Integrated Assessment of the Draft Trafford Local Plan

Climate Change Risk Assessment

Prepared For: Trafford Council

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Contents

Tables

1.0 Introduction

1.1 Trafford Council is preparing a new draft Local Plan for Regulation 18 Stage. The Trafford Local Plan will include detailed planning policies, area designations and site allocations for specific types of development to guide and manage the Borough's future growth and development needs up to 2042.

1.2 The Council are intending to carry out Regulation 18 consultation that will focus on the thematic polices of the draft Local Plan in Spring 2025, with the draft allocations being consulted upon in Autumn 2025. The draft plan is then intended to be published for consultation (Regulation 19) in early 2026, with an expected submission of the plan in late 2026.

1.3 The draft Local Plan will need to be subject to an Integrated Assessment (IA), which will consist of a Sustainability Appraisal (SA), Equality Impact Assessment (EqIA), Health Impact Assessment (HIA) and Climate Change Risk Assessment (CCRA). This CCRA focuses on the draft thematic policies.

1.4 Following the adoption of the Trafford Local Plan, Trafford's Development Plan will comprise the following:

- Places for Everyone (PfE) (adopted March 2024);
- Trafford Local Plan;
- Places for Everyone Plan;
- Greater Manchester Joint Waste Plan (adopted April 2012);
- Greater Manchester Joint Minerals Plan (adopted April 2013);
- Civic Quarter Area Action Plan; and
- Any adopted Neighbourhood Plans. This currently includes the Altrincham Town Centre Neighbourhood Business Plan (made November 2017).

1.5 This report comprises the Climate Change Risk Assessment (CCRA) for the IA and will include the following:

- The state of climate change in the UK and in Trafford.
- Commitments and requirements for Trafford Council in addressing climate change.
- The risks and opportunities identified in the UK Climate Change Risk Assessment.
- Scoping of climate risks and opportunities most relevant to the Trafford Local Plan.
- Assessment of climate change risks against proposed Local Plan policies.

2.0 Climate Change in the UK and Trafford

Global Climate Change Context

2.1 The Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report[1] identifies that human activities have "unequivocally caused global warming", causing global average surface temperatures from 2011-2020 to reach 1.1°C above 1850-1900 levels. Despite efforts to mitigate climate change, average annual greenhouse gas emissions globally were higher than in any previous decade, with 79% of emissions coming from energy, industry, transport and buildings.

2.2 The Sixth Assessment Report also states that changes to the atmosphere, ocean, cryosphere and biosphere have already started to affect global climate and extreme weather, leading to "widespread adverse impacts and related losses and damages to nature and people", with vulnerable communities disproportionately affected. Human induced climate change has been responsible for increased frequency and severity of heatwaves, heavy precipitation, droughts and tropical cyclones.

2.3 The IPCC can say with increasing certainty that extreme events and impacts are attributable to climate change[2]. The following impacts have been observed:

- Increases in temperature and aridity leading to increased frequency and intensity of wildfire.
- Adverse impacts on human health from extreme weather, damage to ecosystems and effects on the livelihoods of resource-dependent communities.
- Local species losses, increases in disease and mass mortality events of plants and animals.
- Widespread and severe loss and damage caused by extreme weather events.
- Rising sea levels placing coastal communities at risk.
- Stress to food and forestry systems, with negative impacts for livelihoods and food security.
- Populations facing water scarcity.
- Harm to physical and mental health: trauma of extreme events, mortality and morbidity from extreme weather and disasters, increased transmission of vector-borne diseases.
- Migration and displacement due to extreme weather.

[1] Climate Change 2023 Synthesis Report - IPCC (2023) (https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_SPM.pdf)
[2] Climate Change 2022: Impacts, Adaptation and Vulnerability - IPCC (2022) (https://www.ipcc.ch/report/sixth-assessment-report-working-group-ii/)

2.4 Further impacts and risks are also projected by the IPCC for the future:

- Increasing risks to species and ecosystems in oceans, coastal regions and on land, particularly in biodiversity hotspots.
- Climate-driven shifts in ecosystems and damage to their integrity will increase in magnitude and frequency due to cumulative stressors and extreme events.
- Climate change will add pressure on food production systems and undermine food security, with regional disparities.
- Increasing water-related risks: water scarcity, drought, impacts on ecosystem services, flood risk and damage, impacts on agriculture and energy production.
- Coastal risks from sea level rise including risks to wetlands and coastal populations.
- Increased mortality from non-communicable and infectious diseases.
- New patterns of climate-driven migration.

Climate Change in the UK

2.5 The UK's third Climate Change Risk Assessment (2021) states that climate change has already arrived in the UK, with the country already experiencing some of the dangerous impacts of a warming world; even on the most ambitious emission reduction pathways, climate change impacts remain inevitable and the UK must adapt[3].

2.6 The Climate Change Risk Assessment identifies numerous risks and opportunities grouped into themes: natural environment and assets; infrastructure; health, communities and the built environment; business and energy; and international dimensions. The risks are set out in the below table (Table 1).

Table 1 UK CCRA Identified Risks and Opportunities[4].

Code	Risk/Opportunity
N	**Natural Environment and Assets**
N1	Risks to terrestrial species and habitats from changing climatic conditions and extreme events, including temperature change, water scarcity, wildfire, flooding, wind, and altered hydrology (including water scarcity, flooding and saline intrusion).

[3] Independent Assessment of UK Climate Risk - Climate Change Committee (2021) (https://www.theccc.org.uk/wp-content/uploads/2021/07/Independent-Assessment-of-UK-Climate-Risk-Advice-to-Govt-for-CCRA3-CCC.pdf)
[4] UK Climate Risk Independent Assessment (CCRA3) Technical Report - Betts and Brown (2021) (https://www.ukclimaterisk.org/wp-content/uploads/2021/06/Technical-Report-The-Third-Climate-Change-Risk-Assessment.pdf)

Code	Risk/Opportunity
N2	Risks to terrestrial species and habitats from pests, pathogens and invasive species.
N3	Opportunities from new species colonisations in terrestrial habitats.
N4	Risk to soils from changing climatic conditions, including seasonal aridity and wetness.
N5	Risks and opportunities for natural carbon stores, carbon sequestration from changing climatic conditions, including temperature change and water scarcity.
N6	Risks to and opportunities for agricultural and forestry productivity from extreme events and changing climatic conditions (including temperature change, water scarcity, wildfire, flooding, coastal erosion, wind and saline intrusion).
N7	Risks to agriculture from pests, pathogens and invasive species.
N8	Risks to forestry from pests, pathogens and invasive species.
N9	Opportunities for agricultural and forestry productivity from new/alternative species becoming suitable.
N10	Risks to aquifers and agricultural land from sea level rise, saltwater intrusion.
N11	Risks to freshwater species and habitats from changing climatic conditions and extreme events, including higher water temperatures, flooding, water scarcity and phenological shifts.
N12	Risks to freshwater species and habitats from pests, pathogens and invasive species.
N13	Opportunities to freshwater species and habitats from new species colonisations.
N14	Risks to marine species, habitats and fisheries from changing climatic conditions, including ocean acidification and higher water temperatures.
N15	Opportunities to marine species, habitats and fisheries from changing climatic conditions.
N16	Risks to marine species and habitats from pests, pathogens and invasive species.
N17	Risks and opportunities to coastal species and habitats due to coastal flooding, erosion and climate factors.
N18	Risks and opportunities from climate change to landscape character.
I	**Infrastructure**
I1	Risks to infrastructure networks (water, energy, transport, ICT) from cascading failures.

