



**UPDATED INTEGRATED ASSESSMENT OF THE
CIVIC QUARTER AREA ACTION PLAN**

MAIN MODIFICATIONS CONSULTATION

JUNE 2022

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1.0 INTRODUCTION

Background

- 1.1 The purpose of this report is to present the findings of an updated Integrated Assessment (IA) in relation to the emerging Civic Quarter Area Action Plan (CQAAP).
- 1.2 The Council has been preparing the CQAAP to guide development and positive change in this key growth location. It establishes a vision, masterplan and strategy for the area's revitalisation over the next 15 (plus) years, to 2037, to create Trafford's newest, greenest and most vibrant neighbourhood for local residents, businesses and visitors. Once adopted the CQAAP will form part of the statutory development plan for Trafford and will comprise the starting point for planning application decision-taking in the Civic Quarter. It will sit alongside the Trafford Core Strategy and the saved policies of the Revised Trafford Unitary Development Plan (RTUDP). In time, the Core Strategy and the RTUDP will be replaced by the emerging new Trafford Local Plan. Places for Everyone, on its adoption, will also form part of the statutory development plan.
- 1.3 An Integrated Assessment (IA) is an integral part of the plan-making process for the CQAAP. Its purpose is to assess the impacts of the emerging plan on social, economic, environmental, health and equality objectives.
- 1.4 The preparation of a development plan document, such as the CQAAP, is an iterative process which follows a series of statutory steps and which allows for widespread consultation and the provision of feedback. The CQAAP has been subject to a process of IA at two previous key stages: when the Council published the Regulation 18 version of the CQAAP for consultation in February 2020; and again when the Regulation 19 version of the CQAAP underwent consultation in January 2021. At each stage, the IA reflected the content of the CQAAP at the time.

1.5 In November 2021 the CQAAP was formally submitted to the Secretary of State for its independent examination. In April 2022 a series of hearing sessions were held in order to enable the CQAAP to be examined in public. As a result of this process, some sixty Main Modifications have been proposed to the CQAAP in order to ensure that the document is compliant with the test of soundness in paragraph 35 of the National Planning Policy Framework and is legally/procedurally compliant. These modifications will be subject to further statutory consultation and it is necessary to update the IA to account for them.

The IA Process

1.6 16 specific IA objectives have been defined to capture key issues relevant to the CQAAP, and with these used as ‘assessment criteria’ against which the policies of the CQAAP are to be judged. These IA objectives are identified in Table 1 below.

Table 1: The Integrated Assessment Objectives

IA Objective 1	Provide housing of an appropriate mix of sizes, types, tenures in locations to meet identified needs and reduce disparity
IA Objective 2	Promote equality of opportunity and reduce levels of deprivation and disparity
IA Objective 3	Support improved health and wellbeing of the population and reduce health inequalities
IA Objective 4	Ensure sustainable economic growth and job creation
IA Objective 5	Ensure that there is sufficient coverage and capacity of sustainable transport and utilities to support growth and development
IA Objective 6	Improve the accessibility of the Borough by equitable means to community facilities, services and other needs
IA Objective 7	Conserve and enhance landscape, townscape, and the character of the borough
IA Objective 8	Conserve and enhance the historic environment
IA Objective 9	Improve air quality
IA Objective 10	To conserve and protect land and soils, whilst reducing land contamination
IA Objective 11	Protect and improve the quality and availability of water resources
IA Objective 12	Conserve and enhance biodiversity and promote nature conservation
IA Objective 13	Promote sustainable consumption of resources and support the implementation of the waste hierarchy

IA Objective 14	Reduce per capita greenhouse gas emissions
IA Objective 15	Reduce the consequence of flooding
IA Objective 16	Ensure communities, developments and infrastructure are resilient to the other effects of expected climate change

1.7 A bespoke matrix has then been prepared to enable the effects of each CQAAP policy to be assessed when pitched against the IA objectives, and with the policies scored using a traffic-light approach. The assessment scoring system is identified in Table 2 below. In relation to the assessment of the policies and vision, the matrix also factors in the short, medium and long-term effects.

