

Publication Salford Local Plan: Development Management Policies and Designations

Addendum to the January 2020 Sustainability Appraisal Report

Main Report

Salford City Council

January 2021

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1.0 Introduction

- 1.1 The [Publication Salford Local Plan Development Management Policies and Designations](#) ('SLP:DMP') document and its accompanying [Sustainability Appraisal](#) ('SLP:DMP SA') were published for a period of representations (Regulation 19 consultation) between January and March 2020.
- 1.2 This document forms an addendum to the SLP:DMP SA and covers two main issues:
- 1) To identify changes to the SLP:DMP SA in response to representations received to it; and
 - 2) To provide an assessment of any differing sustainability impacts to those identified in the January 2020 SA as a result of proposed modifications to the SLP:DMP
- 1.3 National Planning Policy Guidance (PPG) relating to Strategic environmental assessment and sustainability appraisal states that¹:

“The sustainability appraisal report will not necessarily have to be amended if the plan is modified following responses to consultations. Modifications to the sustainability appraisal should be considered only where appropriate and proportionate to the level of change being made to the plan. A change is likely to be significant if it substantially alters the plan and/ or is likely to give rise to significant effects.

Further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects. A further round of consultation on the sustainability appraisal may also be required in such circumstances but this should only be undertaken where necessary. Changes to the plan that are not significant will not require further sustainability appraisal work.”

- 1.4 The PPG further sets out that the SA should focus on ‘the environmental, economic and social impacts that are likely to be significant’². It also states that criteria for determining the likely significance of effects on the environment are set out in [schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004](#)³; considerations under this include the characteristics of plans and programmes, effects and the areas likely to be affected.
- 1.5 In light of the above guidance and the conclusions reached in the sections below, this addendum report amends the following sections of the SLP:DMP SA Main Report and associated Annexes and should be read alongside those documents:

¹ MHCLG (Last updated 16 July 2020) [Strategic environmental assessment and sustainability appraisal](#), Paragraph: 021 Reference ID: 11-021-20140306

² Ibid, Paragraph 009, Reference ID: 11-009-20140306

³ Ibid, Paragraph 018 Reference ID: 11-018-20140306

Sections of Publication SLP:DMP Sustainability Appraisal that have been updated	Relevant sections of this addendum report
Components that constitute the Environmental Report	See section 4 and updated table 1 (paragraph 4.2)
Executive Summary (paragraphs E17 and E18)	See Annex 1.1 to this Main addendum report
Section 4 Sustainability Issues and Problems (Housing and Economic Growth sections)	See paragraphs 2.3 to 2.8 of this Main addendum report (under Key issue A)
Section 5 Sustainability Appraisal Framework (paragraph 5.12)	See paragraphs 2.14 to 2.15 of this Main addendum report (under Key issue B)
Section 8 Sustainability Appraisal of Strategic Options Sustainability Appraisal of Strategic Options	See Annex 1.2 to this Main addendum report
Appendix 5 Appraisal of Publication SLP:DMP and No Plan Option	See Annex 1.4 to this Main addendum report
<p>Appendix 6 Appraisal of Publication SLP:DMP policies and reasonable alternatives, specifically policies:</p> <ul style="list-style-type: none"> • EC2 Port Salford • TC1 Network of designated centres • A5 Sustainable movement of freight • A11 Barton Aerodrome • A12 Protection of aviation safety at Manchester Airport • A13 Safeguarding potential transport routes • EG1 Sustainable Energy • EG2 Renewable and low carbon energy schemes • WA3 Flood risk management and infrastructure • HE1 Heritage protection • HE6 Canals • GB1 Green Belt • GI2 Chat Moss • GI3 Irwell Valley • GI4 West Salford Greenway 	See Annex 1.5 to this Main addendum report

<ul style="list-style-type: none">• G15 Local Green Space• BG1 Nature Improvement Areas• BG2 Development and biodiversity• BG3 Geodiversity• R4 Strategic Recreation Routes• R5 Outdoor and indoor sports facilities	
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2.0 Changes to the SLP:DMP Sustainability Appraisal in response to representations received to it

2.1 Comments were specifically received to the SLP:DMP SA from two parties, namely The Peel Group and Historic England. These comments are summarised in the table below, with the key issues to consider in relation to them being identified in the adjacent column.

Comments received to the SLP:DMP SA and key issues arising

General comments to the SLP:DMP SA	Key issues to consider
<p>Peel have a number of concerns with the SA from a soundness and legal compliance perspective.</p> <p>The production of the SLP:DMP prior to the adoption of the GMSF and SLP:CS is premature and unsound on the basis that the number and distribution of housing and employment sites has not been established. This results in inaccurate scoring of SA objectives, failure to consider reasonable alternatives and the designation of land (such as the West Salford Greenway) that is likely to be required for housing.</p> <p>To remedy the deficiencies with the SA and Plan, Peel believe that the SLP:DMP should be paused until the GMSF and SLP:CS are adopted or any spatial allocations (such as Policy GI5) should be removed from the plan so that it becomes purely an update of Development Management and other non-spatial policies (The Peel Group).</p>	<p>Whether the SA should consider an additional strategic option of a development management focused Local Plan without the inclusion of protective designations (such as the West Salford Greenway).</p> <p><i>This is considered further in this Addendum under Key issue A) below.</i></p>
<p>Overriding concern that the SLP:DMP has been prepared on the assumption that the Greater Manchester Spatial Framework (GMSF) and the Salford Local Plan: Core Strategy (SLP:CS) will be found sound.</p> <p>Given that these policies will determine housing numbers, distribution strategy and the allocation of housing and employment sites, the SLP:DMP and its associated SA cannot be considered sound, particularly as the SLP:DMP designates significant quantities of greenfield/open land which could be used for residential development (The Peel Group)</p>	<p>Whether the appraisal of relevant policies should consider an additional strategic option reflecting the potential that the GMSF and subsequent SLP:CS may not be found sound, and / or additional housing may be needed across Greater Manchester and Salford.</p> <p><i>This is considered further in this Addendum under Key issue B) below.</i></p>
Comments on 'Section 4 - Sustainability Issues and Problems' of the SLP:DMP SA main report	Key issues to consider
<p>Several of the sustainability issues and challenges within the City identified in this section could be positively addressed through a development plan that swiftly promotes sustainable economic growth through the allocation of much needed housing and employment sites in key locations across Salford including:</p>	<p>Whether Section 4 of the SA main report should recognise that the issues and challenges identified could be positively addressed through a development plan that swiftly promotes sustainable economic</p>