Code	Risk/Opportunity
I2	Risks to infrastructure services from river, surface water and groundwater flooding.
I3	Risks to infrastructure services from coastal flooding and erosion.
I4	Risks to bridges and pipelines from flooding and erosion.
I5	Risks to transport networks from slope and embankment failure.
I6	Risks to hydroelectric generation from low or high river flows.
I7	Risks to subterranean and surface infrastructure from subsidence.
I8	Risks to public water supplies from reduced water availability.
I9	Risks to energy generation from reduced water availability.
I10	Risks to energy from high and low temperatures, high winds, lightning.
I11	Risks to offshore infrastructure from storms and high waves.
I12	Risks to transport from high and low temperatures, high winds, lightning.
I13	Risks to digital from high and low temperatures, high winds, lightning.
H	**Health, Communities and the Built Environment**
H1	Risks to health and wellbeing from high temperatures.
H2	Opportunities for health and wellbeing from higher temperatures.
H3	Risks to people, communities and buildings from flooding.
H4	Risks to the viability of coastal communities from sea level rise.
H5	Risks to building fabric.
H6	Risks and opportunities from summer and winter household energy demand.
H7	Risks to health and wellbeing from changes in air quality.
H8	Risks to health from vector-borne disease.
H9	Risks to food safety and food security.
H10	Risks to water quality and household water supplies.
H11	Risks to cultural heritage.
H12	Risks to health and social care delivery.
H13	Risks to education and prison services.
B	**Business and Energy**
B1	Risks to businesses from flooding.
B2	Risks to businesses and infrastructure from coastal change from erosion, flooding and extreme weather events.
B3	Risks to business from water scarcity.

Code	Risk/Opportunity
B4	Risks to finance, investment and insurance including access to capital for businesses.
B5	Risks to business from reduced employee productivity due to infrastructure disruption and higher temperatures in working environments.
B6	Risks to business from disruption to supply chains and distribution networks.
B7	Opportunities for business from changes in demand for goods and services.
ID	**International Dimensions**
ID1	Risks to UK food availability, safety, and quality from climate change overseas.
ID2	Opportunities for UK food availability and exports from climate impacts overseas.
ID3	Risks and opportunities to the UK from climate-related international human mobility.
ID4	Risks to the UK from international violent conflict resulting from climate change overseas.
ID5	Risks to international law and governance from climate change that will impact the UK.
ID6	Opportunities from climate change (including Arctic ice melt) on international trade routes.
ID7	Risks associated with international trade routes.
ID8	Risk to the UK finance sector from climate change overseas.
ID9	Risk to UK public health from climate change overseas.
ID10	Systemic risk arising from the amplification of named risks cascading across sectors and borders.

2.7 2024 was the UK's fourth warmest year on record, behind 2022, 2023 and 2014; the UK's top ten warmest years have all been since 2000[5]. The 'State of the UK Climate 2023' Report, in the International Journal of Climatology, found that the UK's climate is continuing to change, with recent decades being warmer and wetter; the UK's winters have become consistently wetter and stormier, with increases in heavy rainfall, sea levels are also rising[6].

[5] 2024 UK's fourth warmest year on record - BBC Weather (2025) (https://www.bbc.co.uk/weather/articles/c1mrz200474o#:~:text=According%20to%20their%20latest%20analysis,most%20recent%20decade%202015%2D2024.)
[6] State of the UK Climate 2023 - Kendon et al (2024) (https://rmets.onlinelibrary.wiley.com/doi/10.1002/joc.8553)

2.8 According to the Met Office UK Climate Projections, hot summers and extreme heatwaves are expected to become more common[7]. Summers are expected to become substantially drier, with drought conditions more likely, while winters are expected to become wetter, with implications for the frequency and severity of flooding. While summers will become drier overall, periods of intense rainfall may increase. Sea levels will continue to rise, more so in the south of the country.

2.9 A Climate Change Risk Assessment has also been completed for Greater Manchester, providing a local level of detail on risks[8]. The assessment identifies that Greater Manchester has already experienced warming, decreased summer rainfall and increased winter rainfall and is projected to see more severe droughts, more extreme heat, frequent and intense storm events. Fourteen risks from the UK CCRA are identified as high magnitude risks in present day Greater Manchester (Table 2).

Table 2 Present day High Magnitude risks and opportunities for Greater Manchester

Code	Risk/Opportunity
N	**Natural Environment and Assets**
N1	Risks to terrestrial species and habitats from changing climatic conditions and extreme events, including temperature change, water scarcity, wildfire, flooding, wind, and altered hydrology (including water scarcity, flooding and saline intrusion).
N5	Risks and opportunities for natural carbon stores, carbon sequestration from changing climatic conditions, including temperature change and water scarcity.
N12	Risks to freshwater species and habitats from pests, pathogens and invasive species.
I	**Infrastructure**
I1	Risks to infrastructure networks (water, energy, transport, ICT) from cascading failures.
I2	Risks to infrastructure services from river, surface water and groundwater flooding.
I10	Risks to energy from high and low temperatures, high winds, lightning.
H	**Health, Communities and Built Environment**
H1	Risks to health and wellbeing from high temperatures.
H3	Risks to people, communities and buildings from flooding.
H7	Risks to health and wellbeing from changes in air quality.

[7] UK Climate Projections: Headline Findings - Met Office (2022) (https://rmets.onlinelibrary.wiley.com/doi/10.1002/joc.8553)
[8] Greater Manchester Climate Change Risk Assessment - GMCA (2024) (https://www.greatermanchester-ca.gov.uk/media/qtrhgi2y/gm-ccra-report_final.pdf)

Code	Risk/Opportunity
H9	Risks to food safety and food security.
B	**Business**
B1	Risks to businesses from flooding.
ID	**International Dimensions**
ID1	Risks to UK food availability, safety, and quality from climate change overseas.
ID9	Risk to UK public health from climate change overseas.
ID10	Systemic risk arising from the amplification of named risks cascading across sectors and borders.

The need to address Climate Change

International Agreements

2.10 There are numerous agreements and obligations at a range of levels focused on mitigation of and adaptation to climate change.

2.11 The United Nations Framework Convention on Climate Change (UNFCCC) came into force in March 1994, having been ratified by 198 countries (including the UK). The Convention sets an ultimate objective of stabilising greenhouse gas concentrations "at a level that would prevent dangerous anthropogenic (human induced) interference with the climate system"[9]. As part of the UNFCCC, there is an annual Conference of the Parties (COP) to continue to discuss and take action to meet the Convention's ultimate objective.

2.12 The legally binding Paris Agreement was adopted by 196 parties at COP21 in Paris in 2015. The Agreement seeks to pursue efforts to limit the global temperature increase to within 2°C of the pre-industrial average temperature, with an aspiration for an improved limit of 1.5°C[10]. The Paris Agreement also introduced Nationally Determined Contributions (NDCs), which set out the post-2020 climate actions of each country, with each revision becoming increasingly ambitious and demonstrating how the country will reduce carbon emissions. The UK's latest NDC was published in January 2025, which sets a target of the UK reducing all greenhouse gas emissions by at least 81% by 2035, compared to 1990 levels[11].

