

Trafford Council  
Integrated Assessment of the  
Trafford Local Plan

Consultation Statement  
Draft Scoping Report  
February 2020

## Quality Management

<b>Title</b>	Trafford Council Integrated Assessment of the Trafford Local Plan Consultation Statement Draft Scoping Report	
<b>Date</b>	November 2019	
<b>Project Code</b>		
<b>Client</b>	Trafford Borough Council	
<b>Prepared by</b>	Laura Craddock	
<b>Checked by</b>	Martin Craddock	
<b>Authorised by</b>	Jackie Palmer	

The Trafford Local Plan Draft Integrated Assessment (IA) Scoping Report was subject to public consultation between 23 July 2018 and 14 September 2018. The Draft IA Scoping Report identifies the type, nature and extent of potential effects that need to be considered in the preparation of the Trafford Local Plan and proposes the scope for future assessment stages of an IA of the Local Plan.

13 representations were received to the consultation. Representations were received from the statutory consultees Natural England, Historic England and the Environment Agency, along with several other stakeholders.

This Consultation Statement sets out the representations that were received, Trafford Council's response and the amendments that are proposed in preparation of a final IA Scoping Report.

Consultee	Representation	Response	Suggested amendment to Scoping Report
<b>Emery Planning (IDCR128) on behalf of Barratt Homes (ID CR321)</b>	<p>The list of relevant documents at Appendix B should be subject to a thorough review. For example, references are made to revoked and irrelevant strategies such as the NW Regional Spatial Strategy (RSS) and other strategies that have constrained the supply of housing and contributed towards the Borough's housing crisis e.g. Sustainable Communities: Building for the Future 2003. Such strategies have no relevance to the emerging local plan. At a local level, there is no reference to relevant strategies and studies such as the Greater Manchester SHMA 2016, Trafford Housing Strategy 2018-23, Trafford Vision 2031 and the Trafford Economic and Housing Growth Framework 2016.</p> <p>As discussed earlier through this Statement, the Integrated Assessment Scoping Report should reflect the need to review the Green Belt boundaries at a non-strategic scale in order to complement the work being undertaken through the emerging GMSF.</p>	<p>Thank you, the documents listed at Appendix B will be reviewed and updated where necessary.</p> <p>The Scoping Report discusses, as required, the current baseline situation and relevant evidence, plans and programmes relating to the Green Belt. Green Belt amendment is a strategic issue. It notes that the GMSF will be looking to make any changes to the Green Belt.</p>	<p>Updates have been made throughout Appendix B.</p> <p>None proposed.</p>
<b>Environment Agency (ID CR228)</b>	<p><u>Section 5.8.2</u> Rivers are identified as priority habitats<sup>1</sup> and are outlined a key green infrastructure assets as in the draft Greater Manchester spatial framework<sup>2</sup>. Trafford borough has 5 major watercourses and 9 Water Framework Directive (WFD) waterbodies as outlined in NW River Basin Management Plan<sup>3</sup> we would recommend these key aquatic habitats are recognised within the current baseline situation.</p> <p><u>5.14 Water resources</u> The current Capita baseline situation data for water resources is seemingly using now outdated and superceded</p>	<p>Noted, reference to rivers as a priority habitat will be included as part of the baseline.</p> <p>Noted, the data is outdated and can be replaced with more current information.</p>	<p>Section 5.8.2 now includes reference to Trafford's watercourses and their status as priority habitats.</p> <p>Section 5.14 has been updated with the most up-to-date data available on the</p>

<sup>1</sup> <http://jncc.defra.gov.uk/page-5706>

<sup>2</sup> [https://www.greatermanchester-ca.gov.uk/downloads/file/371/draft\\_greater\\_manchester\\_spatial\\_framework\\_october\\_2016\\_-\\_full\\_version](https://www.greatermanchester-ca.gov.uk/downloads/file/371/draft_greater_manchester_spatial_framework_october_2016_-_full_version)

<sup>3</sup> <https://www.gov.uk/government/publications/north-west-river-basin-district-river-basin-management-plan>

