

Regulation 18 Local Plan - Integrated Assessment Scoping Report Consultation Form

Any comments you have on the Local Plan Integrated Assessment Scoping Report can be submitted using this consultation response form. **Please note, not all questions are mandatory.**

Comments, using this form, can be submitted by email to localplan.consultation@trafford.gov.uk or by post to Strategic Planning, Strategic Growth Services, Trafford Council, Trafford Town Hall, Talbot Road, Manchester, M32 0TH.

If you have any enquiries regarding the Local Plan Integrated Scoping Assessment Report, please email localplan.consultation@trafford.gov.uk or call 0161 912 3149 and a member of the Strategic Planning Team will be able to assist.

Comments are invited on the Integrated Assessment Scoping Report from 23rd July 2018 until 14th September 2018 when the consultation will close.

Data protection

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information such as your postal and e-mail address will not be published, but your name and organisation (if relevant) will.

Trafford Council maintains a database of consultees who wish to be kept informed about strategic planning matters such as the Local Plan. In responding to this consultation your contact details will automatically be added to the consultation database (if not already held). If you do not want to be on the consultation database and therefore not be contacted about future strategic planning consultations please state this in your response.

Personal details

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Position/title (if applicable)			
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Integrated Assessment Scoping Report

Are there any other plans or strategies that should be taken account of during the appraisal process?

Given Government's expectation that 'the Plan should protect and enhance biodiversity and habitats; **support the protection of peat** and support the improvement of water quality', and that there is a significant area of peat bog (Carrington Moss), I am surprised that the UK Peatland Strategy 2018-2040 has not been considered important enough to include:

<http://www.iucn-uk-peatlandprogramme.org/resources/uk-peatland-strategy-2018-2040>.

Given that HS2 will impact the Borough, I am surprised not to see evidence showing why Trafford is supporting this hugely expensive vanity project.

Is there any additional baseline information that should inform the appraisal processes being undertaken on the Local Plan?

What are the numbers of vehicles which 'just pass through' Trafford, as opposed to belonging to residents. We should look at the benefits of 'park and ride' schemes to reduce traffic, in particular that coming from South of the Borough to reach Manchester City Centre.

There is no information or evidence which relates to the Digital Economy, which is one of the fastest growing areas of employment. What are the technology and workplace trends which need to be considered? For example, more people are working from home – how does that impact the need for physical workspaces? What are the training (and retraining) requirements? What infrastructure is needed to be successful?

Given Trafford had been identified as 'one of the highest-emitting Boroughs for carbon emissions and nitrogen oxides within Greater Manchester' and Section 5.9.1 states that 'Within Trafford, data is not available to assess the variation in emissions across the borough', such data should be collected and made available to support the Local Plan.

Table 7.1 (6) includes 'Improve the availability of opportunities to residents and others to walk, cycle and use public transport to meet their needs' – there is no mention anywhere in the report about horse-riders. There are over 1000 horses in the Carrington Moss area alone. Some baseline information should be collected about the needs of horse-riders, including those whose businesses are based on sustaining this form of transport/leisure.

Are there any other sustainability or environmental issues which should be considered as part of the appraisal of the Local Plan? Please clarify any evidence which supports the additional issues being proposed.

There is a huge lack of traffic free routes, particularly for commuters, which results in more people taking their car than necessary. See GMCA's Made to Move Strategy https://www.greatermanchester-ca.gov.uk/download/downloads/id/463/made_to_move.pdf

It would be helpful to include a summary of the environment/sustainability targets that Trafford is aiming to achieve in one consolidated section of the report.

Do you have any other comments on the Integrated Assessment Scoping Report?

There is no mention of encouraging greater community participation and increasing the number of Neighbourhood Plans – this should be a key priority for Trafford, especially given that there is currently only one plan (Altrincham town centre neighbourhood business plan). I would anticipate that there will be national strategies to consider to encourage community participation and sites which offer advice and guidance on this.

Section 5.4.1 mentions that Mersey Valley is a 'strategic countryside area' for a variety of districts. It should be noted that much of the Mersey Valley area is often flooded and inaccessible! Flooding is mentioned on many occasions throughout the report. Given the increased risk of flooding set out in the report, and the fact that some of the land which floods regularly is contaminated, if houses **or roads** are built on that land and the flooding is dispersed to other areas, the contamination could seriously impact neighbouring residents, particularly if noxious substances (cyanide, asbestos, etc – which are known to be on the land) are uncovered by the flood waters. What information exists about the potential contaminants on land at risk of flooding?

The TPT and the NCN are not all public rights of way. Although the public have been using them for decades (33 years in my own case), they have not been recorded on Trafford's Definitive Map. Effort should be assigned to address these gaps.

Table 7.1 (12) mentions 'Provide opportunities to enhance new and existing wildlife and geological sites?' and 'Avoid damage to, or destruction of, designated wildlife sites, habitats and species and protected and unique geological features?' It should also mention that any developments (of housing **or roads**) should minimise the impact on protected species, declining bird species and other wildlife. The number of developments being proposed in areas are coming through in 'drips and drabs'. This means that nesting birds in declining species (for example) could be moved from one habitat to another, only to be moved again when that second habitat is developed at a later date. This would have a significant impact on those species.

There seems to be a large discrepancy between the identified shortfall in housing, the number of empty homes and the number of houses which were planned for Trafford in the previous iteration of the GMSF!!! There is clearly a shortfall in social housing, which should be the priority for any build in Trafford.

Thank you for the opportunity to comment on the IA Scoping Report.