<ul style="list-style-type: none"> • Population - Addressing issues including population loss, difficulty sustaining facilities and services, and ensuring a residential offer to meet the demand for family housing. • Health - Health inequalities which could be at least partly relieved through the provision of open space, community infrastructure and support for active travel as part of new development. • Housing - The lack of diversity in residential accommodation in some parts of the city. • Economic growth - A proactive approach to encouraging growth and addressing issues of unemployment. <p>It is clear from Section 4 of the SA that Salford Council clearly see the urgent need for private and affordable housing for families and all demographics together with a wide range of sites for economic growth and development. Given that the function of the SA is to ensure that policies within a plan positively address key sustainability issues then this should be clearly articulated in the document (The Peel Group).</p>	<p>growth through the allocation of much needed housing and employment sites in key locations across Salford.</p> <p>Further whether it should identify an urgent need for private and affordable housing for families and all demographics, together with a wide range of sites for economic growth and development.</p> <p><i>This is considered further in this Addendum under Key issue C) below.</i></p>
<p>Comments on ‘Section 5 – Sustainability Appraisal Framework’ of the SLP:DMP SA main report</p>	<p>Key issues to consider</p>
<p>Section 5 of the SA features a table indicating the compatibility of Salford Local Plan Objectives against the SA Objectives of the GMSF (table 6). The SA states that the Local Plan addresses all of the sustainability objectives identified in the Greater Manchester Integrated Appraisal. Critically however, the SA fails to recognise that the GMSF is only in draft format and has yet to be found sound and therefore the GM Objectives may well change.</p> <p>Furthermore the SLP:DMP does not allocate any land for housing or employment and therefore cannot support those GM objectives that seek to do so. The SA should therefore recognise that, at present, there are no policy mechanisms to address some of the GM objectives.</p> <p>In reference to GMSF Integrated Appraisal Objective 1 (Provide a sustainable supply of housing land including for an appropriate mix of sizes, types, tenures in locations to meet housing need, and to support economic growth) whilst the SLP:DMP SA aims to highlight how it is compatible with the objective and sub-questions of the GMSF, in this instance it does not and cannot. The SLP:DMP does not address or allocate housing, and thus cannot effectively deal with this issue. It cannot successfully respond to the sub-questions within the GMSF SA framework focussing on the quantity and mix of housing, specifically.</p> <p>Peel believe that under the ‘key links’ column the SA should record the following: The SLP:DMP does not currently</p>	<p>Whether Section 5 of the SA main report should be amended to clarify that the IA objectives of the GMSF reflect the assessments undertaken to date and that the plan itself has not yet been adopted.</p> <p><i>This is considered further in this Addendum under Key issue D) below.</i></p> <p>Whether Section 5 of the SA main report should be revised to reflect the fact that the SLP:DMP will not allocate sites and will not therefore fully meet the objectives of the GMSF IA.</p> <p>Specifically, whether Table 6 of the SA main report and the commentary associated with GMSF IA Objective 1 (under the ‘Key links’ column) should record that “The SLP:DMP does not currently allocate any land for housing or employment and given that the GMSF and Local Plan Allocations document are</p>

<p>allocate any land for housing or employment and given that the GMSF and Local Plan Allocations document are under development, elements of this objective are not supported (The Peel Group).</p>	<p>under development, elements of this objective are not supported.”</p> <p><i>This is considered further in this Addendum under Key issue E) below.</i></p>
<p>Comments on ‘Section 7: Consideration of Reasonable Alternatives’ of the SLP:DMP SA main report</p>	<p>Key issues to consider</p>
<p>Paragraph 7.4 of the SA states the following,</p> <p>“It is not the role or purpose of the SLP:DMP to consider the scale of development needs within the city or allocate land to deliver it. Issues of development need and the allocation of land will instead be considered through the GMSF and the subsequent Salford Local Plan: Core Strategy and Allocations document.”</p> <p>The SA states that as a direct result of the above, developing reasonable alternatives to the SLP:DMP policies is intrinsically limited. Consequently, throughout the SA itself and many of the policies contained within it have been assessed against only one alternative; a no-plan/business-as-usual option.</p> <p>Peel consider this approach to be fundamentally flawed as the SA ignores the possibility that the GMSF and subsequent SLP: CS may not be found sound and / or additional housing may be needed across GM and Salford and therefore reasonable alternatives that account for this possibility should have been considered as part of the assessment within the SA.</p> <p>As a specific example of this, Policy GI5: Local Green Space protects a number of sites across Salford as Green Space and therefore exempt from development on the basis that they will be treated as Green Belt from a policy perspective.</p> <p>Two of the sites within this Policy, Broadoak South, Worsley and Worsley Green, Worsley are owned by Peel and are currently being promoted as sustainable residential community sites that are fully capable of making a meaningful contribution to some of the key sustainability challenges of Salford, particularly the provision of family housing.</p> <p>Should the housing requirement within Salford change as a result of the GMSF then sites such as those above must then be reconsidered for potential allocations. Furthermore, given that the SLP:CS will address allocations it is premature to protect land until the SLP:CS SA has undertaken its own objective and independent assessment</p>	<p>Whether the appraisal should consider an additional strategic option reflecting the potential that the GMSF and subsequent SLP:CS may not be found sound and / or additional housing may be needed across Greater Manchester and Salford.</p> <p><i>This is considered further in this Addendum under Key issue B) below.</i></p> <p>Whether the SA should include an additional strategic option of a development management focussed Local Plan document without the inclusion of protective designations (such as the West Salford Greenway).</p> <p><i>This is considered further in this Addendum under Key issue A) below.</i></p>

<p>of the reasonable alternatives for residential development for which Peel will be promoting these and other sites within Salford.</p> <p>Until the housing need distribution strategy and housing allocations have been determined Peel believe it unsound and premature for the SLP:DMP to be sterilising suitable residential and employment land within Salford (The Peel Group).</p>	
<p>Comments on ‘Section 8: Sustainability Appraisal of Strategic Options’ of the DLP: DMP SA</p>	<p>Key issues to consider</p>
<p>Section 8 of the SA identifies and appraises the different strategic options for the SLP:DMP. As with previous chapters of the SA, Chapter 8 states that reasonable strategic options around the policy framework are limited by the scope of the document, and need to be consistent with the emerging GMSF. The only reasonable alternative at an overarching plan level therefore, is to the saved policies of the UDP, or a no plan/business as usual option.</p> <p>As such, a comparative assessment of the SA objectives against two strategic options; Option 1 ‘No Plan’ and Option 2 ‘SLP:DMP’ is undertaken. Whilst, the assessment (see Table 3 below) concludes that Option 2 would support more positive impacts on Salford, the SLP:DMP is still reliant upon the successful adoption of both the GMSF and the SLP: SC which at this stage in the Local Plan process, cannot be guaranteed. Given the uncertainty of the GMSF and the SLP: CS Peel fail to understand how the SA can provide a range of positive and major positive benefits against the objectives of the SLP:DMP.</p> <p>To demonstrate this fact, against Plan objective 17: Provision of a good home, the SA records a positive/major positive benefit despite the level of housing provision across Salford uncertain at this time.</p> <p>Peel believe that until the level of housing and economic provision is confirmed, the SA can only record an uncertain effect against the following plan objectives;</p> <ul style="list-style-type: none"> • SAO14: To maximise economic growth that can be sustained in the long term • SAO15: To enhance economic inclusion • SAO16: To improve the city’s knowledge base • SAO17: To ensure that everyone has access to a good home that meets their needs • SAO18: To improve accessibility to facilities and opportunities • SAO19: To improve community cohesion <p>Policies within the SLP:DMP specifically designate open land to be protected across Salford.</p>	<p>Whether, given the uncertainties created by the GMSF and the SLP:CS the positive and major positive ratings in Section 8 of the SA main report against objectives SA014 to SA019 should be revised to “uncertain”.</p> <p><i>This is considered further in this Addendum under Key issue F) below.</i></p>