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	<p>GQA data for rivers and canals in the borough. We would recommend that the summary of water resources in the Trafford Borough is based on the most up to date River Basin Management Plan cycle 2 data<sup>4</sup> which looks at both biological and chemical quality, as well as hydromorphological issues associated watercourses, which all impact on the overall ecological value and functioning of waterbody. Current WFD data for waterbodies in Trafford borough can be accessed by GOV.UK website<sup>5</sup>.</p> <p>Due to the continued threat of drought based on the current climate change predictions it is recommended that the current area drought plans are highlighted within the baseline situation, and how future sustainable planning can play a role in reducing this environmental threat, and recommend reference to <a href="https://www.gov.uk/government/publications/drought-management-for-england">https://www.gov.uk/government/publications/drought-management-for-england</a></p> <p><u>6 Key Sustainability issues for Local Plan</u> <u>Biodiversity</u> Providing a high quality ecological network and a multiple functioning green infrastructure will increase connections between habitats, improve movement of species and have a more resilient environment for people and wildlife.</p> <p>The improvement and/or restoration of habitats, the reduction in fragmentation and reducing the threat of non-native invasive species<sup>6</sup> can all provide a biodiversity benefit.</p> <p>We would welcome an ‘environmental net gain’ principle for</p>	<p>Noted. Drought effects and its management should be included within the Scoping Report.</p> <p>Comments noted. The Government’s 25 year environmental improvement plan should be included within the list of documents at Appendix B.</p> <p>The Scoping Report does acknowledge the need for environmental enhancement as well as protection. This is reflected in the recommended IA Objectives. There could be further clarity on enhancement in Section 6</p>	<p>Environment Agency’s website.</p> <p>The Drought Framework has been added to the list of relevant plans and programmes at Appendix B. Discussion on drought and its links to climate change has been added at section 5.9.2.</p> <p>“A Green Future: Our 25 Year Plan to Improve the Environment” has been added to Appendix B.</p> <p>Additional reference to the need for environmental enhancement added to section 6, notably relating to air quality and climate</p>

<sup>4</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/718335/North\\_West\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718335/North_West_RBD_Part_1_river_basin_management_plan.pdf)

<sup>5</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/699308/River\\_basin\\_management\\_plan\\_how\\_to\\_access\\_data\\_information.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/699308/River_basin_management_plan_how_to_access_data_information.pdf)

<sup>6</sup> <http://www.nonnativespecies.org/index.cfm?sectionid=25>

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	<p>development as advocated in the Government 25 year environmental strategy<sup>7</sup> being identified as a key sustainability opportunity.</p> <p><u>Water</u> All of the current WFD waterbodies in the Trafford Borough are currently failing their statutory ecological objectives through a combination of water quality and hydromorphological issues. As highlighted in North West River Basement Management Plan<sup>8</sup> local government and spatial planning process provides one of the measures in helping prevent deterioration of waterbodies, and opportunity to enhance these waterbodies, ecological networks and key blue infrastructure assets as part of sustainable design<sup>9</sup></p> <p>We consider that flood risk has been appropriately taken into consideration within the document.</p>	<p>“Key Sustainability, Health and Equality Issues for the Local Plan”.</p> <p>Noted. Proposed IA Objectives 11 “Protect and improve the quality and availability of water resources” and 12 “Conserve and enhance biodiversity and promote nature conservation” and their assessment criteria will be used to consider how the emerging Local Plan would meet these aims. The IA Framework would benefit from the addition of ecological network protection as an assessment criterion.</p> <p>Comment noted.</p>	<p>change.</p> <p>New assessment criteria added to IA Objective 12 relating to ecological networks.</p>
<p><b>Friends of Carrington Moss (ID CR145)</b></p>	<p>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: <a href="http://www.iucn-uk-peatlandprogramme.org/resources/uk-peatland-strategy-2018-2040">http://www.iucn-uk-peatlandprogramme.org/resources/uk-peatland-strategy-2018-2040</a></p> <p>Given that HS2 will impact the Borough, I am surprised not to see evidence showing why Trafford is supporting this hugely expensive vanity project.</p>	<p>Parts of the Carrington Moss area is designated as Priority Habitat Deciduous Woodland, and this habitat is discussed in the Scoping Report. Further information could be included within the “Land” section. Natural England have published a report on peatlands in England that should be looked to as a relevant plan.</p> <p>There was no previous reference to HS2 within the IA Scoping Report. However, for completeness and to reflect the potential substantial impact upon the area that development HS2 could have upon Greater Manchester and Trafford in particular, a short</p>	<p>Information from Natural England’s “England’s peatlands - Carbon storage and greenhouse gases” is now included at Appendix B. Some further discussion of Peatland is also provided in the Land, Soils and Geology section.</p> <p>Short description of HS2 consultation – noting potential station at Manchester Airport – added to the Transport and Accessibility section of the baseline analysis.</p>

