

# Trafford Local Plan

## Friends of Carrington Moss Response



### Integrated Assessment Report

#### **11 Does the Integrated Assessment Report, including its appendices, provide a comprehensive assessment of the likely short, medium and long-term impacts of the draft Trafford Local Plan?**

The Integrated Assessment is an astoundingly positive assessment of the Local Plan. It does not feel independent!

There are just so many points which have not been addressed, from the negative impact of development on green belt land to the lack of recognition of workplace and social changes post the pandemic. There is no recognition of the effect of increased air and noise pollution on the health and wellbeing of local communities and wildlife nor of the impact of the loss of irreplaceable habitats which the New Carrington development, for example, proposes.

We have set out some examples below but, quite frankly, could have exponentially increased the size of our response given the biased review of the Local Plan document. It is to be hoped that future versions are more impartial. We would have expected that at least some of the points we have raised in our response would have been picked up by an independent Integrated Assessment.

#### **Appendix B: Integrated Assessment of the Trafford Draft Local Plan**

Point 2 on page 27 does not highlight the expected significant increase in HGVs, which will impact air pollution. In addition, this point talks about more sustainable transport, when our FOI request has revealed there are no plans or commitments to any? On what basis has this assessment been made?

Point 3 on the same page does not reference the loss of green belt, the potential massive carbon release following the uplifting of the peat, the increased air pollution in the remaining “green” corridor, which actually includes United Utilities works, Manchester United’s training grounds, a farmstead, two riding centres, a solar farm, Sale Sharks training grounds and Sale Rugby FC’s training grounds, in addition to a new road, which is expected to become a dual carriageway! Why is this green?

Point 5 on page 28 should definitely be red rather than neutral! There is not only no reduction in car use, there will be a positive increase in cars and HGVs using the road, leading to a significant increase in air pollution. The current plan for the road cuts across green belt land, some of which has peat deposits, which will result in a massive carbon release, which is not compatible with numerous policies, Trafford’s declaration of a climate emergency and the carbon neutral action plan!

Point 6 on the same page does not mention the potential lack of equality for access to school places.

Point 2 on page 204 suggests that *“Maintaining a strong and diverse supply of employment sites across Trafford including New Carrington and Timperley Wedge will promote equality and reduce deprivation by allowing for a wide range of skilled people the opportunity for employment”*. Given that New Carrington plans only to host industrial and warehousing, rather than a diverse supply of employment – why is this green?

#### **12 Are there any other likely short, medium and long-term impacts of the draft Trafford Local Plan that the Integrated Assessment should identify? Please refer to relevant evidence.**

Too many to mention, this IA Report is unreasonably incomplete.

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Some examples include:

- substantial carbon release following mass peat extraction to enable construction on Trafford's mosslands
- significant increase to air and noise pollution in areas of extensive over-development
- impact on red listed bird populations and endangered wildlife species of development on their breeding and feeding grounds
- no focus on community engagement
- lack of recognition of impact on equal access to school places
- lack of prioritisation of active travel options and public transport in policies
- lack of compliance with a declaration of a climate emergency
- lack of commitment to Brownfield FIRST and Sustainable Locations FIRST policies
- etc, etc, etc

### **13 Does including its appendices, identify potential mitigation or enhancement measures for the draft Trafford Local Plan where appropriate?**

No. The report is unreasonably incomplete.

### **14 Are there any other potential mitigation or enhancement measures for the draft Trafford Local Plan that the Integrated Assessment should identify? Please refer to relevant evidence.**

The alternative strategies proposed by local communities should be included and assessed. The GM Wetlands initiative should be referenced, particularly in relation to our mosslands.

### **15. Do you have any other comments on the Integrated Assessment Report, including its appendices?**

#### **Appendix C: Site assessments**

When will updated information be available for the planned New Carrington developments?

#### **Appendix D: Flood Risk Sequential test results**

When will updated information be available for the planned New Carrington developments?

#### **Appendix E: Equality Impact Assessment**

We believe there will be a number of issues in the Local Plan that will impact the equality of various groups:

- higher levels of air pollution will, for example, impact pregnant women, the disabled and young children disproportionately
- challenges to access school places will impact young people directly, their parents or carers (in terms of the stress of dealing with the processes associated with getting children into the school of your choice, and local residents in terms of the additional traffic and higher levels of air pollution (see point above) that will result from the lack of school places in the localities where large developments are planned (such as New Carrington)

The list at Appendix E should include Genuine and Robust Engagement with Communities as, without it, many residents with protected characteristics will be severely disadvantaged.