<p>Policy GI5: Local Green Space for example, allocates 10 green spaces that will be managed in accordance with national and local Green Belt policy, thus restricting any development which could take place. There are several soundness issues with this Policy (as articulated in other comments to the plan), including the lack of evidence base for the selection of the 10 green spaces, and its performance within the SA.</p> <p>Notably, the SA of Policy GI5: Local Green Space indicates that the policy's impact would be the same regardless of whether the SLP:DMP was implemented, or the no-plan option instead went ahead. Peel consider such a conclusion unsound on the basis that allocation of substantial areas of green space will have a positive and negative impact on a wide range of SA objectives compared to no allocations.</p> <p>With respect to the provision of housing, Peel believe that policy GI5 will have a major negative effect upon SA Objective 17 (provision of housing) given that it sterilises significant quantities of greenfield land. On this example alone, it is clear that an independent and objective appraisal of the sustainability impacts of this (and other policies) has not been undertaken to allow the selection of the preferred option (The Peel Group).</p>	
<p>Comments relating to the impact of particular SLP:DMP policies on SA Objective 10 (To protect, enhance and enable the appreciation of, the city's heritage)</p>	<p>Key issues to consider</p>
<p>Policy D8 Alterations and Extensions</p> <p>Disagree that Policy D8 will have a neutral (0) short-term to positive (+) impact on SA Objective 10. As drafted the policy would have a negative (-) impact on the Objective (Historic England).</p>	<p>Whether the ratings given to policy D8 against objective 10 should be revised to a negative impact.</p> <p><i>This is considered further in this Addendum under Key issue G) below.</i></p>
<p>Policy HE1 Heritage protection</p> <p>Disagree that Policy HE1 will have a major positive (++) impact on SA Objective 10. As drafted the policy would have a major negative (--) impact on the Objective (Historic England).</p>	<p>Whether the ratings given to policy HE1 against objective 10 should be revised to a major negative impact.</p> <p><i>This is considered further in this Addendum under Key issue G) below.</i></p>
<p>Policy HE2 Managing change across historic areas</p> <p>Disagree that Policy HE2 will have a major positive (++) impact on SA Objective 10. As drafted the policy would have a major negative (--) impact on the Objective (Historic England).</p>	<p>Whether the ratings given to policy HE2 against objective 10 should be revised to a major negative impact.</p>

	<i>This is considered further in this Addendum under Key issue G) below.</i>
<p>Policy HE4 Heritage at risk</p> <p>Disagree that Policy HE4 will have a major positive (++) impact on SA Objective 10. As drafted the policy would have a major negative (--) impact on the Objective (Historic England).</p>	<p>Whether the ratings given to policy HE4 should be revised to a major negative impact.</p> <p><i>This is considered further in this Addendum under Key issue H) below.</i></p>

2.2 Given reference to GMSF in the key issues raised to the SA above and within the SLP:DMP itself, it is considered necessary to provide an update regarding the status of the GMSF as part of this SA addendum. In October 2020 the AGMA Executive Board agreed to recommend the Draft Publication GMSF 2020 to the 10 Greater Manchester Councils' and their Executives/Cabinets for approval to consultation and submission to the Secretary of State following the period for representations. At its Council and Cabinet meetings which were held in early December 2020, Stockport Council resolved not to publish the Draft Publication GMSF for consultation or submit it to the Secretary of State following the period of representations for examination. The Draft Publication GMSF 2020 is a joint development plan document of the ten Greater Manchester authorities and requires the approval of all ten local authorities to proceed.

2.3 Having regard to these decisions, on 11 December 2020, the AGMA Executive Board agreed in principle to the preparation of a Joint Development Plan Document (DPD) of nine authorities (Greater Manchester districts excluding Stockport) and to commend these authorities to establish a joint committee with delegated authority to co-ordinate and develop a joint plan on their behalf.

2.4 The report to the AGMA Executive⁴ on 11 December 2020 explained that discussions with the nine remaining authorities indicate that there is considered to be merit in continuing to work collaboratively to:

- progress the strategic policies in GMSF 2020 which commanded widespread support, for example net zero carbon development, affordable housing and space and accessibility standards for new housing;
- provide flexibility to respond to changing requirements, for example the new Local Housing Need methodology expected in late 2020;
- maximise the use of sustainable urban/brownfield land and limit the need for Green Belt to accommodate the development needs of the nine;
- align with wider Greater Manchester strategies for transport and other infrastructure investment; and
- utilise the evidence base already commissioned and completed

⁴ [Economic Development \(greatermanchester-ca.gov.uk\)](http://greatermanchester-ca.gov.uk)

- 2.5 A further report is due to be provided to the AGMA Executive in due course to set out the issues and timescales involved in producing a Joint DPD of the nine.
- 2.6 In line with the above AGMA report, the preparation of a Joint Development Plan Document (DPD) of nine authorities (Greater Manchester districts excluding Stockport) will ultimately replace the work-to-date on the GMSF. As work is progressing to set out the issues and timescales involved in producing this Joint DPD, this potentially raises some uncertainties for the SLP:DMP and its associated SA. Notwithstanding this however, the December 2020 AGMA report does refer to progressing the strategic policies that were in the Draft Publication GMSF and utilising the evidence base already completed (as published for approval in October 2020). It would appear that the scope of the plan of nine districts will be the same (or very similar) to that of the GMSF. On this basis, at the current time it is considered that the move away from producing a plan of ten districts (i.e. the GMSF) to a Greater Manchester plan of nine districts will have a neutral impact for the purposes of the SLP:DMP SA. As a result, and for simplicity, references to GMSF in the SLP:DMP SA have not been updated as part of this Addendum and should be read in the context of paragraphs 2.2 to 2.6 of this SA addendum report (i.e. the move to a Joint DPD of nine districts). It is recognised however, that the SLP:DMP SA may need to be updated in the future to take into account progress on the Greater Manchester plan of the nine districts.
- 2.7 The key issues identified in the table above are considered further below.

Key issue A)

Whether the appraisal should consider an additional strategic option of a development management Local Plan document without the inclusion of protective designations (such as the West Salford Greenway).