<sup>7</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>8</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/718335/North\\_West\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718335/North_West_RBD_Part_1_river_basin_management_plan.pdf)

<sup>9</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/297315/LIT8146\\_7024a9.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/297315/LIT8146_7024a9.pdf)

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	<p>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.</p> <p>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?</p> <p>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.</p> <p>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.</p>	<p>note referencing the latest consultation routes and stations will be added to the report.</p> <p>Such detailed data is not readily available. However, the Scoping Report does recognise the need to improve public transport infrastructure and attractiveness.</p> <p>This scoping report outlines the baseline position of a range of characteristics relevant to sustainable development and preparation of the Local Plan in Trafford. Discussion of broadband infrastructure is included in section 5.6 Utilities.</p> <p>The Scoping Report notes in section 5.9.1 that it is likely most carbon emissions arise from the economic centres of Trafford Park and Carrington. Section 5.7 on Air Quality notes that nitrogen dioxide levels are highest by major roadways. Reference to no data should be removed.</p> <p>It is agreed that horse-riding is a form of active travel that should be supported within the Borough.</p>	<p>None proposed.</p> <p>None proposed</p> <p>Section 5.9.1 amended to remove reference to no data on variation in emissions across the borough.</p> <p>The need to improve infrastructure and conditions for horse riders is now noted in the Report under section 6. Assessment criteria under IA Objective 6 now reads “Improve the availability of opportunities to residents and others to walk, cycle, <i>horse ride</i> and use public transport</p>

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	<p>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<sup>10</sup></p> <p>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.</p> <p>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.</p> <p>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!</p> <p>Flooding is mentioned on many occasions throughout the report. Given the increased risk of flooding set out in the</p>	<p>Comments noted. The Scoping Report notes that there is a need to improve infrastructure and conditions for pedestrians and cyclists. Made to Move should be looked to as a relevant plan.</p> <p>Section 7 outlines the 13 sustainability objectives arising from consideration of the baseline position and relevant plans and programmes.</p> <p>Community participation is important. The IA process does give consideration to fostering good relations between people and equality of access and opportunity, particularly through the Equalities Impact Assessment. However, it is not considered necessary to make additions to the Scoping Report relating to community participation and NP preparation. The Scoping Report sets out a framework to assess the policies and allocations of the emerging Local Plan, and potentially other future development plans. The Framework is reflective of the topics likely to be covered in the emerging Local Plan and required of the SEA Regulations.</p> <p>Section 5.4.1 notes that the Mersey Valley is as important for nature conservation as it is for recreation and makes reference to its location within the Green Belt.</p> <p>The Scoping Report acknowledges the importance of risk from contamination and</p>	<p>to meet their needs.”</p> <p>“Made to Move” is now included within Appendix B.</p> <p>None proposed.</p> <p>None proposed.</p> <p>None proposed.</p>

<sup>10</sup> [https://www.greatermanchester-ca.gov.uk/download/downloads/id/463/made\\_to\\_move.pdf](https://www.greatermanchester-ca.gov.uk/download/downloads/id/463/made_to_move.pdf)

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	<p>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?</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>flooding. It sets out a framework for assessing the suitability of policies and allocations with regards to these matters. Detailed assessment of flood and contamination risk is a part of the development management process to ensure the safety of residents.</p> <p>Comments noted. The scoping Report acknowledges the need for improved active travel infrastructure and proposed that this is assessed during Local Plan preparation.</p> <p>Comments noted. It is considered that the two recommended IA Objectives noted would be sound criteria in which to assess the impacts described.</p> <p>Comments noted. The Scoping Report acknowledges the need for the delivery of housing, including affordable homes, to meet needs. The IA framework proposes that these matters are assessed during Local Plan preparation.</p>	<p>None proposed.</p> <p>None proposed.</p> <p>None proposed.</p> <p>None proposed.</p>
<p><b>Graham Fawcett (ID)</b></p>	<p><i>Are there any other plans or strategies that should be taken account of during the appraisal process?</i></p>	<p>The Altrincham Town Centre Neighbourhood Business Plan has been looked to in setting</p>	<p>None proposed.</p>

