Trafford Local Plan

TRAFFORD COUNCIL

Regulation 18 Consultation - Policies Consultation Report

September 2025



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1. Introduction

1.1 The Regulation 18 Trafford Local Plan (Policies) consultation was held in spring / summer 2025 and this statement describes how the consultation was undertaken, as well as a summary of the comments received.

1.2 The Local Plan Regulation 18 Consultation is being undertaken in two parts – the first, which this statement relates to, on the Local Plan thematic policies and then a further consultation on the proposed Allocations in Autumn 2025. A separate Statement of Consultation will be prepared on how engagement will be undertaken for the Trafford Local Plan Regulation 18 Consultation Draft – Allocations.

1.3 This Consultation Statement meets Regulation 17 of Town and Country Planning (Local Planning) (England) Regulations 2012 (the Local Planning Regulations) specifically requires the Council to prepare a statement setting out: which bodies and persons were invited to make representations under Regulation 18 of the Local Planning Regulations; how those bodies were invited to make representations; a summary of the main issues raised by those representations; and how those main issues have been addressed in the Local Plan.

1.4 The Council carried out a previous round of consultation on an earlier Regulation 18 version of the Local Plan in 2021. Progress on this document was paused during the development of the Places for Everyone (PfE) Plan, which was adopted in March 2024.

2. Consultation Overview and compliance with the Statement of Community Involvement (SCI)

2.1 This chapter outlines how the Trafford Local Plan April 2025 Regulation 18 Consultation Draft - Policies consultation was promoted, and how information was made accessible to residents and other stakeholders. It also sets out how the consultation was undertaken in accordance with the Council's adopted Statement of Community Involvement (April 2025).

2.2 The consultation took place from 24 April 2025 to 12 June 2025 and included a concurrent 'Call for Sites' exercise, which invited submissions of potential sites for allocation or protection from developers, landowners, residents, and other stakeholders.

2.3 The consultation focused exclusively on the emerging Local Plan policies. Site allocations and designations will be subject to separate consultation later in 2025. Both policies and site allocations will then be combined and published at the Regulation 19 stage in early 2026.

Documents for consultation

2.4 Consultation was undertaken on the following documents:

- Trafford Local Plan Regulation 18 Consultation Draft - Policies (April 2025)
- Interactive Policies Map and Policies Map (April 2025)
- Integrated Assessment (IA) Report and Policies Assessment (April 2025)
- Integrated Assessment (IA) Scoping Report update (March 2025)
- Climate Change Risk Assessment (CCRA) (April 2025)
- Habitats Regulations Assessment (HRA) (March 2025)
- Site Selection Methodology (April 2025)

2.5 The Local Plan document contains the draft Vision and Strategic Objectives alongside draft policies covering a wide range of topics such as climate change, residential and employment development, transport, town centres and retail, green spaces and the natural environment, and water and sustainable drainage.

2.6 The draft policies map shows how the draft Trafford Local Plan policies apply on the ground. This was available both as a PDF and an interactive online format.

2.7 The IA was carried out on the draft vision, objectives and policies and included a Sustainability Appraisal, Equalities Impact Assessment, Health Impact Assessment and Climate Change Risk Assessment (CCRA). The IA scoping report sets out the criteria against which a Local Plan should be assessed. The CCRA includes an assessment of climate change risks against proposed Local Plan policies. A Habitats Regulation Assessment (HRA) was also prepared, which is a screening opinion and assessment regarding harm to European protected natural sites.

2.8 A draft site selection methodology was published, setting out a proposed methodology for assessing sites and determining which are most suitable for allocation.

2.9 The Call for Sites exercise was also run in parallel to the policies consultation, providing an opportunity for interested parties to put forward sites to be considered for development, protection or for some other purpose within Trafford.

Methods of consultation and SCI compliance

2.10 The Council is committed to involving local communities and stakeholders in the preparation of the Local Plan and sees consultation as an ongoing activity. In accordance with the Council's 2025 SCI, the following methods of consultation were used in the preparation of the Trafford Local Plan Regulation 18 Consultation Draft - Policies.

Consultation methods used	
Consultation database	Notification of the consultation was sent on 24 April to all contacts registered on the Council's Local Plan database. A total of 465 contacts were notified of the consultation, comprising of 461 emails and 4 letters. The contacts on the database included local residents, community groups, landowners, developers and statutory consultees, and all elected Members. The list of consultees notified about the Trafford Local Plan Regulation 18 Consultation Draft – Policies can be found in **Appendix A**. The notification set out the scope of the consultation, where consultation documents could be viewed, dates, venues and times of in-person Local Plan drop-in sessions and how to make representations to the consultation. A PDF copy of the Local Plan Summary was also attached to emails or enclosed in letters, providing further detail. Details of both can be found in **Appendix B.**
Website	The Trafford Council website maintained a dedicated Local Plan webpage (www.trafford.gov.uk/draftlocalplan) throughout and beyond the consultation period which provided details on: • The consultation period. • Background on the Local Plan, including links to a Trafford Local Plan Summary Document, other development plan documents and guidance. • The Local Plan timetable (and link to the Council's Local Development Scheme). • Links to all documents subject to consultation, along with the Regulation 18 – Draft Local Plan Public Notice (Statement of Availability) • Details of how to respond to the consultation, including a link to the online consultation platform (Citizen Space), email and postal addresses. • Details of where to view hard copies of the consultation documents. • Dates, venues and times of in-person Local Plan drop-in sessions with Council Officers. • Information, on-line and PDF response forms for the Call for Sites.

	• Links to Locality specific Topic Papers, and to the previous Local Plan consultation. • Contact details for any questions.
Social media	Posts were made on the Council's social media channels throughout the consultation period. The Trafford Council Facebook page (18k followers) posted about the consultation (including details of drop-in session events) on the following dates: • 29 April, 6 May, 12 May and 9 June 2025 (deadline reminder). The Trafford Council 'X' page (27.3k followers) also posted about the consultation (including details of drop-in session events) on the following dates on the following dates: • 29 April, 6 May, 7 May, 8 May, 12 May and 15 May 2025. The Trafford Libraries Facebook page (4.9k followers) also posted about the consultation on the following dates: • 6 May, 12 May and 19 May 2025. Details of the Council's Social Media Posts can be found in **Appendix C**.
Publicity material	A press release was posted to the News section of the Trafford Council website, promoting the consultation and the drop-in events on 24 April 2025 - Trafford Council website. Details of the text of the press release can be found in **Appendix D**. This was followed by the following media coverage: • 24 April 2025 - Manchester Evening News website • 25 April 2025 - Manchester Evening News website • 28 April 2025 - BusinessLive website • 01 May 2025 - Messenger website and front page of their print edition. Details of the media coverage can be found in **Appendix E.** A poster / leaflet was also displayed in all public libraries within the borough, advertising the consultation and drop-in events. A copy of the poster / leaflet can be found in **Appendix F.**
Deposit points	Throughout the consultation, hard copies of the consultation documents were made available at the Council's offices at Trafford Town Hall and Sale Waterside. Display boards illustrating a summary of the consultation document were also displayed at Trafford Town Hall main entrance (after the final public drop-in event).

	Copies of the display boards can be found in **Appendix G**.
Stakeholder events / **Stakeholder workshops**	The following series of public drop-in events were held during the consultation period. In total the events were attended by 133 individuals. Council officers were available at each to answer questions and help residents and stakeholders respond to the consultation. Drop-in events took place at the following locations: • 1 May, Stretford Library (3:30 – 7:30pm) – 14 attendees • 6 May, Urmston Library (3:00 – 7:30pm) – 28 attendees • 7 May, St Annes Church, Sale (3:00 – 7:30pm) – 36 attendees • 8 May, Timperley Library (3:00 – 7:30pm) – 10 attendees • 12 May, Old Trafford Library (3:00 – 7:30pm) – 15 attendees • 14 May, Altrincham Library (3:00 – 7:30pm) – 7 attendees • 15 May, Partington Library (3:00 – 7:30pm) – 0 attendees • 19 May, Sale Library (2:30 – 7:00pm) – 23 attendees At these events, A1 exhibition boards provided an overview of the Local Plan, and large scale maps used to engage attendees and provide context. Copies of the display boards can be found in **Appendix G**. There were also hard copies of the Local Plan available to view at the drop in events, as well as an A5 leaflet for attendees to take away with information on responding to the consultation. A copy of the poster / leaflet can be found in **Appendix F.** A Duty to cooperate meeting was also held with neighbouring local authorities, Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM) on 12 June 2025.
Other	<u>External</u> Stakeholders on the Trafford Council Strategic Housing Partnership and Increase Housing Delivery Group were emailed about the consultation on 6 May 2025. This circulation list included stakeholders such as housing associations and social housing landlords. On 7 May 2025, The Trafford Community Collective (an organisation that supports the Voluntary, Community, Faith and Social Enterprise sector) was emailed with information about the consultation, and encouraged to share the information among its network. In May 2025, information on the Local Plan consultation was also issued to the Trafford Council Schools E-bulletin and the Business/community bulletin.

	Internal The following series of Drop-in sessions were held by the Strategic Planning Team: • 03 and 06 Feb 2025 – Other Council Departments. • 03, 06, 12 and 13 May 2025 – Council Members. In addition, a consultation post was published on the Council's intranet (accessible to all Council employees) on 6 May 2025.

3. Summary of main issues

3.1 The following section provides a summary of the responses received to the Trafford Local Plan April 2025 Regulation 18 Consultation Draft - Policies consultation.

3.2 In total, 89 individuals and organisations made representations (28 online responses and 61 written representations). A list of all the respondents can be found in **Appendix I** along with full redacted comments in **Appendix K**.

3.3 Responses were received from the following stakeholder groups:

- Residents – 22.5%
- Businesses, organisations and community groups – 68.5%
- Local councillors / Political parties – 9%

3.4 The comments received have been reviewed and summarised below following the same layout and policy numbering of the Regulation 18 Consultation Draft - Policies consultation plan.

Chapter 1: Introduction, Vision & Strategic Objectives

3.5 Chapter 1 sets out the Vision and Strategic Objectives, introducing the Local Plan and its locality – based approach. The Council received feedback from 42 respondents on this section.

3.6 **General comments** were received within this section expressing concerns over its alignment with national policy (NPPF paragraph 192). Criticism focused on the plans failure to reflect Green Belt review especially for New Carrington and Davenport Green. Opposition was voiced against the Battery Energy Storage System facility proposal on Green Belt land without an approved masterplan. Requests included more defensible Green Belt boundaries, enhanced green infrastructure, and clearer alignment with Places for Everyone (PfE) policies. Concerns about New Carrington and

Davenport Green included loss of peat moss, increased emissions, poor transport infrastructure, and limited affordable housing. Respondents urged stronger links between housing, economy, and community sustainability.

3.7 Regarding the **Policies Map** some responded that key environmental assets like Carrington Moss, Warburton Moss, and the Transpennine Trail were missing or inaccurately shown. Outdated UDP designations caused confusion, such as protected areas planned for development. Requests were made to update the map to include all peat mosses, wildlife corridors, and heritage assets, and to improve usability through better keys and user testing.

3.8 **The Vision** was generally supported but viewed as insufficient on environmental issues like sustainable food choices and peatland protection.

3.9 There was support for carbon neutrality and biodiversity goals, with calls to extend the plan period beyond 2042. Some felt the transport network should better support walking, cycling, horse riding, and sustainable freight. Others questioned the Council's capacity to deliver the Vision due to governance and funding challenges.

3.10 **Strategic Objectives** were generally supported but criticised for lacking clear, measurable targets. Suggestions included emphasising the carbon impact of lifestyle choices such as adopting plant-based diets, adding more detailed housing and sustainability targets including active design, and providing clearer definitions of carbon neutrality and peatland restoration. Respondents also called for greater focus on rural economies, enhanced transport objectives particularly for freight and rail projects, expanded biodiversity targets, and recognition of Trafford's role within Greater Manchester. Additional objectives for sustainable economic growth and utility resilience were proposed. Caution was also expressed about setting ambitious carbon neutrality timelines and the need to balance development on both brownfield and greenfield sites.

3.11 Other key issues raised included calls for better evidence and updated assessments, especially on rural areas, biodiversity, and New Carrington. Concerns were noted about incomplete infrastructure feasibility testing. The need for a robust delivery and monitoring framework with funding and public engagement was stressed. Specific objections were made regarding Warrener Street Car Park's development and calls for more precise wording in documents.

3.12 Comments on equality and inclusion suggested updating terminology and having a stronger focus on local deprivation in some area, particularly in Broomwood, Sale West, and Trafford West. Additionally, some respondents called for stronger local voices and better alignment with national guidance.

Chapter 2: Strategy

3.13 The chapter sets out the overarching planning strategy for Trafford, establishing sustainable development principles in line with national policy. It identifies climate change as a core issue across all policies, with specific focus on reducing carbon emissions and promoting green infrastructure. Overall, Chapter 2 received feedback from 48 respondents, with Policies ST3, ST4 and ST5 attracting the greatest number of comments.

3.14 **Policy ST1: Core Growth Area (Trafford)** received criticism for being too high-level, lacking clear targets, developer guidance, and ambitions for increasing green spaces. Concerns were raised about regeneration plans near Old Trafford football stadium and the impact of changes to the nearby freight terminals. Support was expressed for sustainable development that protects heritage assets, alongside calls for stronger coordination with transport authorities and incorporation of Active Design principles. Respondents recommended explicitly prioritising housing within mixed-use developments and emphasised the need to integrate green infrastructure.

3.15 Concerns were raised about **Policy ST2: Inner Area (Trafford)**, specifically that it does not provide enough service improvements in the Manchester United Football Club area. There is an unclear monitoring framework lacking green space and environmental ambitions. While support was given for concentrating development in designated locations, it was recommended that heritage impact assessments be mandatory for all allocated sites. The inclusion of Active Design principles and detailed assessments on sports facilities were suggested. Some respondents criticised the effectiveness of the policy due to the borough's poor track record on utilising brownfield land and promoting town centres.

3.16 **Policy ST3: Southern Areas (Trafford)** was opposed for permitting development on former Green Belt land, with calls for buffer zones around protected ecological sites. Support existed for retaining the Green Belt and protecting heritage through robust assessments. Feasibility concerns were raised about New Carrington due to infrastructure funding and environmental constraints. Suggestions included promoting active travel, sustainable development near local centres, and addressing transport impacts, particularly around Davenport Green. Opposition stemmed from concerns about peatland destruction, air pollution, and environmental vulnerability. Criticism was also directed at the underuse of brownfield land and the need for clearer evidence supporting development options.

3.17 **Policy ST4: Sustainable Development** was noted to lack clear monitoring and a precise definition of sustainable development. The need for greater focus on the environmental impact of food was stressed, particularly promoting plant-based diets

to reduce carbon emissions. While the presumption in favour of sustainable development was supported, clearer terminology and stronger guidance on community health, active travel, and infrastructure investment were recommended. Concerns included capacity constraints for services, traffic congestion, and alignment with national net-zero and solar energy policies.

3.18 **Policy ST5: Climate Change** drew calls for a greater focus on the environmental impacts of food choices, including promoting plant-based diets and highlighting the Council's role in influencing food provision. The policy was criticised for insufficient monitoring, especially regarding peatland protection and carbon loss. Recommendations included aligning with national energy standards and promoting nature-based solutions, such as peatland restoration and green infrastructure. Clear expectations for developers on carbon reduction and air quality improvements were urged, alongside support for net-zero carbon targets by 2050.

3.19 **Additional comments** on the chapter raised concern about the lack of a Green Belt review and the need to withhold grey belt land pending a full audit of brownfield capacity. Holistic planning with neighbouring areas was recommended, along with clearer transport strategies for New Carrington.

Chapter 3: Renewable Technology and Methods

3.20 Chapter 3 covers the essential role of renewable technologies and methods in shaping a sustainable, energy-efficient future for Trafford. Overall, Chapter 3 received feedback from 28 respondents, with Policies RT1 and RT2 attracting a higher number of comments.

3.21 **Policy RT1: Carbon Neutrality and Renewable Energy** was generally supported but the policy is viewed as incomplete, lacking clear monitoring and evidence on net zero impacts, especially green space loss. Support exists for carbon neutral development by 2038, with calls to clarify where large-scale renewables like solar farms and wind turbines are supported. The lack of emphasis on rooftop solar and active travel was made.

3.22 Concerns were also raised over excluding carbon emissions from Carrington Moss in reports and the inclusion of an energy hierarchy, which may be better governed nationally. Suggested changes included aligning with Government targets and Building Regulations, safeguarding air quality near sensitive sites, supporting industrial decarbonisation especially hydrogen use. Calls for clearer objectives and policy flexibility, including for energy storage and transmission infrastructure protection,

were made. Some respondents flagged the policy as unjustified and unviable without further evidence.

3.23 There was broad support for **Policy RT2: Decentralised Energy Networks**, but concerns raised about feasibility, consumer choice limitations, and grid capacity risks were raised. The policy should focus on site-specific assessments, allowing flexibility for developments where heat networks are impractical, especially for older persons' housing and industrial sites. Financial contribution requirements must consider viability. Suggestions included better alignment with national standards, focusing heat network requirements on co-located uses, and clarifying applicability to relevant major developments only. Some cautioned against assuming decentralised energy is always beneficial without infrastructure commitments. Community energy schemes were also recommended for inclusion.

3.24 **Policy RT3: Green Infrastructure and Cooling** was supported in principle, but concerns were raised about how Green Infrastructure (GI) measures would be monitored and delivered. There was strong support for urban planting and flood management, though it was suggested that playing fields should be protected from tree planting where it could cause conflict. Green roofs and walls were welcomed but may not be suitable for all buildings and should be assessed case by case. Respondents said that the cooling hierarchy and overheating policies should match Building Regulations, to avoid setting local rules that are too strict. Active cooling should only be used if it follows carbon reduction policies. Overall, the policy is well supported but needs clearer guidance on GI requirements and how overheating will be assessed.

3.25 **Policy RT4: Sustainable Demolition and Retrofit** was generally supported, though some concerns were raised about how it would be monitored and how clear the wording is. Suggestions included looking at a wider range of low-carbon heating options, not just heat pumps, and making a clearer distinction between conservation areas and heritage assets. Respondents said that the definitions of demolition, targets for reducing waste (which should remain flexible), and how embodied carbon is considered need to be made clearer. While the benefits of retrofitting buildings were recognised, it was noted that reuse is not always possible. The policy should better explain when demolition or reuse is acceptable and should also cover proposals involving a change of use. Overall, changes were suggested to improve clarity, flexibility, and ensure the policy aligns with national guidance.

3.26 **Policy RT5: Circular Economy in Construction** is generally supported, but respondents felt it lacks clear guidance on how it will be implemented and monitored. Concerns were raised about how practical it is to apply local embodied carbon standards and how they would be enforced. It was suggested that the policy should align with

national targets and focus on major developments involving construction. Encouraging carbon-neutral supply chains and sustainable procurement were also recommended. A phased approach, based on the size and type of development, was advised to help keep the policy viable and effective.

3.27 **Additional gaps:** identified the need for monitoring peat moss restoration, addressing sustainable freight at New Carrington, and using tree planting to support carbon capture. Respondents also called for clearer policies on renewable energy, such as hydrogen power, and protection of related infrastructure, especially in key industrial areas. Cross-boundary working and risk assessment for hydrogen and carbon capture projects were seen as essential. Overall, the policies should focus on developments with significant construction work and not apply to proposals with only operational changes, to ensure it remains practical.

Chapter 4: Residential Development

3.28 Chapter 4 outlines the overarching housing requirement and the policies that will guide housing delivery across Trafford, covering affordable housing, the size type and tenure of new homes, adaptable and accessible housing, and other accommodation types. Overall, Chapter 4 received feedback from 44 respondents, with Policies R1, R3, R4, and R5 attracting the greatest number of comments.

3.29 There was broad agreement on the need to align housing delivery with sustainable growth. However, the current target set out in **Policy R1: Housing Delivery**, which aims to build 1,091 dwellings per year, is widely seen as outdated. The Government's Standard Method suggests a higher housing requirement, so it is recommended that this target be updated or put under a formal review process. Respondents strongly support prioritising brownfield development and concentrating higher-density housing in sustainable locations. Nevertheless, concerns remain about the viability of brownfield sites, particularly delivering affordable housing. To address these issues, clearer phasing strategies, detailed viability assessments, and a published housing trajectory showing a five-year land supply are requested. There was also considerable advocacy for reviewing Green Belt policies to either release or protect land to meet rising housing demands.

3.30 Regarding **Policy R2: Protecting Existing Homes** respondents requested greater transparency on restrictions around self-contained homes and recognised the importance of "Grey Belt" sites in housing delivery. Many supported minor Green Belt boundary changes to reflect this role.

3.31 Affordable housing provision within **Policy R3: Affordable and Social Housing**, was strongly supported in principle, especially when delivered through major developments. However, widespread concerns exist about viability, tenure mix, and the clarity of the policy. Terms allowing off-site contributions were criticised for ambiguity and it considered that it should align more closely with national planning definitions. The fixed tenure split of 60% rented to 40% ownership, alongside restrictions on grouping affordable homes, faced calls for increased flexibility informed by site-specific viability evidence. Respondents stressed the importance of rigorous viability testing, particularly on brownfield sites, to allow appropriate exemptions. There was also a push for alignment with Greater Manchester's affordable housing targets and clearer guidance on managing clustering. While opinions differ on specific tenure targets by locality, the general consensus favoured flexibility to ensure realistic delivery outcomes.

3.32 **Policy R4: Size and Type of New Home** was supported in principle, but seen as lacking incentives for developers and economic feasibility. Respondents suggest reconsidering the Community Infrastructure Levy (CIL) and improving early engagement with developers and housing associations to encourage collaboration. Additional measures to prevent buy-to-let speculation and promote mixed tenure delivery, whether through Registered Providers or affordable developer-led models, are recommended to strengthen policy effectiveness.

3.33 **Policy R5: Housing Density** promotes a balanced housing mix and specialist housing provision for older persons. While supported, concerns were raised about the policy's rigidity and the clarity of monitoring mechanisms. Flexibility was advised to allow alternative housing mixes tailored to site-specific needs and emerging trends such as increased homeworking. Apartment-led schemes receive support in some locations, with calls to allow 100% apartment developments where justified. The policy should better reflect demographic changes and the diversity of household types.

3.34 The approach within **Policy R6: Older Persons Accommodation** was supported but caution expressed against inflexible broad requirements. Specialist housing targets were welcomed but require updated evidence, differentiated viability expectations, and closer collaboration with housing providers. Allocating specific sites for older persons' housing is encouraged to provide certainty and aid delivery.

3.35 **Policy R7: Adaptable and Accessible Housing** was supported however, concerns were raised about applying these standards only to developments exceeding 50 homes, respondents recommend lowering the threshold to 25 dwellings. Terminology should be updated to refer to Building Regulations M4(2) and M4(3) rather than "Lifetime

Homes." Flexibility is necessary to accommodate site constraints and viability challenges, alongside clearer alignment with regional policies.

3.36 **Policy R8: Homes for Children and Care Experienced Young People** received general support due to its focus on sustainable accommodation near support networks. Emphasis was placed on appropriate locations and avoiding excessive concentration to foster integration and well-being.

3.37 The co-living and student accommodation policy, **Policy R9: Other Types of Homes**, was broadly supported but respondents call for clearer monitoring and a more defined scope to manage speculative development and affordable housing requirements. Most agreed affordable housing obligations should apply to student accommodation to support low-income students, though views differ on nomination agreements tied to specific institutions.

3.38 **Policy R10: Gypsies, Travellers and Travelling Showpeople Accommodation** was supported, with recommendations to improve clarity on site access and landscape integration. Prioritising brownfield sites was encouraged, alongside heritage considerations and meaningful engagement with traveller communities to balance cultural needs with local impacts.

3.39 Views on **Policy R11: Self Build and Custom Housing** were mixed. Support existed in principle, but concerns related to viability, enforcement, and the robustness of the 5% target for large sites. Suggestions included allocating specific self-build plots, clarifying marketing periods, and prioritising local residents' access.

3.40 **Additional comments** highlighted concerns about housing losses to short-term lets such as Airbnb, suggesting possible restrictions. The need to prioritise brownfield development, achieve carbon neutrality, and safeguard critical infrastructure was consistently emphasised. Strong advocacy exists for reviewing Green Belt policy to better meet housing needs. Local tenure mixes were viewed as somewhat arbitrary, with calls for more comprehensive, flexible, and evidence-based approaches at the plan level.

Chapter 5: Economy and Jobs

3.41 Chapter 5 sets out the borough's employment land requirements, including for industry, warehousing and offices. It highlights key employment areas, such as Trafford Park, and supports the development of green and low-carbon industries. Overall, Chapter 5 received feedback from 24 respondents, with each policy attracting a similar number of comments.

3.42 **Policy EJ1: Employment Land Requirements** faced significant criticism for being incomplete and lacking robust evidence on demand, sustainability, and mitigation of heavy goods vehicle (HGV) impacts. While safeguarding employment land was broadly supported, respondents called for a stronger emphasis on sustainable locations, enhanced transport options, and measures to address climate change. Concerns include insufficient monitoring mechanisms, unclear infrastructure delivery plans, traffic congestion, health impacts from pollution, and protection of the historic environment. To improve policy effectiveness, more detailed and flexible guidance on employment uses is needed, alongside better alignment with other Local Plan policies and careful safeguarding of land to avoid unjustified Green Belt release.

3.43 **Policy EJ2: Trafford Park** was generally supported but regarded as insufficiently strong to guarantee a sustainable future for this key employment area. Critiques highlighted unclear monitoring arrangements, inadequate facilities for lorry drivers, and lack of clarity on reducing HGV movements. Suggested improvements include enabling more flexible employment uses, mandating strategic travel plans, enhancing public transport connections, and integrating policies with wider strategic plans. Supporters welcomed the emphasis on urban greening, heat networks, and public transport but requested stronger wording and detailed design standards to bolster sustainability and accessibility.

3.44 Environmental concerns dominated responses to **Policy EJ3: Industry and Warehousing**. Respondents stressed the urgent need for stronger mitigation of hydrological impacts, biodiversity loss, and pollution risks, as well as improved community communication regarding potential hazards. Alignment with the New Carrington masterplan was also recommended, with policy flexibility to accommodate emerging technologies beyond traditional industrial uses. While some supported the allocation, comprehensive environmental and traffic impact assessments were demanded. The policy was also critiqued for lacking clarity on sustainable transport provisions, carbon emissions reduction, and hazardous materials monitoring.

3.45 Opinions on the proposed policy boundary for Trafford Park vary widely. Some respondents fully endorse it, whilst others deferred to local community views or expressed uncertainty due to insufficient detail. Calls for greater clarity and justification of the boundary were common. Similarly, the Broadheath Employment Area boundary also received mixed reactions, with emphasis on local input and concerns about map clarity and appropriateness.

3.46 **Policy EJ4: Office** raised significant issues related to the use of Green Belt land. Many submissions called for clearer monitoring, stronger evidence of office demand, and recognition of changing work patterns, including increased remote working.

Opposition to development in specific areas was linked to concerns over misleading processes during Green Belt removal. While some supported the policy, they requested enhanced transport infrastructure plans and broader employment use classes to encourage diverse economic activity. There were also calls for stronger policy wording to balance office development with community vitality.

3.47 Responses to **Policy EJ5: Safeguarding Trafford's Employment Land** highlighted the need for greater flexibility given the reduced demand for office space post-COVID-19. Some submissions opposed strict land protection and extended marketing periods, advocating instead for shorter or removed marketing requirements. Exemptions for masterplanned areas to enable redevelopment were suggested. Support was expressed for broader use classes and reduced marketing times to prevent economic inactivity. Requests were also made for better alignment with national guidance and site-specific policies.

3.48 **Policy EJ6: Data and Energy Storage** generated concerns about insufficient risk assessments and monitoring. Safety issues near sensitive locations such as schools were flagged. Calls were also made for stronger energy efficiency and climate change mitigation measures, especially in data centre proposals. Some submissions advocated for more flexible site criteria extending beyond brownfield locations. Opposition to compensation requirements for data centres was voiced due to their economic benefits. Innovative proposals such as heat sharing received cautious reception, suggesting the need for careful evaluation.

3.49 **Policy EJ7: Rural Economy** received support along with concerns over limited evidence and potential impacts of development allocations on sensitive environments. There were strong calls for protecting high-quality agricultural land and supporting long-term farm viability. Some respondents viewed farm diversification criteria as disproportionate, and there was a desire for formal recognition of agriculture's regional economic importance. Additional issues raised included promotion of fair wages and acknowledgment of key regional employers.

Chapter 6: Transport and Movement

3.50 Chapter 6 promotes sustainable travel within Trafford, including walking, cycling, and public transport. It focuses on enhancing connections across the borough, with a focus on improving the A56 and other transport hubs. Overall, Chapter 6 received feedback from 43 respondents, with Policies TM1, TM2 and TM10 attracting the greatest number of comments.

3.51 **Policy TM1: Walking, Wheeling and Cycling** received broad support for encouraging active travel through improved connectivity, modal shift, and integration with new developments. The embedding of Active Design principles and safeguarding of strategic routes were particularly welcomed. However, concerns were raised about the clarity and feasibility of the policy, with calls for more precise terminology and assurances that infrastructure will be accessible to all users, including horse riders and people with disabilities. Respondents also wanted measures to avoid unintended consequences such as rat-running, suggesting enhancements such as continuous pavements, reduced speed limits, and improved crossing points. Safety on busy roads and developer contributions beyond site boundaries are emphasised, alongside calls for clearer delivery mechanisms, phased implementation, and robust monitoring. There was also a request for alignment with masterplans and clarity on policy applicability to major projects.

3.52 **Policy TM2: Public Transport** was widely supported for strengthening transport networks and infrastructure. Respondents highlighted the need for concrete, enforceable commitments, particularly in areas with limited or unreliable services. The policy's promotion of developer contributions towards public transport infrastructure was welcomed, though clearer wording and transparency regarding viability and contributions were sought. Support was also voiced for tram and rail expansions, route safeguarding, and improvements to station accessibility. Calls for better regional collaboration and integration with Greater Manchester transport strategies were also stated.

3.53 **Policy TM3: Car Clubs** received general approval and was seen as a means to reduce private vehicle use. However, concerns about affordability, coverage, and convenience led to suggestions for expanding car club availability, increasing electric vehicle fleets, and integrating car clubs with public transport hubs. Clearer implementation and monitoring strategies were also requested.

3.54 **Policy TM4: Mobility Hub** was positively received. However, respondents asked for clearer criteria for hub locations, measurable success indicators, and examples of best practice. The policy is seen as important for supporting sustainable transport but requiring more detailed guidance.

3.55 **Policy TM5: Local Highway Network** received mixed reactions. Maintenance and safety improvements were generally supported, but many oppose proposals for road expansion or new roads due to concerns about increased traffic, environmental damage, and climate targets. Instead, investment prioritising public transport and infrastructure for walking and cycling was urged. Comments called for integrated transport solutions rather than road capacity increases.

3.56 **Policy TM6: The A56 Corridor** was strongly supported across responses. Suggestions included dedicated cycle lanes, bus priority measures, improved drainage, and congestion management techniques. Alignment with regional transport strategies and phased delivery plans was also seen as crucial for success.

3.57 **Policy TM7: Freight** was broadly supported, but met with concerns regarding the reliance on HGVs and associated environmental impacts. Respondents sought clearer evidence for alternatives to freight movements, robust mitigation of pollution and traffic congestion, and improved facilities for HGV drivers. Policy clarity and alignment with regional freight strategies was also advised.

3.58 **Policy TM8: Manchester Ship Canal** was positively viewed as a potential route for sustainable freight transport to alleviate road congestion. Support included improving canal infrastructure, promoting freight use, and enhancing crossing points for pedestrians and cyclists. Respondents suggested further promotion and integration with multimodal freight networks.

3.59 **Policy TM9: Potential Future Rail Route** received mixed feedback. Environmental and heritage impacts were raised, and some questioned the benefits given cost and disruption. Nonetheless, there was support for long-term transport planning and the need to better integrate rail improvements with existing networks.

3.60 **Policy TM10: Parking Standards** received mixed feedback. Support was for linking parking requirements to site accessibility and promoting electric vehicle charging infrastructure. Many respondents sought stronger limits on parking to reduce car dependency, improved management of disabled parking bays, and better design standards. Clearer guidance on monitoring and enforcement was also requested.

3.61 **Policy TM11: Lorry Management** comments highlighted concerns about traffic volumes, road safety, and pollution. Respondents advocated for enhanced monitoring, promotion of sustainable freight alternatives, and provision of adequate driver facilities. Consistency with other planning policies and early incorporation of management strategies in development design were also recommended.

3.62 **Policy TM12: Park and Ride** schemes were generally accepted as useful for managing travel demand, though concerns were raised regarding environmental impacts and the potential to increase traffic. Respondents also emphasised the importance of clear monitoring, location criteria, and integration with public transport services to ensure effectiveness.

3.63 **Policy TM13: Crowd Movements and Routes** was welcomed for its focus on safety and accessibility. However, respondents also suggested detailed safety standards, and

some proposed handling such arrangements through masterplanning rather than the Local Plan.

Chapter 7: Town Centres and Retail

3.64 Chapter 7 defines the hierarchy and function of Trafford's town centres, focusing on Altrincham, Sale, Stretford, and Urmston, as well as district centres. It includes policies on retail and leisure developments outside of these centres. Overall, Chapter 7 received feedback from 22 respondents, with Policies TC1 and TC3 attracting the greatest number of comments.

3.65 **Policy TC1: Hierarchy of Centres** was generally supported but many suggested centre designations should be reassessed, with one requesting justification for the hierarchy of centres. With regard to the Stadium District and Wharfside, a similar policy to CQAAP Policy CQ3 to allow other main town centre uses to meet local needs was recommended. Other suggestions included a Local Place Plan for each district (reviewed periodically), recognise the role of housing to support town centre vitality, viability, and economic success, and include Active Design principles. Concerns were also raised in relation to unclear monitoring and supporting housing development along transport routes as it would result in "ribbon development".

3.66 Comments regarding the proposed boundaries for the **Town, Other Designated, Local and Neighbourhood centres** include: New Carrington centres should be added; Altrincham Town Centre differs to Altrincham Neighbourhood Plan boundary; and Shaftesbury Avenue should be amended to include only the existing retail offering. Some respondents also found the proposed boundaries on the policies map unclear.

3.67 **Policy TC2: Role and Function of Centres** was generally supported, especially policies pushing for a modal shift. Concerns were raised in relation to the proposed increase in residential use and the need for additional services (e.g. health and leisure provision) and their relationship with the night-time economy. Inclusion of office space in town centres and additional visitor accommodation was recommended, as well as pairing smaller local centres with district centres (i.e. Broomwood, Timperley). The Climate Change Risk Assessment with respect to reusing buildings in town centres being more sustainable than building new out-of-centre retail and leisure centres was endorsed. Policy TC2. B. v) should expanded beyond local heritage assets to reflect national policy. Monitoring was also considered unclear and Policy TC2.F. should be deleted as PfE allocations should not be developed.

3.68 **Policy TC3: Out of Centre Retail and Leisure** received mixed feedback regarding the proposed 500 sqm threshold for requiring an Impact Assessment for out-of-town retail

offers. It was noted that this threshold is overly restrictive and not aligned with national policy, suggesting 2,500 sqm was more appropriate and that the policy should distinguish between food and non-food retail. Overall, concerns were raised that the policy is too restrictive with an out-of-date evidence base were raised. Monitoring was considered unclear, specifically the fixed targets set for monitoring indicators. Sustainable transport to out-of-town developments and Active Design principles were suggested for inclusion, as well as reference to the Trafford Centre's economic and employer role within the supporting text.

3.69 **Additional gaps** identified included: support for small/local businesses (potentially offering subsidised rent); additional monitoring indicators, including empty shops and a plan to address them; a policy to undertake comprehensive masterplanning assessments of all major centres; addressing the severance of Altrincham Town Centre by requiring stronger parking controls, resident-only parking schemes, removal of surface car parks, and a kerbside strategy. Other comments included: the need for more publicity of car parks; a concern of stores and leisure facilities leaving Altrincham; and "exceptional circumstances" (TC1.B) should be explained.

Chapter 8: Green Infrastructure and Natural Environment

3.70 Chapter 8 outlines policies to protect and enhance Trafford's natural environment, including designated sites, landscape types and biodiversity areas. It emphasises habitat connectivity, nature recovery and the integration of biodiversity in new developments. The Mersey Valley is also covered, highlighting flood risk management, active travel and biodiversity. Overall, Chapter 8 received feedback from 41 respondents, with Policies GI6, GI7 and GI10 attracting the greatest number of comments, closely followed by Policies GI2 and GI5.

3.71 General support received for **Policy GI1: Landscape Character Areas** however respondents noted evidence is over 20 years old, a new Landscape Character Assessment should be of finer detail, and Landscape Character Areas overlap and conflict in some areas. Recommended changes included a requirement that Landscape Visual Impact Assessments assess all communities affected and are applied to development that has a significant impact, not just adverse; policy to be supportive of urban fringe land development; and set out clear requirements for specific areas, based on up-to-date evidence.

3.72 **Policy GI2: Green Infrastructure Network** was generally supported, however suggestions included: additional cycling infrastructure; reference to accord with other Local Plan Policies; reference to seeking appropriate contributions; extra Green Infrastructure (GI) opportunities to enhance biodiversity and provide robust

boundaries; alignment with the current Network Rail's Biodiversity Action Plan; clarifying how GI and electricity transmission network assets can function together; and greater flexibility to allow development where it (and any compensatory measures) outweigh harm to the GI network. It was also noted that the evidence base is out-of-date or absent and it is unclear why some sites have been designated as part of the GI Network.

3.73 **Policy GI3: Great Manchester Wetlands Nature Improvement Area (NIA)** was generally supported however, it was noted the NIA boundary misses the deepest parts of Warburton Moss and is a lost opportunity. Other comments noted that the policy requires a Natural Infrastructure Strategy for New Carrington masterplan.

3.74 **Policy GI4: Mersey Valley** was largely supported but representations suggested inclusion of nature-based solutions, and improvements for horse riders. One objection stated the focus is on improving access, rather than conserving biodiversity / natural environment and improving the water quality of the River Mersey.

3.75 **Policy GI5: Green Infrastructure Opportunity Areas** was generally supported, however comments observed the selection criteria appears unclear, with lack of evidence in terms of existing baseline, intended outcomes, and impact on viability/deliverability. Policy B. ii) is noted to be a blanket approach, inconsistent with NPPF. Concerns also raised in relation to inclusion of operational land or designated employment sites within GI opportunity areas. Manchester Airport Group wish for aviation safety, including consultation, to be included within policy and National Grid Electricity Transmission request amendments to acknowledge essential infrastructure. Dunham Forest Golf and Country Club was suggested as an opportunity area. Other suggestions included reference to measures identified in the LNRS; a policy on maintenance; wildlife corridors added to GI5.C and alignment with the Circular and the Design Manual for Roads and Bridges.

3.76 **Policy GI6: Green Infrastructure in New Developments** was generally supported, however comments suggested: additional inclusion of impacts on the setting of heritage assets, no loss of existing green infrastructure, both mitigation and compensation measures and opportunities for / integration with sustainable surface water management. BNG could be stronger, including commitment for off-site BNG within the Trafford boundary. Concerns regarding the proposed Urban Greening Factor (UGF) and the evidence base in terms of its justification, viability, and impact on deliverability were raised. Suggestions made to omit B2 and B8 development, apply UGF flexibly and consider other policy requirements, whilst others suggested a higher UGF for brownfield and non-residential developments. Clarification was also required

for the proposed 30-year effectiveness requirement as well as public / private space and the GI network on the policies map.

3.77 **Policy GI7: Trees, Woodland and Hedgerows** received mostly positive feedback however comments highlighted GI7 as being onerous, unjustified, that it should not be applied to all development (e.g. employment and change of use) and should be subject to viability testing. Questions were also raised whether there is a policy/ position on management of invasive species / use of native species. Irreplaceable habitats (e.g. ancient woodland, veteran trees) must be protected and enhanced, and policy should reflect this. Integration with surface water management strategy was also recommended.

3.78 **Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets** was largely supported but comments included suggestions for a buffer zone to natural assets, a greater reference to the LNRS, a clear requirement for ecological assessments, a differentiation between designation and quality of sites and an alignment with the current Network Rail's Biodiversity Action Plan. Objections related to designation of operational land, and blanket approach.

3.79 **Policy GI9: Biodiversity Opportunity Areas** was generally supported but Carrington Moss and Dunham Forest Golf & Country Club were suggested for inclusion within Opportunity Areas. Policy wording should be clear that new tree and hedge planting should not take place on playing fields which could potentially compromise its use.

3.80 **Policy GI10: Building Biodiversity into New Developments** was largely supported, however comments considered the policy onerous with no evidence to justify exceeding 10% BNG requirements, which should also be subject to viability testing. Policy and supporting text should be sufficiently expanded.

3.81 **Additional gaps** identified included: water quality; development to be built in an environmental and sustainable way; monitoring indicators, particularly measuring carbon release and habitat restoration schemes; specific measurable targets for each policy; nature-based solutions with multiple benefits; support for development of urban fringe land. The plan should refer to Green and blue infrastructure plans, LNRS, biodiversity and landscape plans, Rights of Way Improvement Plans, River Basin Management Plans, National Parks and AONB strategies. Maps could be improved, particularly the key.

3.82 Other comments that have been repeated throughout the Green Infrastructure and Natural Environment chapter included: unclear monitoring with lack of evidence and baseline data; question the credence of policy as much of the GI Network/ Natural Assets has been depleted and PfE allocations will deplete further. Sport England suggest inclusion of Active Design Principles and also note that any proposals affecting

playing fields should align with NPPF and Sport England's Playing Field Policy and Guidance and suggest this is embedded within the Policy.

Chapter 9: Open Space, Sports and Recreation

3.83 Chapter 9 focuses on policies to protect and enhance open spaces and sport and recreation facilities within Trafford. It includes policies on maintaining a high-quality, multi-functional network of open spaces, as well as protecting existing sports facilities and providing new ones where needed. Policies also cover allotments, community gardens, and cemeteries. Overall, Chapter 9 received feedback from 22 respondents, with Policy OS1 attracting the greatest number of comments.

3.84 Many respondents were unable to support **Policy OS1: Open Space**. Carrington Moss was considered absent, the evidence base fails to consider redundant/surplus facilities, inappropriate for development to mitigate existing deficiency, feasibility of high-density brownfield residential development, and relevance for C2 extra care or C3 Sheltered Housing. It was suggested policy should set financial contributions and allow for flexibility. Reference was also sought for significance of Registered Parks and their setting, access to facilities by active travel modes, "walkable accessibility standards" and other guidance. Other respondents sought more allotment space in the North locality, a new criterion in relation to sustainable surface water management and explanation of abbreviations for non-planners.

3.85 Policy OS2: Outdoor Sports and Recreation Facilities and Provision received a mixed response with comments highlighting: the need for more flexibility, it would be inappropriate to require new development to mitigate an existing deficiency, and horse riding is not mentioned. Sport England does not support the 'standard based' approach, finds the policy wording limits possible improvements, and suggests the inclusion of Active Design principles and the term 'playing fields'.

3.86 **Policy OS3: Indoor Sports and Recreation Provision** received a mixed response with comments noting the policy as not practical for high-density residential and it is unclear how increased capacity will be provided for new residents. Suggestions included stronger reference to accessibility and active travel routes, clearer and more flexible policy, and a positive framework for loss of indoor sports facilities (recommending a similar approach to the loss of employment sites). Sport England questions some of the terminology and structure, as it's considered that it limits what would be protected or improved and suggests further clarification in areas. Further, the Council's evidence base with a Built Facilities Strategy should be included to meet NPPF requirements and establish needs.