[9] United Nations Framework Convention on Climate Change - United Nations (1992) (https://unfccc.int/files/essential_background/background_publications_htmlpdf/application/pdf/conveng.pdf)
[10] The Paris Agreement - United Nations Climate Change (https://unfccc.int/process-and-meetings/the-paris-agreement#:~:text=The%20Paris%20Agreement%20is%20a,force%20on%204%20November%202016.)
[11] United Kingdom of Great Britain and Northern Ireland's 2035 Nationally Determined Contribution - DESNZ (2025) (https://assets.publishing.service.gov.uk/media/679b5ee8413ef177de146c1e/uk-2035-nationally-determined-contribution.pdf)

2.13 The United Nations 2030 Agenda for Sustainable Development set the Sustainable Development Goals, a set of 17 goals and 169 targets with several aims, including: ending poverty and deprivation, improving health and education, reducing inequality and ensuring economic growth, tackling climate change, and preserving biodiversity[12]. Goal 13, "Climate Action", sets targets to help society mitigate and adapt to the effects of climate change. For example, target 13.2 asks countries to integrate climate change measures into national policies, strategies and planning.

National Commitments

2.14 With the passing of the Climate Change Act 2008, the UK became the first country in the world to set legally binding carbon budgets, aiming to cut emissions by at least 80% by 2050 (compared to the 1990 baseline)[13]. This target was amended in 2019, requiring 2050 emissions to be 100% lower than the 1990 baseline, or "net zero". The Climate Change Act also requires the government to set legally binding carbon budgets, which cover a five-year period and encourage gradual carbon emission reductions. The Act created the Climate Change Committee, which provides independent scientific advice to the government on meeting net zero and carbon budget targets and reports on progress.

2.15 In February 2025, the Climate Change Committee sent the UK Government its recommendations for the level of the Seventh Carbon Budget, covering the period 2038-2042[14]. The recommendations identify the importance of electrification and low-carbon electricity supply, which make up the largest share of emissions reductions, while also identifying the importance of policy to help investors and consumers to choose low carbon options. The latest adopted carbon budget is the Sixth Carbon Budget, covering the period 2033-2037; the recommended pathway in this budget requires a 78% reduction in UK territorial carbon emissions by 2035, compared to the 1990 baseline[15]. It is identified that substantial investment will be required to achieve this target.

Local Commitments

2.16 Trafford Council declared a climate emergency on 28th November 2018 and committed to tackling climate change and working towards carbon neutrality for the borough and the Council by 2038; the Council recognises the need both to reduce

[12] The 17 Goals - United Nations (https://sdgs.un.org/goals)
[13] Climate Change Act 2008 (https://www.legislation.gov.uk/ukpga/2008/27/contents)
[14] The Seventh Carbon Budget: Advice for the UK Government (2025) (https://www.theccc.org.uk/wp-content/uploads/2025/02/The-Seventh-Carbon-Budget.pdf)
[15] The Sixth Carbon Budget: The UK's path to Net Zero (2020) (https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf)

greenhouse gas emissions and adapt to the impacts of climate change[16]. The declared climate emergency must be considered across all the Council's work.

2.17 The Council's Executive also approved a Carbon Neutral Action Plan in December 2020[17]. The plan contains measures that will reduce the borough's carbon footprint and sets out a pathway to carbon neutrality by 2038. The Plan acknowledges that most of the borough's emissions are beyond the Council's direct control and co-ordination with other groups is required to achieve carbon neutrality. The Action Plan is structured around seven key themes:

- Governance, Engagement and Collaboration.
- Production and Consumption of Resources.
- Transport and Travel.
- Heat and Energy.
- Natural Environment.
- Skills and Green Growth.
- Homes, Workplaces and Buildings.

2.18 Within these key themes, several actions are proposed, each with a designated lead and target timescale. For example, in the 'Governance, Engagement and Collaboration' theme, the following action is proposed: "Embed Climate Emergency, Climate Change and Low Carbon in Local Plan/GMSF Policy and allocations, Development Briefs, Development Management, Place Shaping and Masterplanning". The Greater Manchester Combined Authority is identified as a lead, alongside development partners. This highlights the importance of considering climate change in the Local Plan.

2.19 The Action Plan was reviewed and refreshed by the Trafford Climate Change Network in June 2023, with updates to objectives and actions[18].

2.20 The Greater Manchester Five-Year Environment Plan 2025-2030 sets out the pathway for the region to achieve its target of becoming carbon neutral by 2038, following Greater Manchester declaring a climate emergency in 2019[19]. The plan acknowledges that carbon emissions have been falling too slowly to achieve the target and accelerated action is required. The Plan sets out eight aims:

[16] About Climate Change - Trafford Council (https://www.trafford.gov.uk/residents/environment/climate-change/About-climate-change.aspx)
[17] Carbon Neutral Action Plan - Trafford Council (2020) (https://www.trafford.gov.uk/planning/strategic-planning/docs/Carbon-Neutral-Action-Plan.pdf)
[18] Carbon Neutral Action Plan June 2023 - Trafford Council (https://www.trafford.gov.uk/planning/strategic-planning/docs/CNAP-FINAL-June-2023.pdf)
[19] Greater Manchester Five-Year Environment Plan 2025-2030 - GMCA (2024) (https://www.greatermanchester-ca.gov.uk/media/alnl0fsy/gmca_5-year-plan_final_digital_v3-ua.pdf)

- Our energy infrastructure is smart, flexible and fit for a low carbon future.
- Our buildings are sustainable and energy efficient.
- Our transport system is reliable, integrated, inclusive, affordable and enables sustainable travel.
- Our natural environment is enhanced providing benefits for people, economy and nature.
- Our city region transitions to a circular economy and our waste is reduced, reused, recycled or recovered.
- Our city-region is better adapted and more resilient to the increasing impacts of climate change.
- Our air quality enhances the health, well-being and quality of life of the city region.
- Our economy will grow sustainably because of the interventions we make, benefitting our residents and businesses.

2.21 The Trafford Local Plan can influence the achievement of these aims in the borough and contribute to several targets within the aims.

3.0 Methodology

3.1 This Climate Change Risk Assessment (CCRA) is focused on the Draft Trafford Local Plan. The Trafford Local Plan will sit alongside the Greater Manchester 'Places for Everyone' Plan, which covers nine Greater Manchester boroughs, including Trafford. Places for Everyone includes policies which address and relate to climate change, these should be read alongside the Trafford Local Plan. However, it is beyond the scope of this CCRA to assess the impact of Places for Everyone policies on climate change.

3.2 The CCRA uses similar methods of assessment to the rest of the Integrated Assessment. The effect of the Draft Local Plan is considered against climate change risks which are relevant to Trafford. The CCRA describes the nature of the impact of the plan on climate change risks (i.e. positive, negative, or neutral). An explanation is given for these conclusions.

3.3 This CCRA uses the risks identified in the most recent UK Climate Change Risk Assessment as a starting point for the assessment. A total of 61 risks and opportunities are identified. However, some of these are clearly not relevant to Trafford and/or local planning policy and have been scoped out of this assessment.

3.4 The assessment takes the relevant risks from the national CCRA and considers the impact of the Draft Local Plan on each of them. An overall judgement of the impact of the local plan is made.

3.5 Where the local plan is likely to lead to an increase in the likelihood or severity of climate risks, mitigation measures are suggested.