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<b>CR348)</b>	<p>Altrincham Neighbourhood Business Plan, adopted by the council in 2017</p> <p>It is not clear whether this new plan would replace some of the existing local plans (e.g. Altrincham local Plan).</p>	<p>the scope for the IA of the emerging Local Plan and is noted within Appendix B.</p> <p>Section 2.2 of the Scoping Report discusses the collection of development plan documents that the emerging Local Plan will form part of. Emerging draft versions of the Local Plan will be clear in where the document would sit within existing and future development plans.</p>	
<b>Heather Fairfield (ID CR319)</b>	<p><i>Are there any other plans or strategies that should be taken account of during the appraisal process?</i></p> <p>Health service capacity. GP surgeries. Transport capacity or buses and routes, trams and capacity at peak hours. Environment</p> <p><i>Is there any additional baseline information that should inform the appraisal processes being undertaken on the Local Plan?</i></p> <p>Green spaces and play areas for children.</p>	<p>All these matters are considered through the baseline analysis in the Scoping Report and relevant plans and strategies addressing these matters are considered in highlighting the sustainability issues relevant to Trafford.</p> <p>Comments noted. Green space is covered throughout the Scoping Report. The baseline with regards to play areas should be added.</p>	<p>None proposed.</p> <p>Section 5.4.1 now includes reference to children's play areas.</p>
<b>Historic England (ID CR292)</b>	<p>Historic England has produced a document, which you might find helpful in providing guidance on the effective assessment of the historic environment in Strategic Environmental Assessments<sup>11</sup>.</p> <p>Historic England recommends that a scoping report should:</p> <ul style="list-style-type: none"> <li>• Review the objectives of relevant policies, plans and programmes;</li> <li>• Establish the baseline for the historic environment, including any trends and targets and gaps in the existing information;</li> <li>• Identify sustainability issues and opportunities for the historic environment and heritage assets;</li> <li>• Develop sustainability appraisal objectives;</li> <li>• Identify indicators and targets;</li> </ul>	<p>Thank you for the advice, which is noted.</p>	<p>None proposed.</p>

<sup>11</sup> <https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

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	<ul style="list-style-type: none"> <li>Consider how alternatives will be assessed;</li> <li>Provide sufficient information on the proposed methodology for the appraisal to assess whether effects upon the historic environment will be properly addressed.</li> </ul> <p>Historic England suggests that scoping reports are tailored to the type, purpose and level of plan under consideration. This accords with the NPPF, which requires that local plans are based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.</p> <p><u>Context</u> The report should identify the built environment and its character and distinctiveness and refer to the historic environment. There is the potential for undesignated assets and archaeology on some sites, and these should be referred to within the baseline information.</p> <p><u>Relevant Plans, Programmes and Policies</u> In terms of the plans and policies identified, this needs to cover all those relevant at an international, national and local level that would have a direct bearing for the historic environment.</p> <p><u>Baseline Information</u> Baseline information should describe the current and future state of the historic environment, providing the basis for identifying sustainability issues, predicting and monitoring effects and alternative ways of dealing with them. It can use both quantitative and qualitative information and should be kept up to date. It is important that meaningful conclusions can be drawn from the baseline information; what it means for the Plan and how the historic environment is to be dealt with.</p>		

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	<p>The baseline information in the scoping report on the historic environment should include all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged. This not only involves undesignated (or local heritage assets) but the potential for unrecorded archaeology, and historic landscape character areas for example.</p> <p>The NPPF recognises the importance of undesignated heritage assets and therefore this should be included within the baseline data. The source of this information should be included within the scoping report; references made to them and recognise the opportunities for their enhancement and contribution to other aspects of the Plan area.</p> <p>The importance of local character and identity including the landscape and townscape of an area is an important consideration. The scoping report should recognise the importance of this and the source of this information should be included within the scoping report, with reference made to them in key issues and opportunities.</p> <p><u>SEA Themes and Objectives</u> It is important that the role the historic environment plays in sustainable development and the contribution it makes to delivering social, cultural, economic and environmental benefits is recognised. The historic environment underpins sustainable development and therefore, it may warrant including in other objectives including the need for specific reference to landscape character.</p>		