3.87 **Policy OS4: Loss of Sport and Recreation Land or Facilitie**s was mostly welcomed, however respondents sought a more flexible and clearer policy, particularly in what the policy is trying to prevent/promote. Sport England does not support OS4.A.iv. and states any loss of facilities should be replaced within other allocations and recommends numerous amendments to the policy wording to provide clarity and improved policy intent.

3.88 **Policy OS5: Allotments and Growing Space** was generally supported, however concerns were raised in relation to feasibility/ practicability, and potential conflict between this policy and the rest of the Plan. Smaller areas of green space (e.g. raised beds) for shared community use were favoured as it is less daunting than an allotment plot.

3.89 **Policy OS6: Cemeteries and Burial Grounds** was mostly supported. One representation suggested changing the supporting text to curtail and minimise the additional land required.

3.90 **Additional Gaps** included suggestions for: additional and clearer indicators for monitoring, specific for each policy, maintenance built into public realm improvements, clarifying that Policies OS1, OS2 and OS3 refer to major residential development only, and evidence to demonstrate baseline position and how the Plan will address any deficiency before seeking developer contributions. The use of planning applications as an indicator, and inclusion of Gaelic football was questioned.

Chapter 10: Water, Flooding and Drainage

3.91 Chapter 10 focuses on managing water resources and addressing flooding and drainage issues in new developments. It includes policies on flood risk management, water efficiency, and sustainable drainage systems. Overall, Chapter 10 received feedback from 19 respondents, with Policies WA1 and WA2 attracting the greatest number of comments.

3.92 **Policy WA1: Managing Flood Risk** was in the main supported however, several suggestions were made to strengthen the policy's effectiveness. These included: greater recognition of the impact of climate change and water storage role of Carrington Moss, greater safeguards to prevent impacts on water systems, protection for existing communities (and not just new development), prevention of building adjacent to areas of floodplain, wording to cover risks from sewer or reservoir flooding, a requirement to follow GM SuDs Design Guide, and greater flexibility in the wording of criterion F. A South Locality specific policy was also requested to focus on managing flood risk.

3.93 **Policy WA2: Sustainable Drainage – Surface and Foul Water** received a range of comments. These included: conformity with the rest of the plan when considering the historic environment, clarification of 'wider development' (identified in criterion F), and greater flexibility for criterion B. Other suggestions included: CIL or S106 funding from Davenport Green to support flood mitigation for areas downstream, surface water run-off into public sewers not to be permitted, and a stronger presumption against pumped drainage systems. Elements of the policy were recommended not to apply to Davenport Green. Concerns were also raised regarding insufficient water and sewage capacity to support new homes, and water pollution from previous industrial uses at New Carrington. Additions were also recommended to cover foul and surface water management, multifunctional design, coordination of development with new infrastructure, asset owner consent and the surface water hierarchy.

3.94 **Policy WA3: Flood Storage Areas** received several responses which stated that Carrington Moss should be identified as a flood storage area. It was also suggested that a new floodwater storage area is required in Trafford South.

3.95 **Policy WA4: Water Efficiency** received recommendations to include support for retrofitting water efficiency measures to reduce the risk of water shortages. Maintenance and requiring development to not cause incidents were also raised. The higher standard of 110 litres per person was also challenged and considered to be not justified nor consistent with national policy. Conversely United Utilities referenced their updated Water Resource Management Plan which requested the higher 110 litre standard.

3.96 **Additional Gaps** identified for the chapter included: improved monitoring indicators (including on flood risk around Carrington Moss), water and sewerage capacity, recognising the role of nature-based solutions in flood risk management, water management and carbon storage. In addition, comments also stated that: sustainable urban drainage systems can provide multifunctional green / blue spaces with ecological and resilience value, and peat and other natural systems offer climate and biodiversity benefits. Plans should include provisions for good water quality alongside flood prevention. Retrofitting SuDS in urban areas may offer additional biodiversity and resilience benefits. It is suggested that SuDs to Ciria standard should be required in all new developments. An additional policy was also requested to support investment in infrastructure in constrained locations, development at existing utility sites and water quality / groundwater source protection zones.

Chapter 11: Community and Social Infrastructure

3.97 Chapter 11 sets out policies to protect and enhance community and social facilities, restricting their loss where necessary. Policies also set out measures to guide development of new community and social facilities to support local communities. Overall, Chapter 11 received feedback from 25 respondents, with Policies CT1 and CT3 attracting the greatest number of comments.

3.98 **Policy CT1: Protecting Existing Community and Social Facilities** was largely supported, with several additions suggested. These included: Carrington Moss being a community asset, a sequential test being used only as part of the analysis, greater flexibility for the disposal of sites considered redundant or no longer suitable, more specific wording for school sites, and clarification that playing fields and sports facilities are covered by Policy OS2. Greater flexibility was also requested, to consider loss where justified to secure wider benefits, and to ensure enable development doesn't compromise existing use(s). Planning considerations were also raised as an obstacle to and expense to modernising community facilities. Conflicting views were also expressed on the need for a sequential test or a statement setting out evidence as to why a facility is not needed.

3.99 **Policy CT2: Loss of Community Facilities:** received a mixed response. Any loss was considered by some to require community engagement. The NHS requested greater flexibility on their sites which they consider surplus to requirements and / or have been identified as part of estate reorganisation / service transformation programmes. Sport England also raised the loss of school playing fields / sports facilities. Several responses questioned the requirement for evidence of 24-month marketing. Other responses recommended the policy should not apply to the Trafford Centre Rectangle angle, and efforts should be made to adopt unadopted parks and green spaces in high density areas.

3.100 **Policy CT3: New Community and Social Facilities** received a mixed response. Some considered that developers are not in control of take-up of opportunities to open facilities on site. Others considered that the policy needed to factor in a much wider range of impacts (for example traffic, air quality wildlife impacts etc.). Funding support was also considered necessary for isolated rural communities. Accessible healthcare facilities within economic centres was also encouraged.

3.101 **Policy CT4: Fast Food** received a mixed response. In addition to some support, others suggested additional wording. Others argued that the 2-mile radius set out is onerous / covers most of the borough and recommended a smaller area. The Trafford Centre and Trafford Centre Rectangle were also recommended to be omitted from the

requirement. Minor additions / points of clarification were also highlighted for the supporting text to the policy.

3.102 **Policy CT5: Social Value in New Developments** received concerns over how the policy would work and its impacts on costs and viability etc. Unspecified targets were also raised as an issue. Conversely, social values were stated as being wider than just employment opportunities and should be expanded to meet wider needs of local communities.

3.103 **Additional Gaps** identified for the chapter included: policy required on places of worship, more developed monitoring indicators, new development should make a proportionate contribution to funding healthcare needs arising from new development, more community spaces are needed. Consultation with a wider range of community groups was also recommended and linking the policies back to the Plan's objectives.

Chapter 12: Built Environment

3.104 Chapter 12 outlines policies to protect and improve the built environment of the Borough, ensuring that new developments are well-designed and appropriately located. Key areas covered include design, heritage and tall buildings. It also addresses issues such as noise, vibration and land contamination. Overall, Chapter 12 received feedback from 27 respondents, with Policies BE1, BE2 and BE5 attracting the greatest number of comments.

3.105 **Policy BE1: Design** received a range of comments. These included support for the objective of the policy and for certain policy criteria, to a lack of support due to the need for further policy development and / or clarification. Reflecting the wide range of elements the policy is trying to cover; a range of wording additions were recommended. These include but are not limited to additional / stronger wording around: active travel links, building sustainability standards, street design, Sustainable Urban Drainage, Health Impact Assessments, and the NPPF's 'agent of change principle'. Reference was also made to several design guides produced by other organisations, national policy / guidance and the Trafford Design Code.

3.106 **Policy BE2: Tall Buildings** received a mixed response. Some respondents supported the policy, including the identified range of named locations deemed suitable for tall buildings, whilst others felt that the policy requires amending to reflect impacts on heritage assets and their settings, requirements for lift access, and reconsideration of the policy's definition of a tall building. A detailed point was also raised around the potential that tall buildings can have in interfering with air navigation systems.

3.107 **Policy BE3: Elevated Green Spaces** was largely supported. A small number of additional policy criteria were suggested. These included the addition of growing balconies / cloud gardening, ensuring that spaces are accessible to disabled people and reference to integration with surface water management.

3.108 **Policy BE4: Advertisements and Signage** was in the main supported however, a small number of recommendations were made including adding reference to: the setting of heritage assets, signage that can be seen from motorways (M56 and M60) and at roundabouts. Issues surrounding enforcement were also raised, and whether there would be a design guide for shopfronts.

3.109 **Policy BE5: Heritage Assets** was in the main supported. Historic England provided a detailed response, which included the need to include a description and assessment of the historic environment in the borough and the contribution it makes to the area. It was also questioned whether the policy could be combined with policies BE6 and BE7, which in turn could form part of a wider section on the strategy for the historic environment in Trafford. Several wording changes were also set out, including clear reference to Conservation Areas and undesignated archaeological sites. Comments from other respondents covered: conservation should not restrain modern design and development, and that planning considerations are an obstacle and expense to existing community facilities that need redevelopment to remain viable.

3.110 **Policy BE6: Designated Heritage Assets** received a recommendation from Historic England to combine the policy with Policy BE6: Heritage Assets. The need for criteria B and C was questioned (as they reiterate national policy) and criterion D was considered not to be policy. The definition of 'substantial harm or loss' was also raised, along with the view that conservation should not restrain modern design and development. Additional wording was also recommended to provide further detail on the number of designated heritage assets on the Dunham Massey Estate.

3.111 **Policy BE7: Non-designated Heritage Assets** received comments expressing a range of concerns. Historic England suggested combining the policy with BE5: Heritage Assets. Concerns were also raised on the extent and accuracy of the list of non-designated heritage assets, and the threshold for a building deemed to be a non-designated heritage asset should be made clearer. Other responses stated that the policy wording was too imprecise and open to interpretation, and conversely that it largely repeated national planning guidance.

3.112 **Policy BE8: Noise and Vibration** received several comments which recommended that the policy covers additional topics. These included: consideration of light pollution, impact on sites of environmental importance, the Agent of Change Principle, impact on wildlife, impacts on utility assets, and noise and vibration from air and rail

operations. A concern was also raised over whether too much residential development in town centres could restrict night-time economy uses.

3.113 **Policy BE9: Land Contamination and Remediation** was in the main supported. One comment did however consider the policy to be weak and recommended that its wording is strengthened. The same response also questioned how the Council would prevent land contamination.

3.114 **Policy BE10: Digital Connectivity** received several policy wording additions. These included: clarification that proposals could be a heritage asset or affecting it, reference to digital communications from satellites, provision of ducting and draw-wires to enable connections to be made, and a requirement for the reinstatement of surfacing back to its original after underground works. Others commented that requirements should not go beyond the provision of infrastructure, and a request was put forward a South Locality-specific policy which aims to preserve the area's character through restricting overhead poles and lines. Finally, another response supported the policy but recommended using less technical wording.

3.115 **Additional Gaps** identified for the chapter included: more developed monitoring indicators, strengthening the approach set out on heritage including making it more locally specific, expansion to cover the non-built environment, for example scheduled monuments and registered parks and gardens, plus inclusion of a strategy for Trafford's Historic Environment. A further response raised several missing policy areas in respect to the masterplan for Timperley Wedge (including provision of NHS dental and general healthcare, education, safe active travel, and noise mitigation from Manchester Airport, M56 and any future rail route).

Chapter 13: Culture, Tourism and Leisure

3.116 Chapter 13 focuses on policies to support and enhance the cultural, leisure and tourism offerings within the borough. The chapter covers cultural assets and tourism, promoting their growth and sustainability. Overall, Chapter 13 received feedback from 23 respondents, with Policies CL1 attracting the greatest number of comments.

3.117 **Policy CL1: Protecting and Supporting Existing Cultural Leisure and Tourism Assets** was supported in the main and widely acknowledged it would provide extensive opportunities to create a new and vibrant community. A collaborative approach to successfully deliver this was stated in several responses, a number of which also emphasised the need for early and continuous engagement. Concerns were also raised around match day parking, re-opening / relocating of the Manchester United Football Ground railway station. Duplication of infrastructure contributions with Policy

IPN1 was also raised. The inclusion of other assets identified within the policy list were supported, and Altrincham's Garrick Playhouse recommended for inclusion.

3.118 **Policy CL2: New Culture, Leisure and Tourism Developments** was supported in the main. Comments were raised regarding greater prioritisation of public transport and active travel, and potential impacts on the strategic road network. Greater clarity was also requested on the requirements for air quality / pollution, stronger incentives to encourage active frontages onto the canal / waterways and improve accessibility, and the range of leisure uses for the area and those that could be suited to a town centre location. It was also requested that additions are made to include enhancements to local parks, supporting public art and inclusion of Active Design principles.

3.119 **Additional Gaps** identified for the chapter included: hotels and Airbnb's, reducing takeaways and late-night permits, safety aspects of outdoor street events, strengthening links between leisure centres – recognising the role of the Trafford Leisure Strategy, and identification of precise alignments / locations of areas identified for safeguarding (e.g. rail lines).

Chapter 14: Infrastructure and Planning Obligations

3.120 Chapter 14 included policies that will ensure sufficient delivery and monitoring of infrastructure to support the level of growth identified in the Local Plan. Overall, Chapter 14 received feedback from 26 respondents, with Policies IP1 attracting the greatest number of comments.

3.121 Comments on **Policy IP1** raised significant concerns about the lack of evidence and clarity around essential infrastructure provision, especially for school places, healthcare, and sustainable transport. The policy was seen as unsound without clear delivery plans, robust viability assessments, and environmental safeguards. While support exists for active travel and sports facilities, the policy was criticised for vague aims, overreliance on financial contributions, and a lack of proportionality. Respondents stress infrastructure needs should be assessed case-by-case, comply with national regulations, and be coordinated with relevant providers. Fixed charges or levies under Policy IP1 are objected to as unjustified, duplicative, and inconsistent with existing plans. Clearer wording, updated viability evidence, and a more flexible, site-specific approach were requested to make the policy effective and fair.

3.122 Comments on **Policy IP2** generally support monitoring planning obligations but raise concerns over fairness, proportionality, and transparency. It was suggested that the policy explicitly includes heritage assets, especially those at risk, as beneficiaries of planning obligations. While some back a monitoring fee, many find the proposed 5%

charge for major developments excessive and unjustified, potentially exceeding application fees. Alternatives include linking fees to actual Council costs or a percentage of fees or obligation values, such as 1%, and triggering fees only when needed to avoid unfair charges if permission is refused. Requests for clearer wording, itemised costs, evidence for fee levels, and justification for non-refundable fees, were requested. National bodies emphasised involving relevant stakeholders, especially for larger developments impacting strategic networks.

3.123 In response to whether a **fee should be required to monitor** and report on all planning obligations, there was broad agreement on the need to properly monitor these obligations and seek reasonable costs, supported by existing policies and guidelines. However, concerns remain over the Council's ability to administer fees fairly and transparently, citing past issues with local highway maintenance. It was also stated that fees should be justified, proportionate, ideally refundable, and supported by clear evidence. Effective monitoring was also raised, focusing on specific environmental and biodiversity impacts using bespoke indicators, with the Local Nature Recovery Strategy (LNRS) encouraged as a baseline.

3.124 **Additional comments** included support for expanding monitoring indicators as current ones are insufficient. A full Infrastructure Delivery Plan was recommended alongside future development allocations to improve management and monitoring. Financial concerns about the Council's ability to meet infrastructure demands were raised. Environmental priorities include protecting and restoring peatlands due to their climate role, opposing development on restorable peat. The LNRS was highlighted as crucial for guiding biodiversity and climate-adaptive development. Other resources on climate planning and green infrastructure were suggested. Some criticism was directed at speculative policy language around growth assumptions seen as ambition-driven rather than evidence-based. There were also calls to include higher-rise flatted developments in the Community Infrastructure Levy (CIL) for fairness. Concerns persisted over broad infrastructure levies lacking viability evidence, particularly overlapping with existing obligations like the Civic Quarter Area Action Plan. Finally, background documents were criticised for not addressing the previously adopted 'roof tax,' which was controversial due to outdated data.

4. Integrated Assessment (IA)

4.1 Feedback was received on how effectively the IA evaluated the draft Plan's environmental and social impacts, including suggestions to strengthen criteria and methodology. The Integrated Assessment (IA) received comments from 9 respondents.

4.2 The **Integrated Assessment (IA)** was criticised for being overly positive and lacking evidence, especially on air quality and light pollution. IA objectives were considered to need broadening to address such as pollution, health inequalities, sustainable freight, school capacity, building height limits, air and water quality, ecological buffers, and nature-based solutions. The role of mobile services in tackling health inequalities was also recommended.

4.3 The following **IA criteria** were also identified as requiring improvement: access to greenspace, light pollution reduction, tranquillity protection, safeguarding prime farmland, referencing nature recovery and peat carbon storage, and enhancing climate resilience with nature-based solutions.

4.4 The **Health impact objectives** were also considered to be incomplete, lacking focus on hazardous materials, vulnerable groups, and green space loss. The **Equality Impact Assessment** was also identified as missing key pollution-related inequalities.

4.5 The **Climate Change Risk Assessment** was identified as requiring additions to emphasise nature-based solutions, peat preservation, flood risks, sustainable freight emissions, and stronger climate action.

4.6 The **IA scoping report** also received comments to include Climate Change Committee reports and peat projects. Flexibility in healthcare facility management and awareness of catchment areas were also advised.

5. Habitats Regulations Assessment (HRA)

5.1 The HRA received feedback from 5 respondents, which covered the following:

- Policy **EJ3** should be screened in due to HGV traffic potentially impacting European nature sites.
- Policy **TM7** does not adequately plan for sustainable freight, particularly at New Carrington, where traffic is likely to affect these protected sites.
- Local Plan monitoring obligations should be screened to identify any concerns relevant to the HRA.
- The Appropriate Assessment conclusions were supported, provided all mitigation measures are properly secured in policy wording.

6. Call for Sites

6.1 As part of the consultation, a Call for Sites exercise invited submissions of potential sites for inclusion within the Trafford Local Plan. A total of 44 sites were submitted (a full schedule of sites submitted can be found in Appendix J), suggesting the following:

- 29 sites for residential
- 5 sites for office
- 7 sites for industry / warehousing
- 5 sites for retail
- 4 sites for protection
- 4 sites for other uses (e.g. energy storage or generation, and infrastructure
- 1 site for a hotel
- A further 5 sites were submitted without a proposed use suggested.

7. Draft Site Selection Methodology

7.1 Comments were received from 16 respondents on the Call for Sites process. In summary these comments focused on:

- Concern over treating Green Belt sites solely as non-development areas. Green Belt assessments should align with national policies, consider safeguarded land, and account for increased housing requirements after recent reforms.
- An unclear approach to / lack of transparency on Grey Belt sites / assessments.
- Clearer definitions needed for the Green Infrastructure Network.
- Criticism for the criteria used, particularly landowner willingness.
- Unnecessary removal of Green Belt land, and questions about re-designation and how effectively the Local Plan prevent further loss.
- Greater protection for biodiversity and natural assets when excluding sites.
- Prioritisation of sustainable access via public transport and active travel, with clear evidence on deliverability.
- Site exclusions more tailored, considering heritage impacts, drainage, flood risk, groundwater protection, and utility constraints, with specific policies addressing sewer flooding and sustainable drainage.
- Priority given to sites with the least environmental and amenity value that support sustainable transport and minimise emissions, pollution, and hazardous risks.
- Sites important for wildlife or playing fields should generally be excluded unless robust mitigation evidence is provided.
- A cost-benefit approach recommended to weigh development benefits against alternative land uses like recreation or agriculture.

Appendix A – List of consultees notified

- All elected ward members
- Access Trafford
- Accrue (Forum) 1 LLP
- Active Travel England
- Altrincham & Bowdon Civic Society
- Altrincham Neighbourhood Business Plan - Design Panel
- Altrincham Neighbourhood Business Plan Forum
- Amey
- Anchor
- Arqiva
- Arriva Bus
- Ashley Parish Council
- AshtonHale
- Avison Young
- Aylward Town Planning Ltd
- Barratt Developments PLC (Manchester)
- Barratt Homes
- Barratt Homes Manchester
- Barton Willmore
- Barton Willmore LLP
- Barton Willmore Manchester
- Beech Holdings
- Bell Ingram Design Ltd
- BizSpace Ltd
- BNP Pariabas
- Bolton Council
- Bowdon Conservation Group
- Bramhall Town Planning
- Breathe Clean Air Group
- British Geological Survey
- British Horse Society
- British Telecom
- Broadgrove Planning & Development Ltd
- Brookhouse
- Brookhouse Group
- Bury Council
- Cadent Gas (formerly National Grid Gas Distribution)
- Campaign for Real Ale
- Carrington Parish Council
- CBRE
- CBRE Ltd

- Cheshire East Council
- Cheshire West and Chester Council
- Cheshire Wildlife Trust
- Church Commissioners for England
- City of Trees
- Citybranch Ltd
- Civil Aviation Authority
- Colliers International
- Council for the Protection of Rural England
- Cushman & Wakefield
- De Pol Associates
- De Pol Associates (on behald of Northern Trust Co Ltd)
- Deaf Advocacy & Wellbeing Service
- Deloitte
- Department for Education
- Department
- Department for Transport
- DevPlan
- Dobbies Garden Centres
- Dobbinetts Redevelopment Limited
- DPDS Consulting Group
- Dunham Massey Parish Council
- Eccleston Homes
- Eden Planning and Development
- Edgar Wood Society (Middleton)
- Edgeplan Ltd
- EE
- Electricity North West Ltd
- Emery Planning
- Emery Planning Partnership Ltd
- Environment Agency
- Footprint Property Services Limited
- Forward Property Group
- Friends of Altrincham Interchange and others
- Friends of Ashton Park
- Friends of Carrington Moss
- Friends of Cow Field
- Friend's of Davyhulme Park
- Friends of Halecroft Park
- Friend's of Longford Park - member
- Friends of Lostock Park
- Friends of the Earth
- Friends of Turn Moss

- Friends of Victoria Park
- Frost Planning
- Frost Planning Ltd
- Galliford Try Partnership and Trafford Housing Trust
- Gary Halman Land & Planning
- Gerald Eve
- Gerald Eve LLP
- GL Hearn
- GLP
- GM Environment Team
- GM Local Enterprise Partnership
- GMCA
- GMCA Planning and Housing
- GMCC
- Goshawk
- Greater Manchester Ecological Unit
- Greater Manchester Ecology Unit
- Greater Manchester Local Nature Partnership
- Greater Manchester Minerals and Waste Planning Unit
- Greater Manchester Older Peoples Network Housing and Neighbourhoods Working Group
- Hale Civic Society
- Harlex Property
- Health and Safety Executive
- HEREF Trafford Park Property Unit Trust (Harbert)
- HIMOR (Carrington) Ltd
- Historic England
- Hollins Strategic Land
- Home Builders Federation
- Homes England
- Housebuilder Consortium
- HOW Planning LLP
- Iceni Projects
- Indigo Planning
- Indigo Planning Ltd
- intu Properties PLC
- Jigsaw Homes Group
- John Walley Property Consultants
- Jones Homes North West
- Jumani Holdings
- Kingward Investments
- Lambert Smith Hampton
- Lichfields

- Lidl Great Britain
- Little Bollington Parish Meeting
- Little Bollington with Agden Community Council
- Love Old Trafford
- Ludlam Associates
- Lymm Neighbourhood Planning Group
- Lymm Parish Council
- Lyondell Basell - Carrington
- Maddox Planning
- Maloneview (Sale) Limited
- Manchester Airports Group
- Manchester and Salford Ramblers
- Manchester City Council
- Manchester United Football Club
- Marine Management Organisation
- MC Construction
- Merlin Architectural Ltd
- Millington, Rostherne and Tatton Parish Council
- Mining Remediation Authority
- MJF Pension Trustees Ltd
- Montagu Evans LLP
- Moor Nook Park
- Morland Capital Partners
- Mosaic Town Planning
- Mulbury Homes
- My Flixton Neighbourhood Planning Group
- National Gas Transmission
- National Grid
- National Grid (represented by Avison Young)
- National Grid Land and Property
- National Highways
- National Trust
- National Trust, North Region
- Natural England
- Network Rail
- Nexus Planning Ltd
- NHS England North
- NJL Consulting
- North Quays Business Park Executive Pension Plan
- North West Ambulance Service
- NPL Group
- Office of Rail and Road
- Oldham MBC

- P&D Northern Steels Ltd Executive Pension Fund
- Panflora Nurseries
- Parliament
- Partington Parish Council
- Partington Parish Council c/o Library
- Partnership Enabling Group
- Paul Butler Associates
- Peak & Northern Footpaths Society
- Peak and Northern Footpaths Society
- Peel Energy Ltd
- Peel Holdings
- Peel Holdings (Land and Property) Limited
- Peel Investments (North) Limited
- Peel Land & Property
- Peel Land and Property
- Pegasus Group
- Persimmon Homes
- PHD Design
- Pioneer Property Services
- Plainview Planning Ltd
- Planinfo
- Planware Ltd
- Pollution and Housing, Trafford Council
- Positive Partington
- Positive Partington Partnership
- Profectus Town Planning
- Ramblers Association (Manchester & High Peak)
- Rapleys LLP
- Redrow Homes
- Redrow Homes Ltd
- resolve106
- Richborough
- Ridgeway Nurseries
- Ringway Golf Club
- Ringway Parish Council
- Rixton with Glazebrook Parish Council
- Rochdale MBC, Strategic Planning Service
- Rostherne Parish Council
- Royal London Asset Management
- Sale Golf Club
- Salford City Council
- Satplan
- Savills

- Scottish Power (MANWEB) SP Energy Networks
- Senior Community Action
- Sirus Planning
- South Trafford Partnership
- SP Energy Networks
- Spawforths
- Sport England
- St Modwen Strategic Land & Regeneration
- Stantec
- Stantec UK
- Steven Abbot Associates
- Steven Abbott Assoc LLP (on behalf of P Longworth)
- Stockport MBC
- Story Homes Ltd
- Stretford M32
- Strong Communities
- Tameside Strategic Planning
- Taurus Investment Holdings Ltd in partnership with Orbit and Mountpark
- Tetlow King Planning
- Tetra Tech
- The Cedar Rest Home Ltd
- The Derwent Group
- The Emerson Group
- The Land Trust
- The Planning Bureau Limited
- The Showmen's Guild of Great Britain
- The Strategic Land Group Ltd
- The Theatres Trust
- Theatres Trust
- Three
- Trafford Arts Association
- Trafford Clinical Commissioning Group
- Trafford Council
- Trafford Council Commissioning
- Trafford Council Pollution and Housing
- Trafford Council Public Health
- Trafford Disability Advisory Group
- Trafford Green Party
- Trans Pennine Trail Partnership
- Transport for Greater Manchester
- Tree Residents Association
- Turley
- U+I Group Plc

- United Utilities Property Services
- United Utilities Water Limited
- United Utilities Water Ltd
- Urmston Partnership
- VirginLand by Ringley
- Vodafone and O2
- Voluntary & Community Action Trafford
- Walton & Co
- Warburton Parish Council
- Warrington BC
- Wigan Council
- Woodland Trust
- Woodsend Community Association
- Woolston Parish Council
- WSP
- Your Housing Group
- Approximately 156 residents were also contacted via the Local Plan database

Appendix B(1) – Consultee notification letter

TRAFFORD COUNCIL

Strategic Planning
Trafford Council
1st Floor, Trafford Town Hall, Talbot Road
Stretford, Manchester M32 0TH
Email strategic.planning@trafford.gov.uk
Telephone 0161 912 3149
www.trafford.gov.uk

24 April 2025

Dear Consultee,

Trafford Local Plan – Draft Local Plan (Policies) Regulation 18 Consultation and Call for Sites

We are writing to you because you previously responded to a consultation on a Trafford planning policy document and/or have asked to be kept updated on the Trafford Local Plan and other planning policy documents.

We are holding a consultation on the draft policies of the **Trafford Local Plan** from **24 April 2025** until 23:59 on **12 June 2025**. The consultation is an opportunity for the local community and relevant stakeholders to have their say on a plan which will guide development in the borough for the next 15+ years.

This consultation, under Regulation 18 of the plan-making process, relates only to the vision, strategic objectives and thematic policies of the draft plan. Any site allocations and designations will be the subject of a separate future consultation later in 2025.

Consultation on an earlier draft of the Trafford Local Plan previously took place in February 2021, a summary of the comments made to that consultation have been published alongside this consultation and have been considered in preparing this updated iteration.

We are now consulting on a new draft Trafford Local Plan, following the adoption of Places for Everyone (PfE) (a joint plan between nine Greater Manchester districts), which will expand on PfE and provide detailed, Trafford-specific policies covering the whole of the borough.

About the Trafford Local Plan

The Trafford Local Plan, alongside PfE, will be the key land use planning document for Trafford, forming part of the Development Plan. It will guide the day-to-day decisions on planning applications and strategic planning and development in Trafford up to 2042.

Some key strategic decisions have already been made in PfE, such as the allocation of the strategic development sites at New Carrington and Davenport Green (Timperley Wedge). PfE also sets the housing requirement for Trafford and establishes the Green Belt boundary. Considering this, the draft Trafford Local Plan does not propose any changes in these areas.

Please find enclosed a copy of the **Local Plan Summary**, setting out further information about the draft Local Plan and the consultation.

About the Consultation

Draft Trafford Local Plan (Policies), Integrated Assessment and Habitat Regulations Assessment

We are seeking feedback on the draft Vision and Strategic Objectives alongside draft policies covering a wide range of important topics such as climate change, residential and employment development, transport, town centres and retail, green spaces and the natural environment, and water and sustainable drainage.

In addition to the draft policies, we are also seeking views on the findings of the Integrated Assessment (IA), comprising a Sustainability Appraisal, Climate Change Risk Assessment, Equalities Impact Assessment and Health Impact Assessment. Views are also sought on the accompanying Habitat Regulations Assessment (HRA).

Call for Sites

We are also undertaking a Call for Sites exercise, inviting people to put forward any sites to be considered for development, protection or for some other purpose within Trafford.

Further information on the Call for Sites exercise is on the Trafford Council website.

Any site allocations and designations included in the Local Plan will be the subject of a separate future consultation later in 2025.

Site Selection Methodology

To inform this next stage of the draft Trafford Local Plan, we are also seeking views on the proposed **'Site Selection Methodology'** that we will use to allocate sites for development and protective designation etc.

Further information on the Site Selection Methodology is on the Trafford Council website (www.trafford.gov.uk/draftlocalplan).

How to comment on the Local Plan

The draft Trafford Local Plan policies consultation documentation, including the Integrated Assessment, Habitat Regulations Assessment, Call for Sites form and Site Selection Methodology are all available on the Trafford Council website at www.trafford.gov.uk/draftlocalplan.

The consultation documents will also be available to view at deposit locations at Trafford Town Hall, Trafford Council's Sale Waterside offices, and Trafford's libraries.

Comments are invited on the draft Trafford Local Plan from **24 April 2025** until 23:59 on **12 June 2025**.

The most efficient way to respond to the consultation is **online via Citizen Space**. The online consultation platform will guide you through the plan and its accompanying consultation documents and provide an opportunity to comment on each policy/ document. You can access the Citizen Space platform via the Trafford Council website at www.trafford.gov.uk/draftlocalplan.

If you need to respond by email or post, please send completed responses to:

- Email – localplan.consultation@trafford.gov.uk
- Post – Strategic Planning, Trafford Council, Trafford Town Hall, Talbot Road, Stretford, M32 0TH

Please ensure you include the following information if responding by email or post:

- Name and contact details
- Organisation (where relevant)
- What you are commenting on – which chapter, policy or section of the Local Plan or accompanying document, including the policy reference and/or paragraph number.
- Your comments – what you do or do not like about the policy / section of the document, the reasons why and any alternative proposals or evidence you have.

Please note that there is no requirement or expectation for you to comment on all of the policies or documents that are part of the consultation. You only need to comment on the policies of the draft Local Plan and/or other elements of the consultation that you are interested in. Similarly, there is no need to respond 'no comment' to any questions, policies or elements of the consultation that you have no comments on or are not interested in.

Drop-in sessions

A series of consultation drop-in sessions will be held during the consultation period where officers will be available to answer questions. Details of these events are shown below.

Date	Venue	Time
01/05/2025	Stretford Library	3:30 - 7:30pm
06/05/2025	Urmston Library	3:00 - 7:30pm
07/05/2025	St Anne's church, Sale	3:00 - 7:30pm
08/05/2025	Timperley Library	3:00 - 7:30pm
12/05/2025	Old Trafford Library	3:00 - 7:30pm
14/05/2025	Altrincham Library	3:00 - 7:30pm
15/05/2025	Partington Library	3:00 - 7:30pm
19/05/2025	Sale Library	2:30 - 7:00pm

What happens next

Following the conclusion of this draft Trafford Local Plan (policies) consultation, all responses received will be analysed and considered. This will then inform the next version(s) of the Trafford Local Plan. There will be opportunities during future consultation stages to make further representations and shape the development of the plan, as timetabled in the Local Development Scheme, detailed below.

Other documents available

The following documents are available online via the Strategic Planning web pages at www.trafford.gov.uk/strategic-planning under 'Plan Making in Trafford':

- **Local Development Scheme**
  The Councils' timetable to produce the Trafford Local Plan and other emerging Development Plan Documents is set out in the Local Development Scheme, covering the period 2025-2028.
- **Statement of Community Involvement (SCI)**
  The Councils' SCI sets out how we will engage with the community and involve local people in the preparation of the Local Plan and other planning policy documents - as well as how we will consult on planning applications in Trafford.

If you have any questions or you no longer wish to be contacted about Trafford's planning policy documents – including the Local Plan – please email localplan.consultation@trafford.gov.uk or contact us by telephone on 0161 912 3149.

Yours sincerely,

The Strategic Planning Team

Growth, Communities & Housing Service | Trafford Council | Trafford Town Hall | Talbot Road | Stretford | M32 0TH

Appendix B(2) – Trafford Local Plan Summary Document

TRAFFORD COUNCIL

TRAFFORD LOCAL PLAN

Summary Document
April 2025



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About the Trafford Local Plan

The Local Plan is a key part of the Development Plan for the borough and will guide development in Trafford up to 2042, covering housing, the economy, community needs, infrastructure, the environment and a range of other subjects.

It will set out where in the borough different types of development are acceptable and provide policies to enable the Council to determine planning applications on a day-to-day basis.

Why the Local Plan is important

Local Plans are a statutory requirement and are the starting point for guiding decisions about individual development proposals. The Local Plan is key for managing land use and development in Trafford. Without it, planning decisions may be made based on national policies, which might not reflect local needs, desires or constraints.

Preparation of the Trafford Local Plan

The development of the Trafford Local Plan began in 2021 with a public consultation (Regulation 18) on an initial draft. The feedback from that consultation was used to shape the current draft.

Work on the plan was paused to allow for the adoption of the Places for Everyone (PfE) Plan in March 2024. PfE sets the overall strategy for the region, covering jobs, homes, and sustainable growth until 2039. The Trafford Local Plan will provide detailed, local policies that align with PfE.

Some key strategic decisions have already been made via the PfE process, such as the allocation of New Carrington and Timperley Wedge (Davenport Green) for development. PfE also establishes the number of new homes required in Trafford and the Green Belt boundary. In light of this, the Trafford Local Plan does not propose any changes in these areas.

What the Trafford Local Plan covers

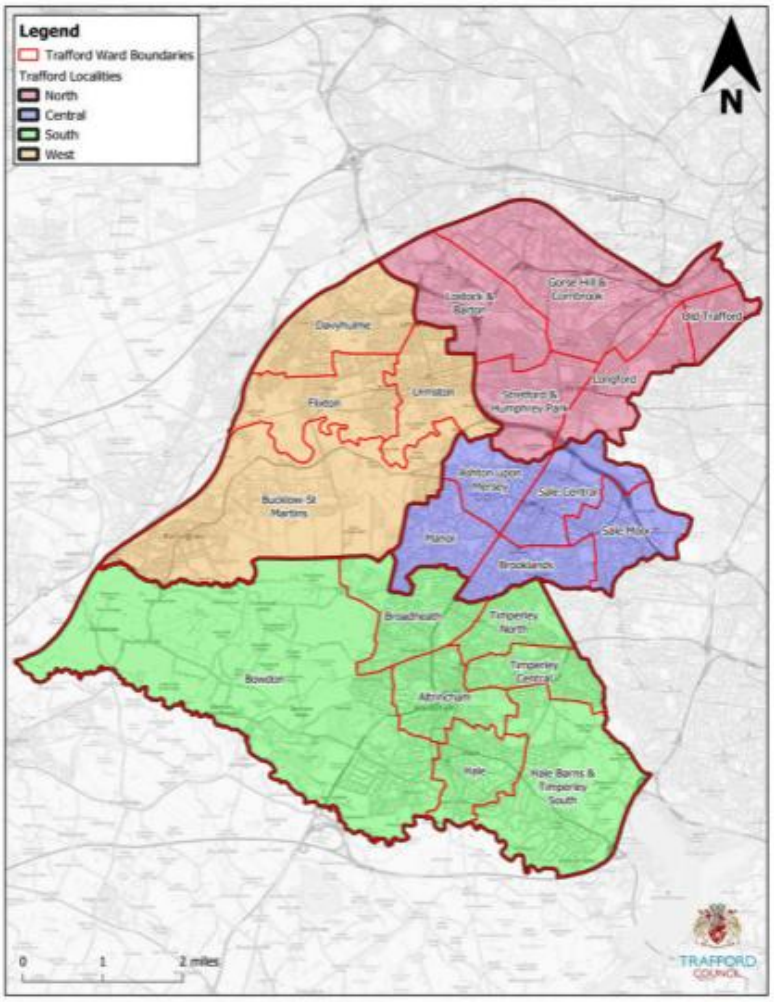
TRAFFORD COUNCIL

The draft Local Plan is divided into 14 chapters, which cover various important topics including sustainability, economic growth, and environmental protection. The chapters are grouped into different themes, with general policies for the whole borough and more specific policies for certain areas. The main topics the Local Plan covers are set out below.

Chapter Number	Chapter Symbol	Chapter Heading
1		Introduction, Vision and Strategic Objectives
2		Strategy
3		Renewable Technologies and Methods
4		Residential Development
5		Economy and Jobs
6		Transport and Movement
7		Town Centres and Retail
8		Green Infrastructure and Natural Environment
9		Open Space, Sport and Recreation
10		Water, Flooding and Drainage
11		Community and Social Infrastructure
12		Built Environment
13		Culture, Tourism and Leisure
14		Infrastructure and Planning Obligations

Trafford's localities

To help make the Local Plan more locally specific, and in turn better reflect the needs and aspirations of Trafford's communities, the plan sets out specific policies for the following four localities: North, South, Central and West. These localities are at the heart of the plan's policies, making sure that each area's needs are properly addressed.



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Vision and strategic objectives

Vision
The draft Local Plan includes a vision for what Trafford should look like in 2042. The vision focuses on creating a sustainable, thriving borough where people, businesses, and communities are successful, with carbon neutrality by 2038. It aims to provide affordable housing and sustainable transport, protect green spaces and also focuses on creating vibrant town centres and supporting job opportunities for local people.

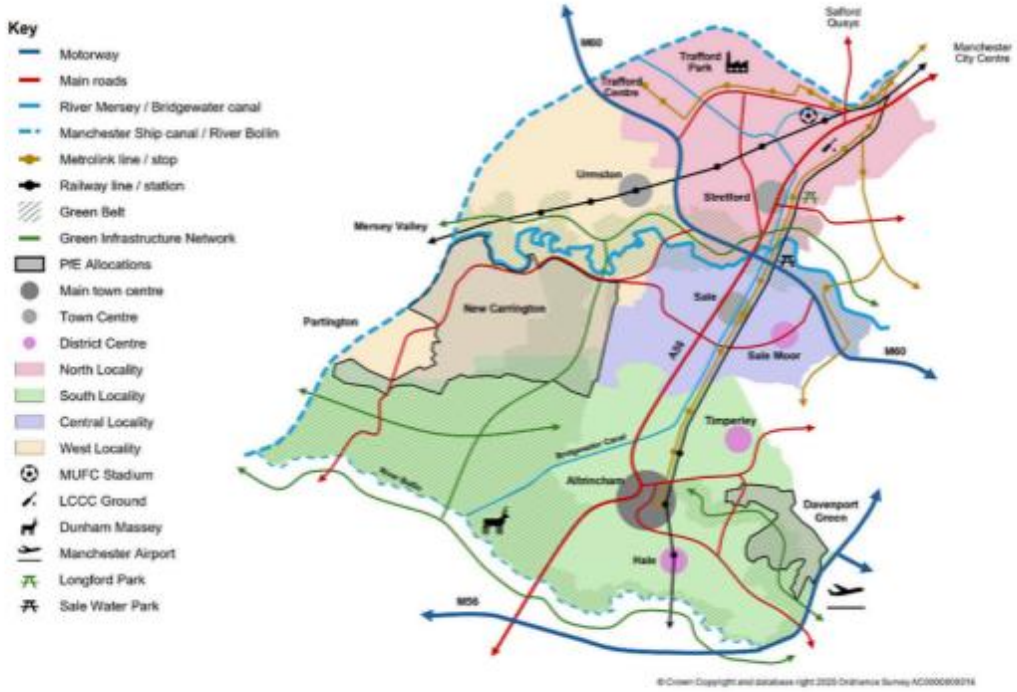


Strategic objectives:
To help deliver the vision the following strategic objectives have been identified which combined cover key social, economic, and environmental policy considerations:

- SO1: Deliver the homes 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 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

Key diagram

The Key diagram below highlights the main features and factors that were considered when developing the policies in the draft Local Plan.



Public consultation on the Local Plan

TRAFFORD COUNCIL

The Local Plan will be published for consultation from **24 April – 12 June 2025**. This is your chance to give feedback on the draft policies and help shape the plan.

This consultation is on the strategy, vision, objectives and policies of the Local Plan. A further consultation will take place on site allocations later in 2025. This will then be followed by a consultation on the complete plan in 2026.

Consultation process and timeline

- **Summer 2025:** We will respond to all the comments we receive during this consultation and amend the draft Local Plan Policies where necessary.
- **September - November 2025**: There will be another public consultation to present the second part of the Local Plan, covering site allocations and designations.
- **February - March 2026:** A formal consultation will take place on a single Local Plan, made up of the policies and allocations sections. This consultation is only concerned with the legality of the plan – not its content.
- **December 2026:** The final draft of the Local Plan, all supporting documents and any comments will be submitted to the Secretary of State for independent examination.
- **Spring 2027:** An Examination in Public will be held. An independent Inspector will be appointed and may recommend further modifications to the Local Plan before it can be adopted.

6

What this consultation covers

Draft Trafford Local Plan (Policies)
We are seeking feedback on the draft Vision and Strategic Objectives alongside draft policies covering a wide range of important topics such as climate change, residential and employment development, transport, town centres and retail, green spaces and the natural environment, and water and sustainable drainage.

Integrated Assessment and Habitat Regulations Assessment
We are also seeking views on the Integrated Assessment (IA), comprising a Sustainability Appraisal, Climate Change Risk Assessment, Equalities Impact Assessment and Health Impact Assessment. Views are also sought on the accompanying Habitats Regulations Assessment (HRA).

Call for Sites
The Council is also undertaking a Call for Sites exercise, inviting people to put forward any sites to be considered for development, protection or for some other purpose within Trafford.