3.6 Any deficiencies in the plan, where climate change risks have not been addressed, are also identified.

4.0 Trafford Local Plan Overview

Introduction, Vision and Strategic Objectives

4.1 The Draft Trafford Local Plan sets out a "Vision for Trafford". The vision states:

Trafford's Local Plan will ensure that by 2042 all our residents, businesses and communities are thriving, by addressing the climate crisis locally, with ambitious net zero carbon targets for new development by 2028 delivering resilient and well-adapted sustainable communities that are attractive and well-designed; and achieving carbon neutrality across the borough by 2038.

4.2 The vision also refers to enhancing biodiversity, prioritising a sustainable transport network with car free travel, meeting housing requirements and ensuring a successful economy with vibrant town centres and neighbourhoods. High quality design and social infrastructure are also seen as central.

4.3 The plan goes on to set out ten Strategic Objectives which link to the Vision:

- SO1 Deliver the homes that Trafford needs.
- SO2 Make Trafford healthy, accessible and equal for all.
- SO3 Ensure Trafford's resilience and carbon neutrality.
- SO4 Sustain Trafford's economic growth.
- SO5 Champion Trafford's workforce and young people.
- SO6 Support vibrant town centres and designated centres.
- SO7 Protect and improve the natural environment and connect green assets.
- SO8 Sustainable movement.
- SO9 Support cultural and leisure assets.
- SO10 Design, heritage and placemaking.

Addressing Climate Change Risks

4.4 Trafford's approach places climate change as a central issue and acknowledges how it affects a range of planning and development issues across the borough.

4.5 The vision links to the Greater Manchester objective to become a carbon neutral city region by 2038. National commitments to climate change (i.e. net zero by 2050) are not addressed directly, however this is covered by the more ambitious regional target.

4.6 Three of the ten Strategic Objectives specifically relate to climate and sustainability issues (SO3, SO7 and SO8) and others have sub-objectives which mention climate-related issues (SO1, SO5).

4.7 There are however missed opportunities to integrate consideration of climate change into the Strategic Objectives. SO4 (Sustain Trafford's economic growth) does not mention opportunities to invest in the Green Economy. This is despite policies such as EJ2 (Trafford Park) which states that the Council will support proposals for green, low carbon industry at Trafford Park.

4.8 Similarly, SO2 (Make Trafford healthy, accessible and equal for all) fails to address how addressing transport emissions (a key part of Trafford's contribution to climate change) will lead to improved air quality and health outcomes.

The Strategy

4.9 The Draft Local Plan acknowledges that Places for Everyone provides the overarching strategy for the borough.

4.10 In Places for Everyone, the Growth strategy is to plan for the objectively assessed needs of the nine districts. The Spatial Strategy identifies broad areas, including:

- Core Growth Area: covering central Manchester, south-east Salford, and north Trafford.
- Inner Area Regeneration: the inner parts of Manchester, Salford and Trafford closest to the Core Growth Area.
- Sustain Southern Competitiveness: covering most of Trafford and south Manchester but also Stockport, who will play a vital role through its own Local Plan.

4.11 The Strategy for Trafford's Local Plan builds on the PfE strategy. The Trafford strategy focuses higher density developments in the most accessible locations served by public transport, primarily in the north of the borough. The most is made of existing assets such as Trafford Park and the borough's town centres. The plan seeks to deliver a range of homes and varied employment opportunities. To encourage carbon neutrality, the plan encourages the use of heat and energy network opportunities and where possible seeks to locate higher density development close to the public transport network.

4.12 The Strategy chapter identifies that climate change is a theme that runs through the Local Plan, both through strategic and some specific policies.

4.13 The Strategy chapter includes specific policies mirroring Places for Everyone, directing most growth towards the Core Growth Area (Trafford) (Policy ST1) and

Inner Areas (Trafford) (Policy ST2) as well as some development in Southern Areas (Trafford) (Policy ST3).

4.14 The Chapter also includes a Sustainable Development Policy (ST4), key to reducing the environmental impact of development and a Climate Change Policy (ST5). Policy ST5 requires development proposals to contribute towards net zero ambitions and/or mitigate the impacts of climate change, new development must also demonstrate how climate change has been considered in the design.

Addressing Climate Change Risks

4.15 The inclusion of Sustainable Development and Climate Change Strategic Policies which will apply to all new development in Trafford demonstrates a commitment from the Council to meeting its stated aims for carbon neutrality and mitigating the effects of climate change.

4.16 The strategy focuses new development primarily in locations which are already developed and accessible. This strategy fits with addressing climate change by ensuring that development is directed to the most sustainable and accessible locations with the fewest environmental impacts and effects on the borough's open and natural land.

4.17 Some impacts from climate change are inevitable, resulting in mitigation and adaptation being equally important. It may be advantageous for Policy ST5 to suggest that development proposals which contribute to the Council's ability to adapt to climate change risks will be supported.

Renewable Technology and Methods

4.18 Chapter 3 of the Draft Local Plan explores methods to improve the sustainability of the built environment, through the use of renewable and decentralised energy generation, reducing overheating, retrofitting buildings and encouraging a shift to a circular economy.

4.19 Policy RT1 (Carbon and Energy) and the related policies for the Trafford sub-areas demonstrate a clear consideration of how development will contribute to carbon neutrality and addressing climate change risks. Priorities have been identified which differ by area, showing that key opportunities for mitigation and how these differ by location have been considered.

4.20 Emissions from heating are also a key part of domestic carbon emissions. Policy RT2 (Decentralised Energy Generation) demonstrates an attempt to address this through the creation of local heat networks. Policy RT1 also prioritises the use of heat pumps where this is not possible, demonstrating a commitment to the widespread decarbonisation of heating.

4.21 Policy RT4 (Sustainable Retrofitting) acknowledges that it is not just new development which will contribute to climate change; the energy use of existing buildings is substantial. Support for retrofitting demonstrates a consideration of the widespread change to the built environment required to achieve carbon neutrality and mitigate climate change.

4.22 Policy RT5 (Circular Economy) demonstrates that consideration has been given to how Trafford can transition to more sustainable methods of production and consumption and how the carbon intensity of new development can be reduced.

4.23 Despite focusing on 'Renewable Technologies and Methods', this chapter does not set out the Council's policy position on new renewable energy generation projects (for example, solar farms and wind farms). A policy setting out where and in what circumstances proposals for large-scale renewable energy generation would be supported would help to support the decarbonisation of the borough's energy system and help to mitigate climate change and associated risks.

Residential Development

4.24 Chapter 4 of the Draft Local Plan sets out policies to meet the housing needs of the growing population and ensure the provision of high-quality, affordable housing.

4.25 Policy in this chapter sets out the Council's approach to housing delivery. This includes ensuring an adequate supply of new houses of a variety of sizes and types and including affordable and social housing, accommodation for older people and accessible housing. Policies here focus on specific housing issues, as well as ensuring that housing is provided in sustainable and accessible locations.

4.26 Although there are no policies in this chapter which specifically discuss the impact of new residential development on climate change, this is generally covered in other policy areas.

Economy and Jobs

4.27 Chapter 5 of the Draft Local Plan focuses on policies to produce a "thriving and productive" economy, which maximises opportunities from existing assets.