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	<p><u>Site Allocations</u>            Historic England has produced an advice note – Site Allocations and the Historic Environment in Local Plans<sup>12</sup> which may be of help in the production of your Local Plan and in assessing the impact of sites on the historic environment. This document is intended to offer advice to all those involved in the process, to help ensure that the historic environment plays a positive role in allocating sites for development. It offers advice on evidence gathering and site allocation policies, as well as setting out in detail a number of steps to make sure that heritage considerations are fully integrated in any site selection methodology.</p> <p>Historic England strongly advises that you engage conservation, archaeology and urban design colleagues at the local and county level to ensure you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered as part of the Local Plan, the allocation of any site and in the preparation of the SEA. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER (formerly SMR). They will be able to provide you with the Historic Environment Records for the area including any relevant studies, and ensure a joined-up and robust approach is undertaken.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by you with your email of 23 July 2018. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the Plan) where we consider that, despite the SA/SEA, this would have an adverse effect upon the historic environment.</p>		

<sup>12</sup> <http://www.historicengland.org.uk/images-books/publications/historic-environment-and-siteallocations-in-local-plans/>

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<b>Jeremy Williams (ID CR239)</b>	<p>For sustainable development, Local Plans are supposed to be based on “objectively assessed needs for housing and other uses”. These supposedly objectively assessed needs are not evident in this consultation. Even the Integrated Assessment Scoping Report does not provide proper objectively assessed information in relation to housing and other uses.</p> <p>On page 74 of the Integrated Assessment Scoping Report, under Altrincham and neighbouring communities, the Key Issues and Objectives column reads, “Ensure that the distractive characteristics of the place are not lost through development, particularly with the residential suburbs such as Bowdon and Hale Barns”.</p> <p>Presumably, this should read, “Ensure that the distinctive characteristics of the place are not lost through development, particularly with the residential suburbs such as Bowdon and Hale Barns”, but, from what has been written, this is not entirely clear.</p>	<p>The Scoping Report has looked to the most up-to-date available evidence to set out the baseline position with regards to housing and other uses. The emerging Local Plan’s role will be to set out the Borough’s objectively assessed housing need.</p> <p>Thank you for pointing out this typing error, which will be amended.</p>	<p>None proposed.</p> <p>In Appendix A, “distractive characteristics” amended to “distinctive characteristics”.</p>
<b>Mike Shields (ID CR77)</b>	<p><i>Are there any other plans or strategies that should be taken account of during the appraisal process?</i> The Altrincham Town Centre neighbourhood business plan, 2015 to 2030</p> <p><i>Is there any additional baseline information that should inform the appraisal processes being undertaken on the Local Plan?</i> The most up to date NPPF should be used - issued in July 2018.</p> <p><i>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.</i> The beneficial impact of electric cars and the potentially</p>	<p>The Altrincham Town Centre Neighbourhood Business Plan has been included in the Report’s list of relevant documents, with the recommendation that the Local Plan is prepared with regard to its aims.</p> <p>Noted – the most up-to-date NPPF should be referenced.</p> <p>Comments noted. Whilst not possible to address all matters in detail, the Scoping Report aims to set out a general framework where the overall effects of Local Plan policies and allocations can be assessed. Electric</p>	<p>None proposed.</p> <p>References to the NPPF have been updated to refer to the most recent version (2019).</p> <p>None proposed.</p>