Each submission will be assessed in terms of its 'fit' with the Local Plan and against site selection criteria, which may lead to the site being proposed for allocation or designation. The 'Call for Sites' does not determine how much new development is needed, or whether a site will be allocated for a particular use in the Local Plan.

There is no need to resubmit sites which were provided as part of the 2021 Local Plan consultation. There is also no need to submit sites which already are in the Strategic Housing Land Availability Assessment (SHLAA).

Any site allocations and designations included in the Local Plan will be the subject of a separate consultation later in 2025.

The call for sites form can be accessed on Citizen Space via www.trafford.gov.uk/draftlocalplan, and must be submitted between 24 April 2025 and 23:59 on 12 June 2025. Only in exceptional circumstances will the submission of sites be accepted after this period.

Site Selection Methodology
To inform this next stage of the draft Trafford Local Plan, we are also seeking views on the proposed 'Site Selection Methodology' that we will use to allocate sites for development and protective designation etc. You can find further information on the Site Selection Methodology on the Trafford Council website via www.trafford.gov.uk/draftlocalplan

How to comment

The most efficient way to respond to the consultation is online via Citizen Space. The online consultation platform will guide you through the plan and its accompanying consultation documents, providing an opportunity to comment on each policy/ document if you wish to. You can access the online platform via www.trafford.gov.uk/draftlocalplan

If you need to respond by email or post, please send completed responses to:

- Email: localplan.consultation@trafford.gov.uk
- Post: Strategic Planning, Trafford Council, Trafford Town Hall, Talbot Road, Stretford, M32 0TH

Please ensure you include the following information if responding by email or post so we can consider your comments:

- Name and contact details
- Organisation (where relevant)
- What you are commenting on – which chapter, policy or section of the Local Plan or accompanying document, including the policy reference and/or paragraph number.
- Your comments – what you do or do not like about the policy / section of the document, the reasons why and any alternative proposals or evidence you have.

Please note that there is no requirement or expectation for you to comment on all of the policies or documents that are part of the consultation. You only need to comment on the policies of the draft Local Plan and/or other elements of the consultation that you are interested in. Similarly, there is no need to respond 'no comment' to any questions, policies or elements of the consultation that you have no comments on or are not interested in.

Furthermore, please note all comments will be held by the Council and will be available to view publicly. **Comments cannot be treated as confidential.** Your personal information such as your postal and e-mail address will not be published, but your name and organisation (if relevant) will.

Drop-in sessions

A series of drop-in sessions will be held during the consultation period where officers from the Local Plan team will be available to help answer questions. Details of these events are shown below.

Date	Location	Time
01/05/2025	Stretford Library - Meeting Room	3:30pm – 7:30pm
06/05/2025	Urmston Library – Meeting Room 1	3pm – 7:30pm
07/05/2025	St Anne's Church, Sale	3pm – 7:30pm
08/05/2025	Timperley Library – Meeting Room	3pm – 7:30pm
12/05/2025	Old Trafford Library – Library Meeting Room	3pm – 7:30pm
14/05/2025	Altrincham Library – Meeting Room	3pm – 7:30pm
15/05/2025	Partington Library – Library Activity Room	3pm – 7:30pm
19/05/2025	Sale Library	2:30pm – 7:00pm

Get in touch
If you have any questions on any of the above please email localplan.consultation@trafford.gov.uk or contact us by telephone on 0161 912 3149.

Appendix C – Trafford Council Social Media Posts

Examples of Trafford Council Facebook Posts



Trafford Council
Favourites · 29 April at 14:45 ·

Shape the future of Trafford!

We're asking for your comments and views on the draft Trafford Local Plan, which will guide development in our borough for the next 15 years.

From housing and the local economy to green spaces and infrastructure, this is your chance to influence how Trafford grows and changes.

The consultation runs until 12 June 2025

You can have your say online or join us at a drop-in session to find out more:

Thursday 1 May – Stretford Library– 3:30pm – 7:30pm

Tuesday 6 May – Urmston Library– 3pm – 7.30pm

Wednesday 7 May – St Annes Church, Sale – 3pm – 7:30pm

Thursday 8 May – Timperley Library – 3pm – 7:30pm

Monday 12 May – Old Trafford Library – 3pm – 7:30pm

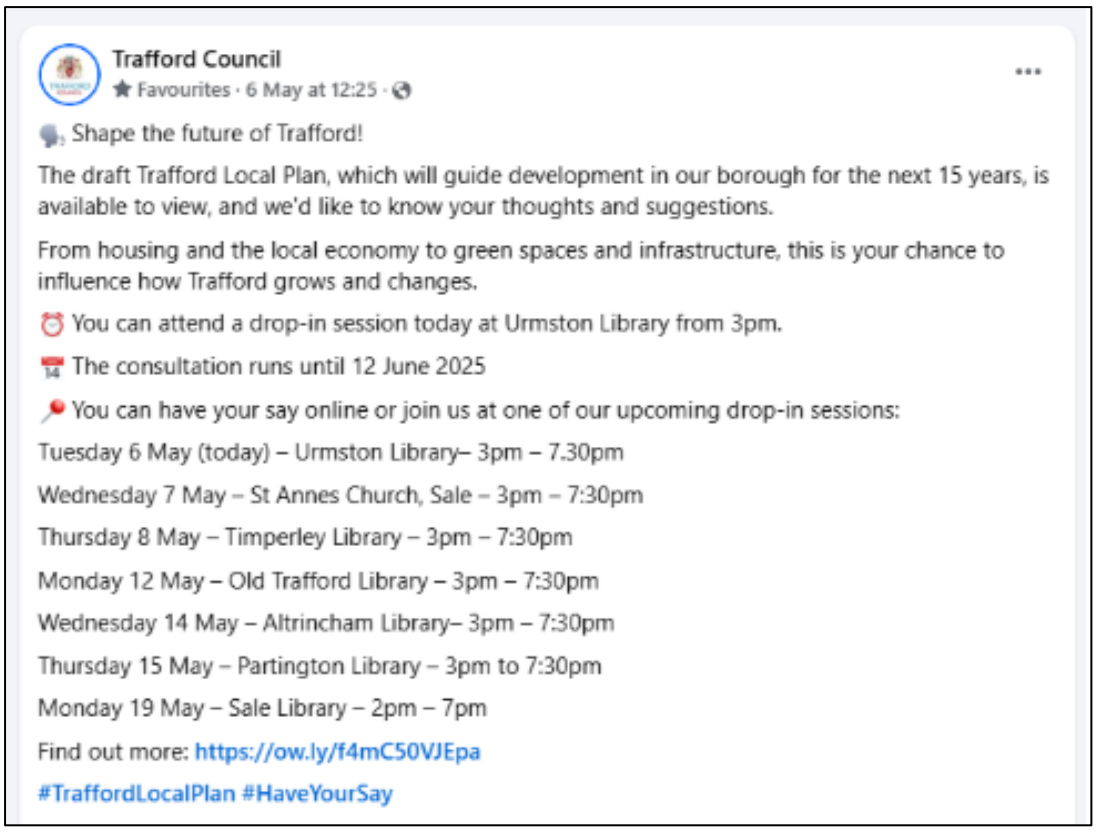
Wednesday 14 May – Altrincham Library– 3pm – 7:30pm

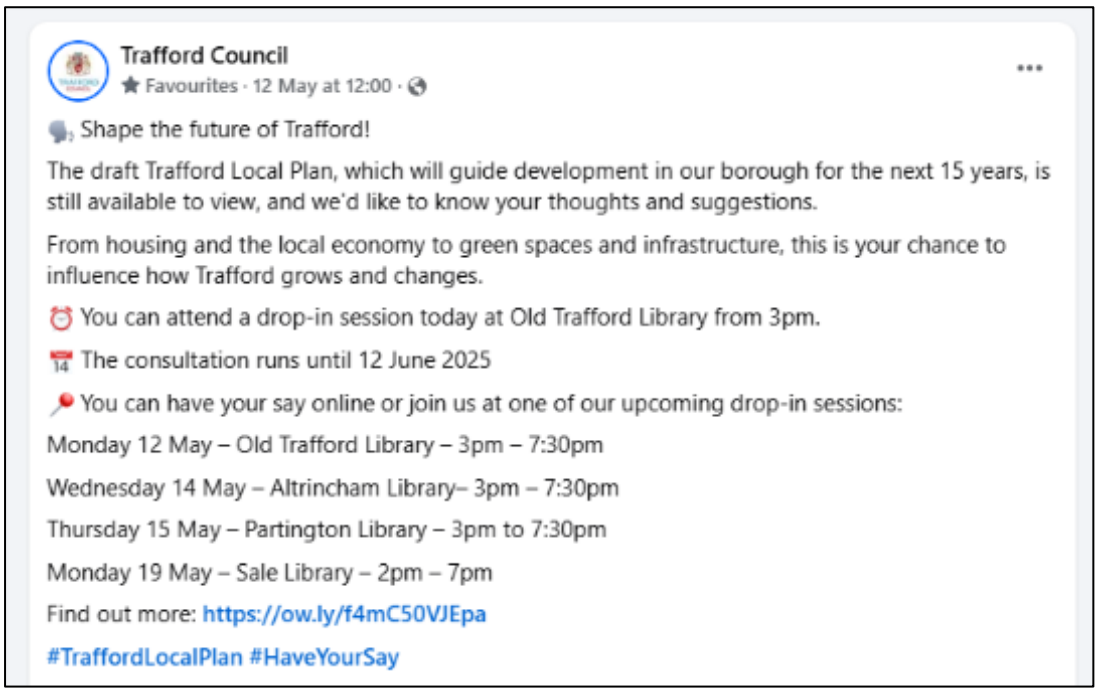
Thursday 15 May – Partington Library – 3pm to 7:30pm

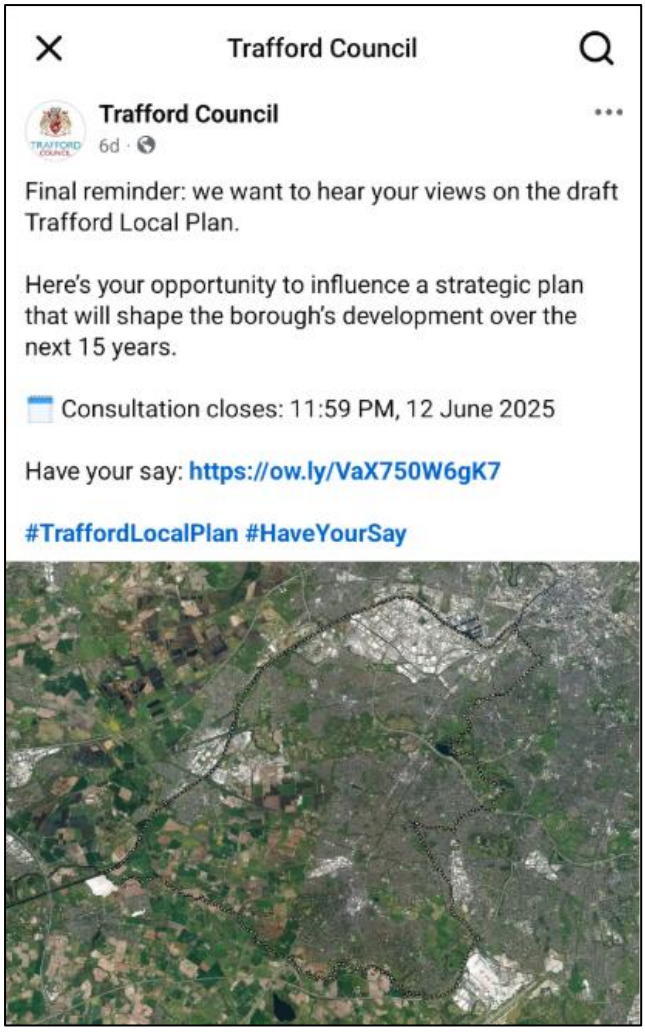
Monday 19 May – Sale Library – 2pm – 7pm

Find out more: https://ow.ly/f4mC50VJEpa

#TraffordLocalPlan #HaveYourSay


Trafford Council
Favourites · 6 May at 12:25 ·
Shape the future of Trafford!
The draft Trafford Local Plan, which will guide development in our borough for the next 15 years, is available to view, and we'd like to know your thoughts and suggestions.
From housing and the local economy to green spaces and infrastructure, this is your chance to influence how Trafford grows and changes.
You can attend a drop-in session today at Urmston Library from 3pm.
The consultation runs until 12 June 2025
You can have your say online or join us at one of our upcoming drop-in sessions:
Tuesday 6 May (today) – Urmston Library– 3pm – 7.30pm
Wednesday 7 May – St Annes Church, Sale – 3pm – 7:30pm
Thursday 8 May – Timperley Library – 3pm – 7:30pm
Monday 12 May – Old Trafford Library – 3pm – 7:30pm
Wednesday 14 May – Altrincham Library– 3pm – 7:30pm
Thursday 15 May – Partington Library – 3pm to 7:30pm
Monday 19 May – Sale Library – 2pm – 7pm
Find out more: https://ow.ly/f4mC50VJEpa
#TraffordLocalPlan #HaveYourSay


Trafford Council
Favourites · 12 May at 12:00 ·
Shape the future of Trafford!
The draft Trafford Local Plan, which will guide development in our borough for the next 15 years, is still available to view, and we'd like to know your thoughts and suggestions.
From housing and the local economy to green spaces and infrastructure, this is your chance to influence how Trafford grows and changes.
You can attend a drop-in session today at Old Trafford Library from 3pm.
The consultation runs until 12 June 2025
You can have your say online or join us at one of our upcoming drop-in sessions:
Monday 12 May – Old Trafford Library – 3pm – 7:30pm
Wednesday 14 May – Altrincham Library– 3pm – 7:30pm
Thursday 15 May – Partington Library – 3pm to 7:30pm
Monday 19 May – Sale Library – 2pm – 7pm
Find out more: https://ow.ly/f4mC50VJEpa
#TraffordLocalPlan #HaveYourSay

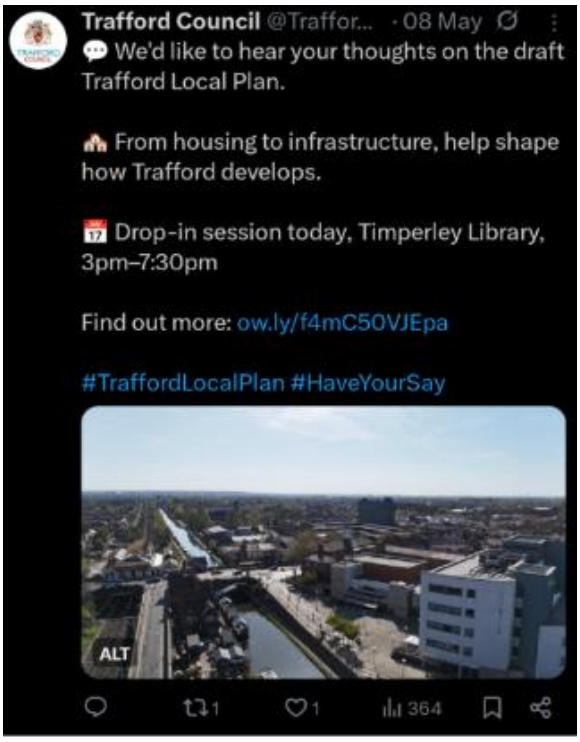

Trafford Council
Trafford Council
6d
Final reminder: we want to hear your views on the draft Trafford Local Plan.
Here's your opportunity to influence a strategic plan that will shape the borough's development over the next 15 years.
Consultation closes: 11:59 PM, 12 June 2025
Have your say: https://ow.ly/VaX750W6gK7
#TraffordLocalPlan #HaveYourSay

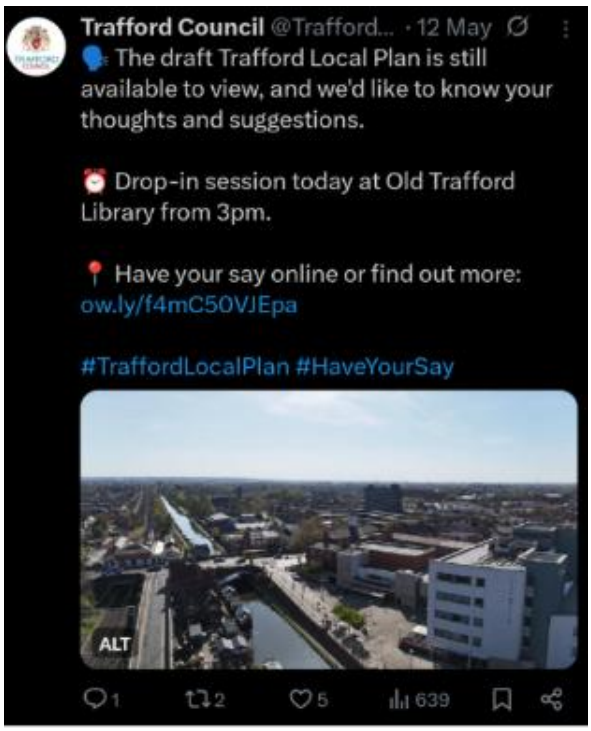
Examples of Trafford Council X Posts

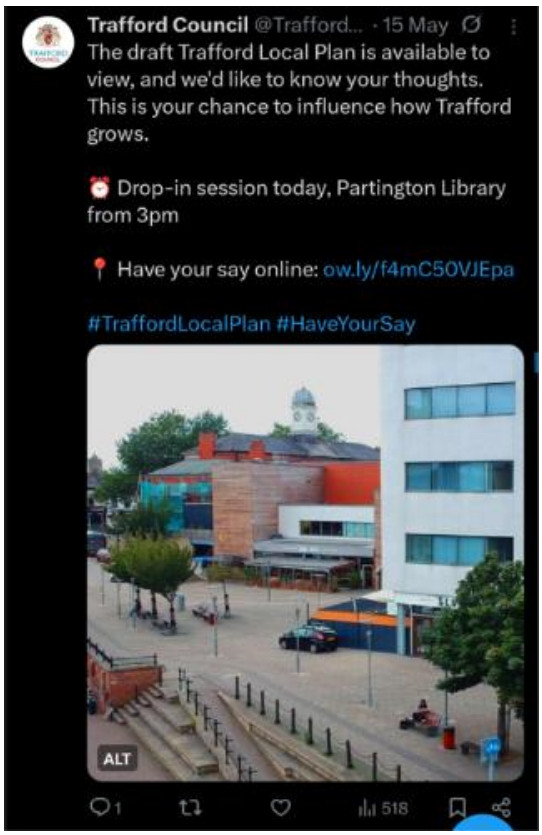









Trafford Council @Trafford... · 12 May
🗣️ The draft Trafford Local Plan is still available to view, and we'd like to know your thoughts and suggestions.
⏰ Drop-in session today at Old Trafford Library from 3pm.
📍 Have your say online or find out more: ow.ly/f4mC50VJEpa
#TraffordLocalPlan #HaveYourSay
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Trafford Council @Trafford... · 15 May
The draft Trafford Local Plan is available to view, and we'd like to know your thoughts. This is your chance to influence how Trafford grows.
⏰ Drop-in session today, Partington Library from 3pm
📍 Have your say online: ow.ly/f4mC50VJEpa
#TraffordLocalPlan #HaveYourSay
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Trafford Libraries Facebook Posts





Trafford Libraries
19 May ·

🗣️ Shape the future of Trafford!
The draft Trafford Local Plan, which will guide development in our borough for the next 15 years, is available to view, and we'd like to know your thoughts and suggestions.
From housing and the local economy to green spaces and infrastructure, this is your chance to influence how Trafford grows and changes.
⏰ You can attend a drop-in session today at Sale Library from 2pm.
📅 The consultation runs until 12 June 2025
📍 You can have your say online or join us at one of our upcoming drop-in sessions:

Monday 19 May – Sale Library – 2pm – 7pm
Find out more: **https://ow.ly/f4mC50VJEpa**
#TraffordLocalPlan #HaveYourSay

Appendix D – Trafford Council Press Release Text

Trafford people urged to give their views on the future of development

Residents of Trafford are invited to share their views on how planning and development should be managed in the borough over the next 15 years. A public consultation is being held on the Trafford Local Plan, which covers a wide range of policy areas including housing, the economy, infrastructure and the environment.

The Local Plan will align with the recently adopted, Places for Everyone Plan and will provide detailed local policies.

Comments are invited on the draft Local Plan, which is newly approved by Trafford Council's Executive, for a period of six weeks from **24 April 2025** until **12 June 2025**, 23:59.

The consultation documents, including the Draft Local Plan, will be available to view on the Council's website (www.trafford.gov.uk/strategic-planning under 'Plan Making in Trafford') and residents are encouraged to complete the online survey via the Council's Citizen Space platform (https://trafford.citizenspace.com/).

The consultation documents will also be available to view at deposit locations at Trafford Town Hall, Trafford Council's Sale Waterside offices, and Borough libraries.

Drop-in sessions

A series of consultation drop-in sessions will be held during the consultation period where officers will be available to answer questions and help you respond to the consultation. Details of these events are shown below.

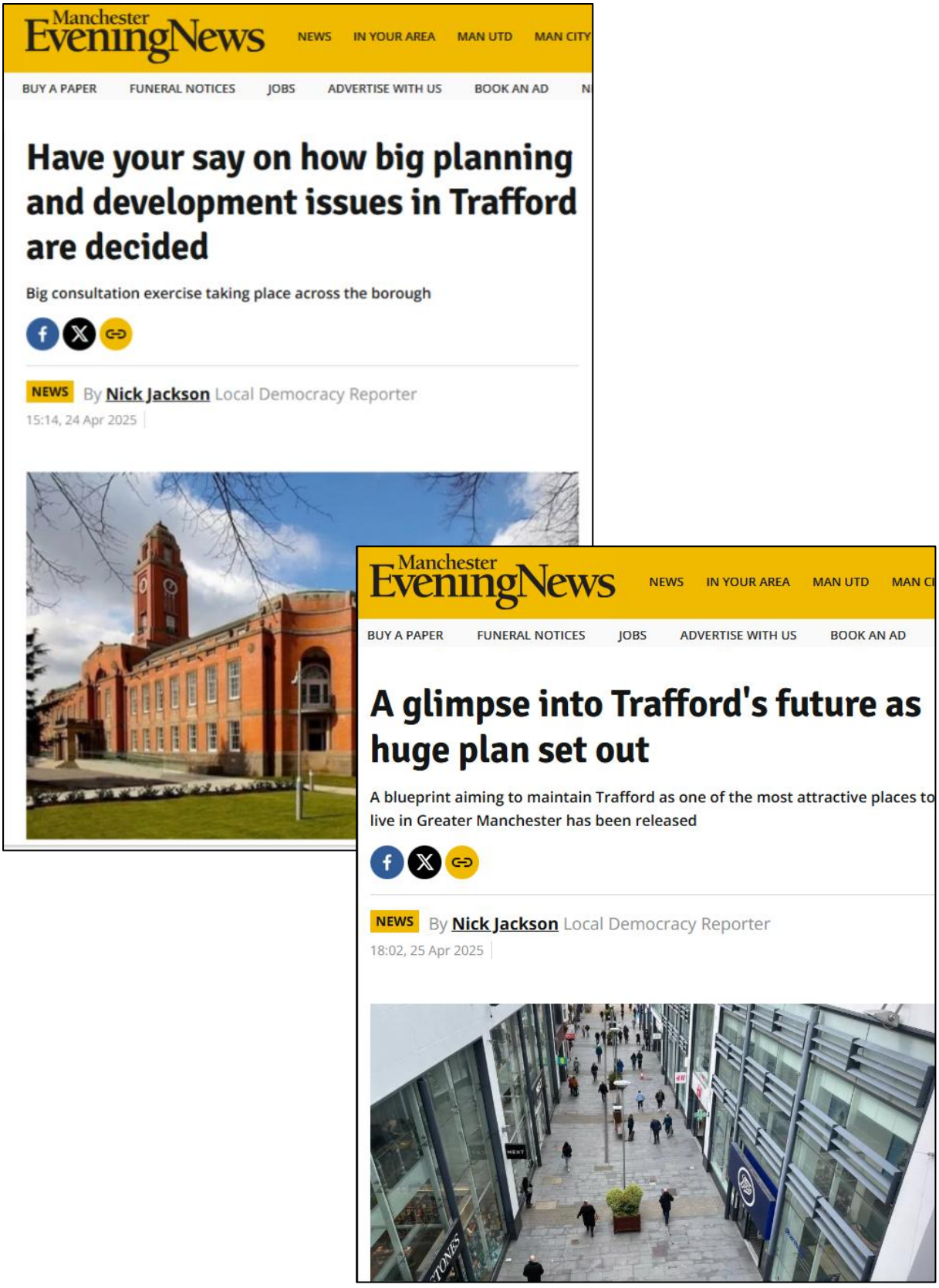
Date	Venue	Time
01/05/2025	Stretford Library	3:30 - 7:30pm
06/05/2025	Urmston Library	3:00 - 7:30pm
07/05/2025	St Annes church, Sale	3:00 - 7:30pm
08/05/2025	Timperley Library	3:00 - 7:30pm
12/05/2025	Old Trafford Library	3:00 - 7:30pm
14/05/2025	Altrincham Library	3:00 - 7:30pm
15/05/2025	Partington Library	3:00 - 7:30pm
19/05/2025	Sale Library	2:30 - 7:00pm

Cllr Liz Patel, Trafford Council's Executive Member for Economy and Regeneration, called on as many people as possible to have their say on the details of the policies.
She said: "Planning applications with the potential to change the landscape of Trafford are often contentious and met with mixed views. By getting involved in shaping the

Council’s overall approach to planning and development, people can influence the changes and opportunities ahead, for many years to come”.
“The more people who take part, the better we can reflect the needs and wants of everyone who lives, works and visits here.”
Alongside this consultation, the Council is conducting a 'Call for Sites' exercise, offering individuals the chance to propose sites for potential development, protection, or other uses within Trafford.

This consultation is focused solely on the policies of the draft Trafford Local Plan. A separate consultation regarding site allocations and designations will take place later in 2025.

Appendix E – Examples of Media Coverage



Manchester Evening News

NEWS IN YOUR AREA MAN UTD MAN CITY

BUY A PAPER FUNERAL NOTICES JOBS ADVERTISE WITH US BOOK AN AD N

Have your say on how big planning and development issues in Trafford are decided

Big consultation exercise taking place across the borough

NEWS By Nick Jackson Local Democracy Reporter

15:14, 24 Apr 2025

Manchester Evening News

NEWS IN YOUR AREA MAN UTD MAN CI

BUY A PAPER FUNERAL NOTICES JOBS ADVERTISE WITH US BOOK AN AD

A glimpse into Trafford's future as huge plan set out

A blueprint aiming to maintain Trafford as one of the most attractive places to live in Greater Manchester has been released

NEWS By Nick Jackson Local Democracy Reporter

18:02, 25 Apr 2025

BusinessLive AROUND THE UK SECTORS CLIMATE OPINION PARTNER STORIES

SEND ME DAILY EMAILS ADVERTISE WITH US MARKETING SOLUTIONS FINANCE JOBS LEGAL JOBS BUSINESS SUPPORT JOBS CONTACT US ABOUT US NEWSLE

Economic Development North West

Blueprint for Greater Manchester borough includes thousands of new homes and 'strong and resilient communities'

The 340-page plan stipulates that a minimum of 22,443 homes must be delivered in Trafford by March 31, 2042

ECONOMIC DEVELOPMENT By Nick Jackson, Local Democracy Reporter

13:09, 28 APR 2025

Bookmark



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Trafford: Thousands of homes part of blueprint until 2042

1ST MAY PLANNING AND DEVELOPMENT TRAFFORD



Search Results

Manchester Evening News

Borough's bold vision for future

Trafford unveils plan to build thousands of new homes and maintain its status as one of region's best places to live

Real Estate • Business

4 May 2025 By NICK JACKSON Local Democracy Reporting Service



THOUSANDS of new homes, opportunities for jobs and a commitment to make Trafford 'accessible and equal for all' are part of a blueprint for the borough until 2042.

An aspiration to get commuters, shoppers and visitors to the area out of their cars and onto more eco-friendly modes of transport also features strongly.

Town hall bosses have produced the first elements of Trafford's 'Draft Local Plan,' which will guide policy for planning development in order to maintain the area as one of the most

Appendix F – Consultation Poster / Leaflet

Trafford Local Plan Consultation

TRAFFORD COUNCIL

Trafford Council is consulting on a new Local Plan, alongside a range of supporting documents from **24 April 2025** until 23:59 on **12 June 2025**. The Local Plan is a key planning document which will guide how the Borough will grow over the next 15+ years and inform day to day planning decisions.

Responding online

The most efficient way to respond to the consultation is online via **www.trafford.gov.uk/draftlocalplan**

The online consultation platform will guide you through the plan and provide an opportunity to comment on each policy. Please note that it is not necessary to respond to all the consultation questions.

Scan to view and comment on the Local Plan

Other ways to respond

If you need to respond by email or post, please send completed responses to:

- **Email** – localplan.consultation@trafford.gov.uk
- **Post** – Strategic Planning, Trafford Council, Trafford Town Hall, Talbot Road, Stretford, M32 0TH

Please ensure you include the following information:

- Name and contact details
- Organisation (where relevant)
- What you are commenting on - i.e. chapter, policy, or section of the Local Plan or accompanying document, including the policy reference and/or paragraph number
- Your comments

Please note that comments will be available to view publicly - see the web link above for more information on Data Protection.

The documents are also available to view at Libraries across the borough



Contact us

If you have any questions about the consultation, please get in touch at localplan.consultation@trafford.gov.uk or contact us by telephone on 0161 912 3149.

Appendix G – Consultation Display Boards

TRAFFORD LOCAL PLAN

TRAFFORD COUNCIL

Welcome to this drop-in event on the draft Trafford Local Plan. We want to hear your views on draft policies which will guide future planning and development in the Borough.

What is the Local Plan?

The Local Plan will guide development in Trafford up to 2042, covering housing, the economy, community needs, infrastructure, the environment and a range of other subjects. The Plan will be used to make day-to-day decisions on planning applications in Trafford and ensure development meets local needs.

Consultation scope

This consultation is on the strategy, vision, objectives and policies of the Local Plan. A further consultation will take place on **site allocations** later in 2025. This will then be followed by a consultation on the **complete plan** in 2026.

Consultation Documents

The following documents have been published for consultation:

- Trafford Local Plan Regulation 18 Consultation Draft- Policies (April 2025)
- Policies Map
- Integrated Assessment (IA) Report and Policies Assessment (including Sustainability Appraisal, Equalities Impact Assessment and Health Impact Assessment)
- Integrated Assessment (IA) Scoping Report update
- Climate Change Risk Assessment (CCRA)
- Habitats Regulations Assessment (HRA)
- Site Selection Methodology

We are also undertaking a **Call for Sites** exercise.

How does this Plan relate to PfE?

The Places for Everyone (PfE) plan, a joint plan between nine Greater Manchester districts, sets the overall strategy for the region, covering jobs, homes, and sustainable growth until 2039.

The Trafford Local Plan will provide detailed, local policies that align with PfE, and alongside it, will form part of the adopted Trafford Development Plan.

Some key strategic decisions have already been made in PfE, such as the allocation of the strategic development sites at **New Carrington** and **Davenport Green** (Timperley Wedge). PfE also sets the housing requirement for Trafford and establishes the **Green Belt** boundary. Considering this, the draft Trafford Local Plan does not propose any changes in these areas.

Climate Change at its heart

Climate change is central to the draft Local Plan, aligning with the Council's Climate Emergency Declaration and Greater Manchester's pathway to achieving zero carbon by 2038. Aside from specific policies on mitigation and adaptation, Climate Change runs through many other policies in the Local Plan.

VISION AND OBJECTIVES

TRAFFORD COUNCIL

We want to hear your feedback on our proposed vision for Trafford and the Strategic Objectives which will run throughout the Plan.

Proposed Vision

Address the climate crisis locally with ambitious targets
- Carbon neutrality by 2038
- Resilient and well-adapted sustainable communities

Biodiversity and Natural Assets
- Enhance biodiversity and protect natural assets
- Ensure that green and blue spaces offer social and active opportunities for all

Sustainable Transport
- A sustainable transport network, with car-free travel being the priority for how people get around

Housing
- Meet housing requirements and address acute affordable housing needs
- Provide homes that people want and need

Town Centres and Communities
- Support successful and distinct centres which communities take pride in

Skilled Workforce and Economy
- Attract investment and retain international businesses
- Develop a skilled local workforce to support the local economy

Physical and Mental Health
- Ensure places promote people's wellbeing by reducing physical and mental health inequalities

Heritage and Culture
- Recognise the value of Trafford's historic and built environment, maximising existing assets
- Maintain international sporting and cultural attractions as successful visitor destinations

Education and Sport
- Deliver successful indoor and outdoor education, recreation and leisure facilities, ensuring young people can grow and prosper

Proposed Strategic Objectives

- **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 and designated centres
- **SO7:** Protect and improve the natural environment and connect green assets
- **SO8:** Sustainable movement
- **SO9:** Support cultural and leisure assets
- **S010:** Design, heritage and placemaking

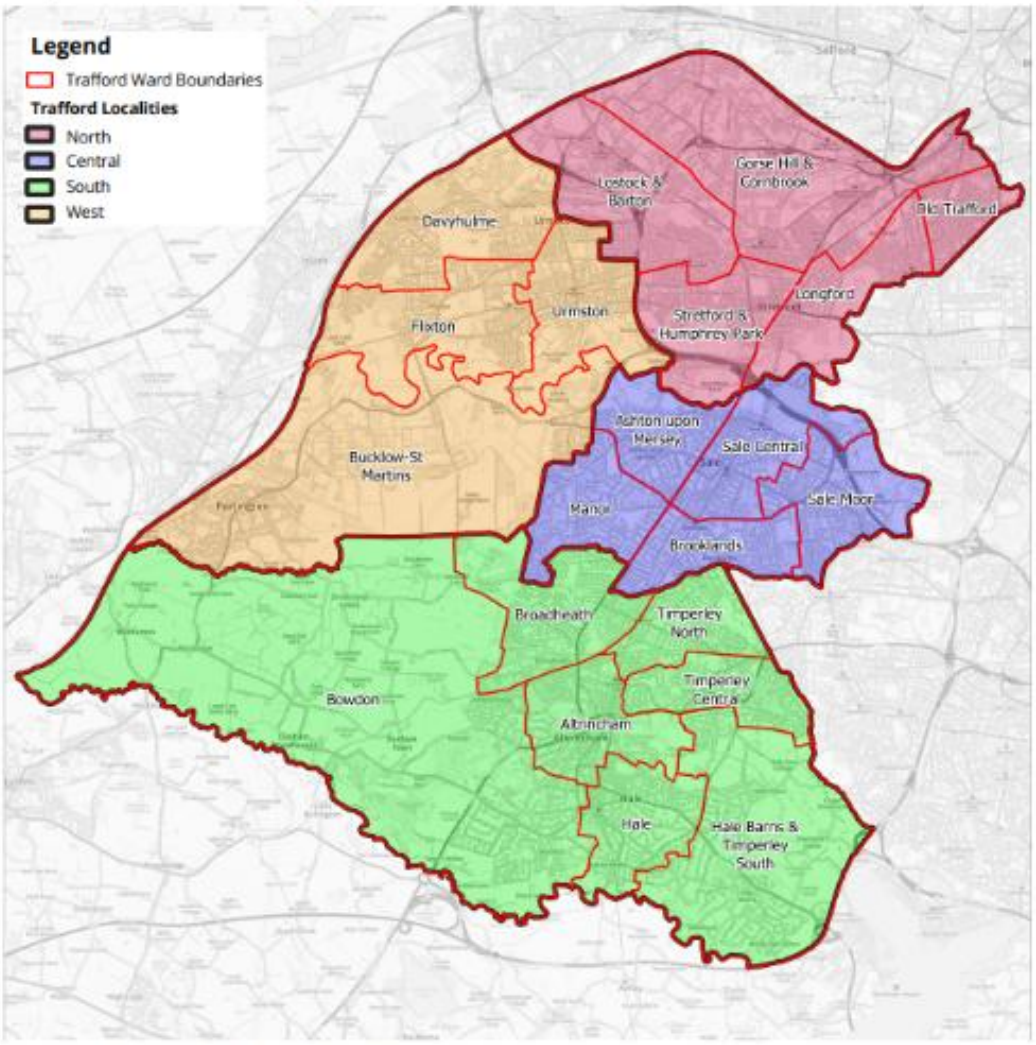
Do you agree with the proposed Strategic Objectives?

TRAFFORD LOCALITIES

TRAFFORD COUNCIL

The draft Local Plan takes a locality-based approach, where possible linking locally-specific policy to four separate Trafford Localities - North, South, Central and West.

Map of Trafford showing the four localities



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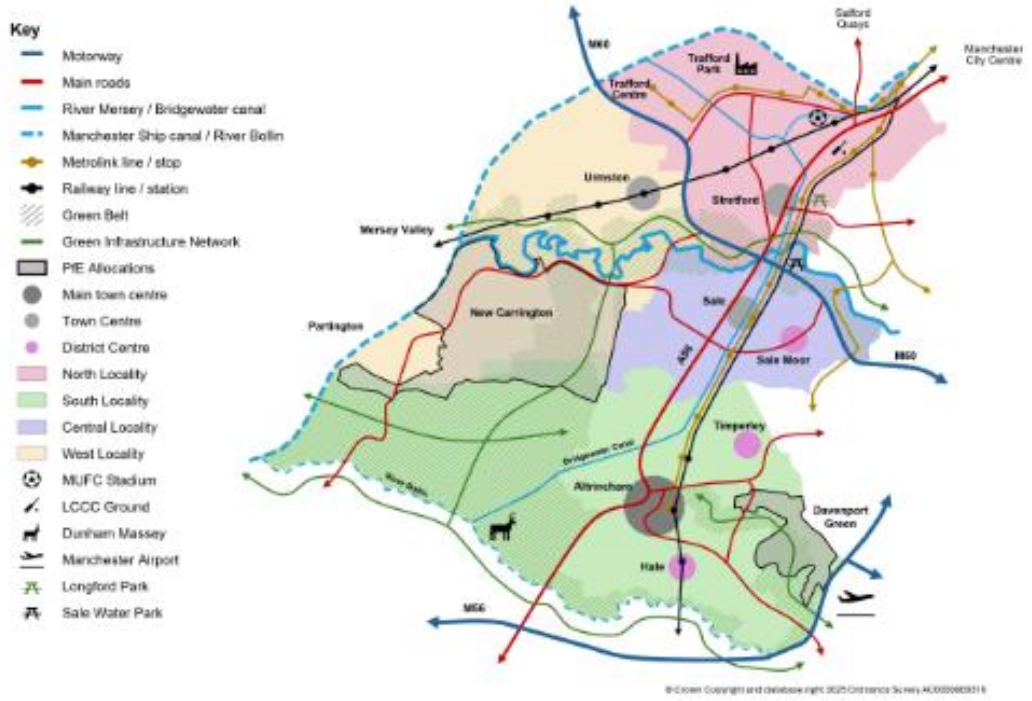
SETTING THE SCENE

TRAFFORD COUNCIL

Trafford benefits from thriving, distinct town centres and important hubs for industry and business, with major and long-established industrial estates such as Trafford Park.

The borough is also home to a high-quality natural environment including leafy suburbs and large areas of countryside. The draft Local Plan will respond to the distinct characteristics of each Locality in Trafford, capitalising on what makes them unique.

Key Diagram



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Scan to view and comment on the Local Plan

CHAPTERS AND POLICIES

TRAFFORD COUNCIL

The draft Trafford Local Plan is structured into themed policy chapters within which are a series of policies. Each chapter has a symbol to aid navigation of the document

Introduction, Vision and Strategic Objectives	Introduces the Local Plan and its Locality-based approach.	• Trafford Local Plan • The Places for Everyone Plan • Setting the Scene • Vision for Trafford • Strategic Objectives • Trafford's Localities
The Strategy	Sets out the overarching planning strategy for Trafford, establishing sustainable development principles in line with national policy. It emphasises climate change as a core issue across all policies, with specific focus on reducing carbon emissions and promoting green infrastructure.	• Policy ST1: Core Growth Area (Trafford) • Policy ST2: Inner Areas (Trafford) • Policy ST3: Southern Areas (Trafford) • Policy ST4: Sustainable Development • Policy ST5: Climate Change
Renewable Technologies and Methods	Covers the essential role of renewable technologies and methods in shaping a sustainable, energy-efficient future for Trafford.	• Policy RT1: Carbon and Energy • Policy RT2: Decentralised Energy Generation • Policy RT3: Overheating and the Urban Heat Island • Policy RT4: Sustainable Retrofitting • Policy RT5: Circular Economy
Residential Development	Outlines the overarching housing requirement and the policies that will guide housing delivery across Trafford. Covering affordable housing, the size type and tenure of new homes, adaptable and accessible housing, and other accommodation types.	• Policy R1: Housing Delivery • Policy R2: Protecting Existing Homes • Policy R3: Affordable and Social Housing • Policy R4: Size and Type of New Homes • Policy R5: Housing Density • Policy R6: Older Persons Accommodation • Policy R7: Adaptable and Accessible Housing • Policy R8: Homes for Children and Care Experienced Young People • Policy R9: Other Types of Homes • Policy R10: Gypsies, Travellers and Travelling Showpeople Accommodation • Policy R11: Self-Build and Custom Housing

Let us know what you think about our draft policies: is there anything further we should include?