4.28 Policy in this chapter is strongly influenced by Places for Everyone, which identifies land in the north of Trafford as a Core Growth Area. Policy EJ1 (Employment Land Requirements) reflects this. The policy also talks about locating employment development in the most sustainable locations. Policy EJ2 (Trafford Park) makes specific reference to the opportunity for "Low Carbon, Green Trafford Park"; the growth of the Green Economy is crucial for mitigating and adapting to climate change, it is positive that this is specifically addressed by policy. Reference is made

in the supporting text to Trafford's commitments to tackling climate change and working towards carbon neutrality, with addressing industrial emissions identified as key to this.

4.29 Policy EJ6 (Data and Energy Storage) identifies the opportunity for data and energy storage facilities as flagship developments in Trafford, they will be expected to utilise brownfield sites with existing infrastructure. An opportunity is also identified for the heat generated by such facilities to contribute to heat networks and decarbonise heating. However, the policy could go further by acknowledging the significant energy demand of data centres and requesting that developers show consideration of how energy will be used efficiently and renewable energy will be integrated into schemes to reduce carbon emissions and mitigate climate change.

4.30 Policy EJ7 (Rural Economy) refers to improving access to public transport. This is key to addressing rural transport emissions and mitigating climate change.

Transport and Movement

4.31 Chapter 6 of the Draft Local Plan considers transport and movement through the lens of sustainable and efficient transport as a key to ensuring carbon neutrality. The chapter recognises the importance of a modal shift away from cars to active and public transport and the range of benefits that this can bring.

4.32 The transport sector is a key contributor to carbon emissions both in Trafford and in the UK as a whole, it is crucial that policy addresses this to ensure a more sustainable transport system.

4.33 The Draft Trafford Local Plan clearly addresses this, with policy focusing on sustainable modes of travel (Policy TM1), with specific improvements suggested for different areas of the borough. It is also stated that Public Transport (Policy TM2) improvements will be supported and promoted, alongside Transport for Greater Manchester and partners to encourage people to shift away from cars to more sustainable modes of transport; it is also suggested that development should contribute to these improvements.

4.34 Policies are also proposed to support the improvement of the local road network. It is inevitable that new road developments will have a negative impact on attempts to mitigate climate change and will increase exposure to climate risks. It is advisable that policies for new road development and upgrades to the local highway network require developers to submit information demonstrating that the impact of the development on climate change has been considered and mitigation measures are put forward to reduce exposure to climate change risks.

4.35 The Local Plan also encourages a modal shift in the freight sector, encouraging movement of freight by rail or water and reducing reliance on road freight transport and its associated negative impacts. This demonstrates a commitment to reducing transport emissions from all vehicle types. Furthermore, the Lorry Management Policy (TM11) refers to addressing climate change and sustainability.

Town Centres and Retail

4.36 Chapter 7 of the Draft Local Plan sets out the hierarchy and use of Trafford's town centres and provides policy to protect and enhance the town centres and their functions.

4.37 Policy on Town Centres and Retail is of limited relevance to addressing climate change. However, it should be acknowledged that supporting the reuse of buildings in town centres, generally the most sustainable and accessible locations, is preferable to building new out-of-centre retail and leisure centres which will result in increased levels of embodied carbon as a result of new construction and increased likelihood of being accessed by car, rather than more sustainable transport methods. This should be clearly addressed in Policies TC2 (Role and Function of Centres) and TC3 (Out of Centre Retail and Leisure).

Green Infrastructure and the Natural Environment

4.38 Chapter 8 of the Draft Local Plan focuses on the protection, enhancement and management of Trafford's Green Infrastructure and Natural Environmental. The chapter identifies the ecosystem services provided by the local area's natural environment and sets out policies to protect and enhance them.

4.39 Protecting Green Infrastructure and the Natural Environment is crucial to mitigating climate risks, as the climate and biodiversity crises are interlinked and natural environments play a key role in the mitigation of certain climate risks (for example, improving air quality, reducing urban temperatures, protecting from flooding).

4.40 Policies are proposed which protect landscape character, existing Green Infrastructure, Locally Designated Sites and natural environment assets, and trees, hedgerows and woodland. Policies are also put forward which seek to enhance the natural environment, for example identifying Green Infrastructure opportunity areas, incorporating Green Infrastructure into new development, improving wetland environments and protecting and enhancing the Mersey Valley.

4.41 Policy to protect and enhance the natural environment is crucial to mitigating climate risks and allowing adaptation to take place, these policies have a positive impact in terms of reducing exposure to risks caused by climate change.

Open Space and Recreation

4.42 Chapter 9 of the Draft Local Plan sets out the policies required to ensure the protection and enhancement of existing open space, sport and recreation facilities, as well as the creation of new facilities where required to ensure the needs of all residents are met.

4.43 The policies in this chapter are not directly relevant to addressing climate change risks. However, a policy on Allotments and Growing Space (Policy OS5) seeks to maintain and protect an adequate supply of allotment provision. Impacts on food security are identified as a climate risk, the provision of allotment space will help to mitigate this risk at the local scale.

Water, Flooding and Drainage

4.44 Chapter 10 of the Draft Local Plan identifies that flooding and water use are key issues affecting residents and businesses. Flood management is required to protect homes, infrastructure and livelihoods, the need for resilience and adaptation in the face of climate change is noted. Policies are set out to manage flood risk and ensure the sustainable management of water.

4.45 Policies are set out to ensure that flood risk is managed and minimised as far as possible, sustainable drainage systems are implemented to manage surface water naturally and flood storage areas are created to act as flood defences for the borough.

4.46 Increased flood risk is identified as a major climate risk, both at a national and regional level, policies which seek to manage flood risk are essential to mitigating and adapting to climate change. While focusing on new development and what this can do to mitigate flood risk and ensure sustainable drainage, it is positive that policy supports proposals for retrofitting sustainable drainage systems, this demonstrates a holistic approach to managing flood risk.

4.47 Policy WA4 (Water Efficiency) seeks to ensure that new development incorporates water efficiency measures. Increased water scarcity, with increased summer drought risk, is an important climate change risk, it is important that policy addresses this. It may be advantageous for policy to include support for retrofitting water efficiency measures.

Community and Social Infrastructure

4.48 Chapter 11 of the Draft Local Plan states that strong communities rely on high-quality social infrastructure. Policies are set out to ensure the protection of existing

community and social facilities, prevent the loss of valued facilities and support the provision of new facilities where required.

4.49 While relevant to the social element of sustainability, policies on Community and Social Infrastructure are not directly relevant to addressing climate change risks. However, the policy on New Community and Social Facilities (CT3) seeks to ensure that facilities are in accessible locations, reducing transport-related carbon emissions.

Built Environment

4.50 Chapter 12 of the Draft Local Plan sets out policies to ensure a high-quality built environment that is sustainable and responsive to local character. Policy also addresses local environmental issues such as noise, vibration and land contamination. The built environment can have an impact on climate change as well as the health, safety and wellbeing of residents and visitors to Trafford.

4.51 The built environment is a key contributor to climate change in urban areas, with buildings have high energy demand and embodied carbon. Measures to reduce the environmental impact of the built environment and increase its liveability are crucial to addressing climate change and associated risks in urban areas.

4.52 In response to this, Policy BE1 (Design) requires proposals to promote sustainable development by locating in accessible locations, applying the energy hierarchy and incorporating multi-functional green spaces. There is however an opportunity to strengthen this policy by requiring new large-scale buildings to meet specific sustainability standards, for example requiring them to achieve a certain BREEAM Certification level. This would ensure that the environmental effects and carbon emissions associated with a new building would be minimised throughout construction and operation and would minimise the contribution of new buildings to climate change, reducing climate risks.