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	<p>radical effect of driverless vehicles needs to be properly assessed and factored in.</p>	<p>vehicles could have a beneficial effect on air quality and carbon dioxide emissions. Driverless cars may require specific supportive infrastructure. The Scoping Report reflects the need to improve air quality and lower carbon dioxide emissions, and for the delivery of required infrastructure.</p>	
<p><b>Natural England (ID CR116)</b></p>	<p>Natural England has not reviewed the plans listed in Appendix B. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;</p> <ul style="list-style-type: none"> <li>• Green infrastructure strategies</li> <li>• Biodiversity plans</li> <li>• Rights of Way Improvement Plans</li> <li>• River basin management plans</li> <li>• Relevant landscape plans and strategies.</li> </ul> <p>Table 6.1 of the IA/SA has identified the most relevant issues to the plan. There are however, other sustainability issues that should be included. For example, we note there is no reference to improving people’s access to nature (be that to linear routes or open spaces), which should also be considered.</p> <p>We welcome the recognition of ‘the need to conserve land and soils’ in the IA. However, we would like to see additional text added that ensures any loss of Best and Most Versatile agricultural land is also reflected in the Plan.</p>	<p>Comments noted. The suggested range of documents have been looked to in setting the scope and are recorded in Appendix B.</p> <p>Agreed, a reference to public access to open space and nature should be noted within the Scoping Report. It is considered that the existing range of IA Objectives and assessment criteria, including “Ensure access to green infrastructure providing opportunities for recreation, amenity and tranquillity?” would be adequate to assess this matter.</p> <p>Agreed, a reference to the Borough’s grade 2 agricultural land and the need to properly consider the use of best and most versatile agricultural land should included as a key sustainability issue. An existing IA Objective and assessment criterion is in place to assess this matter.</p>	<p>Appendix B has been updated.</p> <p>“Access to open space and natural/semi-natural sites should be protected and enhanced.” added as a key sustainability issue in section 6.</p> <p>The Borough’s grade 2 agricultural land and the need to properly consider the use of best and most versatile agricultural land has been included as a key sustainability issue in section 6.</p>

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	<p>The IA/SA objectives outlined in Table 7.1 are appropriate for the future preparation of the new Local Plan. However, we would like to see the following points incorporated into the IA Framework:</p> <ul style="list-style-type: none"> <li>We welcome the objective to conserve and protect land and soils, whilst reducing land contamination. A possible amendment to the assessment criteria, would be to include the suggested wording of avoid as well as protect, ‘the best and most versatile agricultural land / soil resources from inappropriate development’.</li> <li>We also welcome the objective to conserve and enhance biodiversity and promote nature conservation. There is scope to include reference to include opportunities to also enhance ‘ecological connectivity’, as part of the assessment criteria. There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. We therefore suggest adding additional wording that captures the following principle of ‘ensuring current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced’.</li> </ul> <p><u>Monitoring</u> As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 174).</p> <p>The natural environment metrics in the baseline information are largely driven by factors other than the plan’s performance. They are thus likely to be of little value in</p>	<p>The site-specific criteria include the criterion “Avoid loss of best and most versatile agricultural land (Grade 1,2 or 3a)”.</p> <p>Agreed, it is important to protect and enhance ecological networks, rather than consider site in isolation. A new assessment criterion will be added.</p> <p>Comments noted and will be considered when the monitoring framework is prepared under Stage B of the IA process.</p>	<p>The Scoping Report now includes some site-specific assessment criteria, including “Avoid loss of best and most versatile agricultural land”, as suggested.</p> <p>“Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not unnecessarily prejudiced?” added as a new assessment criterion against IA Objective 12.</p> <p>None proposed.</p>

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	<p>monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.</p> <p>Whilst it is not Natural England’s role to prescribe what indicators should be adopted, the following indicators may be appropriate.</p> <p><u>Biodiversity:</u></p> <ul style="list-style-type: none"> <li>• Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.</li> <li>• Percentage of major developments generating overall biodiversity enhancement.</li> <li>• Hectares of biodiversity habitat delivered through strategic site allocations.</li> </ul> <p><u>Green infrastructure:</u></p> <ul style="list-style-type: none"> <li>• Percentage of the city’s population having access to a natural greenspace within 400 metres of their home.</li> <li>• Length of greenways constructed.</li> <li>• Hectares of accessible open space per 1000 population</li> </ul>		
PJ	The Capita Integrated Assessment Scoping Report, at p.4,	The description of sustainable development is	At 1.4.1, amend “Sustainable