Scan to view and comment on the Local Plan

CHAPTERS AND POLICIES

TRAFFORD COUNCIL

Economy and Jobs	Sets out the borough's employment land requirements, including for industry, warehousing and offices. It highlights key employment areas, such as Trafford Park, and supports the development of green and low-carbon industries.	• Policy EJ1: Employment Land Requirements • Policy EJ2: Trafford Park • Policy EJ3: Industry and Warehousing • Policy EJ4: Offices • Policy EJ5: Safeguarding Trafford's Employment Land • Policy EJ6: Data and Energy Storage • Policy EJ7: Rural Economy
Transport and Movement	Promotes sustainable travel within Trafford, including walking, cycling, and public transport. It focuses on enhancing connections across the borough, with a special emphasis on improving the A56 and other transport hubs.	• Policy TM1: Walking, Wheeling and Cycling • Policy TM2: Public Transport • Policy TM3: Car Clubs • Policy TM4: Mobility Hubs • Policy TM5: Local Highway Network • Policy TM6: The A56 • Policy TM7: Freight • Policy TM8: Manchester Ship Canal • Policy TM9: Potential Future Rail Route • Policy TM10: Parking Standards • Policy TM11: Lorry Management • Policy TM12: Park and Ride • Policy TM13: Crowd Movement and Routes
Town Centres and Retail	Defines the hierarchy and function of Trafford's town centres, focusing on Altrincham, Sale, Stretford, and Urmston, as well as district centres. It includes policies on retail and leisure developments outside of these centres.	• Policy TC1: Hierarchy of Centres • Policy TC2: Role and Function of Centres • Policy TC3: Out of Centre Retail and Leisure
Green Infrastructure and Natural Environment	Outlines policies to protect and enhance Trafford's natural environment, including designated sites, landscape types and biodiversity areas. It emphasises habitat connectivity, nature recovery and the integration of biodiversity in new developments. The Mersey Valley is also covered, highlighting flood risk management, active travel and biodiversity.	• Policy GI1: Landscape Character Areas • Policy GI2: Green Infrastructure Network • Policy GI3: Great Manchester Wetlands Nature Improvement Area (NIA) • Policy GI4: Mersey Valley • Policy GI5: Green Infrastructure Opportunity Areas • Policy GI6: Green Infrastructure in New Developments • Policy GI7: Trees, Woodland and Hedgerows • Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets • Policy GI9: Biodiversity Opportunity Areas • Policy GI10: Building Biodiversity into New Developments
Open Space, Sport and Recreation	Focuses on policies to protect and enhance open spaces and sport and recreation facilities within Trafford. It includes policies on maintaining a high-quality, multi-functional network of open spaces, as well as protecting existing sports facilities and providing new ones where needed. Policies also cover allotments, community gardens, and cemeteries.	• Policy OS1: Open Space • Policy OS2: Outdoor Sports and Recreation Facilities and Provision • Policy OS3: Indoor Sports and Recreation Provision • Policy OS4: Loss of Sport and Recreation Land or Facilities • Policy OS5: Allotments and Growing Space • Policy OS6: Cemeteries and Burial Grounds

CHAPTERS AND POLICIES

TRAFFORD COUNCIL

Water, Flooding and Drainage	Focuses on managing water resources and addressing flooding and drainage issues in new developments. It includes policies on flood risk management, water efficiency, and sustainable drainage systems.	• Policy WA1: Managing Flood Risk • Policy WA2: Sustainable Drainage – Surface and Foul Water • Policy WA3: Flood Storage Areas • Policy WA4: Water Efficiency
Community and Social Infrastructure	Sets out policies to protect and enhance community and social facilities, restricting their loss where necessary. Policies also set out measures to guide development of new community and social facilities to support local communities.	• Policy CT1: Protecting Existing Community and Social Facilities • Policy CT2: Loss of Community Facilities • Policy CT3: New Community and Social Facilities • Policy CT4: Fast Food • Policy CT5: Social Value in New Developments
Built Environment	Outlines policies to protect and improve the built environment of the Borough, ensuring that new developments are well-designed and appropriately located. Key areas covered include design, heritage and tall buildings. It also addresses issues such as noise, vibration and land contamination.	• Policy BE1: Design • Policy BE2: Tall Buildings • Policy BE3: Elevated Green Spaces • Policy BE4: Advertisements and Signage • Policy BE5: Heritage Assets • Policy BE6: Designated Heritage Assets • Policy BE7: Non-designated Heritage Assets • Policy BE8: Noise and Vibration • Policy BE9: Land Contamination and Remediation • Policy BE10: Digital Connectivity
Culture, Tourism and Leisure	Focuses on policies to support and enhance the cultural, leisure and tourism offerings within the borough. The chapter covers cultural assets and tourism, promoting their growth and sustainability.	• Policy CL1: Protecting and Supporting Existing Cultural, Leisure and Tourism Assets • Policy CL2: New Culture, Leisure and Tourism Developments
Infrastructure and Planning Obligations	Policy to ensure sufficient delivery and monitoring of infrastructure to support the level of growth identified in the Local Plan.	• Policy IP1: Infrastructure Delivery and Planning Obligations • Policy IP2: Managing and Monitoring Planning Obligations

Let us know what you think about our draft policies: is there anything further we should include?

Scan to view and comment on the Local Plan

NEXT STEPS

TRAFFORD COUNCIL

We want your views on the draft Trafford Local Plan

Have your say

Comments are invited on the draft Local Plan from **24 April 2025** until 23:59 on **12 June 2025**.

The easiest way to respond to the consultation is online via **Citizen Space**. The consultation documents and the online consultation portal can be found at www.trafford.gov.uk/draftlocalplan

The online consultation platform will guide you through the plan and provide an opportunity to comment on each policy.

Please note that there is no requirement or expectation for you to comment on all of the policies or documents that are part of the consultation. You only need to comment on the policies of the draft Local Plan and/or other elements of the consultation that you are interested in. Similarly, there is no need to respond 'no comment' to any questions, policies or elements of the consultation that you have no comments on or are not interested in.

If you need to respond by email or post, please send completed responses to:

- Email – localplan.consultation@trafford.gov.uk
- Post – Strategic Planning, Trafford Council, Trafford Town Hall, Talbot Road, Stretford, M32 0TH

Scan to view and comment on the Local Plan

Timeline

- **Summer 2025:** We will respond to all the comments we receive during this consultation and amend the draft Local Plan Policies where necessary.
- **September - November 2025:** There will be another public consultation to present the second part of the Local Plan, covering site allocations and designations.
- **February - March 2026:** A formal consultation will take place on a single Local Plan, made up of the policies and allocations sections. This consultation is only concerned with the legality of the plan – not its content.
- **December 2026:** The final draft of the Local Plan, all supporting documents and any comments will be submitted to the Secretary of State for independent examination.
- **Spring 2027:** An Examination in Public will be held. An independent Inspector will be appointed and may recommend further modifications to the Local Plan before it can be adopted.

Appendix H – Consultation Questions

Do you support the draft Policies Map? Are there any changes required which would improve it?
Do you agree with the proposed Vision for the Trafford Local Plan?
Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?
The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any areas related to this chapter which you consider are missing and which should be included in the Local Plan?
Do you support Policy ST1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy ST2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy ST5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?
Do you support Policy RT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant
Do you support Policy RT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant. -
Do you support Policy RT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy RT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Do you support Policy RT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?
Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy R2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Should 10% of all affordable and social housing be delivered as Truly Affordable Net Zero Homes (TANZ)?
Should the Local Plan set an affordable housing requirement, including a tenure mix, for each locality (similar to Core Strategy policy L2) that reflects market conditions?
Should any other policy approaches to affordable and social housing be explored?
Do you support Policy R4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
The intention is to set an appropriate house size and type requirements for new development in each Locality to meet housing needs across the borough. Do you agree with this approach?
Do you think specific size and type requirements should be set for major residential development sites in the borough, like Pomona and Wharfside, to align with a Locality approach?
Do you support Policy R5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy R6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Should the Local Plan set a definition for what constitutes a Care Home, Extra Care and Assisted Living? If so, what should they be defined as?
Do you support Policy R7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Do you support Policy R8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy R9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Should the affordable housing requirement apply to student accommodation to enable a proportion of student accommodation schemes to be affordable to students from low-income backgrounds?
Should nomination agreements be used to ensure that accommodation is reserved for students enrolled at a named institution?
Do you support Policy R10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy R11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?
Do you support Policy EJ1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy EJ2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant. - Please write your response here:
Do you support Policy EJ3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant. -
Do you agree with the proposed boundary shown on the policies map for Trafford Park?
Do you agree with the proposed boundary shown on the policies map for Broadheath Employment Area?
Do you support Policy EJ4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy EJ5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy EJ6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Do you support Policy EJ7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?
Do you support Policy TM1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy TM2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy TM3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy TM4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy TM5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy TM6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy TM7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy TM8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy TM9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy TM10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy TM11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy TM12? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy TM13? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?
Do you support Policy TC1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you agree with all of the proposed boundaries for the Town, Other Designated, Local and Neighbourhood centres as shown on the policies map?
Do you support Policy TC2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy TC3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.:
The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?
Do you support Policy GI1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy GI2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy GI3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy GI4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy GI5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy GI6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy GI7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy GI8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Do you support Policy GI9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy GI10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?
Do you support Policy OS1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy OS2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy OS3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy OS4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy OS5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy OS6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?
Do you support Policy WA1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy WA2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy WA3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy WA4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?
Do you support Policy CT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you think the Council should protect the loss of community facilities and local services through a sequential test (as set out in Policy CT1 above), or by requiring a statement setting out evidence as to why a particular facility is not needed?
Do you support Policy CT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy CT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy CT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy CT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?
Do you support Policy BE1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy BE2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy BE3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy BE4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy BE5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy BE6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Do you support Policy BE7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy BE8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy BE9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant. - Please write your response here:
Do you support Policy BE10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?
Do you support Policy CL1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy CL2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?
Do you support Policy IP1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you support Policy IP2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Do you agree that the Council should require a fee to monitor and report on all planning obligations?
Do you agree or have any observations or suggestions on the proposed planning obligation monitoring fees for either minor and/or major developments?
The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?
Do you have any comments to make on the Sustainability Appraisal and its associated appendices?

Do you have any comments to make on the Health Impact Assessment?
Do you have any comments to make on the Equalities Impact Assessment?
Do you have any comments to make on the Climate Change Risk Assessment that forms part of the IA?
Do you have any comments on the IA Scoping Report Addendum?
Do you have any comments on the Habitats Regulations Assessment (HRA) of Draft Local Plan?
Do you have any comments on the proposed Site Selection Methodology (Figure SS-1)? Are there any stages / questions / considerations which should be added and/or removed? –
Specific criteria will need to be identified to assess a sites performance at each stage of the site selection process. Do you have any comments on what these site criteria should include? What evidence should inform this assessment?

Appendix I – Consultation Respondents

- Adult Social Care and Wellbeing (Trafford Council)
- Altrincham and Bowdon Civic Society
- Altrincham NBP- DG
- Anchor Hanover
- ATP
- B AM
- Benjamin Jesson
- Bernice Garlick
- Bernie Burns
- BlackRock UK Property Fund
- Branley Homes Ltd
- Brookhouse Group - Wellacre Academy
- Brookhouse Group- land North of Dane Road, Sale
- Cheshire East Council
- Cheshire Wildlife Trust
- Church Commissioners for England
- Cllr Emma Hirst
- Cllr Julian Newgrosh
- Cllr Nathan Evans
- Cllr Shaun Ennis
- Cllr Simon Lepori
- Cllr Will Frass
- CPRE
- ESN (Scotland) Limited
- Freightliner
- Frost Planning Ltd
- Gaye Fletcher
- Gladman Retirement Living
- Health and Safety Executive
- Historic England
- Hollins Strategic Land
- Home Builders Federation
- Homes England
- Housing and Neighbourhoods for Greater Manchester Older Peoples Network; GMCA Ageing Planning Panel and Ageing in Place Trafford Steering Group
- Howard Mason
- Ian Stuart
- Indurent Management Ltd
- Jeremy Williams
- Jess Grundy
- Jo O'Donoghue (Trafford Council)
- Jonathan (Sustrans)
- Jonathan Morrison

- Jonathan Symms
- Kate Harper
- Kellogg Company of Great Britain Limited
- Lidl Great Britain Limited
- Lorraine Eagling
- Lymm Parish Council
- Manchester Airport
- Manchester United Football Club Ltd
- Marj Powner
- Mark C
- Mark Priestner
- McCarthy Stone and Churchill Living
- Mike Battman
- National Grid Electricity Transmission (NGET)
- National Highways
- National Trust
- Natural England
- Network Rail
- NHS Property Services
- P&D Northern Steels Executive Pension Fund (P&D)
- Paul Beckmann
- Peel Land and Peel Waters
- Peel NRE Limited
- Progressive Energy Ltd
- Redrow Homes (North West) Limited
- Royal London Asset Management (RLAM)
- Sam Smith
- Samuel Hayes
- Sarah Grant
- Sport England
- Stephanie Jenner
- Swifts Local Network: Swifts & Planning Group
- Tatton Estate
- TfGM
- The Coal Authority
- The Trafford and Stockport College Group
- The Trafford Centre Ltd
- Theatres Trust
- Trafford Green Party
- Trafford Palazzo Ltd
- Trans Pennine Trail and Sustrans
- United Utilities Property Services Limited
- United Utilities Water Limited
- Wain Estates (Carrington) Ltd
- Warrington Borough Council

- Westfields Property Management Ltd

Appendix J – Call for Sites Submissions

No.	Location	Proposed Use
CS-01	335 hectares Carrington Moss	Protected
CS-02	Stretford Meadows	Office / Industry & Warehousing
CS-03	Hare And Hounds Public House, Wood Lane, Timperley	Residential
CS-04	332-340 Chester Road	Residential /Retail / Industry & Warehousing
CS-05	Land adjoining Bankwell Farm, Bankhall Lane, Hale, Altrincham, WA15 0LG	Residential
CS-06	The Trafford Rye Bank Rd Community Garden, Rye Bank Rd, Firswood, Stretford, M16 0HB	Protection
CS-07	Land at Ashley Mill Lane North, Hale,Altrincham	Residential
CS-08	Land at the end of Woodcote Road, West Timperley	Protected
CS-09	Land off Green Lane, Timperley	Residential
CS-10	Former Dobbies Garden Centre, Green Lane, Timperley	Retail
CS-11	Land at Barton Road, Stretford	Retail
CS-12	Trafford Waters, Land Between Manchester Ship Canal And Trafford Boulevard/Old Barton Road, Urmston	Residential / Office / Retail
CS-13	Land within draft Trafford Wharfside Masterplan (March 2024) - Plots 3, 4, 5 as defined.	Residential / Other
CS-14	Land at Pomona Island	Residential / Office / Other
CS-15	Former RAC Offices and Car Park, Thomas Street, Stretford	Residential
CS-16	Land adjacent to Timperley Brook Stamford Brook Road Altrincham	Residential
CS-17	Shawe House Penny Bridge Lane Flixton Manchester Trafford	Residential
CS-18	Shawe Lodge, 1, Barton Road Davyhulme, Urmston, Manchester Trafford	Residential
CS-19	Garth Bollinway Hale	Residential
CS-20	Land to the north and south of Bradley Lane, Stretford	Protection / Industry & Warehousing

CS-21	Site of former Flixton Railway Station, Flixton Road, Flixton	Residential
CS-22	Land off Bailey Walk, Bowdon.	Residential
CS-23	Land to the East of Thorley Lane and the South of Timperley Brook	Residential / Other
CS-24	Paddock Farm, Wellfield Lane, Timperley, Altrincham, Cheshire	Residential
CS-25	Land North of Dane Road, Sale	Residential
CS-26	Land at Hawthorn Lane, Ashton Upon Mersey, Sale	Residential
CS-27	Trafford Palazzo Car Park, Manchester	Residential / Hotel / Multi-storey car park
CS-28	Land adjacent to Parcel SR2A, South of Carrington, Lane, Carrington	Residential
CS-29	Parcel CE3B, Brookheys Road, Carrington	Residential / Office / Industry & Warehousing
CS-30	Paddock Farm, Wellfield Lane, Timperley, Altrincham, Cheshire	Residential
CS-31	Plots 10c and 11 at Trafford Park	Residential
CS-32	Land at the junction of John Gilbert Way and Wharfside Way, Trafford Park	Residential
CS-33	Trafford Centre Car Parks 3 and 7	Office / Industry & Warehousing/ Retail / Other
CS-34	Land to East of A5181 (Kelloggs Plant) Park Rd, Trafford Park, Stretford, Manchester M32 8RA	Industry & Warehousing
CS-35	Land to West of A5181 (Kelloggs Plant) Park Rd, Trafford Park, Stretford, Manchester M32 8RA	Industry & Warehousing
CS-36	Land at Bow Green Farm, Bowdon	Residential
CS-37	Land at Clay Lane, Timperley	Residential
CS-38	Land at Higher House Farm, Dairyhouse Lane, Altrincham	Residential
CS-39	Land at Oakfield Road site (Altair)	No use suggested
CS-40	Moss View Primary School, Partington	No use suggested
CS-41	The Jubilee Centre, St Marys Road, Bowdon	No use suggested
CS-42	Former Trafford High School, Flixton	No use suggested

CS-43	Land at Vale Road, Timperley	No use suggested
CS-44	St Francis Community Hall, Budworth Road	Residential

Appendix K – Redacted Consultation Responses

Response ID ANON-MFZ6-4QU7-M

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-05-08 09:16:23

Personal details

1 Forename

Enter your forename:
Sam

2 Surname

Enter your surname:
Smith

3 Organisation (if applicable)

Enter your organisation:

4 Position/title (if applicable)

Enter your position/title:

5 Address

Enter your address:

[redacted]

6 Postcode

Enter your postcode:
[redacted]

7 Email address

Enter your email address:
[redacted]

8 Contact phone number

Enter your contact phone number:

9 Please select ‘opt in.’ if you wish to recieve future consultations on planning policy.

Opt in

Chapter 4 - Residential Development

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Part of what makes Trafford a nice place to live is it's trees and green spaces.
These should be considered in any new housing development.
New homes should also be designed with carbon footprint in mind, having air or ground source heat pumps and solar panels as standard.

Chapter 7 - Town Centres and Retail

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Every effort should be made to support small and/or local businesses, eg offering subsidised rent for independent cafes, bars and shops, to avoid the monotonous image of international brands, plus charity shops and bookies, that afflicts many towns.

Chapter 8 - Green Infrastructure and Natural Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

The protection of nature and green spaces should be paramount in any plans made.

[redacted]

From: Mark C [redacted]
Sent: 25 April 2025 21:40
To: Local Plan Consultation
Subject: Cycle lanes!!!

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: LP April 2025 comment

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

Aargh! Show me the data from the A56 cycle lane, in place since lockdown, that indicates people widh to use bicycles in Trafford!

No one uses it, nor Talbot Road.

The weather doesn't support it, businesses don't have facilities required, no one cycles to an evening put or to go shopping!

Show me evidence that this is a necessary spend.

Kind regards,

Mark.

Happy to discuss with any decision maker. Happy for them to join me in my miserable commute.

Insanity...

[redacted]

From: Samuel Hayes [redacted]
Sent: 01 May 2025 20:59
To: Local Plan Consultation
Subject: Re: Local plan

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: LP April 2025 comment

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

Dear Caroline,

Thank you for your email. I appreciate the time taken to reply.

I appreciate that technical and layout choices have been made to make the many pdf documents technically accessible by screen reader for example, and I am pleased to hear an accessibility check has been performed on the various documents.

However, my concern was more about accessibility to the general public.

I do appreciate that documents such as local plans are complex. [redacted]g in community engagement I know that well. I think the fundamental concern I have with the materials Trafford Council have prepared is that they are all council led, they all serve your purposes and look familiar to the world of the Council Planner. Communities have to meet you where you are with formal and structured pdfs and long surveys. My neighbours would simply not know where to start with it. And they've lived in Trafford for many years, have local knowledge and have a stake in the place which hasn't been meaningfully sought out.

While it is necessary to present these formal drafts of policy text, policy text and the policy format simply isn't accessible. It isn't in a style or format that resonates with most people. And it's not talking about Trafford in a way we understand it as residents. The need for presenting draft policy text also does not preclude including shorter engagement activities which might enable quick comments, explore themes and share priorities, for example. The citizen space platform you're using has many more options for more creative and engaging ways to contribute which don't seem to have been used. The volume of information on the page and number of clicks from the download documents through to the survey is also quite long. There's nothing prepared specifically for the level of interest and time local people realistically have. And yet it will affect us deeply for the next 10+ years.

I will try to attend an event if I can. And maybe I will persevere with the website. I have just tried filling in the survey but I've already lost sight of the summary and you can't click back so I can't get back to where I need to be. So I suppose my central thought was, where's the inviting, engaging quick way for me to make a contribution? That is what's missing in my view to make it genuinely accessible. I've no doubt the legal requirements of section 18 or 19 have been met, but I hope you can see that's not quite what I meant by accessible.

This is obviously just my unsolicited view and late in the day given you're already out to consultation. I just wish we as a sector were better at making strategic planning accessible, and as a resident I was hopeful for an opportunity to engage in collective discussion about the future of the borough. Engagement should be fun and talking about an exciting future, and I don't get that from this. And I don't see how my views are really contributing to the drafting process. Maybe I missed that more open and creative stage? It certainly didn't pop-up on [redacted] or drop into my inbox.

I do understand these things are all under time and financial pressure. I wish your team the best with the process and hopefully we Trafford residents get the strategy we desperately need.

Best wishes,
Sam

On Thu, 1 May 2025, 14:00 Local Plan Consultation, <localplan.consultation@trafford.gov.uk> wrote:

> Dear Sam,
>
> Thank you for your email.
>
> I am sorry to hear that you are having difficulty in accessing the draft Local Plan consultation documents.
>
> We have striven to make the document accessible from the outset, and have used the techniques and settings set out in government guidance, including having a clear structure with headings, larger font and line spacings, contrasting colours and using icons to aid navigation increasing the readability of the document, as well as helping screen readers. To assist us in achieving this, we made extensive use of the in-built accessibility checker in Microsoft Word and made changes wherever possible - with the final document meeting all criteria.
>
> We have also tried to write in plain English throughout; however, as I am sure you will appreciate, Local Plans have a job to do and therefore will by their very nature include some technical language/ jargon. Where technical language is used - efforts have been made to explain it plainly also. However, if you can point to any areas within the Local Plan where this is not the case, or where it is not clear, please let us know and we will look into it.
>
> To this end, I am satisfied that the draft Local Plan currently out to consultation is an accessible document - albeit I accept that it is lengthy and contains elements of technical language, which is unavoidable.
>
> Recognising this, we have produced a Local Plan Summary, which provides a short 10-page overview of the document and the consultation, alongside a Frequently Asked Questions (FAQ) document to assist people in engaging with the consultation (attached for ease).
>
> We are also holding eight consultation events across the borough over the course of the consultation period which are set out on the council's Local Plan Consultation web page where local people can speak to members of the team and ask questions and engage in-person with the Local Plan.
>
> Finally, there is an online survey for providing feedback on the draft Local Plan on the Citizen Space platform. We recognise this is a long form, so to make it as easy as possible to use, we have split the plan up into chapters providing an extract of each policy along with the questions - explaining that

people only need to respond to the questions or parts of the Local Plan consultation that they are concerned with.

I hope the above information is helpful and allays your concerns about the accessibility of the Local Plan, however, please do not hesitate to get in touch with the team should you have any other questions or concerns.

Kind Regards,

Caroline Wright
Strategic Planning and Growth Manager
Growth, Communities & Housing Service | Trafford Council | Trafford Town Hall | Talbot Road | Stretford | M32 0TH
Tel: 0161 912 3149
[redacted]

Trafford – Where all our residents, businesses and communities prosper

---

From: Samuel Hayes [redacted]
Sent: 28 April 2025 13:40
To: Hirst, Emma [redacted]
Cc: Local Plan Consultation <localplan.consultation@trafford.gov.uk>; [redacted]
Subject: Re: Local plan

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

Thanks Emma.

I think it's really important that local people can feed in. Trafford hasn't had an up to date local plan in more than a decade so it's really new for us to have this moment and if local people miss this opportunity because it was too technical and complex in its explanation then we'll be missing a really crucial opportunity for communities to drive the future of the borough.

But really pleased you've asked the question.

Thanks
Sam

On Mon, 28 Apr 2025, 12:19 Hirst, Emma, [redacted] wrote:

> Hi Sam
>
> I've looked at the consultation and agree it is difficult to understand. I've written to Trafford Council to ask whether a more accessible version of the plan, and survey can be produced for residents, and I will let you know when they reply.

Cllr Emma Hirst

Old Trafford Ward

From: Samuel Hayes [redacted]
Sent: 25 April 2025 23:01
To: Local Plan Consultation <localplan.consultation@trafford.gov.uk>
Cc: Hirst, Emma [redacted]
Subject: Local plan

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

Dear Trafford council,

I'd like to see an accessible version of the local plan to be able to understand how these policies affect me.

Please let me know how I can read a version written in everyday language.

At present I don't believe this consultation is accessible and therefore not legitimate.

Many thanks
Sam Hayes

[redacted]

[redacted]

From: Hirst, Emma
Sent: 28 April 2025 12:19
To: Samuel Hayes; Local Plan Consultation
Cc: [redacted]
Subject: Re: Local plan

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: LP April 2025 comment

Hi Sam

I've looked at the consultation and agree it is difficult to understand. I've written to Trafford Council to ask whether a more accessible version of the plan, and survey can be produced for residents, and I will let you know when they reply.

Cllr Emma Hirst

Old Trafford Ward

From: Samuel Hayes [redacted]
Sent: 25 April 2025 23:01
To: Local Plan Consultation <localplan.consultation@trafford.gov.uk>
Cc: Hirst, Emma [redacted]
Subject: Local plan

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

Dear Trafford council,

I'd like to see an accessible version of the local plan to be able to understand how these policies affect me.

Please let me know how I can read a version written in everyday language.

At present I don't believe this consultation is accessible and therefore not legitimate.

Many thanks
Sam Hayes

[redacted]

[redacted]

From: [redacted]
Sent: 13 May 2025 14:53
To: Local Plan Consultation
Subject: FW: M60 J6 / A5103 missing slip road
Attachments: M60-A5103-left-slip.jpg

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: LP April 2025 comment

Email 1 of 3

From: Jonathan [redacted]
Sent: 02 May 2025 12:02
To: [redacted]
Cc: [redacted] Local Plan Consultation <localplan.consultation@trafford.gov.uk>
Subject: Re: M60 J6 / A5103 missing slip road

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

Hi,

For completeness here's a short message to [redacted] after we discussed it at a quarterly meeting:
Date: Tue, 15 Feb 2022 at 13:50
To: [redacted]
And while we're in that spot, I think the best way to tackle Stretford and Chorlton's motoring congestion and pollution would be to add one of the missing slip roads from M60 to Princess Parkway - annotated map attached. Please let me know if you or colleagues are raising this with HE. It wouldn't need land and I don't think it'd require much structural work, just some embankment reinforcement - no new bridges required.

I sent him the attached image, which I expect is the one I showed [redacted] at the CQAP event.

Cheers, Jonathan.

On Fri, 2 May 2025 at 11:54, Jonathan [redacted] wrote:

> Hi,
>
> Here's confirmation of yesterday's suggestion. I think this would be the most beneficial motoring intervention for Stretford town centre and Edge Lane, and relatively straightforward to deliver. [redacted] said he'd raise this with HE to gauge their level of interest. If HE did enable the connection detailed below and attached, Trafford should re-work Edge Lane (and perhaps also its A56 junction) to ensure there's no overall increase in motor capacity.

Cheers, Jonathan.

---------- Forwarded message ---------
From: **Jonathan** [redacted]
Date: Mon, 7 Jun 2021 at 14:22
Subject: M60 J6 / A5103 missing slip road
To: [redacted]

Hi [redacted]

I've done the attached annotated maps after noticing that HE already owns enough land and the height difference looks very achievable without adding any new bridges.

Existing bridges start / end at the dashed lines, and the purple line is the width of a lane to indicate how a new slip road could link them up.

The second version shows a longer slip road in case that'd be required to meet any motorway exit angle / merge / etc regulations, which would require the widening or supplementing of this simple bridge (over a service road, not the Mersey): [redacted]

Either solution would need a ramp that'd require a retaining wall and the removal of some trees, but there's lots of space to achieve that within HE's land, and there's plenty of space around here for more trees.

Cheers, J.

[redacted]

From: [redacted]
Sent: 13 May 2025 14:54
To: Local Plan Consultation
Subject: FW: North profile / drainage

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: LP April 2025 comment

Email 3 of 3

Sarah Todd
Principal Transport Policy Officer
Growth, Communities & Housing Service | Trafford Council | Trafford Town Hall | Talbot Road | Stretford | M32 0TH

Tel: 0161 912 4494
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[redacted]

Trafford – Where all our residents, communities and businesses prosper

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From: Jonathan [redacted]
Sent: 02 May 2025 11:29
To: [redacted]
Cc: [redacted]
Subject: North profile / drainage

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

Hi [redacted]

I'm keen to ensure the mis-naming of Mersey Overflow Channel is stopped and people, especially those in responsible bodies, accept the fact that Kickety Brook is culverted under the high field and A56, then in an open section alongside the tip, then culverted again under the TPT, MOC and M60. Kickety Brook is then open again on the other side of the M60 and it merges with the MOC just before the river(side cafe), almost at the point where Ousel Brook joins from the north. Google maps has accurate lines but inaccurate names - Openstreetmap and the OS data are better. Trafford should be able to get this right - publishing that map of drainage areas, perhaps specifying some assets, would be useful.

It stood out due to:
https://www.trafford.gov.uk/planning/strategic-planning/local-plan/Docs/Locality-profiles/Trafford-North-Place-Profile.pdf

2.10 The majority of the south area of Trafford North is greenbelt land and forms part of the Mersey Valley. Kickety Brook and Stretford Meadows provide a natural habitat for wildlife. The Trans Pennine Trail runs alongside the brook providing a pleasant walking environment.

I'd also suggest it's just the majority of the south of Stretford Town Centre - perhaps the 'southern edge' would fit better in your Trafford north sentence.

Finally, it was a surprise to see A56 rather than Talbot Rd in the below:
2.4 An average of 28% of households have no access to a private car, relying on public transport which serves the area well. There are a large number of cyclists in Trafford North that commute to work/school/education via the A56 and Warwick Road.
I'd also suggest some non-car people walk or cycle, not just use PT. I don't think you should use "multi-modalists" but I do think it's wrong to use "cyclists" - are you able to refer to people who (sometimes) cycle? Your phrase could be "A large number of people cycle in Trafford North, to commute to..." (although I'd still be unsure if they're residents or through-traffic so you could amend that accordingly).

Cheers, Jonathan.

[redacted]

From: [redacted]
Sent: 10 May 2025 13:57
To: Local Plan Consultation
Subject: Trafford Plan Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: LP April 2025 comment

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

The lack of an executive summary makes this a very difficult document to read.
Whilst I acknowledge that there is a lot of detail, it could have been delivered in an additional accessible format.

How many people attended the consultation events? Was this number low? How can participation be encouraged?

Page 83 para 4.15
HMOs.
What research has been carried out on the tenancy and facilities of current HMOs? Why can't we have a Trafford Standard? Each unit of a new HMO should have its own sanitary facility . Many of us will have used shared sanitary facilities as students. Is that really what we would choose now? The HMO residents that I have met are definitely not all students/graduates who are expecting to take their place in lucrative careers. They demonstrate the housing need in an area. One WC shared between 6 residents who are neighbours simply is not good enough. The plan should encourage/ compel WC and shower for each unit in all existing HMOs.

Page 88 Para 4.22
The greatest need is for two and three bedroom homes. What is the breakdown of size of new homes in the plan for each area? How many of the homes in North Trafford (projected 18,704 homes) will be one bedroom homes? How many will be three bedroom homes?

Page 171
Lorry parking in Trafford Park is to be expanded.
How will the lorries drive there? Can we expect more lorry traffic on local roads? Is this a good outcome?

Page 186 para 7.25
The unforeseen consequences of road changes.
Increase in pavement parking is already being seen at Barton Road and Chester Road, where red lines prevent roadside parking. How will behaviour change be reported and managed?

Page 240. Policy OSIS A
Open Space in the area
The need for allotments in the Central area (proposed increase homes 667) does not address the massive residential increase which is planned for the North area of the Borough (proposed increase homes 18,704). Why is there not an identifiable need for more allotment space in North Trafford?

Page 314 para D,E,F
Match Day parking with an increased stadium capacity of up to 100,000 is expected. No further car parking will be allowed.
Already, local streets in North Trafford suffer on match days. If we drive away from our homes a few hours before a match, we have to park our car far away. How can this be remedied? Coaches, trains, trams and buses will not carry all 25,000 extra fans. How will the future developments of the stadium area affect the plans?

Page 314 para G stadium, Page 312 para 13,18 Trafford Centre.
Hotels are mentioned twice in the report. Air B and Bs are not mentioned at all.
If the increase in accommodation is designed to redress the housing needs, how can the use of Air B and Bs be monitored and restricted as they will heighten housing needs locally.There is no legislation about Air B and Bs.

How many people are anticipated to be resident in the North area?
Green space is already at a premium in the designated area. Green walls are pretty, but not leisure space. Roof space is limited. Can Growing balconies be incorporated in design? Would the Cloud Gardener be able to help? Could communal green areas be in the design?

How much research has been done on the number of vehicles travelling between South and North with one occupant?
Car sharing schemes have never met with much success. Why is that? How can we encourage car users onto public transport? The A56 is like a funnel, directing pollution onto a small area, passing through heavily residential areas. Other countries use a charge for single occupancy, or lane restrictions.

How many homes will be built on the Sale Magistrate Court site?

What will be the outside space for a three bedroom duplex?

School numbers.
These are reported as adequate in the report, but this information is based on current population. They do not take into account population growth with the Trafford Plan..

What is the hospital capacity for the Borough? Is it adequate for the expected rise in population?

Only one mention of place of worship.
Even if residents are not regular attenders, everybody will attend a wedding or funeral at some time. What provision will be made in the new community hubs?

The centre of London has seen a large number of new apartment blocks.
They were funded by foreign investment, and serve to increase that investment potential. Lenders borrow against the capital asset and there are thousands of apartments that have never been occupied to maximise the borrowing opportunity. Many of those blocks never have lights on. They have always been vacant to preserve their value. How can we prevent this from happening in our 30 storey blocks etc.

I hope you will take my comments into consideration, and perhaps will be able to answer my questions. I am writing this in a personal capacity, and not as a representative of any organisation. My email address is [redacted] My address is [redacted] This plan looks forward 20 years at least, and I am hugely conscious of the housing need in our Borough. I attended the consultation meeting in Urmston Library, but was very disappointed that very few members of the public were there . Thank you to the Planning staff that I met. Such a lot of work has gone into this document, The content needs to be shared widely in an accessible way. I wish to be on the consultation database to receive further information.

Response ID ANON-MFZ6-4QRJ-4

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-05-15 15:23:28

Personal details

1 Forename

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5 Address

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6 Postcode

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Chapter 2 - Policy ST2: Inner Areas (Trafford)

1 Do you support Policy ST2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The percentage of proposed development in the Old Trafford ward is too high, compared to more affluent areas in Trafford including Altrincham, Bowden etc.
Proposed housing on MUFC site and surrounding areas are all high rise apartments (with a lack of green spaces) bringing temporary residents into already existing communities, who will negatively impact the area in terms of Increased traffic, litter, anti-social behaviour.
The high percentage of new residents will put a huge strain on already stretched services including the tram network, dentists, doctors. The plan does not address huge health and social inequalities in Old Trafford, instead focusing on government housing targets alone.
The developments need to be reduced in size and scale, moved to the more affluent areas of the borough who benefit from much more space to accommodate them, and the council need to better support the existing communities in these poorer areas. People over profits.

Chapter 2 - Policy ST3: Southern Areas (Trafford)

1 Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No.
The percentage of proposed development in the Old Trafford ward is too high, compared to more affluent areas in Trafford including Altrincham, Bowden etc.
Proposed housing on MUFC site and surrounding areas are all high rise apartments (with a lack of green spaces) bringing temporary residents into already existing communities, who will negatively impact the area in terms of Increased traffic, litter, anti-social behaviour.
The high percentage of new residents in the inner areas will put a huge strain on already stretched services including the tram network, dentists, doctors.
The plan does not address huge health and social inequalities in Old Trafford, instead focusing on government housing targets alone.
The developments need to be reduced in size and scale, moved to the more affluent southern areas of the borough who benefit from much more space to accommodate them, and the council need to better support the existing communities in these poorer areas. People over profits.

Chapter 4 - Policy R2: Protecting Existing Homes

1 Do you support Policy R2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 4 - Policy R4: Size and Type of New Homes

1 Do you support Policy R4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No.
The percentage of proposed development in the Old Trafford ward is too high, compared to more affluent areas in Trafford including Altrincham, Bowden etc.
Proposed housing on MUFC site and surrounding areas are all high rise apartments (with a lack of green spaces) bringing temporary residents into already existing communities, who will negatively impact the area in terms of Increased traffic, litter, anti-social behaviour.
The high percentage of new residents will put a huge strain on already stretched services including the tram network, dentists, doctors. The plan does not address huge health and social inequalities in Old Trafford, instead focusing on government housing targets alone.
The developments need to be reduced in size and scale, moved to the more affluent areas of the borough who benefit from much more space to accommodate them, and the council need to better support the existing communities in these poorer areas. People over profits.

2 The intention is to set an appropriate house size and type requirements for new development in each Locality to meet housing needs across the borough. Do you agree with this approach?

Please write your response here::

The plans do not consider the size and scale properly.
Old Trafford ward comprise of many traditional terrace housing yet the plans/the council are approving high rise apartments across the wards.
The 80/20 split should be the other way , with traditional homes a priority and high rise apartments a bare minimum.Cheap, badly built, badly managed office conversions should be knocked back as standard.

3 Do you think specific size and type requirements should be set for major residential development sites in the borough, like Pomona and Wharfside, to align with a Locality approach?

Please write your response here::

People over profits

Chapter 11 - Community and Social Infrastructure

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Response ID ANON-MFZ6-4QRP-A

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-05-19 19:49:47

Personal details

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[redacted]

8 Contact phone number

Enter your contact phone number:
[redacted]

9 Please select 'opt in.' if you wish to recieve future consultations on planning policy.

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Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

Yes theoretically I agree -however as a borough we cannot ignore the carbon impact of our collective food choices (which I cannot find mentioned in the plans).

Trafford Council has a huge role in shaping choice of food - and starting for example with plant based foods as default e.g in schools would be a good start. Please see here's for summary of study to support this done by Oxford University which states not only most environmentally friendly here: https://www.smithschool.ox.ac.uk/news/vegan-foods-better-planet-even-when-processed-study-confirms

Plant based foods now known also the most cost effective:
[redacted]

Other practical suggestions include to promote businesses who promote plant based foods eg restaurants given lower rates to rent spaces in Trafford-

also nudging towards plant based by default.

Chapter 1 - Vision

1 Do you agree with the proposed Vision for the Trafford Local Plan?

Please write your response here::

Yes but not going far enough for environmental and carbon impact of our borough

Trafford Council has a huge role in shaping choice of food - and starting for example with plant based foods as default e.g in schools would be a good start.

Please see here for summary of study to support this done by Oxford University which states not only most environmentally friendly here:
[redacted]

Plant based foods now known also the most cost effective:
[redacted]

Chapter 1 - Strategic Objectives

1 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

Please write your response here::

Yes but more emphasis on our collective environmental impact - biggest individual thing we can do is reduce carbon impact of our food - which is done through eating plant based. Trafford Council need to nudge residents

Plant based known now to be most cost effective, best for health and also environment.

Trafford Council has a huge role in shaping choice of food - and starting for example with plant based foods as default e.g in schools would be a good start. Please see here's for summary of study to support this done by Oxford University which states not only most environmentally friendly here:
[redacted]

Plant based foods now known also the most cost effective:
[redacted]

Chapter 1 - Introduction, Vision and Strategic Objectives

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

Environmental impact of our food systems and choices as a borough

Need more emphasis on our collective environmental impact - biggest individual thing we can do is reduce carbon impact of our food - which is done through eating plant based. Trafford Councul need to nudge residents

Plant based known now to be most cost effective, best for health and also environment.

Trafford Council has a huge role in shaping choice of food - and starting for example with plant based foods as default e.g in schools would be a good start.

Serving processed red meat (who class 1 carcinogen) within school is just not acceptable in this day and age.

Please see here for summary of study to support this done by Oxford University which states not only most environmentally friendly here:
[redacted]

Plant based foods now known also the most cost effective:
[redacted]

Chapter 2 - Policy ST4: Sustainable Development

1 Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Much more emphasis on our collective environmental impact wrt food is needed - biggest individual thing we can do is reduce carbon impact of our food - which is done through eating plant based. Trafford need to nudge residents to this through strategy and policy.
Consider adopting the plant based treaty like other leading counties: see https://plantbasedtreaty.org/

Plant based known now to be most cost effective, best for health and also environment.

Trafford Council has a huge role in shaping choice of food - and starting for example with plant based foods as default e.g in schools would be a good start. Please see here's for summary of study to support this done by Oxford University which states not only most environmentally friendly here:
[redacted]

Plant based foods now known also the most cost effective:
[redacted]

Chapter 2 - Policy ST5: Climate Change

1 Do you support Policy ST5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Much more emphasis on our collective environmental impact wrt food is needed - biggest individual thing we can do is reduce carbon impact of our food - which is done through eating plant based. Trafford need to nudge residents to this through strategy and policy.
Consider adopting the plant based treaty like other leading counties: see [redacted]

Plant based known now to be most cost effective, best for health and also environment.

Trafford Council has a huge role in shaping choice of food - and starting for example with plant based foods as default e.g in schools would be a good start. Please see here's for summary of study to support this done by Oxford University which states not only most environmentally friendly here:
[redacted]

Plant based foods now known also the most cost effective:
[redacted]

Chapter 2 - Strategy

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

Much more emphasis on our collective environmental impact wrt food is needed - biggest individual thing we can do is reduce carbon impact of our food - which is done through eating plant based. Trafford need to nudge residents to this through strategy and policy.
Consider adopting the plant based treaty like other leading counties: see h[redacted]

Plant based known now to be most cost effective, best for health and also environment.

Trafford Council has a huge role in shaping choice of food - and starting for example with plant based foods as default e.g in schools would be a good start. Please see here's for summary of study to support this done by Oxford University which states not only most environmentally friendly here:
[redacted]

Plant based foods now known also the most cost effective:
[redacted]

Chapter 3 - Policy RT1: Carbon and Energy

1 Do you support Policy RT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write you response here::

Cannot talk to carbon and energy without considering the food system

Much more emphasis on our collective environmental impact wrt food is needed - biggest individual thing we can do is reduce carbon impact of our food - which is done through eating plant based. Trafford need to nudge residents to this through strategy and policy.
Consider adopting the plant based treaty like other leading counties: see [redacted]

Plant based known now to be most cost effective, best for health and also environment.

Trafford Council has a huge role in shaping choice of food - and starting for example with plant based foods as default e.g in schools would be a good start. Please see here's for summary of study to support this done by Oxford University which states not only most environmentally friendly here:
[redacted]

Plant based foods now known also the most cost effective:
[redacted]

Chapter 4 - Residential Development

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Development on martial habitats needs to be reduced

The number of take-away restaurants needs to be limited as already ton many in Trafford and these businesses do not make Trafford desirable plan r to live - loads of litter and antisocial opening hours.

Chapter 6 - Policy TM1: Walking, Wheeling and Cycling

1 Do you support Policy TM1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

More cycle lanes
Interaction to extend into sale to reduce traffic on harboro way and A56

Chapter 6 - Policy TM6: The A56

1 Do you support Policy TM6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes but more! Extend interaction zone and more cycle lanes along all a56

Chapter 8 - Policy GI2: Green Infrastructure Network

1 Do you support Policy GI2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

More cycle lanes please

A56 intervention zones into sale and Altrincham bog just stretford

Chapter 13 - Culture, Tourism and Leisure

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Fewer take away and late night permits - bringing the tone of some parts of Trafford down since these types of developments have been permitted

IA: Climate Change Risk Assessment

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

Please write your response here::

Can't consider environment without food choices.

Much more emphasis on our collective environmental impact wrt food is needed - biggest individual thing we can do is reduce carbon impact of our food - which is done through eating plant based. Trafford need to nudge residents to this through strategy and policy.
Consider adopting the plant based treaty like other leading counties: see [redacted]

Plant based known now to be most cost effective, best for health and also environment.

Trafford Council has a huge role in shaping choice of food - and starting for example with plant based foods as default e.g in schools would be a good start. Please see here's for summary of study to support this done by Oxford University which states not only most environmentally friendly here:
[redacted]

Plant based foods now known also the most cost effective:
[redacted]

Response ID ANON-MFZ6-4QUS-G

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-05-26 11:28:51

Personal details

1 Forename

Enter your forename:
Marj

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Powner

3 Organisation (if applicable)

Enter your organisation:
Friends of Carrington Moss

4 Position/title (if applicable)

Enter your position/title:
Chair

[redacted]

Enter your address:

[redacted]

6 Postcode

Enter your postcode:
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Enter your email address:
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Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

Is this map supposed to address the requirements set out at paragraph 192 of the NPPF - if not, where is that information? If yes, it currently does not meet the requirements of that policy.

The following information needs to be added to this map:
- the 335 hectare peat moss at Carrington (irreplaceable and restorable according to Natural England), plus Warburton Moss, should be marked as Natural Environmental Assets
- the sites that are highlighted in the Local Nature Recovery Strategy as Core Nature Sites and Nature Recovery Opportunity Areas
- the sites to be used for mitigation and compensation as a consequence of the destruction to be caused by the New Carrington Allocation
- the Transpennine Trail
- sites that contain or use hazardous materials, including any approved Battery Energy Storage System locations (planning is supposed to promote healthy and safe communities, it is important that these areas are identified and understood, including the notification procedures should an incident

occur)
- any contaminated sites.