Culture, Tourism and Leisure

4.53 Chapter 13 of the Draft Local Plan focuses on Trafford's contribution to culture, tourism and leisure, identifying that the borough is home to important tourist attractions and culturally important elements. Policies are set out to protect existing and provide new cultural, leisure and tourism assets.

4.54 Policies in this chapter are not directly relevant to climate change. However, Policy CL1N for the regeneration of Manchester United Football Stadium does include positive measures to ensure a high-quality public realm incorporating green and natural spaces and the provision of public and active transport options. Furthermore, the Policy requires a new stadium to make provision for future

connections to renewable heat and power networks and incorporate renewable heat and energy generation measures on site. This demonstrates a commitment to sustainability and mitigating climate change in large infrastructure projects and will have a positive effect on reducing greenhouse gas emissions.

Infrastructure and Planning Obligations

4.55 Chapter 14 of the Draft Local Plan identifies that appropriate infrastructure is essential to support the needs of the area and its residents and underpins other areas of development. Policies are set out to ensure that the necessary infrastructure is delivered to support development across Trafford.

4.56 This chapter mainly with the financial contributions required from developers to provide adequate infrastructure to support development. The policy states that planning obligations may include measures to reduce the impacts of climate change.

Summary

4.57 It is clear that consideration of Climate Change is at the heart of the Draft Local Plan, being addressed in the Vision for Trafford and in multiple Strategic Objectives.

4.58 The Strategic Objectives set out how the Local Plan will address climate change and sustainability across multiple areas.

4.59 In the thematic policies, wherever climate change has been identified as a relevant consideration, it is generally addressed and incorporated into policy to ensure that the effects of climate change are mitigated and adaptation measures are put in place.

4.60 However, there are locations in the plan where climate change could be more explicitly addressed or where consideration of climate risks could be strengthened. These are set out in the below table.

Table 3 Opportunities to Reduce Climate Risks

Location in Plan	Opportunity to address Climate Change Risks
Strategic Objective 2	There is an opportunity to refer to addressing transport emissions and the impact of this on climate change.
Strategic Objective 4	There is an opportunity to include promotion of Trafford's green economy, for example at Trafford Park.

Location in Plan	Opportunity to address Climate Change Risks
Policy ST5: Climate Change	The opportunity to minimise climate risks would be strengthened if this policy suggested that development proposals which contribute to the Council's ability to adapt to climate change risks will be supported.
Renewable Technologies and Methods	A policy setting out where and in what circumstances proposals for large-scale renewable energy generation would be supported is a clear omission and would help to support the decarbonisation of the borough's energy system and help to mitigate climate change and associated risks.
Policy EJ6: Data and Energy Storage	This policy could go further by acknowledging the significant energy demand of data centres and requesting that developers show consideration of how energy will be used efficiently and renewable energy will be integrated into schemes to reduce carbon emissions and mitigate climate change.
Policy TM5: Local Highway Network	Advisable that policies for new road development and upgrades to the local highway network require developers to submit information demonstrating that the impact of the development on climate change has been considered and mitigation measures are put forward to reduce exposure of the infrastructure to climate change risks and reduce its contribution to climate change.
Policy TC2: Role and Function of Centres Policy TC3: Out of Centre Retail and Leisure	It should be acknowledged that supporting the reuse of buildings in town centres, generally the most sustainable and accessible locations, is preferable to building new out-of-centre retail and leisure centres which will result in increased levels of embodied carbon as a result of new construction and increased likelihood of being accessed by car, rather than more sustainable transport methods. This would help to mitigate climate change.
Policy WA4: Water Efficiency	It may be advantageous for this policy to include support for retrofitting water efficiency measures, this would help to further reduce the risk of water shortages.

Location in Plan	Opportunity to address Climate Change Risks
Policy BE1: Design	There is an opportunity to strengthen this policy by requiring new large-scale buildings to meet specific sustainability standards, for example requiring them to achieve a certain BREEAM Certification level. This would ensure that the environmental effects and carbon emissions associated with a new building would be minimised throughout construction and operation and would minimise the contribution of new buildings to climate change, reducing climate risks.

5.0 Climate Change Risk Assessment

5.1 It should firstly be noted that the Local Plan and its policies have the potential to contribute to all the climate risks identified in the UK Climate Change Risk Assessment as these are interconnected risks which result from climate change as a whole, rather than from individual actions which contribute to climate change.

5.2 However, policies in the Draft Local Plan are likely to have impacts which directly link to specific climate risks and affect the exposure of Trafford to these risks (either decreasing or increasing these risks, or having a neutral effect).

5.3 The UK CCRA climate risks identified under the 'International Dimensions' theme are clearly beyond the scope of local planning policy and are not assessed against the local plan. The 'International Dimensions' risks are focused on issues facing the UK as a result of climate change impacts from beyond the UK, such as migration, conflict, threats to international law and climate risks faced by other countries. Local planning policy controlling development in Trafford is clearly at a different scale and does not interact with risks caused in other countries by climate change.

5.4 It should initially be acknowledged that the Draft Local Plan does include a specific policy on Climate Change (Policy ST5):

A. Development proposals which contribute towards the Council's net zero ambitions and/or mitigate against the impacts of Climate Change locally will be supported.

B. New development in Trafford will be expected to demonstrate how Climate Change has been considered in the design of the development and what adaptation and mitigation measures have been put in place.

5.5 This policy ensures that all new development must consider its impact on climate change and demonstrate measures which have been included to mitigate and adapt to climate change. Development proposals that contribute towards net zero ambitions will be supported. This policy demonstrates that the Council is committed to tackling climate change and reducing climate risks.

5.6 The below tables provide an assessment of the effects of the Draft Local Plan and its strategic objectives and policies on the relevant climate risks identified in the most recent UK Climate Change Risk Assessment.

Table 4 Local Plan Impact on 'Natural Environment and Assets' Risks

Code	Risk - Natural Environment and Assets	Local Plan Impact on Risk	Nature of Impact	Required mitigation
N1	Risks to terrestrial species and habitats from changing climatic conditions and extreme events, including temperature change, water scarcity, wildfire, flooding, wind, and altered hydrology (including water scarcity, flooding and saline intrusion).	The Local Plan considers climate change throughout. Multiple policies are proposed which will mitigate the impact of climate change, particularly policies RT1-RT5 and Policy ST5 (Climate Change). Furthermore, policies are proposed to improve efficiency of water use and reduce flood risk.	+	
N2	Risks to terrestrial species and habitats from pests, pathogens and invasive species.	No direct link to Local Plan.	N/A	
N3	Opportunities from new species colonisations in terrestrial habitats.	This is a climate opportunity. Policies in the Local Plan (GI1-GI10) seek to manage, protect and enhance Trafford's natural environment, enhancing this opportunity. The protection and enhancement of Trafford's natural and green spaces will allow this opportunity to be maximised, by allowing space for nature.	+	Policies should acknowledge the changing climate and opportunities to integrate new climate-resilient species into natural spaces, particularly in Biodiversity Opportunity Areas (GI9) and when enhancing Green Infrastructure (GI5).