Table 2: The Assessment Scoring System

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

1.8 The scope of the IA for the CQAAP was consulted upon in February 2020 in parallel with the Regulation 18 consultation. The framework that it proposed - as described above - has been applied since, including in relation to this current IA update.

1.9 The majority of the Main Modifications affect the content of policies within the CQAAP (and/or their supporting content). The exception is in relation to the insertion of a new (ninth) strategic objective and a list of Key Performance Indicators (KPIs). In previous stages of IA for the CQAAP, it has been the policies of the CQAAP that have been the focus of the assessment. However, the vision of the CQAAP and its strategic objectives have also been subject to previous assessment. A similar approach has been taken this time around, in noting that the proposed Main Modifications largely affect policy content. The IA process that has been adopted for the policies is based on revisiting previous conclusions (from the last IA exercise undertaken at Regulation 19 stage) and

updating where necessary. However, the new strategic objective and the KPI list have been subject to their first IA appraisal.

- 1.10 A number of minor modifications to the CQAAP are also proposed in conjunction with the Main Modifications. The minor modifications comprise less substantive changes and they are not necessary in order to produce a sound plan. They comprise, for example, updates to policy/guidance references, amendments to ensure consistency, text corrections, and non-material adjustments to CQAAP content. They will also form part of the forthcoming consultation package. The proposed minor modifications have been subject to the updated IA process only where they affect the policies, vision and strategic objectives of the CQAAP. Furthermore, within this, it is only those minor modifications which have some measurable (albeit limited) impact on content which have been referred to.

2.0 THE UPDATED INTEGRATED ASSESSMENT

The Strategic Objectives

- 2.1 The emerging CQAAP has historically contained eight strategic objectives. These are intended as high-level objectives which in turn are translated into the individual policies of the CQAAP which provide the means for achieving them. The IA undertaken at Regulation 18 stage (January 2020) assessed the eight strategic objectives against the 16 IA objectives. This was a less in-depth assessment than of the CQAAP’s policies in recognition of their high-level status. The strategic objectives were not revised at Regulation 19 stage and thus the updated IA process at that time did not revisit them.
- 2.2 However, a ninth strategic objective for the CQAAP has now been proposed in response to representations received. Its introduction has been treated as a Main Modification when acknowledging the importance of the strategic objectives in defining remaining policy content. As part of this IA update, the additional strategic objective has been subject to the same IA procedure as undertaken at Regulation 18 stage for strategic objectives 1 to 8.
- 2.3 The new strategic objective is as follows: *The Promotion of a Major Sporting Venue - The growth and enhancement of Lancashire Cricket Club and the strengthening of its role as an international sporting venue.* Consistent with the approach previously taken, this strategic objective has now been tested against each of the 16 objectives in Table 3 below.

Table 3: IA Assessment of new Strategic Objective

AAP Objective	IA Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
9	n	N	++	+	n	+	n	+	n	n	N	n	n	n	n	n

2.4 The IA appraisal process has not identified any clear conflicts between the IA objectives and the new strategic objective. There are some instances of positive effects and one example of a major positive effect (against IA Objective 3: Supporting improved health and wellbeing of the population and reducing health inequalities). In more cases than this, the effect would be neutral, and significantly no negative effects are anticipated.

The Key Performance Indicators

2.5 The role of the Key Performance Indicators (KPIs) will be to measure the success and effectiveness of the CQAAP policies, and to identify any potential need for a review of all or part of the CQAAP. The KPI schedule, which has been subject to its first IA, is contained at Appendix 1. In total there are 17 KPIs which have been grouped according to theme (covering housing, transport and movement, sustainability, employment, design, and infrastructure delivery). The IA exercise for the KPI schedule has followed the more high-level approach used for the strategic objectives with it tested against the 16 IA objectives. The results are contained in Table 4 below.

Table 4: IA Assessment of new KPI Schedule

KPI Schedule	IA Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	++	n	n	+	+	n	n	n	+	n	n	+	n	+	+	n

2.6 The IA appraisal process has not identified any clear conflicts between the IA objectives and the KPI schedule. There are six instances of positive effects and one example of a major positive effect (against IA Objective 1: Provide housing of an appropriate mix of sizes, types, tenures in locations to meet identified needs and reduce disparity). In most cases, the effect would be neutral, and again no negative effects are anticipated.