It should be noted that the interactive policies map is very confusing as it includes information from the UDP - for example, sites within the New Carrington area are highlighted as Areas of Landscape Protection, clearly the proposed development means that the landscape will no longer be protected - the map should not be misleading.

The Carrington Greenway is an existing former railway line. Planning is supposed to lead to sustainable development. Why doesn't this plan at least make the effort to introduce sustainable passenger and freight transport, including along this route, from Timperley to Irlam?

Chapter 1 - Vision

1 Do you agree with the proposed Vision for the Trafford Local Plan?

Please write your response here::

We would love to agree with this Vision but it is impossible to achieve given the plans for New Carrington and Davenport Green/Timperley Wedge, which is a significant proportion of the district and the harms to be caused there will significantly impact the Council's ambitions. 2042 is only 17 years away. Much more needs to be done to achieve the Vision the Council aspires to attain.

The climate crisis locally will be exacerbated (not addressed) by the damage to, or loss of, a 335 hectare peatmoss, against the advice of Natural England, who believe the size and scale of the proposed development will cause significant harm, if not the complete loss of this irreplaceable habitat (which Natural England consider to be restorable). The consequences of these harms, for existing and new communities, and for Trafford as a whole, along with the loss of productive (Grade 2) farmland, woodland and wetlands has not been assessed in the evidence base either for this plan or within the PfE plan.

Neither New Carrington or surrounding communities will be resilient or sustainable because, in addition to increased flood risk, increased air, noise, light, vibration and water pollution and increased carbon emissions, there are no proposals either previously or in this plan for sustainable freight, nor trams or trains for passengers (despite the size of the proposed development). The proposals for additional bus services are not funded and developers will use viability (which was marginal at best) as a reason to reduce their contributions to infrastructure. Proposals in the previous Core Strategy and UDP for communities surrounding New Carrington were not delivered and we have no reason to believe this plan will achieve what previous plans have failed to do.

There are insufficient school places, dentist and doctor's appointments and other health services to meet the district's need, which will cause additional traffic as residents try to access services elsewhere and Trafford is proposing car and HGV-dependent developments rather than considering sustainable alternatives. Trafford should, as a minimum, be proposing increased availability of school bus services to reduce the impact of traffic at peak times.

Carbon neutrality will not be achieved by 2038 because the developments which take place on that 335-hectare peat moss will cause a huge carbon emissions event (carbon emissions are currently minimised because of the frequency of deep surface water flooding in the area, which keeps the peat wet). Furthermore, the level of traffic anticipated (including huge numbers of HGVs in the area on a daily basis) will increase current emissions.

The number and range of jobs is insufficient (not everyone in New Carrington will want to work in a warehouse, for example). This will mean yet more traffic on local roads as employees drive to other locations for work given the chronic shortage of sustainable passenger transport options. Trafford is also approving development in the New Carrington employment 'zone', and elsewhere in the district, that does not bring any jobs for local people (the Battery Energy Storage Systems, for example). Car-free travel is not achievable when Trafford is locating development on isolated green spaces, rather than in the more sustainable urban areas, which would reduce the need to travel by unsustainable means.

In terms of the actual target for affordable housing, where is this set out in detail? Developments at the New Carrington Allocation are only required to achieve 15% overall, which will provide less than 600 affordable homes, many of which will be "affordable" to buy rather than genuinely affordable homes to rent. This assumes developers will not seek to reduce the number further due to viability claims.

Clearly the harms to be caused at New Carrington mean that Trafford's biodiversity will be impaired rather than enhanced and its natural assets will not be protected for future generations. A 335-hectare irreplaceable natural asset (which is shown on the recently published England Peat Map) will be significantly harmed or completely destroyed by Trafford's plans.

The Open Space Assessment has not considered the area known as Carrington Moss, despite NPPF 103 including "sport and physical activity", and there is no commitment to enhance the currently well-used public rights of way that support walking, cycling and horse riding. Horse riding is not mentioned in the document (it is a physical activity and it is a sport). The developments proposed will discourage, rather than encourage more use of active travel.

Carrington Moss has a community that is proud of our area, we volunteered our time to enhance SBIs, we carry out litter-picks and other community events. This community will be obliterated by Trafford's plans for development in this nature-rich area. Health and wellbeing inequalities will be increased, especially as communities like Partington and Sale West are deprived and need their 'free to access' green spaces. The historic environment at Warburton (including the deer park, the moated rabbit warren and manor house, and the medieval fish ponds) will be sacrificed along with the Carrington Rides and other routes used by the over 1,000 horses that are stabled in the area, the walkers and the cyclists. It will no longer be safe, healthy and pleasant to use routes that are adjacent to thousands of cars and HGVs each day. This plan appears to be focused on what would be good for the developers, not what would be good for Trafford residents!

The New Carrington Masterplan work has also focused on the needs of developers not on the impact to important natural capital assets. The long awaited production of a Natural Infrastructure Strategy is critical to ensuring that sufficient sites are allocated for mitigation and compensation, rather than just for development. Given the absence of the Natural Infrastructure Strategy, it is currently unclear whether the New Carrington Masterplan will

support the achievement of the Vision!

Chapter 1 - Strategic Objectives

1 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

Please write your response here::

Whilst we do not disagree with these objectives, they are poorly articulated, are not SMART, and lack effective target figures. It will be very challenging to determine whether each has been successfully delivered or to monitor progress during the plan period. SO3 includes just one target date which needs explanation (see below). SMART objectives are Specific, Measurable, Achievable, Relevant, and Time-bound, providing a clear, well-defined framework that can be monitored.
S01, for example, does not give any indication (even at a high level) of how many homes are expected to be built, how many will be genuinely affordable, how many will be built on brownfield land, what densities will apply (and how those densities will reduce the need to build on greenfield sites). What is the definition of a 'sustainable location'?
S02 how close are necessary facilities expected to be to communities, does life-long physical activity include walking, cycling and horse riding - if so, how does Trafford plan to enhance the current facilities, how will the inequalities in health, wellbeing and quality of life for those communities impacted by the New Carrington development be addressed (the deprived communities of Partington and Sale West, for example, will lose much of their free to access green spaces and it will no longer be healthy, safe and pleasant to use the public rights of way that have been part of their wellbeing regimes for decades, the increase in hazardous materials on the local road network could also bring increased risks for these communities, along with the risks of toxic fumes and fires from Battery Energy Storage Systems and the air, noise, light, vibration and water pollution from the huge increases in the number of HGVs and other motor vehicle traffic on local roads).
S03 - what does it mean for development to be carbon neutral by 2028 - if a developer builds on a peat moss, causing a huge carbon emissions event, will that still count as being carbon neutral? What does 'harness' mean in relation to Trafford's peat mosses - is there any commitment to restore them as suggested by Natural England? By when will resilience be strenthened to minimise flood risk given the plans to build on the land that captures significant levels of water, putting surrounding communities at further risk. Brownfield land is not being prioritised - given that planning applications are coming forward on greenfield sites in isolated, unsustainable locations - how can this objective be met?
S04 what does 'well-performing employment land' mean. How many jobs, in what sectors, are expected to be provided and where? Planning applications that will bring zero jobs are coming forward in employment zones. When will Trafford Council itself embrace technology? The Peel Planning Inquiry was not accessible to residents as it was not recorded and it was not possible to dial in to participate. How is the rural economy considered? It was not dealt with in PfE, so there is an expectation that it will be a key focus of this local plan. How is the rural economy and its supply chains expected to grow (or diminish given the plans for New Carrington)? How will Trafford support our farmers, our riding stables and other rural businesses?
S05 what are the aspirations (numbers/percentages)? what about adult education and retraining? what will actually be required in relation to new developments?
S06 what footfall numbers, by how much (number/%) are these centres expected to grow?
S07 what % BNG and where (should be on site to ensure biodiversity losses are recovered locally), what are the designated green and blue spaces - is this formal designation? Why are the district's irreplaceable habitats not mentioned here (peatmosses, ancient woodland)? By how much are blue and green spaces expected to be improved and how (for example, increased populations of birds/wildlife, increased area to be protected), from what baseline will a strengthened and expanded green infrastructure network be measured - the accessibility of the land known as Carrington Moss and its presence as a key part of the current green infrastructure network will be diminished as a consequence of the current plans for development. How is the Local Nature Recovery Strategy considered in this objective? The Open Space Assessment does not include any reference to the area known as Carrington Moss, nor to the facilities for horse riders. No assessment was carried out for PfE, so to meet the requirements of NPPF paragraph 103 and 104, a detailed assessment that demonstrates this land is surplus to requirements is needed either within this plan or within the evidence base supporting the New Carrington masterplan.
S08 There is nothing in this plan, nor in PfE, to even plan for sustainable freight transport, particularly in the New Carrington area. This will become a high priority if there are changes to freight transport options at Trafford Park. The provision of a new road, that will impact the peatmoss at Carrington, along with other natural capital assets, is not a sustainable solution and will not encourage sustainable and efficient patterns of movement, in fact, according to Trafford's own documentation, it will induce additional motor vehicle traffic into the area. The most sustainable, well-connected locations in Trafford are not being prioritised. Planning applications are already coming forward in unsustainable locations. Why is there no mention of increasing and improving school bus services, which would significantly reduce traffic in peak periods?
S09 - how will leisure services be increased to support existing and new communities?
S10 - how will existing heritage assets be protected? which heritage assets will explicitly be protected?

The Integrated Assessment (IA) response (4.3) that no negative scores were identified in its assessment of the Strategic Objectives is rather astounding. This is a particularly bizarre conclusion given some of the comments in the IA about the policies themselves, which highlight the negative environmental effects. The over-positive IA is perhaps best demonstrated by the suggestion at paragraph 5.53 that there is "potential" for negative effects on air quality because of increased industrial activity and traffic. Given the lack of sustainable freight transport proposed in this plan, this is more than "potential" and the implications go beyond just air pollution. The substantial increase in the volume of HGV traffic in New Carrington alone will result in significant increases in air, noise, light, vibration and water pollution, as well as carbon emissions. Given how weak the other policies are that the IA suggests will mitigate or protect against negative effects, the IA should have highlighted those areas which could have the most detrimental impacts so that mitigating policies can be strengthened.
The IA should also have highlighted the lack of relevant, up to date evidence to underpin these Strategic Objectives.

Examples of the gaps in the IA itself are highlighted in that part of our response below.

Chapter 1 - Introduction, Vision and Strategic Objectives

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any areas related to this chapter which you consider are missing and which should be

included in the Local Plan?

Please write a response here::

The Evidence Base is incomplete, with much of the evidence out of date. The Cultural Strategy for Trafford predates Covid, the influx of new residents from overseas (Hong Kong, Afghanistan, Ukraine and Syria) and does not incorporate the latest evidence on addressing climate change, for example, in which the Climate Change Committee recommends the restoration of our peat mosses. The Environmental Sustainability Evidence is also extremely dated as are the Transport/Infrastructure documents.
Whilst the Open Space Assessment is dated 2024, it does not include any assessment of Trafford's rural areas, including the area known as Carrington Moss. As such an assessment was not completed as part of PfE, it should be carried out to meet the requirements of NPPF 103 and 104, given the plans for development in this area. It should be noted that NPPF 103 is particularly clear that "Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses)". Horse riding is a sport and a physical activity, along with walking and cycling. it is inappropriate that such spaces were omitted from the assessment.
In addition, PfE did not provide any evidence or policy on the rural economy, nor did it provide the evidence to meet the requirements of NPPF 192. None of this evidence is available with this plan. There appears to be no evidence at all in relation to ecology and biodiversity, no mention of the health of Trafford's SBIs and SSSIs, or its irreplaceable habitats. The policy map does not meet the requirements of NPPF 192. We have raised some issues in our response to the specific question about the map above.
The 'Setting the Scene' section of the plan does not include the rural economy either, nor any mention of Trafford's irreplaceable habitats, suggesting that Trafford does not value these areas.
Paragraph 1.94 is rather disingenuous, the plans for New Carrington will certainly have a transformational impact on the area but not in the positive way that is expressed in this paragraph. What enhanced services and facilities will be provided to existing communities? How will isolation be reduced when there is no committed funding for additional bus services, no trams or trains (despite the former railway line, no sustainable freight options and our green spaces will be decimated not improved. The plans will transform a much used green space that is so valuable for health and wellbeing activities, a 335 hectare irreplaceable habitat, productive Grade 2 agricultural land, woodlands and wetlands into a concrete jungle that brings no benefits to existing communities and significant detrimental effects, including the loss of green spaces, increased air, noise, light, vibration and water pollution and a much higher risk of local flooding!

Chapter 2 - Policy ST1: Core Growth Area (Trafford)

1 Do you support Policy ST1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as we do not understand how its success will be effectively measured and monitored. The policy wording is so high level that absolutely any development could be approved here. There is no direction for developers, no aspiration to increase green space for communities, no expectation of the targets/maximums in the various communities that comprise this part of Trafford.
In addition, there has been much publicity about the regeneration of the area surrounding the Manchester United football ground. Yet, despite these proposals supposedly coming forward during the plan period, there are not even any aspirations mentioned in the policy. What are the implications of reported changes to the freight terminal? What will be the impact of those changes on freight transport in the area?

Chapter 2 - Policy ST2: Inner Areas (Trafford)

1 Do you support Policy ST2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as we do not understand how its success will be effectively measured and monitored. The policy wording is so high level that absolutely any development could be approved here. There is no direction for developers, no aspiration to increase green space for communities, no expectation of the targets/maximums in the various communities that comprise this part of Trafford.
How will development that is not residential be limited?

Chapter 2 - Policy ST3: Southern Areas (Trafford)

1 Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as we do not support the use of former Green Belt land for development and we do not understand how its success will be effectively measured and monitored. The policy wording is so high level that absolutely any development could be approved here. There is no direction for developers, no aspiration to increase green space for communities, no expectation of the targets/maximums in the various communities that comprise this part of Trafford.
How will "making the most use of previously developed land" be enforced?
How will the rural economy and rural businesses be supported?
How will environmental and ecological assets be protected, given the number of SBIs/SSSI on and around Carrington Moss alone? Each SBI/SSSI should be surrounded by an appropriate buffer to reduce the impact of development. Given the importance of the natural capital assets in this part of Trafford, the policy should encourage environmental and ecological enhancements/improvements.

Chapter 2 - Policy ST4: Sustainable Development

1 Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as we do not understand how its success will be effectively measured and monitored. National Policy suggests that at "a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs".
What constitutes sustainable development should, therefore, be more clearly defined within this plan - can planning applications be considered sustainable if they:
- do not provide access to sustainable passenger and/or freight transport options?
- destroy, damage or otherwise harm irreplaceable habitats, SBIs, SSSIs?
- increase the risk of flooding or air, noise, light, vibration and/or water pollution?
- increase carbon emissions?
- destroy, damage or otherwise harm heritage assets?
- further deplete the UK's natural capital assets (including the populations of red listed birds and endangered/protected wildlife species?

Chapter 2 - Policy ST5: Climate Change

1 Do you support Policy ST5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we would like to support this policy, it is incomplete and we do not understand how its success will be effectively measured and monitored. Trafford's recent approval of planning application 115160 demonstrates that there is no genuine intention of monitoring or mitigating the impacts of climate change. Whilst this Battery Energy Storage system (BESS) is supposed to support the move towards net zero, its location on a deep peat moss (with peat thickness of between 3' and 8'/ between 100cm and 300cm), will result in a huge carbon emissions event that will negate the net zero benefits of the scheme. Trafford has already approved a number of BESS, which are renowned for their fire risks and toxic fumes. Whilst these may be considered to be part of the renewable energy portfolio, they bring huge risks to local communities - how will these risks be measured and monitored? How will communities be informed of the risks? What will be the requirements for evacuation procedures in the event of the risks materialising, including for schools that may be downwind of toxic fumes. It should be noted that any fires or toxic fumes will increase carbon emissions and toxic water pollution, which would be contrary to climate mitigation aspirations.
Given Trafford has 2 peat mosses, why is there no reference in this policy to the latest information from the Climate Change Committee that recommends the restoration of peatmosses to support the combatting of climate change, along with tree planting to further support carbon sequestration.
The England Peat Map now shows the depth of peat in our mosslands (as do the Ground Investigations reports from planning applications, such as 115160). The peat at Carrington is extensive, extremely deep and is typically kept wet due to the amount of water captured by the moss.
How will increased carbon emissions caused by increased traffic (particularly HGVs) on local roads be measured?
How will increased carbon emissions caused by significant carbon events if Trafford's peatmosses are further damaged or completely destroyed be measured?
How will the loss of carbon sequestration through trees, woodlands and other vegetation be measured when these natural capital assets are destroyed to support development (including in New Carrington)?
How will increased flooding risk in Trafford's communities be measured?

Chapter 2 - Strategy

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

Regarding paragraph 2.13, given that the Planning Inspectorate has already approved a planning application in the Green Belt (by describing it as Grey Belt), despite the promises that PfE would mean no further Green Belt developments would be approved, why isn't Trafford doing a review of Green Belt to identify any further sites that planning inspectors may consider to be Grey Belt? If there are no such sites, this should be recorded as it will deter landowners from deliberately degrading the sites to enable development via the Grey Belt label. It would also reduce the potential for speculative development on so-called Grey Belt sites.

Paragraph 2.48 provides no confidence that these policies will be effectively measured and monitored. The monitoring proposed by PfE is also weak and ineffective. Specific measurable indicators should be proposed in this plan to ensure each policy criteria are measured, monitored and reported.

Chapter 3 - Policy RT1: Carbon and Energy

1 Do you support Policy RT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write you response here::

We cannot support this policy as it is incomplete and we do not understand how its success will be effectively measured and monitored.

There should be an additional RT1X: Policy for Natural Carbon Reduction Solutions. This should include restoring our peatmosses, which would bring the most benefits in terms of carbon reduction, and tree planting to support the further sequestration of carbon emissions.

Trafford should set out how current and proposed carbon emissions from each of these policies (including carbon emissions events related to RT1X) will be measured and monitored.

Chapter 3 - Policy RT2: Decentralised Energy Generation

1 Do you support Policy RT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we don't disagree with this policy, we do not understand how its success will be effectively measured and monitored.

Chapter 3 - Policy RT3: Overheating and the Urban Heat Island

1 Do you support Policy RT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as we do not understand how its success will be effectively measured and monitored.

How many developments that do have to rely on active cooling systems is too many?
What makes it unfeasible for developments to include the integration of green infrastructure?

Chapter 3 - Policy RT4: Sustainable Retrofitting

1 Do you support Policy RT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we don't disagree with this policy, we do not understand how its success will be effectively measured and monitored.

Chapter 3 - Policy RT5: Circular Economy

1 Do you support Policy RT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Chapter 3 - Renewable Technologies and Methods

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Yes - the restoration of Trafford's peat mosses would significantly support the aim to be carbon neutral by 2038. There is no monitoring criteria that relates to the carbon emissions from degraded peat, the carbon emissions caused by development on peat or the carbon emissions from additional transport, particularly HGVs, that will be the result of the lack of sustainable passenger and freight transport options.
This Local Plan does not even include exploring the possibility of introducing sustainable freight transport options in New Carrington, despite resident feedback over the past almost 10 years and the availability of the former railway line.
There is nothing in the policy about the potential of tree planting to increase carbon sequestration to support the policy.
Whilst the additional monitoring criteria are welcome, they do not include SMART targets and are insufficient to determine that these policy criteria have been fully met.

Chapter 4 - Policy R1: Housing Delivery

1 Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored. Policy criteria E, F, G and H, for example, mention no target metrics to be measured and monitored. It is already clear, for example, that planning applications for greenfield land are already coming forward in advance of Trafford's brownfield sites.

Policy criterion A mentions the allocation of sites. Given that residents were assured that there would be no further Green Belt allocations during the PfE plan period, this criterion should mention that the allocations will only be on brownfield sites.

How will Trafford ensure housing is built to meet need? What is Trafford's policy on investor homes, airbnb's and second homes?

How will Trafford ensure developers deliver when planning applications are approved?

Chapter 4 - Policy R2: Protecting Existing Homes

1 Do you support Policy R2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.
What is Trafford's policy for long-term empty homes and empty commercial properties? These should be repurposed for genuinely affordable rent, for example.
What is Trafford's policy to prevent homes from becoming dilapidated and unusable?

Chapter 4 - Policy R3: Affordable and Social Housing

1 Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored. What is Trafford's overall target for the number of genuinely affordable homes to be made available to support the reduction in waiting list numbers and the time to be spent on the waiting list for the most vulnerable in our society?
What are the implications of developers not adhering to the affordable housing policy % in each part of Trafford, for viability or other reasons?

2 Should 10% of all affordable and social housing be delivered as Truly Affordable Net Zero Homes (TANZ)?

Please write your response here::

Yes

3 Should the Local Plan set an affordable housing requirement, including a tenure mix, for each locality (similar to Core Strategy policy L2) that reflects market conditions?

Please write your response here::

If, by this question, you mean should an actual numerical social housing target be set for each locality, then yes. There is a social housing waiting list which should determine how many social houses need to be built in each locality to meet need.

4 Should any other policy approaches to affordable and social housing be explored?

Please write your response here::

The policy should explicitly assert that Trafford will seek funding to increase the proportion of social housing availability to address the years of chronic undersupply.

Chapter 4 - Policy R4: Size and Type of New Homes

1 Do you support Policy R4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

What proportion of housing provision will be available to meet the requirements of those in the most need of a home?

2 The intention is to set an appropriate house size and type requirements for new development in each Locality to meet housing needs across the borough. Do you agree with this approach?

Please write your response here::

Yes but it should include a target number to ensure housing for those in the most need is addressed as a priority.

3 Do you think specific size and type requirements should be set for major residential development sites in the borough, like Pomona and Wharfside, to align with a Locality approach?

Please write your response here::

Yes but they should include a target number to ensure housing for those in the most need is addressed as a priority.

Chapter 4 - Policy R5: Housing Density

1 Do you support Policy R5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

A vast area of Trafford is set at 35dph, even those sites that will create new centres, such as New Carrington. Higher density should be a requirement in areas where large developments are proposed to minimise the impact on natural and semi-natural green spaces (ie to reduce land-take).

The Planning Application documents for the Redrow development at Warburton suggest density will be much lower than 35dph, despite this being the suggested requirement on this map!

Chapter 4 - Policy R6: Older Persons Accommodation

1 Do you support Policy R6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We totally support this policy and it includes specific targets which will make it possible to monitor and measure success.

How will Trafford minimise the impact on the elderly who wish to downsize but are put off by the extortionate management fees that come with many retirement apartments?

2 Should the Local Plan set a definition for what constitutes a Care Home, Extra Care and Assisted Living? If so, what should they be defined as?

Please write your response here::

Yes. Others will be more qualified to develop the definition.

Chapter 4 - Policy R7: Adaptable and Accessible Housing

1 Do you support Policy R7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we support this policy and there is a measurable target, it only applies to large developments of more than 50 homes. Will this be sufficient to meet need? Why not apply the 4% to proposals of more than 25 homes?

Chapter 4 - Policy R8: Homes for Children and Care Experienced Young People

1 Do you support Policy R8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

A target for the number of homes to support this need should be included in the Plan.

Chapter 4 - Policy R9: Other Types of Homes

1 Do you support Policy R9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

If there is a genuine need for this accommodation, there should be a target. If this policy is aimed at speculative development of this type, this should be clear in the policy.

The second part of policy criterion E is confusing.

2 Should the affordable housing requirement apply to student accommodation to enable a proportion of student accommodation schemes to be affordable to students from low-income backgrounds?

Please write your response here::

Yes

3 Should nomination agreements be used to ensure that accommodation is reserved for students enrolled at a named institution?

Please write your response here::

Others will be more qualified to respond to this question

Chapter 4 - Policy R10: Gypsies, Travellers and Travelling Showpeople Accommodation

1 Do you support Policy R10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored. Whilst the numbers are in the reasoned justification, there are qualitative aspects to this policy.

How will the Council support residents who are affected by unexpected transitional communities, particularly when their occupation affects other uses of the land (sports fields for example)?

Chapter 4 - Policy R11: Self-Build and Custom Housing

1 Do you support Policy R11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes we support this policy and it includes measurable targets that can be monitored.

Chapter 4 - Residential Development

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

The additional monitoring is welcomed but measuring the number of planning permissions granted will not determine the success of the policy.

There is a need to include criteria which set out the penalties if planning permission is granted but development is not delivered.

Each criterion in each policy in the plan should be measurable (either qualitatively or quantitatively) and should be monitored and reported.

Chapter 5 - Policy EJ1: Employment Land Requirements

1 Do you support Policy EJ1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as it is incomplete.

Land should only be released for employment in areas which are sustainable or where there is sufficient commitment to make developments sustainable. Requests for planning permission for employment schemes which would result in large numbers of HGVs on local roads should be required to provide sustainable freight transport options. The "potential" negative impact of HGVs is highlighted in the IA (5.53). As mentioned above, the huge volumes of HGVs in Carrington cause air, noise, light, vibration and water pollution as well as carbon emissions. This is not a "potential" risk, it already exists in Trafford.
Large employment sites should provide sustainable passenger transport options to reduce car dependency for employees (particularly when night time working is anticipated).
There are some qualitative aspects to the policy criteria which need to be monitored.

Chapter 5 - Policy EJ2: Trafford Park

1 Do you support Policy EJ2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.
What are the implications of the Manchester United scheme that has been widely publicised?
How will the number of HGVs coming to and from the site be reduced?
How will the use of sustainable passenger and freight transport options be increased?

Chapter 5 - Policy EJ3: Industry and Warehousing

1 Do you support Policy EJ3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as we are opposed to the use of peatlands and former Green Belt land for industrial and warehousing, and we do not understand how its success will be effectively measured and monitored.

To make these sites sustainable, how will the number of HGVs be reduced?
How will the sustainable passenger and freight transport options be increased?
How will carbon emissions be minimised?

How will the air, noise, light, vibration and water pollution impact of these sites be reduced?

Policy EJ3C appears to suggest New Carrington is a small scale employment area. This is misleading.

How will employment sites that use or transport hazardous materials be monitored? How will communities be advised of the risks that such sites bring, including the transportation of hazardous materials on local road networks?

2 Do you agree with the proposed boundary shown on the policies map for Trafford Park?

Please write your response here::

The local community should be the key responders to this question.

3 Do you agree with the proposed boundary shown on the policies map for Broadheath Employment Area?

Please write your response here::

The local community should be the key responders to this question.

Chapter 5 - Policy EJ4: Offices

1 Do you support Policy EJ4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as we do not support the use of former Green Belt land for office development and we do not understand how its success will be effectively measured and monitored.

How will these sites be made sustainable - what are the plans for increased passenger transport options?

What are Trafford's plans for any empty office space that is available now or becomes available during the plan period?

Chapter 5 - Policy EJ5: Safeguarding Trafford's Employment Land

1 Do you support Policy EJ5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

If land is identified for employment purposes, it should result in employment. This is not the case with the Battery Energy Storage Systems, which have significant landscape, land-take, and risk elements but do not provide local employment opportunities.

Chapter 5 - Policy EJ6: Data and Energy Storage

1 Do you support Policy EJ6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as it does not require any risks to human or wildlife health to be addressed and we do not understand how its success will be effectively measured and monitored.

Both data and energy storage systems create noise pollution that impacts humans and wildlife.

There is no mention of the risks of fire and toxic fumes at energy storage facilities. How are increased fire service requirements to be funded? These sites present a major risk to nearby communities (of both humans and wildlife). They should not be sited near to schools, for example, or in places that would be difficult to evacuate should an incident occur. They should not be sited on peat soils, which are likely to burn underground for extended periods. Our responses to the planning applications for the BESS at New Carrington provide links to evidence of these risks (with the fire at Liverpool burning for over 59 hours, there are also issues for local emergency services and their ability to support multiple schemes).

Communities should be notified of any risks that accompany employment sites that involve the use, storage or transportation of hazardous materials and should be advised of what action to take should an incident occur (does a siren notify them, for example, if they hear it, do they evacuate or stay inside and shut their windows).

Chapter 5 - Policy EJ7: Rural Economy

1 Do you support Policy EJ7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as it is unevidenced and we do not understand how its success will be effectively measured and monitored.
It is clear from the amount of best and most versatile agricultural land that Trafford has sacrificed in Places for Everyone that there is no genuine aspiration to support Trafford's rural communities and their supply chains.
Where is the evidence that shows how much rural land has been lost to development, how many rural jobs are at risk as a consequence of development, how will the supply chains supporting the rural economy be impacted (what were the baseline figures and what will be lost as a consequence of PfE and this plan). This information was not provided as part of the PfE evidence base.
To support isolated rural communities, development should be encouraged to provide mobile services (libraries, for example, but also health services) to enhance what is currently available and reduce the need to travel.

Chapter 5 - Economy and Jobs

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Whilst the additional indicators are welcomed, they are insufficient to monitor the success of these policies.
It is odd that PfE includes an indicator (local labour agreements) when the requirement for these was removed from PfE.
Why are there no spatial targets for the rural economy (ie indicators monitoring how much land and how many employees)?
The planning application indicators are confusing.

Chapter 6 - Policy TM1: Walking, Wheeling and Cycling

1 Do you support Policy TM1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we totally support this policy and there are elements that can be measured and monitored, more indicators of success will be needed, including figures relating to the use of the routes to be provided.
The provision of the safeguarded route for the Carrington Greenway should not prevent any future re-opening of the former railway line, which communities have repeatedly requested. No development should be allowed in the area to ensure the future use of the railway line is not prejudiced.
There are over 1,000 horses stabled on and around Carrington Moss, yet there is nothing in this policy that mentions this form of active travel.
Cyclists, in particular, using the routes to be provided by the Carrington Relief Road will find themselves at greater risk due to the lack of safe cycling space beyond the short new road (ie on the rest of the A6144) and significantly increased motor vehicle traffic (including HGVs).
To encourage take-up of active travel options, developers should be asked to provide cycle hire/borrow facilities (including cargo bikes for shopping), storage/lockups for cycles, etc.

Chapter 6 - Policy TM2: Public Transport

1 Do you support Policy TM2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we totally support this policy, there is a huge lack of confidence in Trafford's ability to deliver it, as evidenced by the lack of progress made following the policies for Carrington, Partington, Sale West and Warburton in the UDP and the Core Strategy.
We do not understand how the success of this policy will be effectively measured and monitored.
Partington Parish Council, Positive Partington and the Friends of Carrington Moss have frequently requested (on behalf of the residents of Partington and nearby communities) that the former railway line be reopened to provide better access to surrounding areas (particularly given the low level of car ownership). Yet, there is no commitment in this plan to even look at the feasibility of such a scheme, despite Partington being identified in the policy as an area of poor service provision! Given the size of the proposed developments at New Carrington, this plan should be seeking to introduce the tram to this area as a minimum.
There is also inadequate public transport to Trafford General Hospital, especially for older people.
What is Trafford's commitment to increasing school bus services, which would significantly reduce the amount of traffic on local roads during peak periods and significantly reduce the required spend on new roads?

Chapter 6 - Policy TM3: Car Clubs

1 Do you support Policy TM3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Chapter 6 - Policy TM4: Mobility Hubs

1 Do you support Policy TM4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Chapter 6 - Policy TM5: Local Highway Network

1 Do you support Policy TM5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We do not support Policy TM5. The Council should be seeking ways to reduce motor vehicle traffic on our roads, yet they are safeguarding a route for motor vehicles and have no commitment to improve access to sustainable transport in the same area. This will result in induced traffic, with drivers seeking a rat run between motorways, increasing the risks for other road users.
This policy should be focused on improving the road surfaces for all users (addressing potholes, ensuring horse riders and cyclists are able to ride safely, ensuring there are appropriate, well maintained footpaths for pedestrians and those who need mobility aids).
Traffic during peak hours would be significantly reduced if Trafford increased the provision of school buses (this could be done at a fraction of the cost of new road schemes) and remove car parking facilities near to schools (making school streets safer for pupils).
Signage should be improved to ensure it is clear that pedestrians and cyclists have priority in accordance with highway code rules.
We do not understand how the success of this policy will be effectively measured and monitored.

Chapter 6 - Policy TM6: The A56

1 Do you support Policy TM6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

As mentioned in our response to TM5, increasing the provision of school bus services would bring numerous benefits, including the significant reduction of motor vehicle traffic during peak hours.

Signage should be improved to ensure it is clear that pedestrians and cyclists have priority in accordance with highway code rules.

Chapter 6 - Policy TM7: Freight

1 Do you support Policy TM7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.
This policy should include reference to hazardous materials carried by HGVs and how communities will be notified of the risks of such transportation.
The impact and measurement of carbon emissions from these vehicles should also be mentioned.
Whilst the policy suggests that the Council will support sustainable freight transport options, the Council is not proposing any for New Carrington, despite the former railway line and the proximity of the Manchester Ship Canal, ignoring the repeated requests from residents for this to be a priority in the area.
The lack of sustainable freight transport options for this and other areas with high HGV volumes is leading to huge increases in air, noise, light, vibration and water pollution, and carbon emissions.

Chapter 6 - Policy TM8: Manchester Ship Canal

1 Do you support Policy TM8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Chapter 6 - Policy TM9: Potential Future Rail Route

1 Do you support Policy TM9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as we do not understand how its success will be effectively measured and monitored.
What are the carbon implications of building a tunnel and which district will account for them in their carbon neutral calculations?
Which local travellers are expected to benefit from this rail link?
It is astounding that Trafford is supporting a rail route in this area which will mostly benefit national travellers, yet is not even proposing to explore the feasibility of reopening the former railway line that runs through the New Carrington allocation area, despite frequent requests from residents over the past 10 years. This suggests that, once again, the needs of the people of Partington will not be addressed for yet another plan period and that the objectives of those who are not Trafford residents are being prioritised!

Chapter 6 - Policy TM10: Parking Standards

1 Do you support Policy TM10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as it does not mention how Trafford will reduce the number of car parks (we have previously highlighted these in our review of brownfield land) to encourage more use of sustainable passenger transport options and minimise greenfield land-take.
We do not understand how its success will be effectively measured and monitored.

Chapter 6 - Policy TM11: Lorry Management

1 Do you support Policy TM11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as development proposals that will generate a high number of HGVs should be required to provide sustainable freight transport options and we do not understand how its success will be effectively measured and monitored.
The policy should mention how the schemes will reduce air, noise, light, vibration and water pollution and carbon emissions (for example requiring Lorry Parking to be adjacent to sustainable freight terminals).
This policy should also mention the need to provide toilet facilities (even if they are portable facilities that are not connected to the main water supply or sewers) and litter bins.

Chapter 6 - Policy TM12: Park and Ride

1 Do you support Policy TM12? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Chapter 6 - Policy TM13: Crowd Movement and Routes

1 Do you support Policy TM13? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Chapter 6 - Transport and Movement

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Whilst the additional indicators are welcomed, they are insufficient to monitor the success of these polices.
How will infrastructure requirements that are not delivered be monitored?
What will be the implications of non-delivery?
The following should also be monitored:
- The length of time to get pot holes fixed?
- Number of complaints about pot holes.
- The actual increase in sustainable passenger and freight transport services.

Chapter 7 - Policy TC1: Hierarchy of Centres

1 Do you support Policy TC1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

2 Do you agree with all of the proposed boundaries for the Town, Other Designated, Local and Neighbourhood centres as shown on the policies map?

Please write your response here::

The New Carrington Centres should be added.

Chapter 7 - Policy TC2: Role and Function of Centres

1 Do you support Policy TC2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

How will leisure centre capacity be increased to support the huge number of additional residents proposed as a consequence of the new development?

Chapter 7 - Policy TC3: Out of Centre Retail and Leisure

1 Do you support Policy TC3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

How will leisure service capacity be increased to meet the needs of the hugely increased population as a consequence of new development.

Chapter 7 - Town Centres and Retail

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Whilst the additional indicators are welcomed, they are insufficient to measure and monitor the policies in this section.

Empty shops and other premises should particularly be monitored, with a plan of action to address (empty shops result in areas quickly becoming run down).

Chapter 8 - Policy GI1: Landscape Character Areas

1 Do you support Policy GI1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we totally support this policy, there is clearly no genuine intention of requiring development to adhere to it, given the approval of the New Carrington Allocation. Planning applications that do not comply with this or PfE policy on landscape character are coming forward and are being approved (such as 115160).
We do not understand how the success of this policy will be effectively measured and monitored. As an example, the policy should include a requirement that LVIAs MUST provide assessments that cover all communities affected, not just cherry-picking a small number of locations as has happened in recent planning applications.

Chapter 8 - Policy GI2: Green Infrastructure Network

1 Do you support Policy GI2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we totally support this policy, we do not believe there is a genuine intention to deliver it and we do not understand how the success of this policy will be effectively measured and monitored, especially given the damage and destruction to be caused to the GI Network by the New Carrington allocation.

The evidence base to support this policy is non-existent, the Trafford Action for Nature document is dated 2005!!! What is the GI baseline this plan is working to? Where is the evidence that demonstrates that the plan meets the requirements set out in NPPF 192?
Please also see our comments in response to the question above about the policy map.

Chapter 8 - Policy GI3: Great Manchester Wetlands Nature Improvement Area (NIA)

1 Do you support Policy GI3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we totally support this policy, there is clearly no intention to deliver it (given the approval of planning application 115160, which will decimate 19.9 hectares of very deep restorable peat) and we do not understand how the success of this policy will be effectively measured and monitored, especially given the damage and destruction to be caused by the New Carrington development proposals.

The lack of a Natural Infrastructure Strategy to underpin the New Carrington Masterplan makes it difficult to understand how this policy will be met at all.

Chapter 8 - Policy GI4: Mersey Valley

1 Do you support Policy GI4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we totally support this policy, we do not understand how the success of this policy will be effectively measured and monitored. Why is there no mention of horse riding?

Chapter 8 - Policy GI5: Green Infrastructure Opportunity Areas

1 Do you support Policy GI5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we totally support this policy, we do not believe it will be genuinely enforced (planning application 115160, for example, is adjacent to an SBI and is sited on very deep restorable peat) nor do we understand how the success of this policy will be effectively measured and monitored.

The New Carrington area (figure 8-9) does not highlight all the SBIs and the SSSI, nor does it identify the 335 hectare peat moss, the woodlands and the wetland areas. It appears to highlight the northern part of the Wetlands at Carrington Moss SBI, for which there is a current planning application to completely fell the woodland SBI and replace it with a 30m high warehouse)! It does not appear to highlight the areas set out in the LNRS.

It is not clear if this policy is aimed at satisfying the requirements of NPPF 192 (if it is, the omissions need to be corrected)?

Chapter 8 - Policy GI6: Green Infrastructure in New Developments

1 Do you support Policy GI6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do support this policy, we do not believe it will be delivered as Trafford does not set out how a genuine balance between the economic, social and environmental benefits (or disadvantages) of development will be achieved.
We do not understand how the success of this policy will be effectively measured and monitored.
It is not clear whether this policy applies to the New Carrington allocation area.
What is the definition of 'major' development in this context?
What is Trafford's policy for developments proposed on its irreplaceable habitats?
The mitigation measures in planning application 115160 is a pitiful 1.15 hectares against a loss of 19.9 hectares of very deep restorable peatmoss (between 3' and 8', 100cm and 300cm), Grade 2 bmv agricultural land and the breeding and feeding grounds of numerous (79 according to the developer) species of red and amber listed bird species, depleting further populations of species such as the skylark. The site is also used by endangered and protected wildlife species. We do not consider this to be of equal or greater value and it demonstrates the lack of compliance to be expected in relation to this policy.

Chapter 8 - Policy GI7: Trees, Woodland and Hedgerows

1 Do you support Policy GI7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we support this policy, we do not believe it will be delivered due to the plans to fell hundreds, if not thousands of trees in the New Carrington area to facilitate development.
We do not understand how the success of this policy will be effectively measured and monitored given the lack of evidence and information, including baseline data.
It is not clear whether it applies to the New Carrington allocation area.
What is the baseline number of trees in Trafford?
Is there an aspiration to reach a specific amount of tree cover?
What are the carbon implications of the loss of (or increase to) tree cover?
What is the meaning of the term 'major' development in this context?

Chapter 8 - Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets

1 Do you support Policy GI8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we support this policy, we do not believe it will be delivered because Trafford has already approved a development that will cause ongoing harm to an adjacent SBI and is considering another planning application that would completely fell a woodland SBI.

We do not understand how the success of this policy will be effectively measured and monitored. The policies map is incomplete and does not identify all the natural environmental assets, including Trafford's peat mosses and wildlife corridors. We cannot find the evidence that satisfies the requirements set out in NPPF 192.
Environmental assets, particularly SBIs and SSSIs but also including Trafford's irreplaceable habitats (peat mosses, ancient woodland), should be surrounded by a buffer zone to prevent harm and ensure protection.
What are the criteria that will apply to policy element 'C' that will result in Trafford considering an ecological assessment is necessary.
No ecologial appraisals were completed for the New Carrington allocation area as part of PfE and it is unclear whether this policy applies to PfE allocations. It should be noted that, where there is significant development in the proximity of natural environmental assets, the cumulative impact should be considered, not just the impact of one planning application.
Whilst regular monitoring is mentioned in the reasoned justification, it is not set out in policy, so may not be delivered.
The policy should include some specific targets in relation to the protection of locally designated sites and natural environment assets.

Chapter 8 - Policy GI9: Biodiversity Opportunity Areas

1 Do you support Policy GI9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we support this policy, it is incomplete as it does not mention Carrington Moss as a priority site for biodiversity enhancements. Given that it hosts a 335 hectare restorable very deep peat moss, and there are 15 SBIs and an SSSI on and around the moss, along with extensive woodland and wetland habitats, it is Trafford's largest natural capital asset, and should be a priority for biodiversity enhancement.
We do not understand how the success of this policy will be effectively measured and monitored.

The lack of a Natural Infrastructure Strategy to underpin the New Carrington Masterplan makes it impossible to understand whether such essential actions will be part of those proposals.

Chapter 8 - Policy GI10: Building Biodiversity into New Developments

1 Do you support Policy GI10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy because it does not make it clear that the mitigation hierarchy is to be followed at all times, meaning that new development will be required to avoid harms rather than assuming that damage can just be mitigated/compensated for.
We do not understand how the success of this policy will be effectively measured and monitored.
What targets and measures will be established?
Will this policy apply to PfE allocations?

Chapter 8 - Green Infrastructure and Natural Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Whilst the additional indicators are welcome they are insufficient to determine the success of the policies in this section. Specific, measurable targets should be identified for each policy and the associated criteria.

Chapter 9 - Policy OS1: Open Space

1 Do you support Policy OS1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as the evidence base is incomplete and we do not understand how the success of this policy will be effectively measured and monitored.
NPPF 103 and 104 require that an assessment of Open Space is undertaken to determine that shows the open space, sport and recreation facilities to be surplus to requirements. The Open Space Assessment included in the plan evidence base does not include any assessment of the area known as Carrington Moss and such an assessment was not carried out as part of the PfE evidence base. Prior to any planning applications being approved in this area, such an assessment should be undertaken that shows the open space to be surplus to requirements. Horse riding is a sport and the physical activity mentioned in NPPF 103 would include walking, cycling and horse riding!

If this policy does not apply to the PfE Allocations, the Open Space Assessments should be carried out as part of the masterplanning process.

Chapter 9 - Policy OS2: Outdoor Sports and Recreation Facilities and Provision

1 Do you support Policy OS2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as it is incomplete and we do not understand how the success of this policy will be effectively measured and monitored. The policy does not mention how the requirements of the district's horse riders will be taken into consideration? There are over 1,000 horses stabled on and around Carrington Moss, for example, and horse riding is an outdoor sport.

