'protected characteristics', as defined in the Equality Act 2010?			
Ensure that the needs of different Places in the Borough are equally addressed?			
Reduce the proportion of people living in deprivation?			
Support reductions in poverty (including child and fuel poverty), deprivation and disparity across the domains of the Indices of Multiple Deprivation?			
Foster good relations between different people?			
Assessment Criteria: Will the proposed development allocation...			
Ensure differential negative impacts based on 'protected characteristics', as defined in the Equality Act 2010 are avoided?			
Support regeneration in a deprived area of the Borough?			
Offer affordability and opportunity?			
Be accessible by all members of the community?			
Foster good relations between different people?			
Objective	3. Support improved health and wellbeing of the population and reduce health inequalities		
IA Topic	Health	Consistency with GMSF IA Objectives	6, 7
Assessment Criteria: Will the Local Plan...			
Support healthier lifestyles and improvements in determinants of health?			
Reduce health inequalities within Trafford and with the rest of England?			
Promote and improve social infrastructure and access to community services and facilities?			

Assessment Criteria: Will the proposed development allocation...			
Be within the vicinity of, or deliver, a health centre or GP service?			
Be within the vicinity of, or deliver, play space or recreational open space?			
Be within the vicinity of, or deliver, a sports facility?			
Have the potential to affect new or existing residents through noise, dust, light or smell?			
Objective	4. Ensure sustainable economic growth and job creation		
IA Topic	Economy and Education	Consistency with GMSF IA Objectives	2, 8
Assessment Criteria: Will the Local Plan...			
Recognise the increasing importance of tourism to the economy and increasing demand for tourist facilities?			
Support education and training to provide a suitable labour force for future growth?			
Increase the vitality and viability of Trafford's town centres?			
Meet the needs for retail, leisure, offices and other main town centre uses by allocating a range of suitable sites for main town centre uses?			
Promote the 'evening economy' within town centres and identify appropriate sites and opportunities?			
Support the increasing importance of culture and leisure uses within the town centres?			
Provide sufficient employment land in locations that are well-connected and well-served by infrastructure?			
Ensure and maintain a sufficient labour force (in terms of volume and skills)?			
Improve the qualification and skill base of residents in order to meet employers' needs?			
Allocate high quality and attractive sites for office, industrial and warehousing uses to mirror its strengths in financial business, professional services, manufacturing and digital?			

Retain and consolidate suitable existing employment sites and areas where there is a reasonable prospect of these continuing to be used for employment purposes?			
Focus employment uses in allocated employment land, such as at Trafford Park?			
Set out criteria that development for non-employment uses on employment sites have to meet?			
Set out the target of level of employment land in Trafford and phasing in accordance with GMSF?			
Allocate suitable sites of employment land (in addition to any strategic allocations coming through the GMSF)?			
Identify whether there is a need for additional culture and tourism facilities in the Borough?			
Assessment Criteria: Will the proposed development allocation...			
Protect and enhance the vitality and viability of existing employment areas and/or town centres?			
Support appropriate retail, leisure, cultural and/or employment opportunities in town centre locations?			
Support economic development in locations that are easily accessible by sustainable transport?			
Support economic development in locations that are well-connected and well-served by infrastructure?			
Provide a variety of employment land and mixed-use development sites over the plan period to support a varied and robust economy?			
Provide high quality, attractive employment sites?			
Contribute to growth in tourist facilities and jobs?			
Support education and training to provide a suitable labour force for future growth?			
Ensure and maintain a sufficient labour force (in terms of volume and skills)?			
Objective	5. Ensure that there is sufficient coverage and capacity of sustainable transport and utilities to support growth and development		
IA Topic	Transport, Utilities	Consistency with GMSF IA Objectives	3, 9