Policy CQ1

2.7 Policy CQ1: Civic Quarter Regeneration is subject to rewording (including of its supporting text) and with the changes encompassing Main Modifications. The reworded text is provided in Appendix 2. A revised assessment and matrix is contained at Appendix 3. In summary, the new wording for Policy CQ1 has led to improved outcomes in relation to 5 IA objectives, as follows:

- IA objective 1: Provide housing of an appropriate mix of sizes, types, tenures in locations to meet identified needs and reduce disparity
- IA objective 3: Support improved health and wellbeing of the population and reduce health inequalities
- IA objective 5: Ensure that there is sufficient coverage and capacity of sustainable transport and utilities to support growth and development
- IA objective 6: Improve the accessibility of the Borough by equitable means to community facilities, services and other needs
- IA objective 8: Conserve and enhance the historic environment

2.8 There has been no downgrading in the performance of Policy CQ1 when against the 16 IA objectives.

Policy CQ2

2.9 Policy CQ2: Housing is subject to some revision and with the changes encompassing Main Modifications. The revised text is provided in Appendix 2. The revised assessment and matrix is contained at Appendix 3. In summary, the new wording for Policy CQ2 has led to improved outcomes in relation to 3 IA objectives, as follows:

- IA objective 3: Support improved health and wellbeing of the population and reduce health inequalities
- IA objective 7: Conserve and enhance landscape, townscape, and the character of the Borough

- IA objective 8: Conserve and enhance the historic environment

2.10 There has been no reduction in the performance of Policy CQ2 when assessed against the 16 IA objectives.

Policy CQ3

2.11 Policy CQ3: Mixed Use Communities is subject to some revision and with the changes encompassing Main Modifications. The revised text is provided in Appendix 2. The revised assessment and matrix is contained at Appendix 3. In summary, the new wording for Policy CQ3 has led to improved outcomes in relation to 2 IA objectives, as follows:

- IA objective 2: Promote equality of opportunity and reduce levels of deprivation and disparity
- IA objective 4: Ensure sustainable economic growth and job creation

2.12 Again, only positive impacts of the adjusted wording for Policy CQ3 have been identified.

Policy CQ4

2.13 Policy CQ4: Sustainability and Climate Change is subject to some revision and with the changes encompassing Main Modifications. The revised text is provided in Appendix 2. The revised assessment and matrix is contained at Appendix 3. In summary, the new wording for Policy CQ4 has led to improved outcomes in relation to 4 IA objectives, as follows:

- IA objective 4: Ensure sustainable economic growth and job creation
- IA objective 5: Ensure that there is sufficient coverage and capacity of sustainable transport and utilities to support growth and development
- IA objective 9: Improve air quality

- IA objective 16: Ensure communities, developments and infrastructure are resilient to the other effects of expected climate change

2.14 There has been no downgrading in the performance of Policy CQ4 when against the 16 IA objectives.

Policy CQ5

2.15 Policy CQ5: Conservation and Heritage is subject to some revision and with the changes encompassing Main Modifications. The revised text is provided in Appendix 2. The revised assessment and matrix is contained at Appendix 3. In summary, the revised wording for Policy CQ3 has led to improved outcomes in relation to 2 IA objectives, as follows:

- IA Objective 7: Conserve and enhance landscape, townscape, and the character of the Borough
- IA Objective 8: Conserve and enhance the historic environment

2.16 There has been no reduction in the performance of Policy CQ5 when assessed against the 16 IA objectives.

Policy CQ6

2.17 Policy CQ6: High Quality Design is subject to some revision (including of its title and the insertion of a new sub-policy concerning tall buildings) and with the changes encompassing Main Modifications. The revised text is provided in Appendix 2. The revised assessment and matrix is contained at Appendix 3. In summary, the revised wording for Policy CQ6 has led to improved outcomes in relation to 4 IA objectives, as follows:

- IA Objective 1: Provide housing of an appropriate mix of sizes, types, tenures in locations to meet identified needs and reduce disparity

- IA Objective 3: Support improved health and wellbeing of the population and reduce health inequalities
- IA Objective 8: Conserve and enhance the historic environment
- IA Objective 13: Promote sustainable consumption of resources and support the implementation of the waste hierarchy