- 2.8 In representations to the SLP:DMP SA concerns were raised in respect of progressing it in advance of the GMSF and SLP: CS which will take decisions in respect of development requirements and the allocation of land for development. To address this it was suggested that the SLP:DMP should be paused until the latter two documents were adopted, or alternatively that protective designations should be removed from the plan. It is considered that this comment would apply equally to progressing a plan of nine districts instead of the GMSF.
- 2.9 With the exception of Local Green Spaces which are discussed earlier in this report, it is considered that the various protective designations in the SLP:DMP are justified on the basis of the value of the land they protect (and are in accordance with the relevant provisions in the NPPF). In addition, the city can deliver its Local Housing Need as calculated using the government's standard methodology, and there is a 10.8 year supply of deliverable sites for housing for the period 1 April 2020 to 31 March 2025.

2.10 It is recognised however that decisions taken through the GMSF / a plan of nine districts (and potentially the SLP:CS) could require some changes to the designations as defined within the SLP:DMP, most likely relating to Chat Moss and the Green Belt (given that some land within these designations will potentially be allocated for built development). This is explained within the relevant parts of the SLP:DMP itself and its SA. Whilst it is also recognised that this interim position in respect of designations being included within the SLP:DMP could potentially cause some confusion it has been considered that, on balance, the inclusion of these designations within the SLP:DMP provides a simpler and more recent planning policy framework when compared to retaining designations as part of the Unitary Development Plan (UDP) saved policies.

2.11 Nevertheless, a development management focussed local plan alongside the retention of protective designations currently saved as part of the Unitary Development Plan is considered to be a reasonable alternative for the SA process (this option would be the “SLP:DMP without designations”). As such this alternative has been appraised through this SA Addendum report as part of the appraisal of the SLP:DMP as a whole, and also for those policies in the SLP:DMP that are considered to be designations. The specific policies in the SLP:DMP that are designations (or are partly designation policies) are set out below:

- EC2 Port Salford
- TC1 Network of designated centres
- A5 Sustainable movement of freight
- A11 Barton Aerodrome
- A12 Protection of aviation safety at Manchester Airport
- A13 Safeguarding potential transport routes
- EG1 Sustainable Energy
- EG2 Renewable and low carbon energy schemes
- WA3 Flood risk management and infrastructure
- HE1 Heritage protection
- HE6 Canals
- GB1 Green Belt
- GI2 Chat Moss
- GI3 Irwell Valley
- GI4 West Salford Greenway
- GI5 Local Green Space
- BG1 Nature Improvement Areas
- BG2 Development and biodiversity
- BG3 Geodiversity
- R4 Strategic Recreation Routes
- R5 Outdoor and indoor sports facilities

2.12 The implications of the “SLP:DMP without designations” option for the SLP:DMP SA are set out in Annex 1 to this addendum report as follows:

- Annex 1.1 outlines revisions to paragraphs E17 to E19 of the SLP:DMP SA main report Executive Summary (which relate to ‘Appraisal of the plan level/strategic options’)
- Annex 1.2 outlines revisions to Section 8 (Sustainability Appraisal of Strategic Options) of the SLP:DMP SA main report⁵
- Annex 1.3:
 - Identifies those policies in the SLP:DMP that are protective designations, or partly protective designations
 - Shows what changes are required to these policies as a result of reducing the scope of them to only relate to development management
 - Identifies which policies from the UDP would need to continue to be saved given the loss of protective designations from the SLP:DMP
 - Sets out the potential implications for decision making of removing designations from the SLP:DMP and relying on the saved UDP
- Annex 1.4 updates the appraisal of strategic options from the SLP:DMP SA Appendix 5 (Appraisal of Publication SLP:DMP and no Plan Option). This has been informed by the content of Annex 1.3 of this Addendum and includes a new strategic option (option 3) which is the SLP:DMP without designations. Note that in Annex 1.4, the No Plan Option is option 1 and the SLP:DMP is option 2.
- Annex 1.5 updates the appraisals of those policies in Appendix 6 (Appraisal of Publication SLP:DMP policies and reasonable alternatives) of the SLP:DMP SA that are also listed in paragraph 2.11 above.

Key issue B)

Whether the appraisal of relevant policies should consider an additional strategic option reflecting the potential that the GMSF and subsequent SLP:CS may not be found sound, and / or additional housing may be needed across Greater Manchester and Salford.

2.13 The scope of the SLP:DMP has enabled part of Salford’s Local Plan to be progressed in advance of the GMSF (or a plan of nine districts as currently intended). Section 7 (‘Sustainability Appraisal, scope of the SLP:DMP and consideration of reasonable alternatives’) of the SLP:DMP SA main report sets out the relationship between these two documents, together with the Salford Local Plan Core Strategy and Allocations Document (SLP:CS).

2.14 It is recognised, at paragraphs 7.5 and 7.18 of the SLP:DMP SA main report, that decisions taken through the GMSF and/or Salford Local Plan Core Strategy, could require the review of elements of the SLP:DMP and that the preparation of the SLP:CS, following on from the GMSF, will provide an

⁵ Annex 1.2 incorporates those changes arising from the discussion relating to Key issue F) below.

opportunity to consider any relevant issues in this regard. This will equally apply to a plan of nine districts.

- 2.15 Should the GMSF (or a plan of the nine districts) and/or SLP:CS be found unsound, and Salford's Local Housing Need Figure increases to such an extent that it can no longer be met, then any development proposals within the city's protective designations would need to be determined in accordance with the presumption in favour sustainable development set out in paragraph 11 of the NPPF.
- 2.16 The SLP:DMP designated 10 sites in Salford as Local Green Space. However it has since been recognised by the council that this designation is inconsistent with the scope of the SLP:DMP as it "should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services" and "should be capable of enduring beyond the end of the plan period"⁶. In the context of issues of the scale of development being considered through the GMSF (and now as a plan of nine districts instead) it is not therefore considered appropriate to designate new Local Green Spaces within the SLP:DMP. Consultation on proposed modifications to the SLP:DMP, including the deferral of Local Green Spaces to the SLP:CS, will be undertaken. On this basis, the policy is not therefore a reasonable option for consideration in the SLP:DMP SA, and the appraisal of policy GI5 (Local Green Space) is therefore deleted in the revisions to Appendix 6 of the SLP:DMP SA (as shown in Annex 1.5 of this addendum report).
- 2.17 With the deletion of Policy GI5 from the Publication SLP:DMP, the potential for the GMSF / a plan of the nine districts and/or SLP: CS to be found unsound would not change the conclusions regarding the contribution the SLP:DMP would make to the various sustainability appraisal objectives. It would however potentially delay any additional positive impacts from the GMSF (or the plan of nine districts) and the SLP:CS should new versions need to be prepared.

Key issue C)

Whether Section 4 of the SA main report ('Sustainability Issues and Problems') should recognise that the issues and challenges identified could be positively addressed through a development plan that swiftly promotes sustainable economic growth through the allocation of much needed housing and employment sites in key locations across Salford.

