

Places for Everyone Representation 2021

<b>Family Name</b>	Richards
<b>Given Name</b>	Adrian
<b>Person ID</b>	1286099
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Richards
<b>Given Name</b>	Adrian
<b>Person ID</b>	1286099
<b>Title</b>	JPA 27: Land East of Boothstown
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>1)The plan assumes that 50% of homes will have heat pumps and 50% will be fuelled by Gas boilers - Forthcoming national legislation will forbid piping gas to new home from 2025, The plan is not consistent with national policy</p> <p>2) EV chargers must be fitted to all new builds from 2022 (national legislation)-along with the requirements for heat pumps has the load on the local electricity supply network been properly considered.</p> <p>3) Congestion - fossil fuel cars and trucks will be around until 2035 - there are still 2.5 mile tailbacks on the A572 even after mitigations put in place at the Worsley Brow roundabouts (road markings). Pollution levels will doubtless rise and the idea that new cycle paths will somehow eliminate car use are considered by many to be somewhat naive. The documents published by the council suggest additional traffic generated by the developments will be of negligible impact on congestion, where is the evidence for this? Has the council considered the additional load that will be generated by maybe 600 more cars from the new development IN ADDITION to the traffic from new developments in neighbouring boroughs? The council already recognises that the area is underserved by public transport and are thinking about improving services. Where is the plan? Pollution level compliance is a legal requirement, where are the detailed analyses of current (post lockdown) pollution levels together with projections for pollution from additional road traffic? Is the plan legally compliant in these respects?</p> <p>4) Schools. Councils are legally required to provide a sufficient number of school places LOCALLY- Where are the detailed demographic studies to prove that this law will be complied when the new development are completed. There are some "vague" ideas that local schools could be extended or perhaps a primary school could be built at another development in an area called Hazelhurst Farm which is some 2.5 miles away on the other side of the M60. Given this would be an hours walk for a parent with a small child along a very busy route, parents will likely use cars to take their children</p>

to such a school thus adding to congestion. Has the council complied with the law concerning provision of local education?

5) Doctors/ dentists in the area are already over subscribed, this has not even not even been addressed in council planning documents. How does this represent "positive preparation"

6) Surface water and fluvial flooding. Council documents recognise that the area is sometimes subject to flash flooding but assume any serious flooding would be "once in 100 year events". These statements appear to be in conflict with the latest UN climate change data which says extreme weather events will become more frequent. Legislation prohibits (or will do) development on land subject to flooding, have the council properly considered the risks and any legislation?

7) Peat. The council analyses recognise that there is peat in the area. Peat forms a carbon sink how does these plans square with atmospheric carbon reduction policies?

8) Wildlife. How will the bat colonies, owls and deer be re-located? There are definitely bats in the area and under the Wildlife and Countryside Act 1981, and the Conservation Regulations 1994, it is a criminal offence to: Intentionally capture, injure or kill a bat. The same laws apply to the owls that live in the area. What consideration has been given to birds, insects and ground dwelling mammals when the hedgerows are ripped out? Where is the 10%(?) increase in biodiversity coming from?

9) Playing fields! There is some suggestion that these could be used for development and "notional" replacements could be provided. Where and when?

10) Justification. Just my opinions but the plans for "50% affordable housing" possibly "off site" seem pretty nebulous. My belief is that what Salford needs is more social housing close to places that people actually work, not out in the suburbs. I would like to see a forward projection of the demographic and household income shifts that Salford expects to see over the next 15 years.

**Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.**

Preferably do not build at all but at a minimum:-

- Comply with current and forthcoming climate change legislation and policy
- Comply with current and forthcoming legislation on atmospheric pollution and prove such compliance to have been achieved to the satisfaction of local people.

- Co-operate with energy suppliers in a re-assessment of the type of energy supply to the site and whether any additional capacity will be feasible in the development timescales suggested in the plans.

- Comply with legislation re:- flood risks and ensure that household insurance remains available to current residents and any future residents.

- Explain IN DETAIL how the proposed developments will comply with the Wildlife and Countryside Act 1981, and the Conservation Regulations 1994 particularly with regard to protected species and bio-diversity.

Finally, can we have a proper explanation of the councils view of the future make up of Salford's population and how that justifies the need for so much more "executive housing" when there are known (and well publicised) serious issues around homelessness and "hidden" homelessness in the city. Will there be enough social housing to address this problem?