

Date: 26 March 2014  
Our ref: 111663  
Your ref: strategic planning



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**BY EMAIL ONLY**

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Dear Sir/Madam,

## **TRAFFORD LAND ALLOCATIONS – CONSULTATION DRAFT**

Thank you for your consultation on the above dated 03 February 2014 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

### **HABITATS REGULATIONS ASSESSMENT (HRA) SCREENING REPORT**

The report states:

*“3.2 As a useful starting point, the Assessment has considered the suite of European sites assessed within the North West Regional Spatial Strategy (RSS) Habitat Regulations Assessment. It is recognised that the RSS itself will soon be rescinded, but the evidence used in the preparation of the RSS, including the HRA, remains current and relevant.”*

Natural England advise that this paragraph needs updating since the RSS was revoked 20 May 2013. We agree, however, that it is acceptable to use the list of sites assessed in the RSS as a starting point.

#### *3.3.1 Diffuse Air Pollution*

It would be relevant here to refer to the Core Strategy HRA that identified that **LS5 Carrington** could lead to potential atmospheric effects.

#### *3.3.3 Diffuse Water Pollution*

It is not acceptable to screen out the Mersey Estuary SPA/Ramsar based on the fact that it was screened out of the RSS HRA nor because it is too difficult to assess. The purpose of the RSS HRA was to assess impacts at a much higher strategic level and in no way should it replace the need for assessment at the local Land Allocations level. A clearer explanation is needed in order to justify the reason for screening this site out of the assessment. It may be relevant to refer back to the Core Strategy HRA.

#### *3.3.4 Recreational Pressure*

It is not relevant to refer to the RSS or impacts being too difficult to assess as per our comments above. It is acceptable to state why it is thought that impacts of this nature will be unlikely but that allocations within 5km of Manchester Mosses will be assessed further on in the report under the precautionary principle.

It would make sense to refer to the Core Strategy HRA here that identified **LS5 Carrington** could lead to increased recreational pressure on Manchester Mosses SAC and made the recommendation that the Land Allocations Plan go through HRA. This would suggest that the HRA of the Land Allocations Plan should be assessing the identified impacts that could not be assessed at Core Strategy due to insufficient detail.

### 3.3.5 Water Supply

Again, outcomes of the RSS HRA and difficulty to assess impacts are not sufficient as justification. If there is clear justification relating to the capacity water supply and that United Utilities do not envisage any issues with water supply and future development then this should be explicit.

## Table 5.1 Initial Screening of Chapters

Regeneration – Partington lies within the 5km buffer so this should be assessed further or a clearer explanation given as to why regeneration in this area would not lead to likely significant effects on Manchester Mosses SAC.

## 8. Assessment of potential impacts identified through the Screening process.

Natural England are of the opinion that potential impacts on Manchester Mosses SAC have not been considered despite the availability of some additional detail that was not available at the Core Strategy stage. Trafford Council need to be certain that the plan is deliverable at project stage and we recommend more thought around the potential impacts as follows:

Carrington Strategic Locations – It is known that there will be a minimum of 1560 residential units planned for this location which should be enough information to begin considering the impacts. In relation to recreational pressure you could consider how accessible Manchester Mosses SAC is from this location, how likely is it that it will be used, are there any other green spaces close by that may be used instead? In relation to atmospheric pollution you could consider what aspects of delivering this strategic location would lead to pollution, is there any baseline data to indicate what the current levels are, are there any possible methods to avoid impacts? We recognise that certain detailed assessment may need to be deferred to project level but there needs to be a certain level of assessment now to ensure the plan is deliverable.

Housing – It is not clear why Partington Priority Regeneration Area is not being assessed, what are the potential impacts?

Transport – It has been identified that new roads could generate increased pollution but this is not being assessed. The impacts need to be considered as fully as possible with the detail available.

Low Carbon Growth Areas – possible impacts have been identified but not assessed, further detail is needed.

## Summary and Recommendations

Overall the assessment of impacts has been deferred to project stage and not enough has been done with the detail available to assess the likelihood of impacts as per our comments above.

## SUSTAINABILITY APPRAISAL (SA)

### 3.2 Links to other plans, programmes and strategies

The boundary of Greater Manchester Wetlands Nature Improvement Area goes through Trafford

district and it is important that it is referred to, it could be especially helpful when developing mitigation.

### **3.4 Sustainability Appraisal Objectives**

#### Environmental

E2 – we are pleased to see the inclusion of geodiversity in this objective.

E4 – we would like to see the inclusion of Green Infrastructure as a sub objective.

#### Options Appraisal

Most of the Allocation location options have multiple negative scores under the SA environmental objectives and it is Natural England's view that the report could go further in terms of assessing the impacts and building up a picture of how they will be mitigated.

It would be helpful if the report provided baseline information on the existing open space, biodiversity, flora and fauna, geological and geomorphological features at each of the strategic locations so that it is clear what assets may be lost and to improve understanding of what a successful mitigation package would look like.

It is not clear from the report where the mitigation details are, we presume that this comes under the 'justification' heading in the Land Allocations Plan itself but this should be made clear.

#### Monitoring

*Objective E4 – Reduce impact of climate change.*

You may wish to use hectares of Green Infrastructure created to monitor this objective.

### **LAND ALLOCATIONS CONSULTATION DRAFT**

#### Strategic locations

We are pleased to see that Green Infrastructure is well embedded in this plan and we believe that this is absolutely essential in light of the negative impacts that have been identified on environmental objectives in the Sustainability Appraisal. We are also pleased that certain sites of environmental importance are being safeguarded. However, we are of the opinion that more needs to be done to plan the functionality of new Green Infrastructure so that it is mitigating for losses and wherever possible taking opportunities to enhance the site in terms of biodiversity and ecosystems as well as for recreation.

This should be informed by baseline data of the strategic locations and some level of assessment of the impacts from implementing the plan. It may also be useful to refer to the objectives of the Greater Manchester Wetlands Nature Improvement Area.

Trafford Council must be confident that losses can be mitigated at project level, how can you be sure there will be no adverse impact? What is needed - habitat creation, buffer zones, linkages, wildlife corridors etc? We recommend that some more work is required in order to provide this certainty.

We hope that you find these comments useful. For any queries relating to the specific advice in this letter only please contact Janet Baguley using the contact details below. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

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