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<b>Thompson (ID CR305)</b>	<p>para 1.4.1, defines Sustainable Development as "that which seeks to strike a balance between economic, environmental and social factors to enable people to meet their needs without compromising the ability of future generations to meet their own needs".</p> <p>This sounds quite reasonable, but there are two problems here: (i) "seeks" makes the definition very weak, and unable to resist brutally destructive money making; (ii) it assumes that we here and now can know what will be the needs of future generations, which seems very arrogant and dismissive.</p>	<p>derived from the UN's definition (as established in the Brundtland Report). The UN define sustainable development as "development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs".</p> <p>For clarity, the Brundtland definition will be used in the Scoping Report.</p>	<p>development is that which seeks to strike a balance between economic, environmental and social factors to enable people to meet their needs without compromising the ability of future generations to meet their own needs." to "Sustainable development is defined as development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs." (<i>Our Common Future</i> [Brundtland Report], 1987, UN).</p>
<b>The Coal Authority (ID CR214)</b>	<p>Although Trafford area is on the coalfield we hold no records of any coal mining activities or features being present at shallow depth and the area is not identified as having any Surface Coal Resource.</p> <p>On this basis the Coal Authority has no specific comments to make in respect of the Integrated Assessment Scoping Report consultation.</p>	<p>Comments noted.</p>	<p>None proposed.</p>
<b>Tom Jeffs (ID CR320)</b>	<p><i>Are there any other plans or strategies that should be taken account of during the appraisal process?</i></p> <p>The report correctly identifies some existing routes as good for cycling, but these are mostly off-road routes. To encourage cycling, we need more on-road routes that serve homes, shops, schools and businesses, with street lighting so that people feel safe. People do not want to walk or cycle on remote, unlit routes at night</p> <p><i>Are there any other sustainability or environmental issues which should be considered as part of the appraisal of the</i></p>	<p>Comments noted. The Scoping Report identifies that the Local Plan should improve the availability of opportunities to residents and others to walk, cycle and use public transport to meet their needs. This is a criterion that will be used to assess the Local Plan. The specifics of proposed routes will be considered in detail during the development management stage.</p>	<p>None proposed.</p>

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	<p><i>Local Plan? Please clarify any evidence which supports the additional issues being proposed.</i></p> <p>Default position for any new housing or business development should be walking and cycling links first. New developments should not just connect to existing infrastructure, they should be built with new walking and cycling infrastructure where possible. This way, you reduce the demand for space on already busy roads.</p> <p><i>Do you have any other comments on the Integrated Assessment Scoping Report?</i></p> <p>The report seems to make no mention of the obvious link between increased active transport resulting in reduced demand on health services.</p>	<p>Comments noted. There are links between many of the topics covered in the Scoping Report. The Scoping Report sets out an IA Framework that would recognise these positive links. IA Objectives have been proposed for both health and transport. As suggested, these objectives, and any policies or allocations relating to them, would score positively when assessed against each other.</p>	<p>None proposed.</p>
<p><b>GVA How Planning (ID CR311) on behalf of Royal London Asset Management (ID CR349)</b></p>	<p>Trafford Council is intending to prepare a new Local Plan which will be the main land use planning document for the borough. The plan as currently proposed will guide and manage the borough's future growth and development needs up to 2035. Given the length of the proposed Plan period it is RLAM's view that the IA policy provisions should offer sufficient flexibility to accommodate future changing circumstances. The proposed policies, designations and sites of the Local Plan, and their alternatives, will require assessment for potential unintended social, economic and environmental effects. The Integrated Assessment Scoping Report proposes the scope for future assessment stages of an Integrated Assessment (IA) of the Local Plan. The IA will include three separate but complementary assessments in order to inform the development of the Local Plan. These are:</p> <ul style="list-style-type: none"> <li>• Sustainability Appraisal/Strategic Environmental</li> </ul>	<p>Comments noted.</p>	<p>None proposed.</p>