Assessment Criteria: Will the Local Plan...			
Ensure that the transport network can support and enable the anticipated scale and spatial distribution of development?			
Reduce the need to travel and promote efficient patterns of movement?			
Promote a safe and sustainable public transport network that reduces reliance on private motor vehicles?			
Champion the use of sustainable modes of transport by all throughout the Borough?			
Ensure infrastructure development, the business community and public transport networks are sufficiently connected, to reduce the need to travel by car?			
Link to the objectives of the 2040 Transport Strategy and consider how new development can contribute to increasing capacity and supporting new infrastructure for Train routes and the Metrolink?			
Improve transport connectivity, particularly to alleviate issues from travelling east to west across the Borough?			
Ensure that utilities / digital infrastructure can support and enable the anticipated scale and spatial distribution of development?			
Assessment Criteria: Will the proposed development allocation...			
Be easily accessible and well served by public transport, walking and cycle routes?			
Allow for improved travel connectivity?			
Be connected to a transport network that can support the development alongside existing development and proposed growth?			
Be within the vicinity of, or deliver, a range of facilities and services to meet residents' needs?			
Be served by utilities/digital infrastructure that can support and enable the anticipated scale and spatial distribution of development?			
Objective	6. Improve the accessibility of the Borough by equitable means to community facilities, services and other needs		
IA Topic	Access and Community Infrastructure	Consistency with GMSF IA Objectives	5, 7, 8, 9
Assessment Criteria: Will the Local Plan...			

Improve the availability of opportunities to residents and others to walk, cycle, horse ride and use public transport to meet their needs?			
Ensure people are adequately served by healthcare and other key facilities, regardless of socio-economic status?			
Ensure people obtain equitable access to affordable high-quality food shopping, and other fundamental needs such as chemists?			
Ensure sufficient access to educational facilities for all children?			
Promote access to, and provision of, appropriate community social infrastructure including playgrounds and sports facilities?			
Assessment Criteria: Will the proposed development allocation...			
Allow for access to primary and secondary schools?			
Be within the vicinity of, or deliver, a range of facilities and services to support potential growth?			
Be within the vicinity of, or deliver appropriate community social infrastructure including playgrounds and sports facilities?			
Provide opportunities to residents and others to walk, cycle, horse ride and use public transport to meet their needs?			
Objective	7. Conserve and enhance landscape, townscape, and the character of the Borough		
IA Topic	Landscape and Townscape	Consistency with GMSF IA Objectives	16
Assessment Criteria: Will the Local Plan...			
Protect landscape character and improve the quality of open spaces and the public realm?			
Conserve and enhance townscape character, and the aesthetic quality of the built environment?			
Respect, maintain and strengthen local character and distinctiveness?			
Assessment Criteria: Will the proposed development allocation...			
Have scope to develop or improve the green infrastructure network?			
Protect landscape character and improve the quality of open spaces and the public realm?			

Conserve and enhance townscape character, and the aesthetic quality of the built environment?			
Respect, maintain and strengthen local character and distinctiveness?			
Objective	8. Conserve and enhance the historic environment		
IA Topic	Cultural Heritage	Consistency with GMSF IA Objectives	16
Assessment Criteria: Will the Local Plan...			
Conserve and enhance the historic environment, heritage assets and their setting?			
Assessment Criteria: Will the proposed development allocation...			
Have the potential to preserve or enhance the character, appearance or special interest of heritage assets or their settings?			
Objective	9. Improve air quality		
IA Topic	Air Quality	Consistency with GMSF IA Objectives	10
Assessment Criteria: Will the Local Plan...			
Improve air quality within the Borough, particularly in Air Quality Management Areas (AQMAs)?			
Assessment Criteria: Will the proposed development allocation...			
Be within or adjacent to an AQMA?			
Have the potential to have an adverse effect on air quality in the area?			
Objective	10. To conserve and protect land and soils, whilst reducing land contamination		
IA Topic	Land, Geology, and Soils	Consistency with GMSF IA Objectives	17
Assessment Criteria: Will the Local Plan...			
Support the development of previously developed land and other sustainable locations?			
Conserve and protect geodiversity?			

Protect the best and most versatile agricultural land / soil resources from inappropriate development?			
Encourage the redevelopment of derelict land, properties, buildings and infrastructure, returning them to appropriate uses?			
Support reductions in land contamination through the remediation and reuse of previously developed land?			
Assessment Criteria: Will the proposed development allocation...			
Bring brownfield land or derelict buildings and infrastructure back into beneficial use?			
Avoid potential increase in levels of land contamination?			
Avoid loss of best and most versatile agricultural land (Grade 1,2 or 3a)?			
Conserve and protect geodiversity?			
Objective	11. Protect and improve the quality and availability of water resources		
IA Topic	Water Resources	Consistency with GMSF IA Objectives	14
Assessment Criteria: Will the Local Plan...			
Encourage compliance with the Water Framework Directive?			
Promote management practices that will protect water features from pollution and, where possible, create a net benefit by improving water quality?			
Avoid consuming greater volumes of water resources than are available to maintain a healthy environment?			
Assessment Criteria: Will the proposed development allocation...			
Avoid consuming greater volumes of water resources than are available to maintain a healthy environment?			
Be near a suitable watercourse or water body in order to assist with drainage issues?			
Be affected by any known drainage constraints?			
Avoid risk to the quality of any watercourse or water body?			