2.18 Again, only positive impacts of the adjusted wording for Policy CQ6 have been identified.

Policy CQ7

2.19 Policy CQ7: Public Realm Principles is subject to some revision and with the changes encompassing Main Modifications. The revised text is provided in Appendix 2. The revised assessment and matrix is contained at Appendix 3. In summary, the revised wording for Policy CQ7 has led to improved outcomes in relation to 6 IA objectives, as follows:

- IA Objective 2: Promote equality of opportunity and reduce levels of deprivation and disparity
- IA Objective 3: Support improved health and wellbeing of the population and reduce health inequalities
- IA Objective 5: Ensure that there is sufficient coverage and capacity of sustainable transport and utilities to support growth and development
- IA Objective 6: Improve the accessibility of the Borough by equitable means to community facilities, services and other needs
- IA Objective 8: Conserve and enhance the historic environment
- IA Objective 12: Conserve and enhance biodiversity and promote nature conservation

2.20 Policy CQ7, as revised, does not score less favourably when appraised against any of the 16 IA objectives.

Policy CQ8

2.21 Policy CQ8: Wellbeing Route: Talbot Road is subject to some revision and with the changes encompassing Main Modifications. The revised text is provided in Appendix 2. The revised assessment and matrix is contained at Appendix 3. In summary, the revised wording for Policy CQ8 has led to improved outcomes in relation to 5 IA objectives, as follows:

- IA Objective 2: Promote equality of opportunity and reduce levels of deprivation and disparity
- IA Objective 3: Support improved health and wellbeing of the population and reduce health inequalities
- IA Objective 4: Ensure sustainable economic growth and job creation
- IA Objective 8: Conserve and enhance the historic environment
- IA Objective 16: Ensure communities, developments and infrastructure are resilient to the other effects of expected climate change

2.22 There has been no reduction in the performance of Policy CQ8 when tested against the 16 IA objectives.

Policy CQ9

2.23 Policy CQ9: Processional Route is subject to some revision and with the changes encompassing Main Modifications. The revised text is provided in Appendix 2. The revised assessment and matrix is contained at Appendix 3. In summary, the revised wording for Policy CQ9 has led to improved outcomes in relation to 4 IA objectives, as follows:

- IA Objective 2: Promote equality of opportunity and reduce levels of deprivation and disparity
- IA Objective 8: Conserve and enhance the historic environment
- IA Objective 12: Conserve and enhance biodiversity and promote nature conservation

- IA Objective 16: Ensure communities, developments and infrastructure are resilient to the other effects of expected climate change

2.24 Again, only positive impacts of the adjusted wording for Policy CQ9 have been identified.

Policy CQ10

2.25 Policy CQ10: Movement, Permeability and Parking is subject to some revision (including of its supporting text and its title) and with the changes encompassing Main Modifications. The reworded text is provided in Appendix 2. A revised assessment and matrix is contained at Appendix 3. In summary, the rewording of Policy CQ10 has led to improved outcomes in relation to 5 IA objectives, as follows:

- IA Objective 3: Support improved health and wellbeing of the population and reduce health inequalities
- IA Objective 4: Ensure sustainable economic growth and job creation
- IA Objective 5: Ensure that there is sufficient coverage and capacity of sustainable transport and utilities to support growth and development
- IA Objective 6: Improve the accessibility of the Borough by equitable means to community facilities, services and other needs
- IA Objective 14: Reduce per capita greenhouse gas emissions

2.26 Policy CQ10, as revised, does not score less favourably when appraised against any of the 16 IA objectives.

Policy CQ11

2.27 Policy CQ11: Infrastructure and Obligations is subject to some revision and with the changes encompassing Main Modifications. The revised text is provided in Appendix 2. The revised assessment and matrix is contained at Appendix 3.