Code	Risk - Natural Environment and Assets	Local Plan Impact on Risk	Nature of Impact	Required mitigation
N4	Risk to soils from changing climatic conditions, including seasonal aridity and wetness.	No direct link to Local Plan.	N/A	
N5	Risks and opportunities for natural carbon stores, carbon sequestration from changing climatic conditions, including temperature change and water scarcity.	The Local Plan will help to enhance natural carbon stores and carbon sequestration through the protection and enhancement of local nature and biodiversity sites. Particularly beneficial are the policies to enhance the Great Manchester Wetlands (GI3), protect the Mersey Valley (GI4), and protect and enhance trees, woodland and hedgerows (GI7)	++	
N6	Risks to and opportunities for agricultural and forestry productivity from extreme events and changing climatic conditions (including temperature change, water scarcity, wildfire, flooding, coastal erosion, wind and saline intrusion).	Not directly relevant to Local Plan.	N/A	
N7	Risks to agriculture from pests, pathogens and invasive species.	Not directly relevant to Local Plan.	N/A	

Code	Risk - Natural Environment and Assets	Local Plan Impact on Risk	Nature of Impact	Required mitigation
N8	Risks to forestry from pests, pathogens and invasive species.	Not directly relevant to Local Plan.	N/A	
N9	Opportunities for agricultural and forestry productivity from new/alternative species becoming suitable.	Not directly relevant to Local Plan.	N/A	
N10	Risks to aquifers and agricultural land from sea level rise, saltwater intrusion.	Not directly relevant to Local Plan.	N/A	
N11	Risks to freshwater species and habitats from changing climatic conditions and extreme events, including higher water temperatures, flooding, water scarcity and phenological shifts.	The Local Plan includes policies to protect and enhance the Great Manchester Wetlands (GI3) and Mersey Valley (GI4) and will help to offset risks faced by these habitats from climate change.	+	
N12	Risks to freshwater species and habitats from pests, pathogens and invasive species.	Not directly relevant to Local Plan.	N/A	
N13	Opportunities to freshwater species and habitats from new species colonisations.	Not directly relevant to Local Plan.	N/A	

Code	Risk - Natural Environment and Assets	Local Plan Impact on Risk	Nature of Impact	Required mitigation
N14	Risks to marine species, habitats and fisheries from changing climatic conditions, including ocean acidification and higher water temperatures.	Not directly relevant to Local Plan.	N/A	
N15	Opportunities to marine species, habitats and fisheries from changing climatic conditions.	Not directly relevant to Local Plan.	N/A	
N16	Risks to marine species and habitats from pests, pathogens and invasive species.	Not directly relevant to Local Plan.	N/A	
N17	Risks and opportunities to coastal species and habitats due to coastal flooding, erosion and climate factors.	Not directly relevant to Local Plan.	N/A	

Code	Risk - Natural Environment and Assets	Local Plan Impact on Risk	Nature of Impact	Required mitigation
N18	Risks and opportunities from climate change to landscape character.	Policy GI1 (Landscape Character Areas) of the Draft Local Plan states that development should protect or enhance landscape character. Landscape will change due to responses to a changing climate including biodiversity, soils and hydrological processes. Development seeking to protect and enhance landscape character should offset this.	+	

Table 5 Local Plan Impact on 'Infrastructure' Risks

Code	Risk - Infrastructure	Local Plan Impact on Risk	Nature of Impact	Required mitigation
I1	Risks to infrastructure networks (water, energy, transport, ICT) from cascading failures.	Infrastructure networks are linked and at risk from cascading failures. The Local Plan advocates measures such as flood risk assessment and use of accessible locations to reduce the vulnerability of infrastructure to climate risks.	N	Any proposals for critical infrastructure should be required to demonstrate how they will be resilient to climate risks and will avoid cascading failures.

Code	Risk - Infrastructure	Local Plan Impact on Risk	Nature of Impact	Required mitigation
I2	Risks to infrastructure services from river, surface water and groundwater flooding.	Policy on Managing Flood Risk (WA1) requires new development to try to locate in the areas of lowest flood risk, flood risk assessment should be carried out. Policy also advocates the use of Sustainable Drainage (WA2), reducing surface water flood risk: new development must incorporate SuDS and retrofitting of existing development will be supported. Flood Storage Areas will be safeguarded (WA3) to further reduce flood risk. Major new infrastructure projects, such as the Manchester United Stadium Redevelopment (CL1N) also consider measures to mitigate climate and flood risks, ensuring reduced risk levels.	++	
I3	Risks to infrastructure services from coastal flooding and erosion.	Trafford is not at risk from coastal flooding and erosion.	N/A	
I4	Risks to bridges and pipelines from flooding and erosion.	Not directly relevant to Local Plan.	N/A	
I5	Risks to transport networks from slope and embankment failure.	Policy TM5 (Local Highway Network) states that the Council will support the maintenance and improvement of the highway network. Combined with appropriate flood risk management (WA1) and implementation of SuDS (WA2), this should offset risks to the transport network.	+	

Code	Risk - Infrastructure	Local Plan Impact on Risk	Nature of Impact	Required mitigation
I6	Risks to hydroelectric generation from low or high river flows.	Not directly relevant to Local Plan.	N/A	
I7	Risks to subterranean and surface infrastructure from subsidence.	Not directly relevant to Local Plan.	N/A	
I8	Risks to public water supplies from reduced water availability.	The Local Plan encourages the use of water efficiency measures in new development (Policy WA4), reducing water demand and offsetting reductions in supply.	+	Risks to public water supplies could be further reduced by policy support for the retrofitting of water efficiency measures in existing development.
I9	Risks to energy generation from reduced water availability.	Not directly relevant to Local Plan.	N/A	
I10	Risks to energy from high and low temperatures, high winds, lightning.	Not directly relevant to Local Plan.	N/A	

Code	Risk - Infrastructure	Local Plan Impact on Risk	Nature of Impact	Required mitigation
I11	Risks to offshore infrastructure from storms and high waves.	Not relevant to Trafford.	N/A	
I12	Risks to transport from high and low temperatures, high winds, lightning.	Not directly relevant to Local Plan.	N/A	
I13	Risks to digital from high and low temperatures, high winds, lightning.	Not directly relevant to Local Plan.	N/A	

Table 6 Local Plan Impact on 'Health, Communities and Built Environment' Risks

Code	Risk - Health, Communities and Built Environment	Local Plan Impact on Risk	Nature of Impact	Required mitigation
H1	Risks to health and wellbeing from high temperatures.	Policy BE1 (Design) encourages the use of multi-functional green spaces to provide benefits for biodiversity and wellbeing. There is also a specific policy addressing Overheating and the Urban Heat Island (RT3), which requires new developments to minimise overheating risks and carry out Overheating Risk Assessment where appropriate. The policy also encourages the use of passive cooling measures in new development and states that the retrofitting of existing buildings must assess overheating risks and include measures to reduce heat gain and improve ventilation.	++	
H2	Opportunities for health and wellbeing from higher temperatures.	Not directly relevant to Local Plan.	N/A	

Code	Risk - Health, Communities and Built Environment	Local Plan Impact on Risk	Nature of Impact	Required mitigation
H3	Risks to people, communities and buildings from flooding.	Policy on Managing Flood Risk (WA1) requires new development to locate in the areas of lowest flood risk and flood risk assessment should be carried out where appropriate. Policy also advocates the use of Sustainable Drainage Systems (WA2), reducing surface water flood risk: new development must incorporate SuDS and retrofitting of existing development will be supported. Flood Storage Areas will be safeguarded (WA3) to further reduce flood risk.	++	
H4	Risks to the viability of coastal communities from sea level rise.	Not relevant to Trafford.	N/A	