Chapter 9 - Policy OS3: Indoor Sports and Recreation Provision

1 Do you support Policy OS3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as it is incomplete and we do not understand how the success of this policy will be effectively measured and monitored. The policy does not confirm how leisure services capacity will be increased to meet the needs of the huge population increase that will be the result of the proposed developments in Trafford.

Chapter 9 - Policy OS4: Loss of Sport and Recreation Land or Facilities

1 Do you support Policy OS4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we support this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Chapter 9 - Policy OS5: Allotments and Growing Space

1 Do you support Policy OS5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Chapter 9 - Policy OS6: Cemeteries and Burial Grounds

1 Do you support Policy OS6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Chapter 9 - Open Space, Sport and Recreation

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Whilst the additional indicators are very welcome, they are insufficient to determine whether the policies set out in this section will be successfully delivered. Specific targets should be set for each policy and the associated criteria.

The number of planning applications is not an indicator of what has been, or will be, delivered as developers may renege on agreed provision after the losses have been caused.

Chapter 10 - Policy WA1: Managing Flood Risk

1 Do you support Policy WA1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

We do not think there is sufficient recognition of the need for mitigation to alleviate the issues that climate change will bring - there is, for example, a huge lack of understand about the amount of water captured and stored on Carrington Moss.

There are also insufficient safeguards. The approval of a BESS on Carrington Moss, could, for example, result in significant toxic water pollution if the risk of fire materialises.

Chapter 10 - Policy WA2: Sustainable Drainage – Surface and Foul Water

1 Do you support Policy WA2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Please see our response to policy WA1.

Chapter 10 - Policy WA3: Flood Storage Areas

1 Do you support Policy WA3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Carrington Moss should be identified as a flood storage area as it captures and stores a huge amount of water as can be seen on the Friends of Carrington Moss website at this link https://friendsofcarringtonmoss.com/carrington-lake-2/.

Chapter 10 - Policy WA4: Water Efficiency

1 Do you support Policy WA4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

The worst excesses of water inefficiency are the result of leaks and fractures in the pipes belonging to the water company. Why are there no requirements to ensure development does not result in such incidents and that opportunities should be taken to renew or maintain this infrastructure.

Chapter 10 - Water, Flooding and Drainage

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Whilst the additional indicators are welcome, they are insufficient to determine the success of the policies in this section. Note that the one PfE indicator needs to be added at paragraph 10.29.
Residents in the areas surrounding Carrington Moss are very concerned about the increased risk of flooding as a consequence of the new developments. If the risks materialise, there could be significant damage and health implications. Risks such as this should be measured and monitored.

Chapter 11 - Policy CT1: Protecting Existing Community and Social Facilities

1 Do you support Policy CT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.
Carrington Moss is currently a well-used community facility which provides significant health and wellbeing benefits. How will the proposed changes due to development be articulated, measured and monitored in a way that demonstrates the supposed benefits to existing communities of losing this extensive community asset.

2 Do you think the Council should protect the loss of community facilities and local services through a sequential test (as set out in Policy CT1 above), or by requiring a statement setting out evidence as to why a particular facility is not needed?

Please write your response here::

Whilst a sequential test is beneficial it does not articulate why a facility is not needed. The statement setting out evidence should be provided as well as meeting the sequential test. Any proposed loss of community should be the subject of genuine community consultation, in which those impacted are specifically and formally notified.

Chapter 11 - Policy CT2: Loss of Community Facilities

1 Do you support Policy CT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Any loss of community facilities should be the subject of genuine and robust community engagement, including the explicit notification of those impacted.

Evidence relating to the use of community facilities could take many forms, especially if they are not formally 'rented out', for example. The policy should make it clear that community facilities are not just those that are available for a price!

Chapter 11 - Policy CT3: New Community and Social Facilities

1 Do you support Policy CT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

To support isolated rural communities, funding should be provided to support mobile services (libraries, for example, but also health services).

Chapter 11 - Policy CT4: Fast Food

1 Do you support Policy CT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.
How will the litter associated with fast food outlets be addressed?

Chapter 11 - Policy CT5: Social Value in New Developments

1 Do you support Policy CT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Chapter 11 - Community and Social Infrastructure

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Whilst the additional indicators are welcomed, they are insufficient to determine the success of the policies within this section.

Chapter 12 - Policy BE1: Design

1 Do you support Policy BE1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as it is incomplete and we do not understand how the success of this policy will be effectively measured and monitored.
There should be a maximum height for warehouses.
The policy should set out the expected evacuation procedures should a development be proposed that uses, stores or transports hazardous materials.
The requirement for sustainable freight transport should be mentioned for appropriate developments, to ensure air, noise, light, vibration and water pollution and carbon emissions are minimised.
Sustainable development should also be supported by local access to social infrastructure.
We do not understand why high quality active travel links are only a 'where possible' - aren't they supposed to be at the top of the hierarchy?

Chapter 12 - Policy BE2: Tall Buildings

1 Do you support Policy BE2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy because it is incomplete, we do not understand how the success of this policy will be effectively measured and monitored.
How will the pros of high buildings (increased density, for example), be weighed against the cons (loss of landscape, for example)?
There should be a height limit for warehouses.
Height limits should take into consideration any requirement to, for example, install solar on rooftops, other infrastructure or green infrastructure.

Chapter 12 - Policy BE3: Elevated Green Spaces

1 Do you support Policy BE3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Chapter 12 - Policy BE4: Advertisements and Signage

1 Do you support Policy BE4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.

Chapter 12 - Policy BE5: Heritage Assets

1 Do you support Policy BE5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.
The density of developments should be increased if that reduces the risk to designated and non-designated heritage assets, including, for example, the Carrington Rides, the medieval deer park at Warburton, the moated rabbit warren and manor house, etc.

Chapter 12 - Policy BE6: Designated Heritage Assets

1 Do you support Policy BE6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored. The policies map is incomplete - it should include both designated and undesignated heritage assets.

Chapter 12 - Policy BE7: Non-designated Heritage Assets

1 Do you support Policy BE7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored. Communities should be fully involved in determining the level of harm or loss and the significance of the asset.

Chapter 12 - Policy BE8: Noise and Vibration

1 Do you support Policy BE8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as it is incomplete and we do not understand how the success of this policy will be effectively measured and monitored. Desktop noise and vibration exercises are insufficient to determine the level of harm to be caused to human and wildlife communities from noise and vibration. The Council should require examples of noise levels from similar developments. This is particularly important when the location of the development is very peaceful and is inhabited by bird and wildlife species.
A comprehensive set of receptors should be required (not cherrypicked).

Furthermore, where is the policy which sets out how Trafford will treat planning applications that will result in light pollution, particularly where the site currently experiences intrinsically dark landscapes.

Chapter 12 - Policy BE9: Land Contamination and Remediation

1 Do you support Policy BE9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy and we do not understand how the success of this policy will be effectively measured and monitored.
Why is 'C' not 'will be refused' rather than 'resisted'. This is a weak policy and could have a number of harmful consequences.
How will Trafford prevent more land from becoming contaminated (for example if there is a fire at a BESS which results in toxic water pollution soaking into the surrounding land)?

Chapter 12 - Policy BE10: Digital Connectivity

1 Do you support Policy BE10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored. How will criterion D be encouraged to ensure existing communities do not become the poor relation in terms of digital infrastructure.

Chapter 12 - Built Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Whilst the additional indicators are welcome, they are insufficient to determine whether the policies in this section are successfully delivered.

Chapter 13 - Policy CL1: Protecting and Supporting Existing Cultural, Leisure and Tourism Assets

1 Do you support Policy CL1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored. What ancillary development would be considered appropriate in relation to the Transpennine Trail?

Chapter 13 - Policy CL2: New Culture, Leisure and Tourism Developments

1 Do you support Policy CL2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we do not disagree with this policy, we do not understand how the success of this policy will be effectively measured and monitored.
How will leisure services be expanded to support the huge number of additional residents in Trafford?

Chapter 13 - Culture, Tourism and Leisure

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Whilst these indicators are welcome, they are insufficient to determine the success of the policies within this section.

Chapter 14 - Policy IP1: Infrastructure Delivery and Planning Obligations

1 Do you support Policy IP1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy because it does not require supporting infrastructure to be sustainable and we do not understand how the success of this policy will be effectively measured and monitored.

There are also no safeguards to ensure developers do not renege on their agreements, or come back at a later date requesting reductions in contributions due to viability concerns. If development is proposed in unsustainable, isolated locations, rather than in more sustainable urban areas, developers should fund the required infrastructure costs or seek an alternative (more sustainable) site.

Chapter 14 - Policy IP2: Managing and Monitoring Planning Obligations

1 Do you support Policy IP2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We do not disagree with this policy, and assume it will be able to be effectively measured and monitored.

2 Do you agree that the Council should require a fee to monitor and report on all planning obligations?

Please write your response here::

Yes.

3 Do you agree or have any observations or suggestions on the proposed planning obligation monitoring fees for either minor and/or major developments?

Please write your response here::

Others will be more qualified to respond to this question.

Chapter 14 - Infrastructure and Planning Obligations

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Whilst we welcome the additional indicator, it is insufficient to determine whether the policies in this section are successfully delivered.

Integrated Assessment (IA) of the Draft Local Plan

1 Do you have any comments to make on the Sustainability Appraisal and its associated appendices?

Please write your response here::

There is a need for a thorough review of the IA from the objectives through to the assessment itself, see the following examples of issues to be addressed:
- there is no mention of how the potential for light pollution will be addressed in the plan and this is not highlighted in the IA - if this was not picked up by the assessors, what else is missing?

- IA objective 3 should include (in the assessment criteria for development) have the potential to increase vibration pollution, fire risks, the risk of toxic fumes, other impacts from hazardous materials
- IA objective 5 makes no mention of sustainable freight transport options
- IA objective 6 should consider school places (not just the fact that there are school buildings)
- IA objective 7 should highlight the need for a height limit on, for example, warehouses
- IA objective 9 should assess whether a development will have a positive/beneficial effect on air quality/pollution
- IA objective 11 should assess whether a development will improve water quality/availability
- IA objective 12 should assess whether the local plan will provide a buffer to protect ecologically rich sites from development
- IA obejctive 14 should assess whether the local plan will encourage the use of nature-based solutions to address the climate crisis

The Assessment itself seems to be over-positive and superficial. A number of the policy assessment should be reviewed. There is, for example, little recognition of how the rural economy (EJ7) will be impacted by the IA objectives. IA Objectives 3 and 6, for example, do not recognise that there can be specific health inequality issues for those employed in isolated, rural locations, making it challenging to access GP/Dental services, pick up children from school, access sports facilities. Given the distances involved for some rural communities, mobile services could be a solution to be considered but this is not identified in the IA.

The assessment of the impact of the CRR on IA objectives (Policy TM5) should be considered to have a major negative effect (not minor). There is a significant link for this policy with equality, deprivation and health and it is astounding that the assessment considers there to be no significant link between this policy and IA objective 16. The assessment should also have identified a significant link between IA objective 16 and Policy TM7.

The impact of Policy GI3 on IA objectives 10, 15 and 16 should be considered to have a major positive effect. The assessment for policy GI6, GI10, WA1, WA2 and many other policies needs to be reviewed.

In terms of monitoring, as mentioned above, the plan indicators are insufficient to determine whether the policies in the Local Plan will be successful (or otherwise). This is not highlighted by the IA.

2 Do you have any comments to make on the Health Impact Assessment?

Please write your response here::

The document suggests that the HIA assesses effects of the Local Plan on the health and well-being of the population and its ability to access health-related facilities and services and also addresses equalities issues. It confirms that IA Objective (Support improved health and wellbeing of the population and reduce health inequalities) fulfils the HIA component of the IA.

As mentioned above, this IA objective is incomplete and does not include reference to all the major health impacts that will be the consequence of new development, including a lack of identification of the issue of development which uses, stores or transports hazardous materials. Nor is there any reference to the need for clear evacuation procedures to be introduced in any and all such developments.

The objective does not highlight the impact of development on the health and wellbeing of the most vulnerable in our society, including those who live in deprived communities, who may not own a car themselves but will suffer from high levels of air, noise, light, vibration and water pollution as a consequence of high levels of motor vehicle traffic, including HGVs.

The loss of free to access natural and semi-natural green spaces will also hit these communities the hardest, with Partington and Sale West, for example, being particularly impacted by the loss of their green spaces in the area known as Carrington Moss. This was not assessed within the PfE documentation.

3 Do you have any comments to make on the Equalities Impact Assessment?

Please write your response here::

The EQIA is limited and does not assess the inequalities affecting deprived communities and does not highlight that air pollution has a higher impact on pregnant women, the very young, the very old and those with respiratory illnesses.

IA: Climate Change Risk Assessment

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

Please write your response here::

The Carbon Neutral Action Plan mentioned at paragraph 2.17 does not include any reference to Trafford's peat mosses and the need to preserve and restore them (as advised by Natural England, which considers Carrington Moss to be 335 hectares in size and a restorable, irreplaceable habitat).

There is insufficient consideration, in this document and in the local plan itself, of the opportunity to support climate mitigation that is provided by Trafford's peat mosses. There is no reference to nature-based solutions to reducing carbon emissions. In addition to carbon sequestration, the mosslands will support flood risks and other ecosystem services. There is considerable concern in the local communities surrounding Carrington Moss that the consequence of building roads, houses and warehouses on this land will result in increased risks of local flooding in surrounding communities and along the River Mersey and Sinderland Brook.

We disagree with the statement at paragraph 4.57, there may be warm words in the document but there is a total lack of associated action to support climate mitigation. This is not highlighted in either the IA or this document. Table 3 at paragraph 4.60 does not mention either the opportunity to introduce nature-based solutions or sustainable freight to reduce carbon emissions.

Despite the comment at paragraph 4.35, there is a lack of definitive action to maximise the benefits of sustainable freight within this plan period. As an example, as with previous local plans, there is no commitment to reducing the carbon emissions from HGVs that operate to and from New Carrington.

Integrated Assessment (IA): Scoping Report Addendum

1 Do you have any comments on the IA Scoping Report Addendum?

Please write your response here::

Why doesn't the list at Appendix B include the Climate Change Committee reports, given their recommendations relating to the restoration of peat mosses? The Greater Manchester Peat Pilot Report is also not listed.

Habitat Regulations Assessment (HRA) of Draft Local Plan

1 Do you have any comments on the Habitats Regulations Assessment (HRA) of Draft Local Plan?

Please write your response here::

EJ3 should be screened in given the number of HGVs this policy will generate, many of which will impact European sites, particularly in terms of air pollution.

Whilst TM7 is currently couched in extremely positive terms, the reality is that sustainable freight is neither planned for nor delivered as can be demonstrated by the New Carrington development, which will see over 3,000 HGVs on the road every day, yet there is still no exploration of sustainable freight transport options and the traffic created by New Carrington is likely to impact European sites, particularly in terms of air pollution.

We note that the Plan's monitoring obligations have been screened out - shouldn't they be screened in and required to notify if the monitoring of any policy raising concerns that should be addressed in relation to this HRA?

Site Selection Methodology

1 Do you have any comments on the proposed Site Selection Methodology (Figure SS-1)?Are there any stages / questions / considerations which should be added and/or removed?

Please write your response here::

Whilst paragraph 2.3 states that "The Council does not need to identify any further Green Belt land for development", will sites in the Green Belt be considered for anything other than non-development uses?

How will the Council handle sites that the developer/proposer considers to be in the Grey Belt?

2 Specific criteria will need to be identified to assess a sites performance at each stage of the site selection process.Do you have any comments on what these site criteria should include?What evidence should inform this assessment?

Please write your response here::

NPPF paragraph 188 requires Local Plans to allocate land with the least environmental or amenity value. This assessment should be made at stage 1 in the process. The evidence should include information from the Greater Manchester Ecology Unit and from local communities.

Stage 2 should include an assessment of the need for sustainable freight transport options (as well as public transport and active travel), the expected carbon emissions and an estimate of air, noise, light, vibration and water pollution to be caused by the development. Those proposing development sites should include an estimate of the likely motor-vehicle traffic, including HGVs.

Stage 2 should also include an assessment of any hazardous materials that are likely to be used, stored or transported as a consequence of any planning permission (including, for example, the risk of fire and toxic fumes from battery energy storage systems). The assessment should include a requirement for confirmation of potential evacuation procedures should incidents arise on the sites concerned.

For sites being proposed for non-development uses, there should be an assessment of the benefits they will bring to, for example, climate mitigation, nature's recovery and future food security.

[redacted]

From: Marj Powner [redacted]
Sent: 30 June 2025 18:36
To: [redacted]
Cc:
Subject: Re: Local Plan Consultation

Follow Up Flag: Follow up
Flag Status: Completed

Categories: LP April 2025 comment

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

We would like to propose all of the restorable peat, including that which is allocated for development (so yes, including the hashed area).

For clarification, we do not understand how sufficient compensation can be proposed for the destruction of restorable irreplaceable habitat given the amount of peatland that has been allocated for development (which we understand from the Natural England document totals 105 hectares).

Government guidance suggests that "*Compensation for irreplaceable habitat needs to be relative to the baseline habitat type*". Given the significant depth of the peat at Carrington, that peat can only be generated on peat and that it typically generates at a rate of around 1 millimeter per year - for the compensation to be relative, the compensation site size would need to be extensive for the loss to meet this criterion.

We, therefore, believe that the allocation of restorable irreplaceable habitat cannot comply with government guidance.

Thanks
Marj

[redacted]

[redacted]

From: [redacted]
Sent: 20 May 2025 10:23
To: Local Plan Consultation
Subject: Consultation on the Trafford Draft Local Plan : Policy R6: Older Persons Accommodation

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: LP April 2025 comment

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

Dear Sir / Madam,

I note that this consultation document on the new Trafford Local Plan states (on Page 93) :

B. The Council will seek to meet the needs of older people through the provision of approximately 4,500 homes of the overall housing land target to be developed as new housing for older person households. This includes approximately 2,500 C3 homes, 1,000 C2 extra care homes ***and 600 C2 residential care bedspaces****.*

This is rather curious. For many years Trafford Council have explicitly said that they want to reduce the number of people going into residential care homes in favour of " keeping people in their own home for as long as possible." However the above intention seems to directly contradict that. Could you explain this please ?

Please could you explain precisely how this figure for 600 additional residential care bed spaces was arrived at by the Council ? What projections underpin this number ?

Thank you.

Kind regards.

Jonathan

Jonathan Symms
[redacted]

[redacted]

From: Kate Harper [redacted]
Sent: 23 May 2025 18:20
To: Local Plan Consultation
Subject: Controls on Air B&Bs

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: LP April 2025 comment

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

I would like to submit my views on the Trafford Local Plan.

My concern is that with all the amazing major developments happening across Trafford, there may be a likelihood that more apartments will be let out as short term lets such as Air B&Bs, especially where they are near the Metrolink, instead of them providing homes for local people.

All apartment owners will probably have a management agency and lease with rules and regulations. Can Trafford Council lay down some restrictions when agreeing planning permission for new apartments, that protects a certain number of apartments for residents, or limits the number of Air B&Bs in a development?

Many thanks

Kate Harper

[redacted]

[redacted]

From: [redacted]
Sent: 27 May 2025 13:47
To: Local Plan Consultation
Subject: Comments on Transport & Movement Section

Follow Up Flag: Follow up
Flag Status: Flagged

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

Mike Battman; Who am I?

[redacted]The Institution of Civil Engineers.

[redacted]

[redacted]in local railway related organisations.

I am Chair of the **Mid Cheshire Rail Users Association** (MCRUA), an organisation that lobbies for better train services on the Altrincham to Chester line. In this role I regularly meet with Northern Rail, have contacts with TPE, TfGM, MPs and councillors.

I am a Director of the **Mid Cheshire Community Rail Partnership** (CRP), an organisation that receives funding from various sources and its principal duty is to promote usage of the Altrincham to Chester Line.

I am also the Treasurer of the **Friends of Altrincham Interchange** (FoAI) a small group that maintains to gardens, poster boxes and waiting room at Altrincham and Navigation Road Stations.

I would be very happy to be contacted about any transport related matters. I can be contacted on [redacted]

[redacted]

Trafford Local Plan, my comments relate only to the Transport and Movement section.

Summary Document (April 2025)

Embarrassingly, the Key Diagram on page 5 of this document is wrong! It shows the Mid Cheshire Rail Line following the trams through Sale and Stretford into Manchester. This is not the case, the line branches off at Deansgate Junction, skirts Timperley Village on its way to Stockport.

6. Transport & Movement

Introduction: A lot of bold statements without much in the way of a plan as to how to achieve the desired outcomes.

6.3: The A56 is a problem. What ever happened to the plans to extend Carrington Spur to the M56, near Bowdon Roundabout? That would act as an A56 by-pass for non-local traffic.

Promoting Sustainable Modes of Transport

Policy TM1 A: Is there a definition of 'everyday shorter trips'?

Policy TM1 B: Very vague

Policy TM1 D: A very ambitious plan but it raises more questions than answers. Routes that end at a development's boundary are not good routes, developers should be made to fund safe routes outside the new development.

Policy TM1S: I am not familiar enough to comment on north or Central areas.

Ai: Is the Canal Towpath already providing this cycle route?

Aii: Does the Carrington Greenway plan not conflict with possible reuse of this railway line?

Aiii: What are "the pedestrian barriers to crossing…"?

6.6 & 6.7: I'd like World Peace but ….

6.8: 50% target for 2040, what is it now?

Policy TM2: Public Transport: General comment, it is just not bold enough. If you really wish to have a change to sustainable public transport, make it cheaper to use. All children & Students get a free pass. Bus Pass eligibility from 60 years old (or even younger).

C: Bus: New Carrington and Davenport Green need commitment, not 'support'.

D: Metrolink: How will you do this? The Wester Leg will take people to Manchester, not Altrincham where many (most?) will want to go. We need an east – west route.

E: Rail: How??

Ei: On the MCL the majority of the trains are made up of 2 carriage 40-year old stock, any 4 carriage trains have the last carriage 'locked out' because of the platform length at some of the stations. So, at best we have 3 carriage trains. Longer trains would not work because of platform length. Modern trains where the guard can select which doors open would help.

Eii: Both lines are currently at capacity, there are no paths for more trains. There is a need to build the new Manchester to Liverpool line and the Burnham-Street version of HS2; both these will increase capacity and allow many more paths for freight and passenger trains.

MCRUA have been campaigning on the MCL for 2 -trains an hour since its inception, yet progress has been limited. The main problems are regular freight trains, lack of paths between Stockport & Piccadilly, and between Mickle Trafford & Chester.

Eiii: Many stations have no or limited access for disabled people.

Not mentioned:

i) HS2 alternatives
ii) Airport Western Link – a connection from Manchester Airport to the MCL near Mobberley

F: New stations are a mixed blessing. Yes, they mean more passengers BUT each new station can add 4-minutes to the journey time of already slow journeys.

TfGM are planning a new station at Cheadle BUT it is on a stretch of line that is a long single track. Time tabling will be difficult, and TfGM are talking about reducing the service at the smaller stations along the line to one train every two hours so that the slots at Stockport and Mickle Trafford can be met.

There have long been talk of a new station at Baguley, one at Timperley Village (Timperley East?) but unless we have faster rolling stock

G: Tram-Train: Sounds good but unless you can remove the freight the practicality of more trains (trams) is not good.

6:13: That is not true … Davenport Green and New Carrington are two of the worse connected places in Trafford.

6:15: Not just Trafford or GM, cross border Cheshire East, etc.

Metrolink:

6:17: What enhancement??

6:18: Airport West Leg is only to Airport at City Centre, no east west connection.

Rail:

6:19: Navigation Road is NOT in Sale, it is in Altrincham!! How will Trafford improve the capacity and reliability of rail services?

6.20: How would the frequency of Trams be increased?

Tram-Train:

6.21: It does, but it is not easy.

6.22: Altrincham to Hale has many problems, freight, reversing, terminus. Make more sense to go to Knutsford but same problems exist.

The Highway Network

TM5: C: What is the Western Gateway Infrastructure Scheme?

TM5:D: New Carrington and Davenport Green will have a material impact on the highway network.

TM7: Freight Movement of Goods

TM7: A: HS2 is needed to move more freight to rail.

National Infrastructure Schemes

TM9: A: This is HS2!! Or the new Liverpool – Manchester line.

[redacted]

From: Linda Broomfield [redacted]
Sent: 28 May 2025 14:11
To: Local Plan Consultation
Cc: [redacted]
Subject: Lymm Parish Council's response to Trafford Local Plan - Regulation 18 Consultation Draft

Follow Up Flag: Follow up
Flag Status: Completed

Categories: LP April 2025 comment

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

Please find below a summary of Lymm Parish Council's key points and responses to the Trafford Local Plan – Regulation 18 Consultation Draft:

- The Parish Council notes and supports that absence of any proposal to change the extent of the Green Belt in any area in close to Parish boundary shared with Trafford.

- It is noted that further consultation on a Site Allocations document will be forthcoming, and the Council would expect consultation and the opportunity to review and comment on such documentation.

- It is not clear from the submissions tabled for consultation as to the extent to which proposals for housing and employment development in the south and west of Trafford have been considered alongside proposals for similar developments across Warrington. It is considered that there should be greater clarity to show that there has been effective co-operation with neighbouring authorities to ensure that duplication of the assessment of need has not resulted in excessive provision of housing land or employment development and where allocations are made, they effectively meet the needs of the local community.

- The provisions of PfE Policy JPA30 in allocating land at Carrington as a strategic development site are noted. The Parish Council has reviewed proposed policy EJ3 in the context of this allocation and the emerging New Carrington Master plan. It is suggested that there should be a greater level of cross reference between the Master plan and the Local Plan which is not currently apparent. The Parish Council considers this to be of critical significance as such cross reference is not currently apparent.

- The successful implementation of the PfE allocation is currently dependant on the range of assumptions, including need for the scale of employment development proposed, infrastructure delivery, phasing and patterns of trip and traffic generation.

- The Parish Council is concerned that the Local Plan does not reference the requirements and expectations of the New Carrington Transport Strategy and that it is currently not possible to fully interpret the scope for this large scale to impact on infrastructure and particularly the local highway network to the west of the site, across the boundary into Lymm and Warrington.

- There is particular concern if the development increases traffic on the A6144 which is entirely unsuited to increased trips west of Partington and through Warburton, but particularly if traffic continues into Lymm via Rushgreen Road and into the centre of the village. Clear consideration of such issues is not currently apparent.

- As it stands the impact of the strategic allocation appears to depend on significant levels of modal shift, which are ambitious and in the Council's consultants' own words require an enlightened and supportive community. In this context it is considered that rather than relying on generic policy relating to housing design and density, infrastructure requirements and delivery, parking standards etc, a site-specific set of development management standards and conditional requirements should be set out within the local plan, to ensure that assumptions made in assessing possible impact are capable of being delivered.

Kind Regards

Linda Broomfield
[redacted]
Lymm Parish Council
Village Hall, Pepper Street,
Lymm, WA13 0JB
[redacted]

[redacted]

Response ID ANON-MFZ6-4QR9-K

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-05-30 18:08:22

Personal details

1 Forename

Enter your forename:
Jonathan

2 Surname

Enter your surname:
Morrison

3 Organisation (if applicable)

Enter your organisation:
Morrison Building Group Ltd

4 Position/title (if applicable)

Enter your position/title:
[redacted]

5 Address

Enter your address:

[redacted]

6 Postcode

Enter your postcode:
[redacted]

7 Email address

Enter your email address:
[redacted]

8 Contact phone number

Enter your contact phone number:
[redacted]

9 Please select ‘opt in.’ if you wish to recieve future consultations on planning policy.

Opt in

Chapter 2 - Policy ST3: Southern Areas (Trafford)

1 Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 2 - Policy ST4: Sustainable Development

1 Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 3 - Policy RT4: Sustainable Retrofitting

1 Do you support Policy RT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We comment as an experienced Business in objecting the mass use of Heat Pumps to replace Gas Central heating in Domestic and Commercial Properties. It is our belief that Government sub-committee evidence has been supplied by mainly businesses in Heating systems such as Air Conditioning. This is as ill advised as asking a roofer , " what is the matter with my roof"!
Heat pumps have their place in larger buildings and open spaces such as Shopping Centres , Exhibition Halls, Large Hotels, etc.
Also the amount of conversion and disturbance to the average, Home, Shop or business premises would be substantial and when completed would leave more improvement works needed to cosmetically address the damage caused by the fitting of Heat Pumps. Also when completed, the aesthetics of buildings outside would be hugely affected. Noise too of the fans overnight and during the day would be substantial. Finally, they require at least two to 3 pumps for an average system plus fans etc. These consume electricity at faster rates than the average gas boiler today.
We have previously suggested that if an Electrical System is to be installed it should be via a small electric boiler - in many cases fitted in the same space as an existing gas boiler. This boiler would use all the existing water pipes and radiators as the present gas system. Such heating systems have been used by National Building Companies for around 10 years in the UK, during which time, they have proved to be as efficient as a gas boiler system, They are presently not common because they are made abroad, some in Germany and others in China and re-branded. The energy they use is less than an equivalent Heat Pump and they heat the radiators to a warmer temperature than present heat pumps.
[redacted], seem single minded to recommend only heat pumps. Why? Is this another Face mask fiasco where soft suppliers made huge profits supplying masks which didn't work? We are not suggesting that Heat Pumps shouldn't be retro-fitted in place of say, a gas central heating system but it is an alternative.
Another system would be low tariff storage heaters which heat up using the cheapest tariffs (often overnight) and heat a home during the day - ideal for Sheltered Accommodation and retirement homes. These don't require pumps at all and if using ceramic radiators with thermostats can be be boosted around 4pm to provide heat which will last until 10.30 pm. Again ideal for people who work from home or the elderly who are at home most times.
So please educate yourselves to the many different types of heating available rather than opting for Heat Pumps for modern heating systems.
Thank you.

Chapter 4 - Policy R1: Housing Delivery

1 Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes but only if with larger developments of say over 20 houses or 30 Apartments, there has to be an assessment of how Schools will be affected. For example if local schools are full to capacity, then there is a definite need for expansion in the local schools of if necessary and new school created to accommodate the needs. Sending children many miles away, out of their area to find a place away from their locality and friends is barbaric and cruel.

Chapter 4 - Policy R3: Affordable and Social Housing

1 Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We do not support Policy R3

2 Should 10% of all affordable and social housing be delivered as Truly Affordable Net Zero Homes (TANZ)?

Please write your response here::

No

3 Should the Local Plan set an affordable housing requirement, including a tenure mix, for each locality (similar to Core Strategy policy L2) that reflects market conditions?

Please write your response here::

No

4 Should any other policy approaches to affordable and social housing be explored?

Please write your response here::

Since 1980, The UK has not carried out its obligations in building enough affordable/social homes to buy or rent. The Local Plans have omitted proper calculations and have not been amended correctly every review period - normally 5 years. This has resulted in an severe under provision of Affordable homes in both the purchase and rented sectors. So Government is unfairly putting blame on Developers.
The calculations in R3 are not encouraging for builders and are uneconomic.
Instead we would recommend and site by site provision as a "one rule fits all " rule won't work. It must surely depend on the local circumstances and needs, Not an unrealistic central government guidance to Local Authorities.

Cil should be abolished for such development, and free , pre-planning application meetings with the planners provided (as they used to be) with every planning application.

Site Selection Methodology

1 Do you have any comments on the proposed Site Selection Methodology (Figure SS-1)?Are there any stages / questions / considerations which should be added and/or removed?

Please write your response here::

Regarding the use or conversion of Greenbelt and in your Draft Local Plan Map, you have the Legend- Green Infrastructure Network? What does that mean? At the moment all this land in your map is Farmed and to all intents and purposes, is Greenbelt. Thus your Draft Plan is altering some of this to the above description. No one at Trafford has explained this to most of the locality and it is causing great stress. So we suggest you explain your intended use of these areas. Farmers already under great pressure are unlikely to invest in their Greenbelt farmed land if they think there is a risk of it being converted to say residential re-development by an out of the blue application. This has just happened at the Bowdon A56 roundabout where East Cheshire , very suddenly, granted planning permission of a Farm and Farmland (Greenbelt) into a commercial undertaking without a public enquiry and without it being in their Local Plan. Trafford Council did object so it was called in by the DOE and granted its use. Everyone in Knutsford and Altrincham is furious that due process has been side lined by the Inspectorate. Please can you explain what Green Infrastructure Network means?
Thank you

2 Specific criteria will need to be identified to assess a sites performance at each stage of the site selection process.Do you have any comments on what these site criteria should include?What evidence should inform this assessment?

Please write your response here::

All site areas on the Draft Local Plan 2025 Map designated Green Infrastructure Network

Response ID ANON-MFZ6-4QRY-K

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-03 19:01:25

Personal details

1 Forename

Enter your forename:
Mark

2 Surname

Enter your surname:
Priestner

3 Organisation (if applicable)

Enter your organisation:

4 Position/title (if applicable)

Enter your position/title:

5 Address

Enter your address:

[redacted]

6 Postcode

Enter your postcode:
[redacted]

7 Email address

Enter your email address:
[redacted]

8 Contact phone number

Enter your contact phone number:
[redacted]

9 Please select 'opt in.' if you wish to recieve future consultations on planning policy.

Opt in

Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

Chapter 1 - Vision

1 Do you agree with the proposed Vision for the Trafford Local Plan?

Please write your response here::

No. By destroying large parts of the peat and moss land of Carrington Moss this cannot be compatible with carbon neutrality and negating climate change which is supposed to be at the heart of the local plan. It is also destroying the habitats for many species of animals and birds.

Chapter 1 - Strategic Objectives

1 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

Please write your response here::

a lot of the objectives are admirable but the negative effect on the environment is considerable with loss of habitat and I question the biodiversity net gain claims.

Chapter 1 - Introduction, Vision and Strategic Objectives

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

Chapter 2 - Policy ST3: Southern Areas (Trafford)

1 Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

It is not making most use of previously developed land as vast swathes of rural land will be built on. From our farm it is presently green fields as far as the eye can see in a northerly/northwesterly direction. All this is proposed to be built on as detailed in this plan. There appears to be a conflict between the vision and the policies of development.

Chapter 2 - Policy ST4: Sustainable Development

1 Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 2 - Policy ST5: Climate Change

1 Do you support Policy ST5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 2 - Strategy

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

Chapter 4 - Residential Development

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Chapter 5 - Policy EJ7: Rural Economy

1 Do you support Policy EJ7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 8 - Policy GI10: Building Biodiversity into New Developments

1 Do you support Policy GI10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 12 - Policy BE2: Tall Buildings

1 Do you support Policy BE2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

[redacted]

From: Gaye Fletcher [redacted]
Sent: 28 May 2025 17:25
To: Local Plan Consultation
Subject: Reply to Trafford's Local Plan and Call to Sitea

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: LP April 2025 comment

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

Hi there,
I am a Trafford resident [redacted] and wholeheartedly support the response of Marj Powner from Friends of Carrington Moss. Peatland must be saved for the future of our planet.
Please acknowledge this response.
Regards
Gaye Fletcher

Trans Pennine Trail ®

sustrans

Consultation Response

Organisation:	Trafford
Detail:	Trafford Local Plan (Policies) – Regulation 18
Planning Ref:	N/A
Link:	Draft Trafford Local Plan
Closing Date:	12th June
Response to:	localplan.consultation@trafford.gov.uk
Submitted by	Trans Pennine Trail & Sustrans
Date:	29th May 2025

Comments:
General Comment: It is important, within this document, to detail how sustainable movement provides a golden thread to interlink within all the other strategic objectives.

Consultation Question 1-2: Do you agree with the proposed Vision for the Trafford Local Plan? Noted reference to having a sustainable transport network but it is important to reference that this should include walking, wheeling, cycling and horse riding. Active Travel England has now recognised that horse riding should be included as a form of active travel and it is essential that all schemes are designed fully accessible and would suggest that the wording be changed to read: Trafford will have an **accessible** sustainable transport network....

Consultation Question 1-3: Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?
S08 should include reference to horse riding where possible.

Consultation Question 6-1: Do you support Policy TM1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
It is important to include within this section that walking, wheeling and cycling provision should be fully accessible and without barriers.

Designing housing developments to be permeable for those walking, wheeling and cycling is very welcome. To compliment this point, it is important to make rat runs through neighbourhoods permeable to motor traffic, to prevent the residential roads becoming busy with through traffic avoiding boundary roads.

Reference should include, where appropriate, to include horse riding, particularly as this has been acknowledged by Active Travel England but also that bridleway provision will also provide routes for walkers, cyclists and wheelers by their nature.

It is also important to reference the Trans Pennine Trail and National Cycle Network in terms of the local, regional and national provision that these routes provide. It is acknowledged that seating is referenced within the policy but it is important to note that different styles of seating should be used to also provide opportunities for those in wheelchairs to slide onto a bench to sit next to their companion. Picnic benches should also include those that have facilities for wheelchairs/pushchairs.

Consultation Question 6-6: Do you support Policy TM6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
Whilst safe, accessible segregated routes are preferred, if a pavement is wide enough to accommodate walking, wheeling and cycling then shared use should be looked at as an option to potentially provide more provision for non-motorised use.

Consultation Question 8-4: Do you support Policy G14? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
In terms of the Trans Pennine Trail it is important to note that connections / upgrades may also require improvements for horse riders. Accessibility of all provision is important.

Consultation Question 9-1: Do you support Policy OS1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
This policy is supported and there is reference to accessibility but it is felt this aspect should be strengthened and note that these facilities should also be fully accessible by active travel modes as part of new developments.

Consultation Question 9-2: Do you support Policy OS2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
This policy is supported and there is reference to accessibility but it is felt this aspect should be strengthened and note that these facilities should also be fully accessible by active travel modes as part of new developments.

Consultation Question 9-3: Do you support Policy OS3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.
This policy is supported but there should be reference that facilities should be accessible to all and accessible by active travel modes as part of new developments.

Consultation Question 14-1: Do you support Policy IP1? Are there any changes required which would improve the policy?

Policy supported and welcome reference to including active travel schemes.

Draft Trafford Local Plan (Policies), Integrated Assessment and Habitat Regulations Assessment

Call for Sites

Importance of Safeguarding the Trans Pennine Trail

As part of Trafford Council's consultation on their local plan and the Call for Sites exercise, it is crucial to emphasize the significance of safeguarding the Trans Pennine Trail. The Trail is not only a vital source of active and utilitarian transport for local communities and visitors alike, but it also plays a key role in promoting health, well-being, and environmental sustainability.

The Trans Pennine Trail offers numerous benefits:

Active Transport: The Trail provides a safe and accessible route for walking, cycling, wheeling and horse riding, encouraging physical activity and reducing reliance on motor vehicles. This contributes to improved public health and reduced traffic congestion.

Utilitarian Transport: For many residents, the Trail serves as a practical means of commuting to work, school, and other daily destinations. It connects various neighbourhoods and amenities, making it an essential part of the local transport infrastructure.

Environmental Sustainability: By promoting non-motorised transport, the Trail helps reduce carbon emissions and supports Trafford Council's commitment to environmental sustainability. It also preserves green spaces and natural habitats, enhancing biodiversity.

Community Engagement: The Trail fosters a sense of community by providing a shared space for recreational activities and social interactions. It is a valuable asset for local events, educational programs, and volunteer initiatives.

Tourism and Economic Benefits: The Trail attracts visitors from outside the area, boosting local tourism and supporting businesses. It is a key feature in promoting Trafford as a destination for outdoor activities and nature exploration.

In conclusion, safeguarding the Trans Pennine Trail is essential for maintaining its role as a vital source of active and utilitarian transport. It is an invaluable asset that contributes to the health, well-being, and sustainability of local communities and visitors. Trafford Council's commitment to preserving the Trail will ensure that it continues to provide these benefits for generations to come.

[redacted]

From: LUP enquiries [redacted]
Sent: 02 June 2025 14:45
To: Local Plan Consultation
Subject: Trafford Local Plan – Draft Local Plan (Policies) Regulation 18 Consultation and Call for Sites

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: LP April 2025 comment

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

Dear Local Plan Consultation team,

Thank you for your email to the Land Use (LUP) Planning advice team of the Health and Safety Executive (HSE) informing us of the new draft Trafford Local Plan.

The comments of the LUP advice team (contact emai[redacted]) are as follows:

HSE is not a statutory consultee for Local or Neighbourhood Plans, however it is a statutory consultee for planning applications for certain developments within the Consultation Zones of major hazard sites and major accident hazard pipelines. HSE's role is to provide local planning authorities with advice on the risks to people at a proposed development from a major accident at a site in the vicinity storing or using hazardous chemicals. There are a number of major hazard sites and major accident hazard pipelines in the Trafford Council area which have consultation zones.

1. HSE provides Planning Authorities with download access to GIS consultation zones for major hazard sites via its LUP Web App https://pa.hsl.gov.uk/ . These tools alongside HSE's published methodology (https://www.hse.gov.uk/landuseplanning/methodology.htm) can assist you in ensuring that land allocations do not conflict with major hazard sites, major accident hazard pipelines and licenced explosives sites.

2. In determining its LUP advice to a Planning Authority, HSE's Land Use Planning Methodology uses a decision matrix with a combination of the consultation zone of the major hazard site or pipeline and the sensitivity level of the development (https://www.hse.gov.uk/landuseplanning/methodology.htm#matrix). The majority of major hazard sites have three consultation zones (inner, middle and outer) and for developments in these consultation zones the LUP Web App also enables local planning authorities and developers to find out whether HSE's advice is "Advises Against" or "Doesn't Advise Against" a proposed development. However there are two of the major hazard sites in the Trafford Council area which have an additional consultation zone inside the inner consultation zone – the Basell Polyolefins Ltd site at Isherwood Road, Urmston (within the West Trafford Locality) and the Valero Logistics UK Ltd Manchester Fuels Terminal at Churchill Way, Trafford Park (within the North Trafford Locality). For developments within these additional consultation zones the WebApp is unable to provide advice and HSE's Land Use Planning team should be contacted directly by emailing [redacted] . On 2 December 2022 HSE provided the Council with general information on the consultation zones for the Basell Polyolefins site at Isherwood Road.

We hope that this takes your consultation forward.

Kind regards

Richard Lomax | Land Use Planning advice team
Health and Safety Executive | Chemical Explosives Microbiological Hazards Division 5B
[redacted]

Please send enquiries on Land Use Planning to [redacted] and enquiries on hazardous substance consents to [redacted]

From: Local Plan Consultation <localplan.consultation@trafford.gov.uk>
Sent: 24 April 2025 15:36
To: Local Plan Consultation <localplan.consultation@trafford.gov.uk>
Subject: Trafford Local Plan – Draft Local Plan (Policies) Regulation 18 Consultation and Call for Sites

Dear Consultee,

Trafford Local Plan – Draft Local Plan (Policies) Regulation 18 Consultation and Call for Sites

We are writing to you because you previously responded to a consultation on a Trafford planning policy document and/or have asked to be kept updated on the Trafford Local Plan and other planning policy documents.

We are holding a consultation on the draft policies of the **Trafford Local Plan** from **24 April 2025** until 23:59 on **12 June 2025**. The consultation is an opportunity for the local community and relevant stakeholders to have their say on a plan which will guide development in the borough for the next 15+ years.

This consultation, under Regulation 18 of the plan-making process, relates only to the vision, strategic objectives and thematic policies of the draft plan. Any site allocations and designations will be the subject of a separate future consultation later in 2025.

Consultation on an earlier draft of the Trafford Local Plan previously took place in February 2021; a summary of the comments made to that consultation have been published alongside this consultation and have been considered in preparing this updated iteration.