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	<p>identified within Section 6 of the document. However, RLAM would like to provide comment on a number of the key issues as follows:</p> <p><u>Population, Equality and Housing</u>            RLAM strongly supports the identification of economy as a key sustainability issue. In particular, RLAM supports the following statement that 'Given the need to deliver housing in the future, pressure will be placed to free land which has not previously been allocated'. RLAM believes that is essential to create new sustainable residential developments in areas well serviced and connected to existing and proposed employment opportunities. This is where new housing is most needed, where there is already a demand and new jobs will be created, and where meaningful change could be brought about by helping to alter commuter habits, reducing reliance upon car borne journeys. As noted in the Scoping Report in section 6 short term population growth is greater than that of housing availability.</p> <p><u>Economy and Education</u>            RLAM strongly supports the identification of housing as a key sustainability issue. In particular RLAM supports the following statement in chapter 6: 'in order that Trafford can grow and improve its overall economic performance, sufficient employment land for expansion in locations well served by transport and other infrastructure and in locations attractive to market will be needed, particularly in the key growth sectors'</p> <p>The scale of the Greater Manchester growth challenge is to reverse and eliminate the present gap between public spending and tax revenues. New transport projects and the delivery of housing and employment development are central to boosting economic output, creating a critical mass of new jobs and closing the north/south performance divide. RLAM has assessed the potential of the currently allocated employment land at Davenport Green as capable of</p>	<p>Comments noted.</p> <p>Comments noted.</p>	<p>None proposed.</p> <p>None proposed.</p>

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	<p>delivering some 93,000 sq. m. (c.1 million sq. ft.) of new accommodation in phases. This could comprise exemplar B1 office accommodation, ancillary supporting amenities and a central hub acting as a focus for both employment and leisure activities centred on a new rural park.</p> <p>This scale of development is envisaged to create in the order of 9,500 FTE jobs and £470m Gross Value Added to the Greater Manchester economy once fully built out. The site is capable of supporting the City Region's aspiration to capture major investment and jobs from national and international companies, which demand sites of the highest locational and environmental qualities, close to markets they serve and capable of attracting high calibre staff to fill high value jobs.</p> <p>Significant residential (3,300 homes) and employment (50,000sqm office space) allocations are proposed at the Timperley Wedge through the GMSF process. An integral local centre is proposed which would encompass both of these uses as well as other appropriate 'town centre' uses, located in close proximity to key transport nodes.</p> <p>RLAM supports the IA framework objective to 'ensure sustainable economic growth and job creation', part of the assessment criteria for this objective is to 'support education and training and provide a suitable labour force for future growth' and 'ensure and maintain a sufficient labour force (in terms of volume and skills)'. Davenport Green can deliver a sustainable mixed use community offering a range of education and labour force opportunities. These include a Medipark R&amp;D facility which will aim to attract life science and medical research companies and potential links between new employment and existing local schools, to include apprenticeships during construction.</p> <p><u>Transport</u> RLAM supports the identification of transport as a key</p>		



Consultee			Representation		Response		Suggested amendment to Scoping Report
	Ref	Objective	Additional Assessment Criteria		<ul style="list-style-type: none"> <li>• Ensure infrastructure development, the business community and public transport networks are sufficiently connected, to reduce the need to travel by car.</li> <li>• Improve the availability of opportunities to residents and others to walk, cycle and use public transport to meet their needs.</li> </ul>		
	1	Provide housing of an appropriate mix of sizes, types, tenures in locations to meeting identified needs and reduce disparity	Ensure all housing land are well-connected locations which are well served by existing and proposed employment land and green space or co-located as appropriate.				
	5	Ensure that there is sufficient coverage and capacity of sustainable transport and utilities to support growth and development	Promote development in locations well served by existing and proposed public transport networks				
<p><u>Task A5: Consulting on the scope of the SA</u>            The scoping report has defined the proposed scope of work for the IA for the Trafford Local Plan. It is RLAM's understanding that following conclusion of scoping consultation the IA framework will be amended to take into account consultation responses and then used to assess the effects of the emerging Local Plan. RLAM is committed to working positively and collaboratively with Trafford Borough Council, GMCA and other stakeholders in promoting the exciting opportunity that Davenport Green represents.</p> <p>RLAM welcomes the opportunity to provide initial comments to the Trafford Local Plan IA Scoping Report Consultation Document. RLAM will be actively contributing towards the process as it evolves and wishes to be kept informed of all future consultation exercises on both the Local Plan itself and the IA. Given the length of the proposed Plan period it is RLAM's view that the IA policy provisions should offer sufficient flexibility to accommodate future changing</p>							
					Comments noted.		None proposed.

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	circumstances.		