Further whether it should identify an urgent need for private and affordable housing for families and all demographics, together with a wide range of sites for economic growth and development.

⁶ MHCLG (February 2019) National Planning Policy Framework, paragraph 99

- 2.18 Section 4 of the SLP:DMP SA main report outlines key ‘Sustainability issues and problems’ identified through the review of ‘Other relevant plans, policies and programmes’ and ‘Baseline information’ (as set out in Sections 2 and 3 of the SA main report respectively). The purpose of Section 4 is to show how the identified issues and problems have informed the ‘Sustainability Appraisal Framework’ (including the SA objectives) that is set out in Section 5. Whilst the allocation of new sites could contribute to a number of the objectives identified it is not the purpose of Section 4 to exhaustively identify all such potential contributors.
- 2.19 In terms of identifying an urgent need for private and affordable housing, Salford currently has a five year supply of housing land (the most recent assessment covering the period 1 April 2020 to 31 March 2025 identifies a supply of 10.8 years⁷). It is however recognised that some parts of the city lack a diversity of residential offer and that there are significant numbers of people seeking affordable housing. Both of these issues are identified within the summary of key issues in Section 4 of the SLP:DMP SA main report (see table below paragraph 4.2) and are particularly addressed through SA Objective 17 which is “To ensure that everyone has access to a good home that meets their needs”. The issues are therefore appropriately addressed within the SLP:DMP SA main report.
- 2.20 In respect of a need for a wide range of sites for economic growth and development, the key issues identified in Section 4 of the SLP:DMP SA main report (see table below paragraph 4.2) include the following:
- “A proactive approach should be taken to encouraging economic growth”;
and
- “The city’s economy is increasingly dominated by a small number of sectors, and although it will be important to target the growth sectors it will also be vital to ensure economic diversity to make the economy more robust to changing circumstances and provide more diverse employment opportunities to meet the varied needs and skills of residents”.
- 2.21 The need to positively encourage economic growth and the need for diversity within the economy are both recognised and are addressed in particular through SLP:DMP SA Objective 14, which is “To maximise economic growth that can be sustained in the long-term”. The economic issues identified are therefore appropriately addressed within the SLP:DMP SA main report.
- 2.22 The need for additional sites to address needs in respect of residential and economic development has been considered through the GMSF (and going forward will be as a plan of nine districts) and will also be considered locally through Salford’s Local Plan Core Strategy and Allocations Plan. This issue therefore falls outside of the scope of the SLP:DMP. Given this and recognising that the 2-part Local Plan does raise some uncertainties in this

⁷ Salford City Council (November 2020) [Five year housing land supply position: 1 April 2020 to 31 March 2025](#)

regard, it is considered appropriate to specifically highlight this issue within the 'Housing' and 'Economic Health' sections of Section 4 of the SLP:DMP SA main report ('Sustainability issues and problems'). This does not however change the appropriateness of the sustainability appraisal objectives that are identified as part of Section 5 of the SLP:DMP SA main report ('Sustainability Framework').

- 2.23 Having regard to the above, it is appropriate to add the following bullets to the end of the 'Housing' and 'Economic Health' rows of the table under paragraph 4.2 in Section 4 of the SLP:DMP: SA Main Report as follows (additional text underlined):

Housing

- “Dwelling requirements across Greater Manchester have been considered through the Greater Manchester Spatial Framework process”

Economic Health

- “Economic development opportunities across Greater Manchester have been considered through the Greater Manchester Spatial Framework process”

Key issue D)

Whether Section 5 ('Sustainability Appraisal Framework') of the SA main report should be amended to clarify that the IA objectives of the GMSF reflect the assessments undertaken to date and that the plan itself has not yet been adopted.

- 2.24 The GMSF and the SLP:DMP were both being progressed, although were at different stages (a revised Draft GMSF was published in January 2019 whilst the Publication version of the Local Plan was published in January 2020) at the time the SLP:DMP: SA Main Report was published. The Publication GMSF was due to be published for consultation in December 2020 but will now be progressed a plan of nine districts for reasons set out earlier in this addendum report. Given this, it is considered appropriate to ensure that the sustainability appraisal objectives framing the assessment of each document through their preparation are compatible, particularly given that both documents will form part of Salford's Development Plan upon adoption. It is recognised however that until such time as the GMSF, or the plan of nine districts has been adopted, there could be changes required to the Integrated Appraisal, including the sustainability objectives identified.
- 2.25 Given the above, it is considered appropriate to revise paragraph 5.12 of the SLP:DMP SA main report as set out below (additional text underlined, and deletions struck through). Note that no changes are proposed to footnote 12.

“Upon adoption, the GMSF, alongside Salford’s Local Plan (parts 1 and 2), will form part of the city’s Development Plan¹². It is therefore appropriate to consider the compatibility of the sustainability objectives that frame the assessments of these documents in order to ensure that they are being appraised against similar goals. The GMSF, just as the SLP:DMP, is currently in draft form and there is therefore the potential for changes to the Integrated Appraisal of it, including to the sustainability objectives. Any such changes can be considered through further updates of the SLP:DMP Sustainability Appraisal as necessary to ensure the assessments remain compatible.”

Key issue E)

Whether Section 5 (‘Sustainability Appraisal Framework’) of the SA main report should be revised to reflect the fact that the SLP:DMP will not allocate sites and will not therefore fully meet the objectives of the GMSF IA.

Specifically, whether table 6 of the SA main report and the commentary associated with GMSF IA Objective 1 (under the ‘Key links’ column) should record that “The SLP:DMP does not currently allocate any land for housing or employment and given that the GMSF and Local Plan Allocations document are under development, elements of this objective are not supported”.

2.26 Table 6 in Section 5 of the SLP:DMP SA main report sets out a ‘Comparison of GMSF integrated appraisal sustainability objectives and Salford sustainability objectives’. It is not the purpose of Table 6 to consider the extent to which the SLP:DMP contributes to the GMSF integrated appraisal objectives. This is considered elsewhere in the SLP:DMP SA as follows:

- Sustainability Appraisal of Strategic Options (Section 8 of the main report) and Appraisal of Publication SLP:DMP and No Plan Option (Appendix 5)
- Sustainability Appraisal of Policy Options (Section 10 of the main report) and Appraisal of Publication SLP:DMP policies and reasonable alternatives (Appendix 6)

2.27 Given the above, it is not therefore considered necessary to add the proposed text to Table 6. However, changes have been made to Section 8 of the SLP:DMP SA main report (Sustainability Appraisal of Strategic Options’) to acknowledge the uncertainties created by the tandem progression of the GMSF and SLP:DMP. See ‘Key issue F’ below for further details of these changes.

Key issue F)

Whether, given the uncertainties created by the GMSF and the SLP: CS the positive and major positive ratings in Section 8 (‘Sustainability Appraisal of Strategic Options’) of the SA main report against objectives SA014 to SA019 should be revised to “uncertain”.