Code	Risk - Health, Communities and Built Environment	Local Plan Impact on Risk	Nature of Impact	Required mitigation
H5	Risks to building fabric.	Climate hazards to building fabric include damage from subsidence due to drought and dry soil, excessive moisture due to flooding and heavy rain and structural damage due to high winds. Policies on managing flood risk (WA1) and implementing Sustainable Drainage Systems (WA2) will help to reduce the risks to building fabric from flooding and excessive moisture. Local Plan policy does not consider risks to building integrity from drought or high winds; however this is something which should be addressed in the building design.	N	

Code	Risk - Health, Communities and Built Environment	Local Plan Impact on Risk	Nature of Impact	Required mitigation
H6	Risks and opportunities from summer and winter household energy demand.	Policy RT3 on Overheating and the Urban Heat Island requires new developments to minimise overheating risks and carry out Overheating Risk Assessment where appropriate. The policy also encourages the use of passive cooling measures in new development and the avoidance of active cooling (for example, air conditioning systems) unless they are absolutely necessary following the implementation of other passive systems. The policy also states that the retrofitting of existing buildings must assess overheating risks and include measures to reduce heat gain and improve ventilation. The integration of Green Infrastructure is identified as key to reducing the urban heat island effect. The Local Plan also has a policy covering the Circular Economy (RT5) which includes support for reducing energy use during construction.	+	The positive impact could be strengthened by including support for energy efficiency measures during operation in the Circular Economy policy. There is also an opportunity for policy to require new large buildings to reach a certain level of sustainability certification (for example, BREEAM), which would ensure the integration of energy efficiency measures.

Code	Risk - Health, Communities and Built Environment	Local Plan Impact on Risk	Nature of Impact	Required mitigation
H7	Risks to health and wellbeing from changes in air quality.	The major source of air pollution in Trafford is vehicle transport emissions. Trafford's Transport and Movement policies are focused on promoting sustainable modes of travel and encouraging shifts away from car use, they will have a positive impact on air quality. Policies to protect and enhance Trafford's natural spaces, including wetlands and woodland, will also help to improve air quality.	+	Positive impacts on air quality can be reinforced by Local Plan policy further committing to the roll out of renewable energy. A policy setting out where and in what circumstances proposals for large-scale renewable energy generation would be supported would help to support the decarbonisation of the borough's energy system and help to improve air quality.
H8	Risks to health from vector-borne disease.	Not directly relevant to Local Plan.	N/A	
H9	Risks to food safety and food security.	Although not directly relevant to planning, the Local Plan does include a policy supporting the provision of allotments and growing space to local people (Policy OS5), helping to support food security at a micro scale.	N	

Code	Risk - Health, Communities and Built Environment	Local Plan Impact on Risk	Nature of Impact	Required mitigation
H10	Risks to water quality and household water supplies.	Policy WA4 (Water Efficiency) requires new development to incorporate water efficiency measures. This is the case for both residential and non-residential development. Although this addresses water efficiency in new development, the policy does not address water efficiency measures in existing development, which could mean that risks to water supplies remain. Regarding water quality, pressure on wastewater treatment infrastructure is beyond the scope of the Local Plan.	+	It may be advantageous for Policy WA4 (Water Efficiency) to include support for retrofitting water efficiency measures.
H11	Risks to cultural heritage.	Designated heritage assets face similar risks to the rest of the built environment. Flood mitigation measures such as the safeguarding of Flood Storage Areas (WA3) will reduce the climate related risks faced by heritage assets. The protection of intangible cultural heritage is not relevant to local planning.	N	A statement could be added to Policy BE5 (Heritage Assets) stating that proposals which conserve heritage assets and help to protect them from climate risks will be supported.
H12	Risks to health and social care delivery.	Not directly relevant to Local Plan.	N/A	
H13	Risks to education and prison services.	Not directly relevant to Local Plan.	N/A	

Table 7 Local Plan Impact on 'Business and Energy' Risks

Code	Risk - Business and Energy	Local Plan Impact on Risk	Nature of Impact	Required mitigation
B1	Risks to businesses from flooding.	Policy on Managing Flood Risk (WA1) requires new development to try to locate in the areas of lowest flood risk, flood risk assessment should be carried out. Policy also advocates the use of Sustainable Drainage (WA2), reducing surface water flood risk: new development must incorporate SuDS and retrofitting of existing development will be supported. Flood Storage Areas will be safeguarded (WA3) to further reduce flood risk.	+	
B2	Risks to businesses and infrastructure from coastal change from erosion, flooding and extreme weather events.	Not relevant to Trafford.	N/A	
B3	Risks to business from water scarcity.	Policy WA4 (Water Efficiency) requires new development to incorporate water efficiency measures. This is the case for both residential and non-residential development. Although this addresses water efficiency in new development, the policy does not address water efficiency measures in existing development, which could mean that risks to water supplies remain.	N	It may be advantageous for Policy WA4 (Water Efficiency) to include support for retrofitting water efficiency measures.

Code	Risk - Business and Energy	Local Plan Impact on Risk	Nature of Impact	Required mitigation
B4	Risks to finance, investment and insurance including access to capital for businesses.	Not directly relevant to Local Plan.	N/A	
B5	Risks to business from reduced employee productivity due to infrastructure disruption and higher temperatures in working environments.	The Local Plan encourages flood risk management and the maintenance of strategic roads, reducing the risk of damage to infrastructure. Policy RT3 on Overheating and the Urban Heat Island requires new developments to minimise overheating risks and carry out Overheating Risk Assessment where appropriate. The policy also encourages the use of passive cooling measures in new development and the avoidance of active cooling (for example, air conditioning systems) unless they are absolutely necessary following the implementation of other passive systems. The policy also states that the retrofitting of existing buildings must assess overheating risks and include measures to reduce heat gain and improve ventilation.	++	
B6	Risks to business from disruption to supply chains and distribution networks.	Not directly relevant to Local Plan.	N/A	

Code	Risk - Business and Energy	Local Plan Impact on Risk	Nature of Impact	Required mitigation
B7	Opportunities for business from changes in demand for goods and services.	Not directly relevant to Local Plan.	N/A	

6.0 Conclusion

6.1 Climate Change is already having impacts in the UK, with over 1°C of warming already having occurred. This has resulted in an increased risk of extreme weather, as well as generally wetter, stormier winters and hotter, drier summers. It is essential to be aware of the climate risks faced by the UK and to take action to mitigate and adapt to these risks.

6.2 The Draft Local Plan addresses climate risks, with tackling climate change at the heart of the vision and mentioned in multiple strategic objectives.

6.3 This Climate Change Risk Assessment (CCRA) has set out the climate change risks and opportunities identified in the most recent UK CCRA and assessed these against the Draft Local Plan. The thematic policies of the local plan generally address climate risks where relevant and it has been determined that the Local Plan will have a positive impact on mitigating climate risks faced by Trafford. There are however a number of climate risks faced by Trafford where changes or additions to policy can enhance the response to the risk and help with mitigation or adaptation to the risk.

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Consultation Question IA4

Do you have any comments to make on the Climate Change Risk Assessment that forms part of the IA?