Objective	12. Conserve and enhance biodiversity and promote nature conservation		
IA Topic	Biodiversity	Consistency with GMSF IA Objectives	11
Assessment Criteria: Will the Local Plan...			
Provide opportunities to enhance new and existing wildlife and geological sites and facilitate biodiversity net gain?			
Avoid damage to, or destruction of, designated wildlife sites, habitats and species and protected and unique geological features?			
Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not unnecessarily prejudiced?			
Support and enhance existing multifunctional green infrastructure and / or contribute towards the creation of new multifunctional green infrastructure?			
Ensure access to green infrastructure providing opportunities for recreation, amenity and tranquillity?			
Assessment Criteria: Will the proposed development allocation...			
Avoid potential damage to designated wildlife sites and geological sites?			
Avoid fragmentation of habitats?			
Provide opportunities to enhance new and existing wildlife and geological sites?			
Be within access to wildlife sites providing opportunities for recreation, amenity and tranquillity?			
Objective	13. Promote sustainable consumption of resources and support the implementation of the waste hierarchy		
IA Topic	Materials and Waste	Consistency with GMSF IA Objectives	18
Assessment Criteria: Will the Local Plan...			
Support the sustainable use of physical resources?			
Promote movement up the waste hierarchy?			

Promote reduced waste generation rates?			
Assessment Criteria: Will the proposed development allocation...			
Promote movement up the waste hierarchy?			
Help to minimise waste generation?			
Be within or impact on a mineral safeguarding area?			
Be within or impact on a mineral area of search?			
Objective	14. Reduce per capita greenhouse gas emissions		
IA Topic	Climate Change and Associated Risks	Consistency with GMSF IA Objectives	15
Assessment Criteria: Will the Local Plan...			
Encourage the growth of the low carbon goods and services sector will contribute to emissions reductions, create employment opportunities and economic growth?			
Improve the energy efficiency of buildings and encouraging low carbon and decentralised forms of energy generation will be key to reducing greenhouse gas emissions?			
Encourage reduction in energy use and increased energy efficiency?			
Encourage the development of low carbon and renewable energy facilities, including as part of conventional developments?			
Promote a proactive reduction in direct and indirect greenhouse gas emissions emitted across GM?			
Assessment Criteria: Will the proposed development allocation...			
Support the growth of the low carbon goods and services sector?			
Support a reduction in energy use and increased energy efficiency?			
Help to minimise emissions of greenhouse gases?			

Promote low and zero carbon technologies and renewable sources?			
Objective	15. Reduce the consequence of flooding		
IA Topic	Climate Change and Associated Risks	Consistency with GMSF IA Objectives	13
Assessment Criteria: Will the Local Plan...			
Restrict the development of property in areas of flood risk?			
Ensure adequate measures are in place to manage existing flood risk?			
Ensure that development does not increase flood risk due to increased run-off rates?			
Ensure development is appropriately future proof to accommodate future levels of flood risk including from climate change?			
Assessment Criteria: Will the proposed development allocation...			
Avoid development in an area at risk of flooding (is it partly or wholly sited in Flood Zone 3 or 2 or at risk from Surface Water Flooding)?			
Allow for adequate measures to manage existing flood risk?			
Increase flood risk in this location or elsewhere?			
Be appropriately future proofed to accommodate future levels of flood risk including from climate change?			
Objective	16. Ensure communities, developments and infrastructure are resilient to the other effects of expected climate change		
IA Topic	Climate Change and Associated Risks	Consistency with GMSF IA Objectives	12
Assessment Criteria: Will the Local Plan...			
Ensure that communities, existing and new developments and infrastructure systems are resilient to the predicted effects of climate change across the Borough, besides climate change (e.g. temperature extremes, high winds)?			
Assessment Criteria: Will the proposed development allocation...			

Ensure that communities, existing and new developments and infrastructure systems are resilient to the predicted effects of climate change across the Borough, besides climate change (e.g. temperature extremes, high winds)?

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12 Appendix B Policy Appraisals

See separate document for Appendix B

13 Appendix C Site Appraisals

See separate document for Appendix C

14 Appendix D Flood risk Sequential test results

See separate document for Appendix D

15 Appendix E Equality Impact Assessment

See separate document for Appendix E

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