- 2.28 A concern was raised that the SLP:DMP SA had been prepared on the basis that the GMSF and Salford's Local Plan Core Strategy and Allocations Document would be found sound. It was commented that in the absence of these documents having been adopted there were uncertainties around outcomes in relation to the following sustainably objectives:
- Objective 14: To maximise economic growth that can be sustained in the long-term
 - Objective 15: To enhance economic inclusion
 - Objective 16: To improve the city's knowledge base
 - Objective 17: To ensure that everyone has access to a good home that meets their needs
 - Objective 18: To improve accessibility to facilities and opportunities
 - Objective 19: To improve community cohesion
- 2.29 Whilst the SLP:DMP SA was not written on the basis of the SLP:CS and GMSF being found sound, it is recognised that the issues being dealt with through the two different plans, particularly in respect of land supply and allocations, mean that there are uncertainties around the possible impacts of protective designations on certain SA objectives.
- 2.30 It is acknowledged that this is particularly the case for SA objectives 14 and 17 which are in part dependent on the availability of appropriate sites to accommodate new development. Whilst the SLP:DMP includes a number of policies that potentially have a positive contribution to meeting objectives 14 and 17, and that Local Housing Need calculated in accordance with the government's standard methodology can be met with all of the protective designations proposed in place, the GMSF (and now the Plan of nine districts including Salford) is progressing in the background and will determine residential and employment requirements for districts. This potentially raises some uncertainties around the ratings that can be given to objectives 14 and 17 in the SLP:DMP SA, particularly in the context of the Revised Draft GMSF allocating two sites for development that have protective designations in the SLP:DMP (i.e. Green Belt and Chat Moss). Having regard to this point, it is considered the ratings for objectives 14 and 17 from year 5 onwards should be amended to reflect this uncertainty.
- 2.31 In respect of the other objectives identified relating to economic inclusion, knowledge base, access to facilities, and community cohesion (objectives 15, 16, 18 and 19 respectively) it is not considered that any amendments to these ratings are required. Much of the potential in relation to these objectives will relate to opportunities within the urban area and are not reliant on decisions taken through any sub-regional plan and/or Salford's Core Strategy and Allocations document. Decisions relating to land supply, and the city's protective designations, are therefore less likely to create the same uncertainties as identified for objectives 14 and 17. Whilst a wider mix of dwellings, incorporating larger dwellings in particular, could have some additional positive impacts in terms of knowledge base, this would be

considered to add to the range of priorities already outlined in the plan. Such identified priorities include the ongoing development of Salford Quays, protection and enhancement of key institution including Salford Royal Hospital and Salford University, and the establishment of the Salford Innovation Triangle.

- 2.32 Although not specifically raised in comments to the SLP:DMP SA, it is recognised that there may be an element of uncertainty created by progressing a Local Plan with protective designations (i.e. the SLP:DMP) alongside a sub-regional plan (be it the GMSF or a Plan of nine GM Districts). Given this, it is considered that this uncertainty should be reflected in further detail against objective 20 which is 'To increase involvement in decision making'.
- 2.33 The table below takes into account the changes identified in the discussion above and provides an update to Table 7 of section 8 of the SLP:DMP SA main report for objectives 14, 17 and 20. It identifies the ratings for years 10+ given the time period covered by the plan⁸.

Table 7: Comparative assessment of Local Plan 'plan' level/ strategic options:

Objective	Option 1 (No plan)		Option 2 (SLP:DMP)	
	Rating in SLP:DMP SA	Revised rating	Rating in SLP:DMP SA	Revised rating
14) To maximise economic growth that can be sustained in the long-term	+	?/+	+ /++	?/+
17) To ensure that everyone has access to a good home that meets their needs	+	?/+	+ /++	?/+
20) To increase involvement in decision-making	0	0	+	?/+

Key issue G)

Whether the ratings given to policy D8 against objective 10 should be revised to a negative impact.

- 2.34 In the SLP:DMP SA the Design Chapter of the SLP:DMP was assessed as a whole rather than as individual policies. Notwithstanding this, Historic England commented that as drafted policy D8 (Alterations and extensions) would have a negative impact on SA objective 10.

⁸ A fully revised appraisal of Strategic Options is provided at Annex 1.4 of this Addendum report reflecting the above changes and those discussed further under Key issue F) below.

- 2.35 In respect of Objective 10 (To protect, enhance, and enable the appreciation of, the city's heritage) the SLP:DMP SA identified a '+' rating for the Design Chapter as a whole over the medium and longer term. The appraisal describes that "A key part of local character is the city's heritage and so both options, alongside other heritage policies, would contribute positively to the protection, enhancement and appreciation of heritage (objective 10)."
- 2.36 Historic England also made specific comments to SLP:DMP Policy D8. Discussions have taken place between the city council and Historic England resulting in changes to the policy that resolve Historic England's objection.
- 2.37 Whilst amendments to the SLP:DMP have been made to address issues raised by Historic England, it is not considered that these would mean that the '+' rating given to the SLP:DMP design chapter against objective 10 in the SA was inappropriate. The detailed design guidance provided in the SLP:DMP includes reference to context; local character and distinctiveness; and, in relation to alterations and extensions, affected heritage assets.

Key issue H)

Whether the ratings given to policies HE1, HE2 and HE4 should be revised to a major negative impact.

- 2.38 In the SLP:DMP SA the Heritage chapter of the SLP:DMP was assessed as a whole rather than as individual policies. In respect of Objective 10 (To protect, enhance, and enable the appreciation of, the city's heritage) a '++' rating was identified for the SLP:DMP Heritage chapter over the medium and longer term. Notwithstanding that the SA did not individually assess policies HE1 (Heritage protection), HE2 (Managing change across historic areas) and HE4 (Heritage at risk), Historic England commented that as drafted these policies would have a major negative impact on objective 10.
- 2.39 Historic England also made specific comments to the wording of SLP:DMP policies HE1 (Heritage protection), HE2 (Managing change across historic areas) and HE4 (Heritage at risk). Discussions have taken place between the city council and Historic England resulting in changes to policies HE1, H2 and HE4 that resolve Historic England's objection.
- 2.40 The amendments that have been made to policies HE1, HE2 and HE4 will improve the clarity and potential application of these policies. As a result, it is concluded that the amendments would improve the Heritage Chapter's overall performance against SA Objective 10. However, the issues raised, and the amendments proposed are not considered to be sufficiently significant as to suggest that the previous appraisal of the chapter against objective 10 as being major positive was inappropriate. No amendment has therefore been made to the SLP:DMP SA in response to this issue.