We are now consulting on a new draft Trafford Local Plan, following the adoption of Places for Everyone (PfE) (a joint plan between nine Greater Manchester districts), which will expand on PfE and provide detailed, Trafford-specific policies covering the whole of the borough.

About the Trafford Local Plan

The Trafford Local Plan, alongside PfE, will be the key land use planning document for Trafford, forming part of the Development Plan. It will guide the day-to-day decisions on planning applications and strategic planning and development in Trafford up to 2042.

Some key strategic decisions have already been made in PfE, such as the allocation of the strategic development sites at New Carrington and Davenport Green (Timperley Wedge). PfE also sets the

housing requirement for Trafford and establishes the Green Belt boundary. Considering this, the draft Trafford Local Plan does not propose any changes in these areas.

Please find attached to this email a copy of the **Local Plan Summary**, setting out further information about the draft Local Plan and the consultation.

About the Consultation

Draft Trafford Local Plan (Policies), Integrated Assessment and Habitat Regulations Assessment

We are seeking feedback on the draft Vision and Strategic Objectives alongside draft policies covering a wide range of important topics such as climate change, residential and employment development, transport, town centres and retail, green spaces and the natural environment, and water and sustainable drainage.

In addition to the draft policies, we are also seeking views on the findings of the Integrated Assessment (IA), comprising a Sustainability Appraisal, Climate Change Risk Assessment, Equalities Impact Assessment and Health Impact Assessment. Views are also sought on the accompanying Habitat Regulations Assessment (HRA).

Call for Sites

We are also undertaking a Call for Sites exercise, inviting people to put forward any sites to be considered for development, protection or for some other purpose within Trafford.

Further information on the Call for Sites exercise is on the Trafford Council website.

Any site allocations and designations included in the Local Plan will be the subject of a separate future consultation later in 2025.

Site Selection Methodology

To inform this next stage of the draft Trafford Local Plan, we are also seeking views on the proposed **'Site Selection Methodology'** that we will use to allocate sites for development and protective designation etc.

Further information on the Site Selection Methodology is on the Trafford Council website.

How to comment on the Local Plan

The draft Trafford Local Plan policies consultation documentation, including the Integrated Assessment, Habitat Regulations Assessment, Call for Sites form and Site Selection Methodology are all available on the Trafford Council website.

The consultation documents will also be available to view at deposit locations at Trafford Town Hall, Trafford Council's Sale Waterside offices, and Trafford's libraries.

Comments are invited on the draft Trafford Local Plan from **24 April 2025** until 23:59 on **12 June 2025**.

The most efficient way to respond to the consultation is **online via Citizen Space**. The online consultation platform will guide you through the plan and its accompanying consultation documents

and provide an opportunity to comment on each policy/ document. You can access the Citizen Space platform via the Trafford Council website.

If you need to respond by email or post, please send completed responses to:

- Email – localplan.consultation@trafford.gov.uk
- Post – Strategic Planning, Trafford Council, Trafford Town Hall, Talbot Road, Stretford, M32 0TH

Please ensure you include the following information if responding by email or post:

- Name and contact details
- Organisation (where relevant)
- What you are commenting on – which chapter, policy or section of the Local Plan or accompanying document, including the policy reference and/or paragraph number.
- Your comments – what you do or do not like about the policy / section of the document, the reasons why and any alternative proposals or evidence you have.

Please note that there is no requirement or expectation for you to comment on all of the policies or documents that are part of the consultation. You only need to comment on the policies of the draft Local Plan and/or other elements of the consultation that you are interested in. Similarly, there is no need to respond 'no comment' to any questions, policies or elements of the consultation that you have no comments on or are not interested in.

Drop-in sessions

A series of consultation drop-in sessions will be held during the consultation period where officers will be available to answer questions. Details of these events are shown below.

Date	Venue	Time
01/05/2025	Stretford Library	3:30 - 7:30pm
06/05/2025	Urmston Library	3:00 - 7:30pm
07/05/2025	St Anne's church, Sale	3:00 - 7:30pm
08/05/2025	Timperley Library	3:00 - 7:30pm
12/05/2025	Old Trafford Library	3:00 - 7:30pm
14/05/2025	Altrincham Library	3:00 - 7:30pm
15/05/2025	Partington Library	3:00 - 7:30pm
19/05/2025	Sale Library	2:30 - 7:00pm

What happens next

Following the conclusion of this draft Trafford Local Plan (policies) consultation, all responses received will be analysed and considered. This will then inform the next version(s) of the Trafford Local Plan. There will be opportunities during future consultation stages to make further representations and shape the development of the plan, as timetabled in the Local Development Scheme, detailed below.

Other documents available

The following documents are available online via the Trafford Council website.

- **Local Development Scheme**

The Councils' timetable to produce the Trafford Local Plan and other emerging Development Plan Documents is set out in the Local Development Scheme, covering the period 2025-2028.

- **Statement of Community Involvement (SCI)**

The Councils' SCI sets out how we will engage with the community and involve local people in the preparation of the Local Plan and other planning policy documents - as well as how we will consult on planning applications in Trafford.

If you have any questions or you no longer wish to be contacted about Trafford's planning policy documents – including the Local Plan – please email localplan.consultation@trafford.gov.uk or contact us by telephone on 0161 912 3149.

Yours sincerely,

The Strategic Planning Team

Growth, Communities & Housing Service | Trafford Council | Trafford Town Hall | Talbot Road | Stretford | M32 0TH

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Os nad chi yw'r derbynnydd bwriadedig, mae unrhyw ddatgeliad, copïo, dosbarthu neu unrhyw gamau eraill a gymerir gan ddefnyddio'r wybodaeth sydd yn yr e-bost hwn wedi'u gwahardd yn llym. Rhowch wybod i'r anfonwr am y gwall fel y gellir dilyn gweithdrefnau mewnol, a dileu'r cyfathrebiad o'ch system ar unwaith wedi hynny.

[redacted]

From: Evans, Nathan
Sent: 03 June 2025 16:20
To: Local Plan Consultation
Cc: [redacted]
Subject: Draft local plan response

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: LP April 2025 comment

Subject: Objection to Trafford Local Plan – Unsound Due to Green Belt Release and Lack of Infrastructure Planning

To: Trafford Strategic Planning Team

Dear Planning Team,

I am writing to submit my comments on the Trafford Local Plan. While I welcome the need for a clear vision for Trafford's future, I am strongly opposed to the current draft on the grounds that it is **unsound**, **unsustainable**, and **undeliverable** in its current form.

1. Unjustified Use of Redesignated 'Grey Belt' Land

The Plan proposes extensive development on formerly **Green Belt** areas that have since been redesignated **Grey Belt** under the **Place for Everyone Plan (P4E)**, including **Timperley Wedge** and **Carrington Moss**, which contradicts the Plan's stated commitment to sustainability and environmental protection. Additionally, there has been no clear demonstration that all **brownfield alternatives** have been exhausted.

2. Lack of Infrastructure Provision

There is **no credible evidence** of how the essential infrastructure required to support the proposed developments will be delivered.

- **School places**: No guaranteed provision for new schools, particularly secondary, despite the pressure new housing will place on existing capacity.
- **Healthcare**: No committed plan to provide additional GP surgeries, dental practices or NHS support for an expanding population.
- **Transport**: Aspirations for "sustainable transport" are vague, with no clear funding or delivery timeline for road or public transport upgrades.

3. Failure to Prioritise Brownfield Development

The Plan appears **developer-led**, with insufficient emphasis on:

- Urban regeneration of areas like **Old Trafford**, **Partington**, and **Stretford**.
- Making best use of **vacant brownfield land** before sacrificing protected green spaces.

4. Contradiction of the Green Agenda

The Plan claims to support environmental objectives and tackle climate change, yet undermines these by:

- The lack of focus on schemes that reduce **car dependency**.

- Lack of evidence about the impact on net zero targets given the destruction of **carbon-absorbing green space**.
- Weakening of **environmental protections** set out in the previous local plan that ensure long-term environmental sustainability.

Conclusion

For these reasons, I consider the Trafford Local Plan to be **unsound** as it is fundamentally contradictory and suggest:

- All grey belt use be withdrawn until brownfield capacity is fully audited and exhausted.
- A full infrastructure delivery plan be published alongside any future development allocations.
- A revised plan be brought forward that genuinely aligns with environmental objectives and community needs.

Strategic Planning & Growth Team
Trafford Metropolitan Borough Council
Trafford Town Hall
Talbot Road
Stretford
M32 0TH

Our Ref: let-UK0041781

2 June 2025

BY EMAIL:

localplan.consultation@trafford.gov.uk

Dear Sir/Madam,

Representations to Trafford Local Plan Regulation 18 Consultation – The Trafford and Stockport College Group

WSP has prepared these representations on behalf of The Trafford and Stockport College Group ("the College"), to respond to the Regulation 18 consultation on Trafford's emerging Local Plan, in respect of its Altrincham Campus on Stamford Brook Road in Timperley (**Appendix A**).

These representations contain a background to the site, an explanation of the College's current budget constraints and future infrastructure requirements, and a justification for allocating the site for residential development. They are supported by a Call for Sites submission (**Appendix B**), together with details of the supporting technical work (**Appendices C-H**).

Background

As you will be aware, the College is a long-term key partner of Trafford Council. It is a registered charity and educational institution which plays an important role within the community, providing learners with the skills and knowledge to progress into employment. However, there is an ever-growing challenge faced by the College to invest in facilities and continue providing a high-quality curriculum for students against a backdrop of diminishing public sector resources and grants.

To consolidate and make the best use of its resources, the College is looking to dispose of some of its surplus assets to raise critically required funds for new education infrastructure. The College owns a parcel of land at its Altrincham Campus in Timperley, which has become surplus to requirements. The site extends approximately to 1.25 ha and is physically separated from the main campus by the Stamford Brook. It comprises a disused artificial sand-based sports pitch and an overspill car park. A copy of the site location plan is included at **Appendix A**.

The existing pitch was originally constructed in 2006 but is now in very poor and dilapidated condition. Due to health and safety and public liability reasons, the pitch has not been used by the College or the community since 2019. The pitch's condition is confirmed in a report undertaken by IPW in 2019 (**Appendix C**), but it has deteriorated further since due to a lack of available public sector funding for maintenance and investment.

8 First Street
Manchester
M15 4RP
Tel: +44 161 200 5000
wsp.com

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The College's sports curriculum has changed and evolved significantly since the playing pitch was originally constructed. Sports courses are mostly now classroom-based, while more practical sports activities are either taught within the on-site sports hall and gym or off-site at another campus (which has much higher quality indoor and outdoor facilities). Even if there were a specific curriculum need to retain the pitch on-site (which there is not), there is no grant or public sector funding available to replace and upgrade the playing surface. To replace the existing pitch would be a considerable expense to the College, and with no current or future need for the facility, this expense cannot be justified. As a result, the pitch is surplus to requirements.

Instead, the College does need to urgently invest in new infrastructure at its Altrincham and Stretford campuses through improvements to on-site security, digital infrastructure, and health and safety.

In terms of the car park, this was originally built as an overflow car park when the College was redeveloped to cater for its needs at the time. As the curriculum has changed over time, the need for on-site parking has decreased. Two car parking surveys have been undertaken which demonstrate that there is sufficient capacity in the existing main College car park alone, and therefore the overflow car park is surplus to requirements. Since the surveys were undertaken, there has been no change to the use / nature of the College. A copy of the feedback from a previous application at the site from Trafford Highways is enclosed at **Appendix D** which confirms that the proposed loss of 54 car parking spaces would not have a detrimental impact on parking or highways in the local area.

An application for residential development was previously submitted to the Council for up to 40 new homes (98386/OUT/19). During the application, all technical matters were addressed but due to an open space allocation on the land, Sport England required sport's provision on an alternative site to be secured. The applicant therefore supported an application at Sale Sport's Club for a new all-weather pitch (ref: 102054/FUL/20) however this was refused and dismissed at appeal and there was no alternative site at the time where this could be provided and so the residential application was withdrawn. If the residential application was approved, the intention would be to sell the land to a prospective developer or housebuilder to generate a capital receipt that can be reinvested back into new facilities at the College.

Call for Sites – Land adjacent to Timperley Brook

On behalf of The Trafford and Stockport College Group ("the College"), we hereby submit the land adjacent to Timperley Brook, Stamford Brook Road (**Appendix A**) for consideration as a proposed new housing allocation. A copy of the Call for Sites consultation form is enclosed at **Appendix B**.

DELIVERABILITY AND BENEFITS

The site is located within the existing urban area of Altrincham. It is brownfield. It is in a highly sustainable location, surrounded by existing housing and within walking distance to the Metrolink station at West Timperley, in addition to a range of facilities and services.

The site is deliverable and can come forward in the short term. It is expected that the site will come forward within the first 0-5 years. Within the previous application (ref: 98386/OUT/19) it was demonstrated that there no outstanding technical considerations.

In summary, some of the key benefits of the site's redevelopment for housing include:

- Contribution to meeting the housing demand in Trafford, including affordable housing;
- Redevelopment of an underused brownfield site within the urban area;
- Provision of a range of family housing;
- Contribution towards new sports facilities within Trafford; and
- A policy compliant contribution towards local open and green space.

Overall, it represents a deliverable, sustainable housing site which should be allocated in the emerging Local Plan for housing.

A copy of the following reports and surveys are enclosed with these representations:

1. An Ecological Assessment which concludes that much of the site is of negligible ecological value, and sets out recommendations for future development (**Appendix E**);
2. Confirmation from the Enironment Agency ("EA") of a 4m easement around Stamford brook (**Appendix F**); and
3. Drainage Assessment with confirmation from United Utilities ("UU") that the public sewers can be diverted (**Appendix G**).

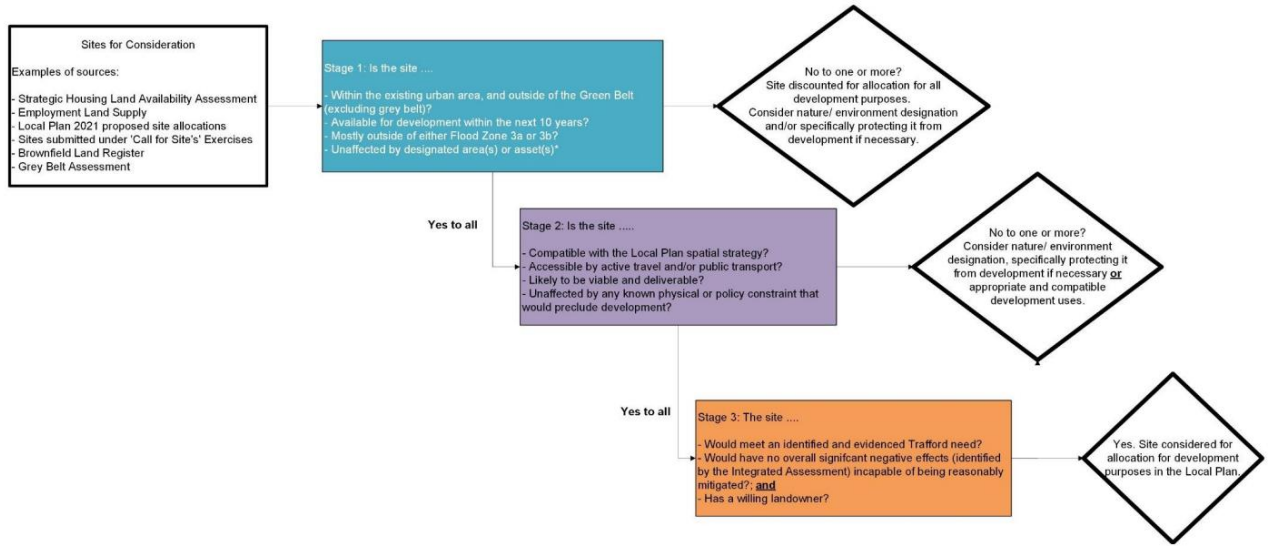
The relevant constraints and opportunities are illustrated on the submitted parameters plan (**Appendix H)**.

Site Selection Methodology– Representations

Trafford's proposed site selection methodology for selecting allocations is shown in Figure 1 below.

Figure 1: Site Selection Methodology

Figure SS-1: Trafford Local Plan, Draft Site Selection Methodology



We agree that Stage 1 should include an assessment of whether the site is within the existing urban area, available for development within the next 10 years and mostly outside high risk flood areas. However, we do not agree that the site should not progress to stage 1 if it is affected by a designated area or asset as the type and extent of the designation/asset should be considered. This is slightly reflected as the methodology states *"consider nature / environment designation and / or specifically protecting it from development if necessary"* however we feel that this should be given greater consideration. This is also the case at Stage 2 *"unaffected by any known physical or*

policy constraint that would preclude development." It is our view that the particular constraint should be considered rather than the above blanket approach to the site selection. A constraint may be a policy constraint in an old local plan that is no longer relevant. Taking account of such a constraint without reconsideration as to its relevance would perpetuate sustainable sites not being considered for development. For instance, our site has not been used as a pitch for over five years and therefore the allocation should not be taken forward with no reassessment.

Local Plan (Regulation 18) – Representations

We note that the site allocations and designations consultation will be held later in the year. The below therefore considers the Strategy, Vision, Strategic Objectives and Thematic policies of the plan, alongside the draft policies plan.

Q. Do you support the draft Policies Map? Are there any changes required which would improve it?

The emerging Local Plan seeks to designate part of the College's site as a 'Green Infrastructure Network' (Policy GI2). The emerging policy effectively carries forward the existing designation from adopted Policy R2 and ENV10.

In principle, we are supportive of the designation of a wildlife corridor running along the Timperley Brook, to conserve and enhance habitats and wildlife. However, the proposed (and adopted) designation crosses diagonally across the site and includes areas which are of low ecological value, including part of the car park and the artificial sand-based sports pitch (Appendix E). Therefore, we request that the designation be revised and reduced in size to include only the areas with ecological value.

The ecological work supporting the previous planning application and consultation with the Environment Agency (EA) concludes that a 4m development-free easement along the Timperley Brook is more appropriate. The easement will incorporate SuDS and additional landscaping to enhance existing ecological habitats along the brook. The 4m easement as recommended by the EA is shown as a pink dashed strip within the parameters plan (Appendix H). The difference in the proposed designation and the agreed easement is shown in Figure 2.

The area of the site that is included as part of the green infrastructure network is mainly a tarmac area. It is important to ensure that the boundaries for designations are drawn accurately based on land use. We therefore request that the designation be amended to reflect the area recommended by the EA, so to exclude the land which has been previously developed and has low ecological value.



Figure 2 - Emerging GI2 allocation overlaid on the Parameters plan (Appendix H) (right), showing the difference between the proposed allocation (green dots) with the EA recommended buffer (pink dashed area within the bright green landscaping area).

Q. Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Policy R1: Housing Delivery A. The Council will ensure that a suitable range of sites are allocated and made available across Trafford, to meet the borough's housing requirement.

We are in full support of Part A of Policy R1, we agree that it is important to allocate sites across the Borough particularly due to recent Government emphasis on the delivery of housing. This site represents a housing opportunity which is available now and deliverable as shown by no outstanding technical constraints on the previous application.

B. The following strategic matters of scale, phasing and distribution of new housing development will be taken into consideration in releasing land for new homes. The release of land for new homes will be subject to the capacity of the urban area and infrastructure to accommodate the development and the need to protect the environment.

We are in support of Part B of Policy R1 and this site contributes to this aim since it is located within the existing urban area of Altrincham. It is a highly sustainable location where new development ought to be focussed. The site will also respect the Wildlife Corridor through incorporating appropriate easement within the layout.

E. The Council will support the provision of new housing that makes as much use as possible of previously developed land, or "brownfield land", within the existing urban area. This will be achieved through new build and conversion.

We are in support of Part E of Policy R1, this site represents the redevelopment of an underused brownfield site within the urban area.

F. The Council will seek to ensure the efficient use of land, concentrating higher density development in the most sustainable locations, at lowest risk of flooding, close to services and facilities as well as public and active transport links; where it can be demonstrated that it is consistent with other policies in the Development Plan.

We are in support of part F of Policy R1, the proposed site is in a highly sustainable location, surrounded by existing housing and within easy walking distance to bus stops on the A56 and the Metrolink station at West Timperley, in addition to a range of facilities and services.

The distribution of development between each Locality is set out in Table 4-2. A large proportion of new housing will be delivered in the North Locality, reflecting the sustainable location of this area and the opportunity to redevelop brownfield sites for housing.

Table 4-2: Total Identified Housing Land Supply by Locality as at March 2025*

Locality	Net additional homes
North	18,704
South	3,860
Central	677
West	5,072
Total	28,313

* This includes small sites which are identified within the current land supply in lieu of setting a windfall allowance.

We are not in support of the distribution of development outlined above. It is our view that the South Locality has numerous available brownfield sites, including this site, which is not reflected in the net additional homes. The South Locality is also one of the most sustainable locations within the Borough due to existing key centres (Altrincham and Timperley) which provides access to services and public transport. It is appreciated that development may be focused within the North but the net homes set out in the above table is significantly for the North Locality than any other location. The South area has high housing needs, in particular affordable need, so more housing needs to be allocated to schemes to deliver the market and affordable homes required.

Q. Do you support Policy GI2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant

Policy GI2: Green Infrastructure Network A. The Council will seek to protect, enhance, and manage Trafford's Green Infrastructure (GI) as an accessible network of connected. varied, multi-functional green and blue spaces, which respond to local character. B. Development proposals will not be permitted, which adversely impact upon any of the services and benefits of GI.

We would request that the designation is reconsidered to account for the points mentioned in the site allocation question above. The GI corridors should be reconsidered to properly align with the land use. This should include revisiting the evidence base to reconsider what qualifies as green infrastructure.

Q. Do you support Policy OS1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Policy OS1: Open Space A. The Council will: i. Provide and connect a high-quality, multi-functional network of open spaces across Trafford. ii. Protect, enhance and make the most of existing parks, gardens and open spaces, and iii. Require new high-quality outdoor spaces to be provided. Existing Parks, Gardens and Open Spaces B. The following open spaces will be protected, and any loss will be resisted: i. Parks, gardens and recreation grounds including provision for children and teenagers ii. Natural and semi-natural greenspace iii. Amenity greenspace iv. Allotments v. Cemeteries and churchyards vi. Private communal space vii. Registered Historic Parks and Gardens C. Within existing spaces, supporting and/or ancillary development which does not have

an adverse effect on the environmental and open character, appearance and function of protected open spaces listed under criterion B will be supported.

Policy OS1S: Open Space in Trafford South A. New provision of and/or improvements and enhancements to open space will be focused on natural and semi-natural greenspaces and allotments. Trafford South is well served by parks, gardens and recreation grounds. However, natural and semi-natural greenspace and allotments do not meet the standards and additional provision is required.

As explained above, the College's site comprises a disused artificial sand-based sports pitch and car park which both are surplus to requirements. The policy above must include provision for situations where sports facilities are redundant and surplus, so policy does not leave such sites in deadlock. Policy must have a methodology to accept exceptions.

We have assumed that the Council are proposing to categorise the site under criterion 'I or ii' of the above. However, as explained above, the existing pitch is in a very poor and dilapidated condition (**Appendix C**) and has been closed since 2019 due to health and safety and public liability reasons. The College's sports curriculum has changed and evolved significantly and there is no grant or public sector funding available to replace and upgrade the playing surface. In addition, an ongoing community use would not sustain the viable ongoing maintenance and liability of the pitch. To replace the existing pitch would be a considerable expense to the College, and with no current or future need for the facility, this expense cannot be justified. As a result, the pitch is surplus to requirements. This local designation thus needs to be revisited for the site as it no longer meets the requirements and should be identified for alternative use.

In terms of the car park, this was originally built to serve as an overspill to the main College car park and was not specifically designated to accommodate users of the former sports pitch (who in any event were primarily students at the College). In addition, this is a private facility on private land that is not intended to be accessible for enjoyment by the general public as a park or area of open space. Anyone who is not a student or member of staff accessing or using the site in this way would be trespassing and in breach of child safeguarding regulations. The College (as an educational institution, as opposed to a local authority or sports club) does not have any intention or funding to provide such a facility. In these terms, it is difficult to understand what valuable contribution a private car park, access road and hard surfaced footpaths could make in being designated as local open space under any of the above criteria. It is not related to sport use and not a sporting facility. The parking was for college use not for the pitch / community.

The evidence base for open space should be revisited to understand what spaces are no longer used/required so that sites can be considered as alternative uses. This can also be used as a mechanism to help funding better located pitches.

We therefore request that the existing designation (Policy OSR5) be removed.

Do you support Policy OS4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant

Policy OS4: Loss of Sport and Recreation Land or Facilities A. The development of existing sport or recreation land or facilities for non-recreation or non--sport purposes will only be permitted where: i. It is ancillary to the sport or recreation use and does not reduce the overall sport or recreation function of the site; ii. Replacement recreation provision of at least the same quantity, quality, accessibility to its catchment population, community benefit and management level is made

in a suitable location; and iii. It has been clearly demonstrated that the site is surplus to sport and/or recreational requirements and is not capable of helping to meet any of Trafford's sport or recreation standards; or iv. The site has been allocated for alternative purposes in the development plan, and development will deliver a net improvement in the boroughs' sport or recreation resources. B. Wherever practicable, replacement provision shall be made directly by the developer and shall be available for use before the existing sport or recreation facility is lost. C. This policy applies to all existing sites and facilities that have a sport and/or recreation use or value, irrespective of whether they are owned or managed by the public, private or voluntary sectors.

We note that the emerging policy set out the scenarios where the loss of sports facilities will be permitted. It is positive that the policy recognises that sports facilities may no longer be required over the lifetime of the plan and provides possible routes where development would be appropriate. However, the policy needs to have more flexibility to allow specific site matters to be judged. A blanket policy risks creating deadlock sites, where a site has no prospect of sports use, could be used for another productive purpose and allow funding to be provided to support, enhance or deliver new facilities in the local area.

We do not support part iii of the above policy. There must be some methodology to allow for exception sites. The policy should incorporate a method of testing whether the site is viable / available to be used as sport or recreation.

We do not support part iv of the policy as this means that if the site is not allocated for alternative purposes, then the net improvement in sport and recreation does not come into play. We would argue that the net improvement in sport and recreation should be at the forefront of the policy and separated out from part iv.

With specific regard to the site, we would urge the council to allocate the site for residential use as this will allow the site to contribute to deliver an improvement of sports facilities elsewhere in the borough. This will unlock sites such as this which sit derelict and contribute nothing to sports facilities or provide any other productive use.

Summary

We trust that our representations will be taken into consideration by the Council as part of the emerging Local Plan and Call for Sites exercise. However, should you require any further information, please do not hesitate to contact me.

Yours faithfully



Doug Hann
Director

Enc :

Appendix A	Site Location Plan
Appendix B	Call for Sites Consultation Form
Appendix C	Pitch condition report

Appendix D	Highways response
Appendix E	Ecology report
Appendix F	EA correspondence
Appendix G	Drainage Assessment
Appendix H	Parameters Plan

Historic England

By email: localplan.consultation@trafford.gov.uk

Our ref: PL00798688
Your ref:

Date: 4 June 2025

Dear Trafford Local Plan Team

Trafford Local Plan – Regulation 18

Thank you for consulting Historic England on the above. This letter details Historic England's response to the Local Plan for Trafford and the historic environment.

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Historic England has a produced a number of good practice advice notes on the historic environment, in particular the Good Practice Advice Note on the Historic Environment and Local Plans (http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/), which provides supporting information on good practice in plan-making, and the Historic Environment and Site Allocations in Local Plans (https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/) may be useful in the production of your Plan.

The Local Plan for Trafford will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include heritage information. The Plan will need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites, which it is proposing to put forward for development, will assist in delivering such a strategy.

The table attached to this letter provides detailed comments on the Plan's sections and policies. To summarise, our response is as follows:

Evidence Base: We could not view this online and therefore, cannot comment on whether there is a robust evidence base for the historic environment.

Historic Environment Policies: The policies are not locally specific to the Plan area and does not set out its priorities. It lacks clarity on its application including different heritage asset types.

Other Policies: This includes lack of mention of the historic environment and heritage assets (or conformity with Local Plan Policies) or incorrectly referenced such as only seeking to conserve and not enhance, for example.

Site Allocations: Although allocated sites are not part of the consultation, it is important that the Council will robustly consider the impact on the Borough's heritage through HIAs (heritage impact assessments) which is supported by Historic England. The findings will need to be

incorporated within the Plan. Historic England have produced advice on this matter which may support you as you progress this part of the Plan.

Historic England would like the opportunity to work with you prior to the next stage of the Local Plan and ensure that the historic environment is appropriately dealt with.

If you have any queries about this or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

E. Hrycan

Emily Hrycan
Historic Environment Planning Adviser (North)
Historic England
[redacted]

Page	Section/ Policy/ Paragraph	Comments
Evidence		A sound local plan should be based on an up-to-date evidence base which includes reference to the historic environment. We are unable to comment on this due to it not being available on the website.
13	Table 1-1	Chapter title : 12 – built environment. The vision mentions built and historic for example. Not all heritage is built and this needs to be amended/clarified. The Local Plan should include a proper description and assessment of the historic environment in the Borough and the contribution it makes to the area (NPPF, Paragraph 205). The Plan needs to describe the historical growth of the area and identify its historic environment. It should also clearly identify the different places, their character and identity and the contribution it makes to all aspects of life in Trafford.
15	Setting the Scene	This section needs to be expanded which sets the scene for the historic and built environment. It also should mention local character and distinctiveness. Particularly as it is mentioned in the Strategic Objectives (S10. g). The Local Plan should include a proper assessment of the historic environment in the Borough and the contribution it makes to the area.
19	Vision for Trafford	The vision seeks to recognise the role of the historic and built environment through maximising but doesn't seek to conserve and enhance it for future generations. In accordance with the NPPF, this should be amended.
23	S10 Design Heritage and Placemaking	F. The strategic objective only seeks to protect the historic environment and buildings. It does not look to enhance, mention heritage assets, settings etc. Why does it specifically mention buildings – as heritage assets/historic environment is more than this. It needs to be amended to accord with national policy. G. We welcome the content.
25	Trafford North Locality Overview	The historic environment and character and identity are important elements of a place. They should also be treated equally with all other matters affecting an area (e.g. the natural environment is mentioned). This accords with national policy. The overview section for Trafford North needs to be expanded to cover these important elements.
27	Trafford South Locality Overview	The historic environment and character and identity are important elements of a place. They should also be treated equally with all other matters affecting an area (e.g. the natural environment is mentioned). This

Page	Section/ Policy/ Paragraph	Comments
		accords with national policy. The overview section for Trafford South needs to be expanded to cover these important elements.
30	Trafford Central Locality Overview	The historic environment and character and identity are important elements of a place. They should also be treated equally with all other matters affecting an area (e.g. the natural environment is mentioned). This accords with national policy. The overview section for Trafford Central needs to be expanded to cover these important elements.
33	Trafford West Locality Overview	The historic environment and character and identity are important elements of a place. They should also be treated equally with all other matters affecting an area (e.g. the natural environment is mentioned). This accords with national policy. The overview section for Trafford West needs to be expanded to cover these important elements.
44	Policy ST1	Historic England supports the intention to deliver development around specific locations. It is important that the Local Plan can demonstrate this can be done sustainably, minimising its effect on the historic environment, heritage assets and their setting. This will be done through a heritage impact assessment (HIA) being carried out for sites and areas that are to be allocated for development. Historic England can provide further support on this. This change will ensure that the Local Plan accords with the requirements for the historic environment as detailed in the NPPF.
47	Policy ST2	Historic England supports the intention to deliver development around specific locations. It is important that the Local Plan can demonstrate this can be done sustainably, minimising its effect on the historic environment, heritage assets and their setting. This will be done through a heritage impact assessment (HIA) being carried out for sites and areas that are to be allocated for development. Historic England can provide further support on this. In addition, the policy seeks to 'enhance the place and facilitate their regeneration'. This is supported but the text should reflect the wording of Para 2.25 which looks to 'enhance the quality of place and local character'. These changes will ensure that the Local Plan accords with the requirements for the historic environment as detailed in the NPPF.
48	Policy ST3	Historic England supports the intention to deliver development around specific locations. It is important that the Local Plan can demonstrate this can be done sustainably, minimising its effect on the historic environment, heritage assets and their setting. This will be done through a heritage impact assessment (HIA) being carried

Page	Section/ Policy/ Paragraph	Comments
		out for sites and areas that are to be allocated for development. Historic England can provide further support on this. Should Bullet B(I) be separated out as half deals with economic competitiveness and the other design? Reference should be made to the wording in the previous policy regarding place and identity. In addition, what is meant by 'environment attractiveness.? This change will ensure that the Local Plan accords with the requirements for the historic environment as detailed in the NPPF.
51	Policy ST4	Historic England supports the presumption in favour of sustainable development. We have the following comments to make: • Bullet B: Makes reference to Development Plan policies (as does Bullet D) whilst Bullet E makes reference to Local Plan. Ensure consistency. What does enhancing the physical environment mean? • Bullet C: Applicants should ensure that information and assessment is done correctly to ensure that proposals can be supported. As drafted, it suggests that proposals will be approved as quickly as possible. It should be reworded to ensure that proposals are appropriate to its context and supported by the right information to ensure that they gain planning permission. • Bullet D: As written, it suggests that sufficient infrastructure that mitigates impacts on an area will be supported. But if something harms the significance of a heritage asset, then it's not infrastructure that mitigates this harm nor an improvement in an area's conditions. It is what is relevant to the significance of the heritage asset and its setting. It is suggested that this bullet be amended in terms of wording. Consistency needed with regards reference to Development Plan or Local Plan. • Bullet E: Consistency regarding reference to Development Plan or Local Plan.
52	Policy ST5	It is expected that proposals that contribute towards climate change do not harm the significance of heritage assets and their setting. As drafted, it appears to promote supporting proposals for it without considering their impact. It is recommended that this policy be changed to ensure it either refers to the historic environment, heritage assets and their setting or makes reference to the need to accord with all the local plan policies.

Page	Section/ Policy/ Paragraph	Comments
		This change will ensure that the Local Plan accords with the requirements for the historic environment as detailed in the NPPF.
53	Figure 2-4	The historic environment is more than the built environment (as mentioned in the diagram). The supporting text in Para 2.40 mentions the historic environment. Therefore, Figure 2-4 needs to be amended.
55	Site Allocations with Trafford	The NPPF and the Town and Country Planning Act 1990 makes it clear that the significance of heritage assets can be harmed through development within their setting. It is also the duty of the Council to preserve or enhance the character or appearance of its conservation areas and their setting. Where potential development sites appear to include non-designated assets including the possibility for archaeology, their potential should be investigated and retention/exploration should be promoted. A HIA needs to be undertaken for all the sites that are to be allocated where they may impact on a heritage asset. This is firstly done through a screening exercise to determine which sites will be subject to a HIA. Further information can be found in our guidance.
60	Policy RT1	While the intention for development to be carbon neutral by 2038 is supported. It is important that any proposals minimise their impact on the historic environment amongst others. It is therefore suggested that the Policy include reference to the need to accord with all other polices in the Local Plan. This will ensure that all other matters are covered.
67	Policy RT3	It is important that any proposals that harm the significance of a heritage asset and its setting is properly assessed and mitigated. Therefore, whilst the intention of this policy is supported, it does not make any provision for this issue, which may result in it not always being an appropriate solution. Therefore, the policy should be amended to ensure that reference to this is made or a statement making sure that any proposals accord with the NPPF on this matter.
69	Policy RT4	An (assumed designated?) heritage asset and a conservation area and their settings are dealt with using different definitions and levels of harm. Bullet C is written to suggest that a building in a conservation area is treated the same as a heritage asset. Whilst this is a good intention, the two need to be separated out. It also seems to want to treat the impact on the conservation area as well. So, it should be worded so that heritage assets and their setting sits separately to conservation areas and their buildings. We support reference to Policy BE2.

Page	Section/ Policy/ Paragraph	Comments
		Does the term 'local historical asset' mean something on the local list or an undesignated heritage asset in general?
78	Policy R1	Historic England supports the need to deliver housing in the Borough through a range of allocated sites. It is important that these sites are fully supported by a robust HIA where needed to ensure that any harm to heritage assets and their settings is minimised and/or mitigated. We have provided information in the covering letter regarding this. In view of the policy itself, we have the following comments to make: • Bullet B: Reference is made to 'environment' - what does this mean? Are you looking at just protection of these assets or enhancement as well? The policy would benefit from reference to local character as the Local Plan previously mentions it and this is just as important. • Bullet E: We welcome the use of brownfield land for development. Is the last line needed of this bullet? • Bullet F: We welcome the efficient use of land. Would the policy benefit to referencing in addition to other policies in the Plan and also to local character etc. As this is important as well as the other matters you have highlighted. • Bullet G: Housing in less than sustainable locations should also be subject to the other polices in the Local Plan. As it suggests that if it meets local infrastructure provision then it will be approved, but its impact for example on the historic environment could be negative (harm the significance) or positive (help deal with an entry on the heritage at risk register), for example. • Bullet H: It is unclear what conservation considerations mean. Does this mean the historic environment? It should be more than 'considerations' and needs to be strongly worded in the policy to make it a requirement.
89	Policy R5	Historic England recognises that the provision of more homes across England is a Government priority with increasing residential density of development identified as a key way of meeting growing housing need. In light of this it is important that the impact of such proposals, have a positive relationship between any new development and the existing character of a place and the historic environment. Indeed, the NPPF requires that providing more homes is more about just a greater quantity of homes it is also about quality and the need to understand and reflect local conditions.

Page	Section/ Policy/ Paragraph	Comments
		The NPPF also requires planning policies and decisions to address the connections between people and places and the integration of new development into the natural, built and historic environment. It is important that there should be a balanced approach to new housing density. The requirements of the NPPF, has the starting point of any new development should be its location and what the local natural, built and historic environment is like including the setting of heritage assets further afield. This ensures that the density on the site will be appropriate and enhances its context – variations in density may be required in order to mitigate harm to heritage asset for example or to relate to local character. The policy needs to be amended to ensure that the policy starts with what defines development densities and why there may be variation, to ensure that development be appropriate to its context and minimise any harm.
98	Policy R10	The impact of any development site has the potential to harm the historic environment, heritage assets and their setting. It is important therefore, that this is considered prior to approving any planning permission. The policy as drafted does not consider the impact on heritage. It is recommended that this be amended either through specific mention or reference to the need to accord with all other policies in the Local Plan.
108	Policy EJ1	Historic England supports the need for the safeguard and provision of employment land. It is important that the impact of the allocation of sites for development consider the impact that they may have on the historic environment. Therefore, it is important that, where needed a heritage impact assessment (HIA) is undertaken for relevant sites. Further information on this can be seen in the covering letter. It is unclear what the reference to 'protect the environment' (bullet c) means. This needs to be defined. Mentioning the historic environment or the need to meet the requirements of all other Local Plan policies need to be mentioned here. In Bullet G, consistency in use of the phrase Development Plan or Local Plan in the document needs to be considered.

Page	Section/ Policy/ Paragraph	Comments
112	Policy EJ2	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
119	Policy EJ4	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
123	Policy EJ5	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
126	Policy EJ6	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
128	Policy EJ7	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
135	Policy TM1	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
162	Policy TM9	The proposals outlined in this policy have the intention to affect the historic environment. It is important that either the policy or supporting text makes reference to the need for its design to minimise the impact on heritage assets and their setting amongst other statutory definitions. In addition, safeguarding land for this proposal needs to be assessed on its impact on the historic environment through a heritage impact assessment to accompany the Plan.
166	Policy TM10	All proposals for different types of car parking has the potential to affect the historic environment. With this in mind it is important that the policy references it. This could be through conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
170	Policy TM11	Consistency regarding reference to Development Plan or Local Plan.
171	Policy TM12	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
179	Policy TC1	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy. At the moment it only makes reference to ‘other significant material considerations’.
182	Policy TC2	Any proposals for residential development in the town centres can impact the historic environment and their setting. The Policy (Bullet v) only makes reference to local heritage assets. This needs to be changed to reflect national policy.

Page	Section/ Policy/ Paragraph	Comments
195	Policy GI1	Historic England support the intention of this policy. We have the following comments to make: • Bullet A: Can a development protect and enhance? As drafted it appears to be either/or? Would reference to the GMLCSA benefit the policy as this is used as the definition? The policy talks about value and this can be subjective. • Bullet B: Rather than use the word 'permitted' say supported. • Bullet B and C: As drafted it states that a LVIA is only needed by development that has an adverse impact not significant. Should it not apply to both? • Bullet C: rather than say 'any development that could have' should it say 'any development that has". • What is the Council's view on harm that is not significant (Bullet B)?
200	Policy G12	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
2016	Policy GI6	Proposals can affect the setting of heritage assets. Therefore, it is important that this phrase is used within the policy.
229	Policy GI10	Measures to support biodiversity may affect the historic environment. Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
237	Policy OS1	Registered Parks and Gardens (RPG) are a designated heritage asset and therefore will be subject to the national policy and local plan policy regarding this. The criteria under Bullet C would not be relevant to them. It is suggested that reference is made to harm to the significance of an RPG and its setting. This will ensure that it is compliant with national policy.
242	Policy OS2	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
248	Policy OS4	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
251	Policy OS6	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.

Page	Section/ Policy/ Paragraph	Comments
257	Policy WA1	Proposals to manage flood risk may affect the historic environment. Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
261	Policy WA2	The construction and operation of new infrastructure and sustainable drainage systems (SUDS) and changes in land management, have the potential to impact on the significance of heritage assets and their settings; this includes impacts on water-related or water-dependent heritage assets. Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
265	Policy WA3	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
266	Policy WA4	There may be instances where the requirements set out in this policy cannot be met due to their impact on the significance of a heritage asset. Therefore, reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
272	Policy CT1	New development for community and social facilities (Bullet iii) can impact on the historic environment. Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
277	Policy CT3	New development for community and social facilities can impact on the historic environment. Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
286	Section 12	The historic environment, heritage assets and their setting are not just buildings (built environment) they can be scheduled monuments and registered parks and gardens. This needs to be defined at the beginning of this chapter to avoid confusion.
286	Paragraph 12.1	It is not just about well-designed buildings and spaces; it is also about places as well (policies cover this).
286	Paragraph 12.2	This paragraph sets out the chapter but only makes reference to local character.
286	Paragraph 12.3	We support the safeguarding of Trafford's heritage and history. It should state that this is not only through the conservation and protection but also enhancement and understanding.