In summary, the revised wording for Policy CQ11 has led to an improved outcome in relation to 1 IA objective, as follows:

- IA Objective 4: Ensure sustainable economic growth and job creation

2.28 No negative impacts are anticipated as a consequence of the revisions to Policy CQ11.

3.0 EQUALITY IMPACT ASSESSMENT

- 3.1 In addition to the general IA process that was undertaken at Regulation 18 stage of the CQAAP, a separate Equalities Impact Assessment (EqIA) was also carried out. This followed an established process adopted by the Council in order to ensure that its policies, practices and decision-taking processes do not unlawfully discriminate against any group with protected characteristics.
- 3.2 Again, it was the policies and the vision of the CQAAP that were the subject of assessment, and with these assessed against the nine equality-based characteristics identified in Table 5 below. The scoring system was based on the policy/vision having either a: positive impact; a neutral impact; or a negative impact on each characteristic.

Table 5: EqIA Characteristics Assessed under the IA

Equality characteristic 1	Sex
Equality characteristic 2	Pregnant women and women on maternity leave
Equality characteristic 3	Gender reassignment
Equality characteristic 4	Marriage and civil partnership
Equality characteristic 5	Race
Equality characteristic 6	Disability
Equality characteristic 7	Age group
Equality characteristic 8	Sexual orientation
Equality characteristic 9	Religious/faith groups

- 3.3 At Regulation 18 stage, when the policies and vision of the CQAAP were tested against each characteristic, the result was either a ‘positive’ or ‘neutral’ impact. No ‘negative’ impacts were identified. At Regulation 19 stage the EqIA was not revisited since it was considered that the adjustments to the CQAAP policies/vision would not materially impact on previous conclusions and would not, most significantly, result in any downgrading to a ‘negative’ impact. This conclusion was reached when also having regard to the fact that some of the defined IA objectives, as detailed in Table 1, were in themselves devised to assess the extent to which the CQAAP promotes equality of opportunity within its objectives.

- 3.4 To reiterate, some modifications to the CQAAP are again proposed. In general terms the same principles have been applied in approaching the EqIA update and its wholesale review has not been undertaken when having regard to the extent and materiality of changes, and the incorporation of equality-led considerations within the IA objectives. However, some exceptions to this approach have been made: namely in relation to Policy CQ1 which has been more substantially reworded relative to the other policies' changes, and also to the new strategic objective and KPI schedule (which have not previously been subject to EqIA). The results are contained in Appendix 4. In summary, it is concluded that the reworded Policy CQ1 would have a range of positive outcomes which would be available to all users groups. In relation to the new strategic objective and the KPI schedule, whilst no negative effects impacts are predicted, a more conservative approach has been adopted when assessing the extent to which this non-policy CQAAP content could deliver positive change. Neutral outcomes have thus been recorded.

4.0 CONCLUSIONS

- 4.1 The Council is preparing the CQAAP to guide development and positive change in this key growth location. It establishes a vision, masterplan and strategy for the area's revitalisation over the next 15 (plus) years, to 2037, to create Trafford's newest, greenest and most vibrant neighbourhood for local residents, businesses and visitors. On its adoption the CQAAP will form part of the overall Trafford Development Plan against which individual planning applications will be assessed.
- 4.2 An Integrated Assessment (IA) is an integral part of the plan-making process for the CQAAP. Its purpose is to assess the impacts of the emerging plan on social, economic, environmental, health and equality objectives. Alongside the preparation and evolution of the CQAAP, an IA document has been produced at various stages to inform the further development of the CQAAP.
- 4.3 The CQAAP is now further advanced. In November 2021 the CQAAP was formally submitted to the Secretary of State for its independent examination. In April 2022 a series of hearing sessions were held in order to enable the CQAAP to be examined in public. As a result of this process, sixty Main Modifications have been proposed to the CQAAP in order to ensure that the document is compliant with the test of soundness in paragraph 35 of the National Planning Policy Framework and is legally/procedurally compliant.
- 4.4 The purpose of this document has been to revisit the IA to account for the Main Modifications and also the effects of more minor modifications. A separate EqIA process has also been revisited. This updated IA will be published alongside the Main Modifications to the CQAAP.
- 4.5 Overall, the IA has concluded constructively, with numerous improvements recorded relative to the previous assessment reflecting positive adjustments to CQAAP content, including in relation to its policies, its strategic objectives and

the means of monitoring CQAAP progress. There have been no instances of downgraded, less positive or negative impacts.