Summary and implications of changes to the SLP:DMP SA in response to representations received

2.41 Having regard to the key issues that arise out of the comments made to the SLP:DMP SA a number of amendments have been made to the SA main report and associated Appendixes. These amendments are shown within this addendum report (and where relevant in annexes) and relate to the following sections of the published SA:

- Executive Summary (paragraphs E17 and E18)
- Section 4 Sustainability Issues and Problems (Housing and Economic Growth sections)
- Section 5 Sustainability Appraisal Framework (paragraph 5.12)
- Section 8 Sustainability Appraisal of Strategic Options Sustainability Appraisal of Strategic Options
- Appendix 5 Appraisal of Publication SLP:DMP and No Plan Option
- Appendix 6 Appraisal of Publication SLP:DMP designation policies and reasonable alternatives

2.42 Updates to Appendix 5 and 6 of the SLP:DMP SA have considered a new option, namely the SLP:DMP without designations (with this option retaining designations as in the saved UDP). The key findings from these appraisals are set out below.

Appraisal of strategic options

2.43 Annex 1.4 to this Addendum updates the appraisal of strategic options from the SLP:DMP SA Appendix 5 by considering each of the 21 sustainability objectives against a new option (Option 3: SLP:DMP without designations). This new option sits alongside Options 1 and 2 which are No Plan, and SLP:DMP respectively, which were considered in the SLP:DMP SA.

2.44 At a strategic level, the SLP:DMP (Option 2) and the SLP:DMP without designations (new Option 3) have in the vast majority of instances been given the same ratings against the various sustainability objectives. Although option 3 does not contain designations, as explained within this main report and Annex 1.3, designations within the UDP would remain saved when considering this option. The nature and coverage of designations within the UDP are very similar to those within the SLP:DMP. It is therefore not surprising that at a strategic level, options 2 and 3 are rated in virtually the same manner.

Appraisal of individual policies

2.45 The sustainability differences between the SLP:DMP, and SLP:DMP without designations are minimal when considering the appraisal of individual policies (and some policies that are grouped within a Chapter). These considerations are set out at Annex 1.5 of this addendum report. With regards to Chapter 17 Energy, the SLP:DMP option scores better against objectives 1, 8 and 9 given that it designates Heat Network Management Areas (with specific

requirements within them) and identifies wind energy opportunity areas (the SLP:DMP without designations option does not do this).

- 2.46 In respect of SA Objective 20 (Involvement in decision making) the SLP:DMP without designations option could have some benefits over the SLP:DMP option. This is on the basis that some of the protective designations in the SLP:DMP may require early revision following decisions taken through the GMSF or the plan of nine districts; this is particularly the case for the Chat Moss (policy GI2) and Green Belt (GB1) boundaries as identified in the SLP:DMP.
- 2.47 Whilst a Local Plan Core Strategy and Allocations document is proposed to follow on from the SLP:DMP and would provide a means to amending the Local Plan boundaries for Chat Moss and the Green Belt (subsequent to any decisions taken at a sub-regional level), the inclusion of protective designations at this time within the SLP:DMP could be confusing for some. The SLP:DMP without designations option would potentially only require one update to relevant designations for the foreseeable future, which may be easier to understand for some. This however must be balanced with the benefits of having all development management policies and designations within one document rather than continuing to rely on some elements of the existing UDP, alongside a newly adopted SLP:DMP without designations.

Overall conclusion

- 2.48 As a whole the amendments made to the SLP:DMP SA outlined above, whilst contributing to the robustness of the appraisal, have not changed its overall conclusions. The SLP:DMP remains the preferred option.

3.0 Assessment of implications of proposed modifications to the SLP:DMP policies for the SLP:DMP SA

- 3.1 As well as considering changes to the SLP:DMP SA as a result of representations received to it (as set out above), this section provides an assessment of the sustainability implications that arise out of proposed modifications (main, and additional) to the SLP:DMP. These proposed modifications have been published by the council for a period for representations and therefore are not repeated within this addendum.
- 3.2 National Planning Policy Guidance (NPPG) on strategic environmental assessment and sustainability appraisal states that the “sustainability appraisal report will not necessarily have to be amended if the plan is modified following responses to consultations” and that “modifications to the sustainability appraisal should be considered only where appropriate and proportionate to the level of change being made to the plan. A change is likely to be significant if it substantially alters the plan and/ or is likely to give rise to significant effects.” It continues by stating that “further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects” and states that “a further round of consultation on the sustainability appraisal may also be required in such circumstances but this should only be undertaken where necessary. Changes to the plan that are not significant will not require further sustainability appraisal work.”⁹
- 3.3 The NPPG further sets out that the SA should focus on ‘the environmental, economic and social impacts that are likely to be significant’¹⁰. It also states that criteria for determining the likely significance of effects on the environment are set out in [schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004](#)¹¹; considerations under this include the characteristics of plans and programmes, effects and the areas likely to be affected.
- 3.4 Within the context of the NPPG and relevant regulations, a scoping exercise has been undertaken to assess which of the proposed modifications (Main, and Additional) to the SLP:DMP are significant in sustainability terms. This assessment has concluded that the only modifications to the SLP:DMP that are considered to be significant relate to the following policies:
- Chapter 12 Town Centres and retail development: Policy TC1 Network of designated centres
 - Chapter 12 Town Centres and retail development: Policy TC2 Development involving main town centre uses
 - Chapter 12 Town Centres and retail development: Policy TC3 Retail frontages, changes of use and redevelopments within centres

⁹ MHCLG (Last updated 16 July 2020) National Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal, Paragraph 021 Reference ID: 11-021-20140306

¹⁰Ibid, Paragraph 009, Reference ID: 11-009-20140306

¹¹ Ibid, Paragraph 018 Reference ID: 11-018-20140306

- Chapter 12 Town Centres and retail development: Policy TC4 Food and drink uses within designated centres
- Chapter 12 Town Centres and retail development: Proposed new Policy TC5 Community Facilities
- Chapter 21 Green Belt and Agriculture: Policy GB2 Soils and agricultural land
- Chapter 22 Green Infrastructure: Policy GI2 Chat Moss
- Chapter 22 Green Infrastructure: Policy GI5 Local Green Space

3.5 For those policies listed above it has been considered appropriate to review in further detail the earlier appraisals presented in the SLP:DMP SA¹², and update then having regard to the proposed modifications. The revised policy appraisals are presented in Annex 2 of this Addendum report.

3.6 Where relevant and for ease of reference, the revised appraisals in Annex 2 also include those changes resulting from the consideration of the SLP:DMP with no designations Option, as discussed further in section 2 and Annex 1.5 of this Addendum Report, for the following policies:

- Chapter 12 Town Centres and retail development: Policy TC1 Network of designated centres
- Chapter 22 Green Infrastructure: Policy GI2 Chat Moss
- Chapter 22 Green Infrastructure: Policy GI5 Local Green Space

3.7 For all other policies not listed in paragraph 3.4 above, the appraisals presented in Appendix 6 the SLP:DMP SA are considered to remain reflective of their potential contribution to the various sustainability objectives and are not therefore reproduced in this Addendum report.

Summary of revised appraisals

3.8 The proposed modifications to the SLP:DMP would generally score positively when reappraising Option A (i.e. the SLP:DMP) against the SA objectives set out in table 5 (from page 50) of the SLP:DMP SA. The main findings of this assessment are set out below.

Policy with significant changes	SA objective (s)	SA implications
Policy TC1 Network of designated centres	1	Potentially improved access to health care facilities given the function of primary shopping areas would be wider than just retail.
	2,7,8,9, and18	Could have a greater positive impact against these objectives, particularly objective 18 as it has the potential to reduce the distance

¹² At Appendix 6: Appraisal of Publication Salford Local Plan: Development Management Policies and Designation document policies and reasonable alternatives

Policy with significant changes	SA objective (s)	SA implications
	13	<p>people need to travel to access, jobs, facilities and services.</p> <p>Could provide further daytime and evening activity, with the primary shopping areas having a wider function that just retail development.</p>
Policy TC2 Development involving main town centre uses	1	Takes a more flexible approach to non-retail uses in the primary shopping area, which could increase the provision of health care facilities.
Policy TC3 Retail frontages, changes of use and redevelopments within centres	12	Given the focus on leisure uses within centres this could be detrimental to the residential amenity of those who live within centres. It will be important that amenity is a key consideration in determining proposals that require planning permission.
Policy TC4 Food and drink uses within designated centres	13 14 and 18	<p>Could provide further daytime and evening activity, with the primary shopping areas having a wider function that just retail development.</p> <p>Would protect the existing town and local centres by adding to the mix of uses within centres (rather than there just be a retail function within the primary shopping area).</p>
Policy GB2 Soils and agricultural land	8 11	<p>Not permitting turf production on Chat Moss and examining proposals elsewhere closely, will reduce emissions of greenhouse gasses. This is reinforced by adding in reference to the policy to require that the use of agricultural land shall reduce carbon emissions, retain floodwater, retain and enhance landscape and habitat features.</p> <p>Help to maintain the character of landscape.</p>
Policy GI2 Chat Moss	2, 4 and 8	The statement that new turf operations or extensions to existing turf production will not be permitted at Chat Moss rates more positively. In addition, reference to reducing carbon emissions from the area and to 'wet agriculture' uses being looked on favourably

Policy with significant changes	SA objective (s)	SA implications
		where habitat restoration is not possible would be beneficial.

3.9 Through the proposed modifications to the SLP:DMP a new policy is also proposed (policy TC5). This relates to community facilities and sets out criteria for when planning permission will be granted for new community facilities, and also criteria for determining the acceptability of the loss of a community facility. As noted above, this policy has been considered as part of this SA addendum (in Annex 2). There are not considered to be any negative implications of the introduction of the policy, with neutral impacts against many of the objectives. The new policy does however remove uncertainties against a number of the objectives when compared to the SLP:DMP, given it provides detailed criteria against which to assess proposals relating to new, or the potential loss of community facilities. The policy rates positively against a number of objectives, including objectives 1 (To improve mental and physical health), 16 (To improve the city’s knowledge base) and 18 (To improve the accessibility of facilities and services).

Implications for strategic options

3.10 It is not considered that the implications of the proposed modifications to the SLP:DMP are significant to the plan as a whole. On this basis it is not considered necessary to assess the proposed modifications against each of the 21 sustainability objectives / strategic options (as presented in Appendix 5 of the SLP:DMP and updated at Annex 1.4 of this Addendum to also include a new option ‘SLP:DMP with no designations’).

Overall conclusion

3.11 As set out above, there are clear sustainability benefits arising from the proposed modifications to the SLP:DMP.

4.0 Revised 'Components that constitute the Environmental Report' table in light of changes in this addendum report

4.1 Page 3 of the SLP:DMP SA main report included a table setting out components that constitutes the Environmental Report. As noted in the report:

“This Sustainability Appraisal report incorporates the requirements for an Environmental Report under the Environmental Assessment of Plans and Programmes Regulations 2004. These Regulations transpose the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC) into English law.

Those elements of the Sustainability Appraisal Report that constitute the Environmental Report for the purposes of the SEA Directive are signposted in Table 1 below.”

4.2 The information set out in Table 1 of the SLP:DMP SA main report is shown below. An additional column has been added to the table to identify where information has been updated by this Addendum report

Table 1: Required information under the SEA Regulations

Information to be included in an Environmental Report under the SEA Regulations	Relevant Sections in the Publication SLP:DMP SA Report	Relevant Sections in the Publication SLP:DMP SA Report updated by this Addendum
An outline of the contents, main objectives of the plan and its relationship with other relevant plans and programmes	Chapter 1 Para 5.11-5.29	No updates
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Chapter 3 Appendix 3	No updates
The environmental characteristics of areas likely to be significantly affected	Chapter 3 Appendix 3	No updates
Any existing environmental problems which are relevant to the plan, including in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Chapter 4 Chapter 6	Chapter 4: Two bullet points added at the end of the 'Housing' and 'Economic Health' rows of the table that follows paragraph 4.2. No further updates. Chapter 6: No updates

Information to be included in an Environmental Report under the SEA Regulations	Relevant Sections in the Publication SLP:DMP SA Report	Relevant Sections in the Publication SLP:DMP SA Report updated by this Addendum
The environmental protection objectives, established at international, community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation	Chapter 2 Chapter 4 Appendix 2	No updates
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soils, water, air, climatic factors, material assets, cultural heritage, landscape, and the interrelationship between the above factors	Chapter 8 Chapter 10 Appendix 5 Appendix 6	Chapter 8: Updates shown in Annex 1.2 Chapter 10: No updates Appendix 5: Updates shown in Annex 1.4 Appendix 6: Updates shown in Annex 1.5
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan	Chapter 8 Chapter 10 Appendix 5 Appendix 6	Chapter 8: Updates shown in Annex 1.2 Chapter 10: No updates Appendix 5: Updates shown in Annex 1.4 Appendix 6: Updates shown in Annex 1.5
An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties	Chapter 5 Chapter 7 Chapter 8 Chapter 9 Chapter 10 Appendix 5 Appendix 6	Chapter 5: Paragraph 5.12 of the SLP:DMP SA updated to reference the GMSF being in draft form and there is therefore the potential for changes to the Integrated Appraisal of it, including to the sustainability objectives. Chapter 7: No updates Chapter 8: Updates shown in Annex 1.2

Information to be included in an Environmental Report under the SEA Regulations	Relevant Sections in the Publication SLP:DMP SA Report	Relevant Sections in the Publication SLP:DMP SA Report updated by this Addendum
		<p>Chapters 9 and 10: No updates</p> <p>Appendix 5: Updates shown in Annex 1.4</p> <p>Appendix 6: Updates shown in Annex 1.5</p>
A description of measures envisaged concerning monitoring	Chapter 12	No updates
A non-technical summary of the information provided above	Executive summary	Update to paragraphs E17 to E19 shown at Annex 1.1