Page	Section/ Policy/ Paragraph	Comments
287	Policy BE1	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
290	Policy BE2	Tall buildings can affect heritage assets and their setting. There is no provision within this policy as currently drafted. Therefore, this needs amending. Historic England has produced guidance on tall buildings which should be referenced in the supporting text.
291	Para 12.12	Tall buildings can also harm heritage assets and their setting as well as the character and identity of a place (mentioned). Therefore, this needs to be inserted into the text.
291	Para 12.13	It is worth noting that if the local plan is proposing to allocate sites for tall buildings, then this will have to follow the appropriate process through the Local Plan. It is not appropriate to allocate this outside of the statutory process.
292	Policy BE3	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
294	Policy BE4	Bullet V: include reference to setting. Note that these are subject to LBC for any proposal. It might be worth mentioning here.
296	Heritage and History	The Local Plan does not include a strategy for its Historic environment. The overall strategy should set out what is unique about the place and how it will deliver the conservation and enjoyment of the area's heritage assets for generations to come. This could be through setting out the elements that contribute to Trafford's unique historic environment whilst also prioritising what it is that the Borough will want to achieve. This could be through Conservation Area Appraisals and Management Plans, Heritage at Risk, regeneration of particular areas or the production of a local list, for example. More information on this can be found in our guidance. Historic England can provide more information on this.
296	Policy HE5	There is confusion with this policy and policy BE6 and BE7. Could this become one policy? Could you include a section on the strategy for the historic environment in Trafford (as mentioned above) and call the policy 'historic environment'? We can provide examples of this. In addition:

Page	Section/ Policy/ Paragraph	Comments
		• We support the intention of the policy. • Bullet A: conserve and enhance rather than just conserve should be used. Bullet ii: would 'enhance' be useful to be included. • Section B: this would sit better in a separate policy as it is all about the information needed to be submitted with a planning application. • Bullet B: This seems to mention both designated and non-designated heritage assets. Could it be shortened to say heritage assets and its setting. Does it need to list the type of intervention e.g. alteration, demolition etc? Could it be kept simple? E.g. Proposals that affect a heritage asset and its setting including conservation areas are required to submit the following. • In terms of information for clarity, should a statement of significance, heritage impact assessments, design and access statement be mentioned? • Bullet Bii: Is this a typo? Should it sit further down the list Isn't it also about the harm (impact) on the significance of the heritage asset and its setting? You should also include harm in this bullet. • Should there be a bullet covering the proposals accompanied by detail drawings. • Bullet V: The policy is silent on conservation areas (the Local Plan is) so an additional bullet/section is needed to be included in Part A that could read: "Proposals affecting a Conservation Area should preserve or enhance those elements which contribute to its character and appearance especially any elements identified in any adopted Conservation Area Appraisal as making a positive contribution to the significance of that area." for example. How does the Local Plan deal with Heritage At Risk • How are buildings going to be recorded that may be lost totally or partially through permission. Where will these be deposited? • What about archaeological sites that are undesignated but are to be treated as scheduled monument and also what about those of less than national importance? How are they going to be preserved and managed for example?
298	Policy BE6	It is unclear the purpose of Bullet A and could this not be part of the opening section of Policy BE5? Bullet B and C reiterate the NPPF. Could it not be in Policy BE5?

Page	Section/ Policy/ Paragraph	Comments
		Bullet D: This is not policy. Could this be stated in the supporting text.
299	Policy BE7	Could this not be part of Policy BE5?
304	Policy BE10	Proposals for telecommunication masts that affect a heritage asset and its setting could either be on the heritage asset or affecting it. This could be subject to LBC amongst others. This needs to be made clear and also that it should be considered in line with Policy BE5. It is recommended that Bullet G is reworded.
312	Policy CL1	Ancillary development can affect the historic environment. It is recommended that an additional bullet is inserted. Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
313	Policy CL1N	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
317	Policy CL2	Reference to conformity with the rest of the Local Plan policies needed. This will ensure consistency and consideration of the historic environment in accordance with national policy.
317	Policy CL2N	Reference to conformity with the rest of the Local Plan policies needed or specific heritage assets mentioned. This will ensure consistency and consideration of the historic environment in accordance with national policy.
325	Policy IP2	Heritage assets – particularly those on the heritage at risk register can benefit from planning obligations. It is recommended that this be mentioned within this policy

Historic England

Our ref: PL00798690
Your ref:

By Email: localplan.consultation@trafford.gov.uk

Date: 4 June 2025

Dear Local Plans Team

Trafford Local Plan – Integrated Assessment (IA)

Thank you for consulting Historic England about the above document.

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Historic England has produced a document, which you might find helpful in providing guidance on the effective assessment of the historic environment. This can be found at https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/ .

Due to the amount of consultations received, Historic England will not be providing any comments on the IA in this consultation. However, if the Council have any questions or need additional comments, please let me know.

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, and in the preparation of the IA/SA/SEA. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER. 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.

Finally, we should like to stress that this opinion is based on the information provided by the consultation. 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.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

E.Hrycan

Emily Hrycan
Historic Environment Planning Adviser (North)
Historic England
[redacted]

Historic England

Email:
localplan.consultation@trafford.gov.uk

Our ref: PL00798688

Your ref:

Date: 4 June 2025

Dear Local Plan Team

Trafford MBC Local Plan Site Methodology

Thank you for consulting Historic England on the above.

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Historic England welcomes the production of the site methodology and its publication. The site selection methodology sets out how any sites being put forward for development will be assessed. This will then be used to inform the Local Plan, with the site becoming an allocation. It is important that the historic environment is considered at this stage of the plan making process. The impact on the historic environment, heritage assets and their setting should be included within the assessment of sites. Historic England has produced an advice note Historic Environment and Site Allocations in Local Plans (https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/) which should be used in the site allocation exercise.

In addition to the above, we have the following comments to make:

- Para 3.3: Reference to townscape character and identity should be included here.
- Para 3.4 (iv): Reference should also be made to townscape character and local identity.
- Stage 1: The impact on a heritage asset can be both positive and negative. Harm to the significance of an asset is not necessarily a reason to remove a potential allocation. There needs to be a proper assessment of the site and the heritage asset first (in order to discount it) as well as communication with Historic England on any matters arising. Our guidance provides further information on this.
- Stage 2: This would require a HIA (Heritage Impact Assessment) to be undertaken of the site to inform its suitability and provide any enhancement/mitigation measures that may be needed.
- Stage 3: The negative impact of an allocation on a heritage asset needs to be considered through a HIA not just those identified by the IA.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

E.Hrycan

Emily Hrycan
Historic Environment Planning Adviser (North)

Historic England

[redacted]

Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW
Telephone 0161 242 1416 HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

Historic England

Email:
localplan.consultation@trafford.gov.uk

Our ref: PL00798688

Your ref:

Date: 4 June 2025

Dear Local Plan Team

Trafford MBC 'Call for Sites' 2025

Thank you for consulting Historic England on the above.

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Historic England would like to draw your attention to the need to consider the historic environment at this stage of the plan-making process. Heritage assets and their settings should be included within the assessment of sites which are submitted for consideration as part of the Local Plan process and other planning policy work. It should also consider the impact of sites on heritage assets in adjoining local authority areas. This process providesthe opportunity to provide a sound platform to inform the later stages of plan-making.

Historic England has a produced a number of good practice advice notes on the historic environment, in particular the Good Practice Advice Note on the Historic Environment and Local Plans (http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/), which provides supporting information on good practice in plan-making, and the Historic Environment and Site Allocations in Local Plans (https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/) may be useful in the production of your Plan.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

E.Hrycan

Emily Hrycan
Historic Environment Planning Adviser (North)
Historic England
[redacted]

Positive about disabled people
Stonewall Diversity Champion

Response ID ANON-MFZ6-4Q4J-6

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-12 21:23:16

Personal details

1 Forename

Enter your forename:
Michael

2 Surname

Enter your surname:
Priaulx

3 Organisation (if applicable)

Enter your organisation:
Swifts Local Network: Swifts & Planning Group

4 Position/title (if applicable)

Enter your position/title:
Chair

5 Address

Enter your address:

[redacted]

6 Postcode

Enter your postcode:
[redacted]

7 Email address

Enter your email address:
[redacted]

8 Contact phone number

Enter your contact phone number:
[redacted]

9 Please select 'opt in.' if you wish to recieve future consultations on planning policy.

Opt in

Chapter 8 - Policy GI10: Building Biodiversity into New Developments

1 Do you support Policy GI10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The reference to swift bricks in GI10 and supporting text 8.55 is welcome, but at the moment it is lacking sufficient guidance to be effective.
In summary, please add the recently published guidance from the NPPG Natural Environment paragraph 017, and also reference alternative provision for house martins where appropriate and more detail of the important protection of existing nest sites for building-dependent species.

In more detail:

Please add:

Swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM.

Also please add from NPPG Natural Environment 2025 paragraph 017 [redacted]

The National Planning Policy Framework expects development proposals to bolster wildlife by incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

The use of swift bricks is particularly important in this context because swifts rely on urban cavities for nesting, and the national loss of suitable nesting sites through building renovation has been part of the reason for the species' decline. Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows.

Extensive guidance is available on wildlife friendly features, including the National Design Guide and National Model Design Code which illustrate how well-designed places can support rich and varied biodiversity by facilitating habitats and routes for wildlife. More specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022 the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes.

Also please add:

Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist.

Also please add: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in Trafford return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.

In more detail for supporting evidence, the reason for this is that nest sites in buildings and bird boxes/ bricks and other species features are excluded from the DEFRA Biodiversity Net Gain metric, so require their own clear policy.

NPPF December 2024 Paragraph 187 (d) (page 54) states: "planning policies should... incorporate features which support priority or threatened species such as swifts".

The "exemplar" LNRS recently published by the Isle of Wight states:

"Swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions, in accordance with best practice guidance such as the Brighton and Hove Guidelines which require at least three swift bricks for all appropriate new builds. Artificial nest cups for House Martins should be similarly considered. Existing nest and roost sites for building-dependent and building- reliant species such as Swifts, House Martins, House Sparrows, Starlings and at least 4 species of bat must be protected and wherever possible augmented and enhanced by designed and built additional provision within ecologically relevant distances."

The Coal Authority

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG
[redacted]

W: www.gov.uk/coalauthority

For the attention of: Strategic Planning Team
Trafford Metropolitan Borough Council

[By email: localplan.consultation@trafford.gov.uk]

6th June 2025

Dear Strategic Planning Team

Re: Trafford Local Plan Draft Local Plan (Policies) Regulation 18 Consultation

Thank you for your notification of the 24th April 2025 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

In the Trafford area our records do not indicate the presence of any coal mining features at surface or shallow depth which may pose a risk to surface stability. On this basis the Planning team at the Coal Authority have no specific comments to make on the Local Plan.

Yours faithfully

[redacted]

Melanie Lindsley [redacted]
Principal Planning & Development Manager

Response ID ANON-MFZ6-4QRM-7

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-04 13:18:59

Personal details

1 Forename

Enter your forename:
Lorraine

2 Surname

Enter your surname:
Eagling

3 Organisation (if applicable)

Enter your organisation:

4 Position/title (if applicable)

Enter your position/title:

5 Address

Enter your address:

[redacted]

6 Postcode

Enter your postcode:
[redacted]

7 Email address

Enter your email address:
[redacted]

8 Contact phone number

Enter your contact phone number:
[redacted]

9 Please select ‘opt in.’ if you wish to recieve future consultations on planning policy.

Opt in

Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

I fully support the comments made in the response from The Friends of Carrington Moss. I would also like to add the following;

1) In the Places for Everyone New Carrington Topic paper, the allocation site east and north of MUFC and West of Sale West is described in section 15.10, paragraph 6 which states 'The area to the north of GM45-6, into which the release will be expanded, makes the same significant contribution to Green Belt Purposes 1, 2 and 3 as GM46, and proximity to the A6144, which connects Carrington and Sale, will also reduce perceived settlement separation. Although the woodland belt to the east of this area will be retained as Green Belt, its function in marking a strong edge to Sale will be lost. Both the settlement gap and boundary strength will be reduced, so the overall impact of the allocation here will still be very high. Various measures will be required to mitigate this impact, including a need to establish a strong, defensible Green Belt boundary on the western edge of the development parcel'. It goes on to recommend potential green infrastructure opportunities in section 15.15 to mitigate for this impact and it goes on to say in section 15.16 these opportunities be addressed either through the Places for Everyone masterplan or the Local Plan.
Unfortunately the New Carrington Masterplan is not in place so the recommended mitigation has not been finalised. This land should still be safeguarded until such mitigation is in place.

2) A planning application for a BESS facility has just been approved on the site south of The Shell Pool SBI. This calls into question the validity of the Local Plan Map and the Places for Everyone Plan.
The Local Plan Map shows this site to be green belt, so it should not be developed and criterion 1 in the New Carrington Policy states development of this site is required to be "in accordance with a masterplan that has been developed in consultation with the local community and approved by the local planning authority". This masterplan does not exist, so this site should not be developed.

Chapter 1 - Vision

1 Do you agree with the proposed Vision for the Trafford Local Plan?

Please write your response here::

I completely agree with the response given to this question by The Friends of Carrington Moss. In addition I would like to make the following points;

1) I do not consider New Carrington to be a sustainable community because the needs of current and future residents are not met in a way that protects the environment, promotes social equity, and ensures a thriving economy. The local peat moss will be destroyed, local biodiversity will be lost and the green space that is important to local residents will be significantly reduced, having a detrimental effect on health and well-being. Local residents will remain isolated as there is no plans for public transport infrastructure. Partington and Sale West some of the poorest communities in Trafford and are the poorest served by public transport and this lack of public transport reduces the opportunities for those living in these communities who rely on it to access employment, education and health facilities, further increasing inequalities in the borough.

2) Trafford has the least amount of green space in Greater Manchester, with the exception of Manchester City Centre, yet under Places for Everyone, it plans to release one of the largest allocation of green belt and farmland in Greater Manchester. So it's natural assets are not being protected, a significant amount of biodiversity is being lost and food security is being eroded. It is a complete betrayal for future generations.

3) As mentioned above, there are no plans for any new public transport infrastructure for New Carrington despite it being the largest development in Greater Manchester. The communities of Warburton, Partington, Sale West and Carrington are already the poorest served when it comes to public transport. So whilst the rest of Trafford have public transport options of buses, trains and trams, the New Carrington Allocation has an infrequent bus service, that does not run at night, making them the most car dependent communities in the borough. So inequalities widen as the rest of the borough have a sustainable transport network yet the long promised options for Partington and Carrington, such as reopening the old railway line, never materialise. Then to make matters worse, the road traffic will increase significantly as new residential developments are approved, HGV numbers increase as new warehousing is built and if the Carrington Relief Road goes ahead, traffic will be induced through Warburton, Partington and Sale West creating the most unsustainable transport network possible.

4) If Trafford is to have thriving communities and businesses whilst addressing the climate crisis, it has to put brownfield first, as pledged by the current government. New communities should be built where there is existing infrastructure and facilities. There are existing brownfield sites that lie empty (Higher Road Depot and other empty commercial units on Higher Road, Woodsend Primary School, just to name a few). Use Compulsory Purchase orders to put such sites to good use. Investing in public transport and active travel infrastructure will reduce the number of cars on the roads, freeing up road space and car parks for development. The Council need to be brave and transformative. The Council have shown it can be done with Kingsway in Stretford. The Council had a lot of back lash when they planned to reduce the road from a dual carriageway to a single carriageway, but they were right to do so and the results are transformative. There are no massive tailbacks of cars as predicted by the critics, instead it is a beautiful, calm space enjoyed by residents, children, cyclists and sunbathers!

5) Lessons need to be learnt. Take for example the Trafford Centre. Whilst this provided economic growth, it has done so at a cost. Local motorway networks are at gridlock, local road networks are at capacity at peak times, air, light and noise pollution is high in the local communities. Why wasn't there a cycle network to the centre, why did it take so long for the tram to reach the centre? Before large scale development is approved, public and freight transport must be improved so that there is no increase in road traffic and no more loss of green belt and biodiversity.

Chapter 1 - Strategic Objectives

1 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

Please write your response here::

I agree with the comments made in the response from The Friends of Carrington Moss

Chapter 1 - Introduction, Vision and Strategic Objectives

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

I fully agree with the comments made in the response by The Friends of Carrington Moss

Chapter 2 - Policy ST1: Core Growth Area (Trafford)

1 Do you support Policy ST1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully agree with the comments made in the response by The Friends of Carrington Moss

Chapter 2 - Policy ST2: Inner Areas (Trafford)

1 Do you support Policy ST2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully agree with the comments made in the response by The Friends of Carrington Moss

Chapter 2 - Policy ST3: Southern Areas (Trafford)

1 Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully agree with the comments made in the response by The Friends of Carrington Moss.
In addition I would like to add that despite the fact that the southern areas of the borough is home to most of our farms and green spaces, there has been no consideration for the rural economy and the devastating impact of the huge Places for Everyone developments on farmers, riding schools, liveries, kennels etc.
Under the Places for Everyone Plan, Trafford will lose one of the largest, if not the largest amount of agricultural land of all the boroughs in Greater Manchester and yet this local plan has not mentioned how it will protect and improve the rural economy. The rural economy has been ignored in this local plan and in Places for Everyone

Chapter 2 - Policy ST4: Sustainable Development

1 Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully agree with the comments made in the response from The Friends of Carrington Moss

Chapter 2 - Policy ST5: Climate Change

1 Do you support Policy ST5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I agree with the comments made in the response from The Friends of Carrington Moss. Trafford will not meet it's target to be carbon neutral by 2038 if it builds on a Peat Moss

Chapter 2 - Strategy

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

I fully agree with the comments made in the response from The Friends of Carrington Moss

Chapter 3 - Policy RT1: Carbon and Energy

1 Do you support Policy RT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write you response here::

I fully agree with the comments made in the response from The Friends of Carrington Moss

Chapter 3 - Policy RT2: Decentralised Energy Generation

1 Do you support Policy RT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully agree with the comments made in the response from The Friends of Carrington Moss

Chapter 3 - Policy RT3: Overheating and the Urban Heat Island

1 Do you support Policy RT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully agree with the comments made in the response from The Friends of Carrington Moss

Chapter 3 - Policy RT4: Sustainable Retrofitting

1 Do you support Policy RT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully agree with the comments made in the response from The Friends of Carrington Moss

Chapter 3 - Policy RT5: Circular Economy

1 Do you support Policy RT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully agree with the comments made in the response from The Friends of Carrington Moss

Chapter 3 - Renewable Technologies and Methods

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

I fully agree with the comments made in the response from The Friends of Carrington Moss

Chapter 4 - Policy R1: Housing Delivery

1 Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response by The Friends of Carrington Moss and would also like to add;

1) With regards section E and F this policy should say that the Council will 'actively seek' the provision of new housing that makes as much use as possible of previously developed land, or Brownfield land within the existing urban area.
There are many brownfield sites in Trafford that have been lying empty, some for many years. Here are some examples [redacted]

a) The Former Woodsend Primary School
b) The Former Trafford Vehicle Depot on Higher Road
c) 149 Higher Road
d) 160 Higher Road
e) 120 Higher Road
f) The Old Victoria Pub on Victoria Parade, Higher Road
g) The Car Park on Atkinson Road
h) Land on Addison Road Urmston (behind the Lord Nelson Pub)

The Council should 'actively seek' to make as much use of these buildings as possible even if it means using compulsory purchase orders. All these buildings are dilapidated and in some cases are a public health issue. These sites are close to services and facilities as well as public and active transport links and at lowest risk of flood. More focus should be placed on these type of sites rather than green belt and agricultural land.

2)With regards section G, the developments proposed for what is known as Partington East in the Places for everyone plan is not in a sustainable location as there is no public transport options except an unregular bus service, there are few primary school places and insufficient doctors, dentists etc. So unless provision to meet local infrastructure is delivered, these allocations should not be approved.
The planning applications at Warburton East and West are both unsustainable and isolated in the countryside and none of the circumstances (see below) set out in section 84 of the NPPF guidance apply. So they applications should be refused.

84. Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:
a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;
b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;
c) the development would re-use redundant or disused buildings and enhance its immediate setting;
d) the development would involve the subdivision of an existing residential building; or
e) the design is of exceptional quality, in that it:
i. is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and
ii. would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.

Chapter 4 - Policy R2: Protecting Existing Homes

1 Do you support Policy R2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response from The Friends of Carrington Moss

Chapter 4 - Policy R3: Affordable and Social Housing

1 Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response from The Friends of Carrington Moss.

2 Should 10% of all affordable and social housing be delivered as Truly Affordable Net Zero Homes (TANZ)?

Please write your response here::

I fully support the comments made in the response from The Friends of Carrington Moss

3 Should the Local Plan set an affordable housing requirement, including a tenure mix, for each locality (similar to Core Strategy policy L2) that reflects market conditions?

Please write your response here::

I fully support the comments made in the response from The Friends of Carrington Moss

4 Should any other policy approaches to affordable and social housing be explored?

Please write your response here::

The Council should have a measurable commitment to work with housing associations when Council owned or other suitable sites become available (For example Trafford Vehicle Depot on Higher Road and Woodsend Primary School).

Chapter 4 - Policy R4: Size and Type of New Homes

1 Do you support Policy R4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response by The Friends of Carrington Moss

2 The intention is to set an appropriate house size and type requirements for new development in each Locality to meet housing needs across the borough. Do you agree with this approach?

Please write your response here::

I fully support the comments made in the response by The Friends of Carrington Moss. I would also like to add that there should be a limit to the number of these homes being bought for investment purposes by overseas investors.

3 Do you think specific size and type requirements should be set for major residential development sites in the borough, like Pomona and Wharfside, to align with a Locality approach?

Please write your response here::

I fully support the comments made in the response by The Friends of Carrington Moss. I would also like to add that there should be a limit to the number of these homes being bought for investment purposes by overseas investors.

Chapter 4 - Policy R5: Housing Density

1 Do you support Policy R5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response by The Friends of Carrington Moss

Chapter 4 - Policy R6: Older Persons Accommodation

1 Do you support Policy R6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully agree with the comments made in the response from The Friends of Carrington Moss

2 Should the Local Plan set a definition for what constitutes a Care Home, Extra Care and Assisted Living? If so, what should they be defined as?

Please write your response here::

I fully agree with the comments made in the response from The Friends of Carrington Moss

Chapter 4 - Policy R7: Adaptable and Accessible Housing

1 Do you support Policy R7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response by The Friends of Carrington Moss

Chapter 4 - Policy R8: Homes for Children and Care Experienced Young People

1 Do you support Policy R8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 4 - Policy R9: Other Types of Homes

1 Do you support Policy R9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comment made in the response by The Friends of Carrington moss

2 Should the affordable housing requirement apply to student accommodation to enable a proportion of student accommodation schemes to be affordable to students from low-income backgrounds?

Please write your response here::

I fully support the comment made in the response by The Friends of Carrington moss

3 Should nomination agreements be used to ensure that accommodation is reserved for students enrolled at a named institution?

Please write your response here::

I fully support the comment made in the response by The Friends of Carrington moss

Chapter 4 - Policy R10: Gypsies, Travellers and Travelling Showpeople Accommodation

1 Do you support Policy R10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comment made in the response by The Friends of Carrington moss

Chapter 4 - Residential Development

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

I fully support the comment made in the response by The Friends of Carrington moss

Chapter 5 - Policy EJ1: Employment Land Requirements

1 Do you support Policy EJ1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response by the Friends of Carrington Moss.
In addition I would like to add that traffic volume at peak times and in poor weather conditions, between junction 8 and junction 13 of the M60, is at capacity with traffic regularly at a stand still. The combination of HGV vehicles for Trafford Park, Carrington and Port Salford together with the Trafford Centre make a significant contribution to this traffic. Then there are the leisure facilities such as Factor E, David Lloyd, MUFC, Trafford Retail Park and AJ Bell Stadium which add to the already busy motorway and surrounding road networks. Then there is Therme Manchester which is coming to Trafford Park in 2027 that will add even more traffic to the motorway and local road networks.
In it's focus on economic growth, the health of local residents has been ignored. Air pollution is high and then there is the constant noise pollution from the motorway and the light pollution from the Trafford Centre. Traffic on local road networks is at a standstill in the run up to Christmas and during other festivals/events.
Yet you plan to increase the number of warehousing and industrial sites in Trafford Park, Carrington and Port Salford is to be significantly increased in size.
Before that is done, there really needs to be investment in rail freight that links the three industrial sites to the wider rail network. As your responsibility to existing communities, Trafford and Salford Councils should make it a condition of any more planning applications that freight and passenger rail has significant investment before approval.
Some of the infrastructure is already there. Peel have built the cantilever to facilitate rail between Trafford Park and Port Salford. There is a disused rail line line in Carrington that links to the main line. Renovate the old railway bridge over the Manchester Ship Canal, between Partington and Cadishead then this would connect all three sites. It would also facilitate passenger rail in Partington and Carrington which is desperately needed.

Chapter 5 - Policy EJ2: Trafford Park

1 Do you support Policy EJ2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I agree with the comments made in the response from The Friends of Carrington Moss.
In addition I would also like to add;

Section D should be amended to 'Improvements to public transport and walking, wheeling and cycling
infrastructure across Trafford Park, facilities for lorry drivers (toilets, food stations, bins) along with improved connections to surrounding areas, will be secured through developer contributions
where relevant, in line with Policy IP1'.

The issue with litter in Trafford Park is significant, not only due to the amount but because of the type of litter. I used to do regular litter picks around Trafford Park, but no longer do them due to the fact that a lot of the litter was human excrement in plastic bags or human urine in plastic bottles. The majority of the litter was coming from HGV drivers. These drivers may have travelled very long distances to get to one of the largest industrial estates in Europe only to find there is nowhere for them to get something to eat, go to the toilet, have a shower etc. This is unacceptable. Drivers should be provided with basic facilities, otherwise the issue of litter will never go away.

Chapter 5 - Policy EJ3: Industry and Warehousing

1 Do you support Policy EJ3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response from The friends of Carrington Moss.
Also, see my response to EJ1

2 Do you agree with the proposed boundary shown on the policies map for Trafford Park?

Please write your response here::

I fully support the comments made in the response from The friends of Carrington Moss.
Also, see my response to EJ1

3 Do you agree with the proposed boundary shown on the policies map for Broadheath Employment Area?

Please write your response here::

I fully support the comments made in the response from The friends of Carrington Moss.
Also, see my response to EJ1

Chapter 5 - Policy EJ4: Offices

1 Do you support Policy EJ4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response from The friends of Carrington Moss.

Chapter 5 - Policy EJ5: Safeguarding Trafford's Employment Land

1 Do you support Policy EJ5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response from The friends of Carrington Moss.

Chapter 5 - Policy EJ6: Data and Energy Storage

1 Do you support Policy EJ6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response from The friends of Carrington Moss.

Chapter 5 - Policy EJ7: Rural Economy

1 Do you support Policy EJ7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response from The friends of Carrington Moss.

I addition I would like to add that considering Trafford has the least amount of green space in the whole of GM with the exception of Manchester City Centre, the fact that it proposes to release one of the highest proportions of agricultural land in GM demonstrates it's complete disregard for the rural economy and for food security for generations to come.
So section A of this policy should be amended to 'The Council will support appropriate rural development to ensure the long-term economic viability of Trafford's agriculture and the vitality of its rural communities through the protection of agricultural land by not permitting large scale housing or industrial developments, to ensure food security for future generations'.

Chapter 5 - Economy and Jobs

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

I fully support the comments made in the response from The friends of Carrington Moss.

Chapter 6 - Policy TM1: Walking, Wheeling and Cycling

1 Do you support Policy TM1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response from The Friends of Carrington Moss. In addition I would like to make the following points.

I agree with the comments made in TM1 and hope that the Council delivers on the points made in the policy and does not weaken it's ideas under pressure from motorists.
Kingsway in Stretford is a success and a great example of how key routes in towns should be designed. The cost is obviously an issue but key routes like Flixton Road in Urmston and School Road in Sale could be improved by making some adjustments and without a full refurbishment as done on Kingsway.
More pedestrian crossing should be installed. Wherever there is a crossing and a bus stop, the pavement should be built out into the road to provide good vision, safety and easier access onto buses. On the ends of these built out areas, there should be landscaping and SUDs like those on Kingsway and there should also be cycle parking. Doing this will prevent motorists from parking on zig zags and at bus stops.
The speed limit on these roads should be reduced to a mandatory 20mph. However, as the road is narrowed at regular intervals, it should deter speeding. Also, remove the central markings on the road as this has been shown to reduce speeds.
Continuous pavements should be introduced across the borough to make sure pedestrians are given priority as the majority of motorists still do not obey the highway code. All residential streets should have a speed limit of 20mph.
Please introduce a ban on pavement parking or introduce mandatory permit systems on streets where there are issues with parking.
Designated School streets should be obvious to the motorist through large road markings, coloured bollards and the speed limit should be 5mph.
Therefore Section B should be amended to 'A priority will be to improve safe pedestrian crossings at key junctions across the borough (particularly those with no existing / limited crossing facilities) utilising planning contributions where possible, the introduction of continuous pavements across the borough, the introduction of 20mph speed limits in all residential areas and a ban on pavement parking.'

Chapter 6 - Policy TM2: Public Transport

1 Do you support Policy TM2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response from The Friends of Carrington Moss. In addition I would like to add the following;

In Section A you say that 'The Council will work with TfGM and partners to deliver a high-quality
public transport network across the borough, which offers a choice of accessible, safe and reliable modes of travel to all. ' In Section B you say 'To support delivery of the above, all major development proposals will be expected to provide or contribute towards improvements to public transport services, particularly in those areas poorly served by existing services and / or where proposed development would likely generate additional demand which exceeds existing capacity.'
I fully agree with these policies however evidence suggests that these policies are and will be ignored.
For example the only transport intervention for New Carrington is the Carrington Relief Road. As you even confirm in section C, Partington has poor public transport provision and yet despite the huge development that is taking place in Partington and New Carrington, there are no requirements for developers to contribute to public transport.
Take for example planning applications 99245 Carrington Village development (320 dwellings and 63,000 sqm of industrial), 108032 Heath Farm Lane (up to 600 dwellings), the only transport condition is for the developer to contribute to the Carrington Relief Road or improvements to the junctions at Flixton Road or Banky Lane. Planning application 100110 for the Lock Lane development of 298 dwellings had no conditions for any contribution to public transport or highways.

In order to deliver on your commitment to ensure 'all major development proposals will be expected to provide or contribute towards improvements to public transport services', developer contributions for committed developments should be used to fund public transport interventions and infrastructure that will make a real difference to local residents, will provide a choice of sustainable transport options and will not increase traffic in the area. Here are some viable options that will achieve this;

1) Improved bus service – 255 and 247 increased to every 20 minutes or extend the 256 route to Partington to provide more services in the town and to provide a late night bus.
2) New express bus service to Stretford Tram Station and Manchester via The Carrington Spur Road.
3) Segregated cycle infrastructure along the existing A6144 to Sale West.
4) Re-route HGV traffic along the existing A1 Road.
5) Do a feasibility study to re-open the railway line in Partington to connect it with Irlam and Timperley. This is an option that Partington Residents have been requesting for at least 10 years and would not only provide much needed passenger transport but also provide freight transport options to reduce the high number of HGVs on local road networks. It would link Carrington to Port Salford and it will also link up the Manchester to Liverpool Line with the Mid-Cheshire Line which would reduce pressure on the Deansgate bottleneck.
So I think section B should say 'To support delivery of the above, all major development proposals will
be expected to provide or contribute towards improvements to public transport services, particularly in those areas poorly served by existing services and / or where proposed development would likely generate additional demand which exceeds existing capacity. Contributions to public transport services must be made before any major highway contributions can be considered'.

Chapter 6 - Policy TM3: Car Clubs

1 Do you support Policy TM3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support car clubs but they need to be cheaper and more convenient.

Chapter 6 - Policy TM4: Mobility Hubs

1 Do you support Policy TM4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support mobility hubs

Chapter 6 - Policy TM5: Local Highway Network

1 Do you support Policy TM5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The Carrington Relief Road is extremely expensive and the only beneficiaries are the developers. It will not relieve Partington, Warburton or Sale West. It will induce traffic and overall traffic in the area and beyond will increase significantly as there are no alternatives to using the car.
Don't waste money on this scheme, instead invest the £132 million (and rising) on public transport

Chapter 6 - Policy TM6: The A56

1 Do you support Policy TM6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the Council's plans for the A56

Chapter 6 - Policy TM7: Freight

1 Do you support Policy TM7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The friends of Carrington Moss.
I would also add that section A in the policy is very disingenuous. There are no plans for sustainable freight transport for New Carrington despite it being the largest development in the Places for everyone and it is next to the Manchester Ship Canal and has a former train line running through it.

Chapter 6 - Policy TM8: Manchester Ship Canal

1 Do you support Policy TM8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss and I reiterate my response made to TM7 which also relates to this policy

Chapter 6 - Policy TM9: Potential Future Rail Route

1 Do you support Policy TM9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

Chapter 6 - Policy TM10: Parking Standards

1 Do you support Policy TM10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

Chapter 6 - Policy TM11: Lorry Management

1 Do you support Policy TM11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss.
In addition I would like to add that all industrial sites that require the movement of HGV's should provide toilet facilities and bins for lorry drivers. Large industrial estates such as Trafford Park, New Carrington and Broadheath should provide parking with services (toilets, showers hot food and bins) for long distance lorry drivers. It is inhumane that these facilities don't already exist in one of the largest industrial estates in Europe.
Therefore Section C should say 'Development proposals for employment uses which are likely to
generate a significant number of HGV movements should consider the need for lorry parking facilities, including toilets, recycling facilities, food stations and ensure they are incorporated into the design of the scheme from the outset'.

Chapter 6 - Policy TM12: Park and Ride

1 Do you support Policy TM12? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Where are the existing park and ride facilities?

Chapter 6 - Transport and Movement

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Chapter 8 - Policy GI1: Landscape Character Areas

1 Do you support Policy GI1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

Chapter 8 - Policy GI2: Green Infrastructure Network

1 Do you support Policy GI2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss. In addition I would like to add the following;

I think that this policy should include a caveat that if there are objections to developments that demonstrate that this policy is not being upheld, then the application must be rejected.
Evidence suggests that Trafford Council will ignore section A and Section B of this policy when it is not in the interest of developers and profit. For example, despite the fact that Carrington Moss has all the features as laid out in Section B i) ii) iii) iv) and v), the council are not protecting it from development and they are ignoring any proposals to enhance and restore the existing peat moss.
The protections that are in the Places for Everyone plan are being ignored. The first criterion in the New Carrington Policy is that development of this site is required to be “in accordance with a masterplan that has been developed in consultation with the local community and approved by the local planning authority”. This masterplan, which would provide the framework for the protection, mitigation and compensation for damage to the natural environment, does not exist and yet this and other planning applications for developments on Carrington Moss are being submitted and approved despite the importance of this site.
Even Natural England recommended that no development takes place on Carrington Moss and yet you quote their Green Infrastructure Principles in your policy.
Policies are not worth the paper they are written on unless they are enforced.

Chapter 8 - Policy GI3: Great Manchester Wetlands Nature Improvement Area (NIA)

1 Do you support Policy GI3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss.

I suggest that section B should be amended to 'Proposals for wetland improvement and restoration, a key priority of the NIA, will be supported, including the identification of other sites that would be suitable for protection under the GM Wetland NIA'.

Chapter 8 - Policy GI4: Mersey Valley

1 Do you support Policy GI4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question from The Friends of Carrington Moss.

I think that section A i) should be amended to 'Reduce and / or mitigate the effects of flood risk from the Mersey Valley on the surrounding built environment through the protection of the flood plains at Turn Moss and Carrington Moss'.
After all, how else will the Council be able to 'reduce and/or mitigate the effects of flood risk' without the need for very expensive infrastructure? The solutions are already there but they need protecting and enhancing.

Chapter 8 - Policy GI5: Green Infrastructure Opportunity Areas

1 Do you support Policy GI5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully agree with the comments made in the response to this question by The Friends of Carrington Moss.

Policy GI5W shows that the existing green corridor from the Mersey Valley to Sinderland Brook across Carrington Moss will be completely obliterated. Although the New Carrington Policy proposes a green corridor, to connect these two areas, this corridor has already been built on by MUFC who have constructed a car park on a section of it. I could not find the planning application for this car park and I have not received a response to my enquiry about it's whereabouts.
Section C of this policy should be amended to 'Development proposals must ensure that wildlife corridors remain intact and undisturbed. Proposals which strengthen green infrastructure links between the identified Green Infrastructure Opportunity Areas, improving connectivity and expanding the network, will be supported and encouraged'.

Chapter 8 - Policy GI6: Green Infrastructure in New Developments

1 Do you support Policy GI6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully agree with the comments made in the response to this question by The Friends of Carrington Moss.

Evidence from the planning application 115160 for the BESS facility on Carrington Moss has shown that developers do not need to protect, enhance (including quality and/or expand the Green Infrastructure network, irrespective of how precious the habitat is. They simply need to submit a report to provide some mitigation, however small, and the application will be approved.

In order to provide some more protection for the environment, Section A should be amended to
'All development proposals must ensure there is no loss to existing green infrastructure and they must demonstrate how they will contribute to the protection, enhancement (including quality and/or the multi functionality), and expansion of the Green Infrastructure network. This includes incorporating green and blue infrastructure within schemes and considering its impact on connectivity, biodiversity, local amenity and heritage assets'.

Chapter 8 - Policy GI7: Trees, Woodland and Hedgerows

1 Do you support Policy GI7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question from The Friends of Carrington Moss

I would also like to see section A amended to 'Trees, woodlands and hedgerows will be protected and enhanced. The Council will seek to significantly increase tree canopy cover to support biodiversity net gain and build resilience to climate change. The Council will resist the loss of mature trees and if necessary will seek alternative solutions such as pollarding'.

Chapter 8 - Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets

1 Do you support Policy GI8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments in the response to this question form The Friends of Carrington Moss

Chapter 8 - Policy GI9: Biodiversity Opportunity Areas

1 Do you support Policy GI9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question from The Friends of Carrington Moss.

In addition I would like to add that as the New Carrington Masterplan is not in place, the measures to protect the natural habitats and provide mitigation for the habitats that will be lost on Carrington moss, have not been agreed. This will impact biodiversity area GI9W as Carrington moss provides a green corridor between the areas identified in GI9W
I think section B should say 'Development which would undermine or compromise biodiversity improvements in the Biodiversity Opportunity Areas identified in Policies GI9N, GI9S, GI9C and GI9W will not be supported. Developments on Carrington Moss will not be supported prior to the publication of the New Carrington Masterplan which will be developed in consultation with the local community'.

Chapter 8 - Policy GI10: Building Biodiversity into New Developments

1 Do you support Policy GI10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

Chapter 8 - Green Infrastructure and Natural Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Chapter 9 - Policy OS1: Open Space

1 Do you support Policy OS1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully agree with the comments made in the response to this question by The Friends of Carrington Moss

Chapter 10 - Policy WA1: Managing Flood Risk

1 Do you support Policy WA1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss, particularly the lack of understanding of the amount of water held on Carrington Moss and how development on this site is going to have a significant impact on existing residents. The flooding last New Year is a demonstration of the effect climate change is already having on communities around the Mersey Valley. If the development of Carrington Moss goes ahead, particularly in the current piece meal fashion (prior to the masterplan being in place) then flooding in communities close to the Mersey Valley will get much worse and there will be implications for communities further afield as water levels continue to rise.
The Council have a responsibility to existing communities, not just new developments, to protect against flooding.
I think Section A should say 'The Council will refuse development in areas at risk of flooding, having regard to existing residents'.

Chapter 10 - Policy WA2: Sustainable Drainage – Surface and Foul Water

1 Do you support Policy WA2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by the Friends of Carrington Moss

In addition I would like to add that there is significant risk of surface water pollution from former industrial sites in Carrington, so under section J of your policy it would suggest that development on this former petrochemical site will not be permitted.

Chapter 10 - Policy WA3: Flood Storage Areas

1 Do you support Policy WA3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by the Friends of Carrington Moss

Chapter 10 - Policy WA4: Water Efficiency

1 Do you support Policy WA4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by the Friends of Carrington Moss

Chapter 11 - Policy CT1: Protecting Existing Community and Social Facilities

1 Do you support Policy CT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by the Friends of Carrington Moss

2 Do you think the Council should protect the loss of community facilities and local services through a sequential test (as set out in Policy CT1 above), or by requiring a statement setting out evidence as to why a particular facility is not needed?

Please write your response here::

I fully support the comments made in the response to this question by the Friends of Carrington Moss

Chapter 11 - Policy CT4: Fast Food

1 Do you support Policy CT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I also think that you need some more restrictions as below;

C Proposals for hot food takeaways and fast-food outlets will not be supported if
i) located at a pedestrian crossing (this encourages parking on zig zags etc)
ii) Encourages the use of a car, for example drive through fast food outlets

Chapter 12 - Policy BE1: Design

1 Do you support Policy BE1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

Chapter 12 - Policy BE3: Elevated Green Spaces

1 Do you support Policy BE3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 12 - Policy BE5: Heritage Assets

1 Do you support Policy BE5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

Chapter 12 - Policy BE6: Designated Heritage Assets

1 Do you support Policy BE6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

Chapter 12 - Policy BE7: Non-designated Heritage Assets

1 Do you support Policy BE7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 12 - Policy BE8: Noise and Vibration

1 Do you support Policy BE8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss, in particular the validity of noise impact reports and the location of noise detectors, as demonstrated in planning application 115160, where the report did not consider the impact of noise on a SBI which is adjacent to the proposed site. The report made no reference to the SBI and permission was granted.

Section B should say
The Assessment must demonstrate how the proposal:
i Considered sites of environmental importance (SSI, SBI etc) and that they are rigorously assessed in accordance with Government Guidelines, as it is not appropriate to use BS4142 standards
https://www.gov.uk/government/publications/noise-and-vibration-management-environmental-permits/noise-and-vibration-management-environmental-permits
ii is located in the most appropriate location; and
iii. protects and where appropriate, provides appropriate mitigation for
both current and future occupiers against existing and proposed
sources of noise and vibration, in accordance with the Agent of
Change Principle

Chapter 12 - Policy BE9: Land Contamination and Remediation

1 Do you support Policy BE9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

Chapter 12 - Built Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Chapter 13 - Policy CL1: Protecting and Supporting Existing Cultural, Leisure and Tourism Assets

1 Do you support Policy CL1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

Chapter 14 - Policy IP1: Infrastructure Delivery and Planning Obligations

1 Do you support Policy IP1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss
In addition I would add that any transport contribution from developers should be for public transport infrastructure and not highways

Chapter 14 - Policy IP2: Managing and Monitoring Planning Obligations

1 Do you support Policy IP2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

2 Do you agree that the Council should require a fee to monitor and report on all planning obligations?

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

3 Do you agree or have any observations or suggestions on the proposed planning obligation monitoring fees for either minor and/or major developments?

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

Chapter 14 - Infrastructure and Planning Obligations

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Integrated Assessment (IA) of the Draft Local Plan

1 Do you have any comments to make on the Sustainability Appraisal and its associated appendices?

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

2 Do you have any comments to make on the Health Impact Assessment?

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

3 Do you have any comments to make on the Equalities Impact Assessment?

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

IA: Climate Change Risk Assessment

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

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

Integrated Assessment (IA): Scoping Report Addendum

1 Do you have any comments on the IA Scoping Report Addendum?

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

Habitat Regulations Assessment (HRA) of Draft Local Plan

1 Do you have any comments on the Habitats Regulations Assessment (HRA) of Draft Local Plan?

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

Site Selection Methodology

1 Do you have any comments on the proposed Site Selection Methodology (Figure SS-1)?Are there any stages / questions / considerations which should be added and/or removed?

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

In addition I would like to add the following;

1) In section 2.3 you say that the 'council does not need to identify any further Green Belt land for development'. What can the council do when a planning inspector re-designates land from green belt to grey belt?

2) If development is being approved contrary to Place for Everyone policy, (before the New Carrington Masterplan is in place), how will the policies in the Local Plan be enforced and how will it guarantee that no further green belt land will be used.

2 Specific criteria will need to be identified to assess a sites performance at each stage of the site selection process.Do you have any comments on what these site criteria should include?What evidence should inform this assessment?

Please write your response here::

I fully support the comments made in the response to this question by The Friends of Carrington Moss

Response ID ANON-MFZ6-4QRF-Z

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-08 11:17:50

Personal details

1 Forename

Enter your forename:
Lillian

2 Surname

Enter your surname:
Burns

3 Organisation (if applicable)

Enter your organisation:
CPRE - Campaign to Protect Rural England

4 Position/title (if applicable)

Enter your position/title:
Planning and transport policy volunteer

5 Address

Enter your address:

[redacted]

6 Postcode

Enter your postcode:
[redacted]

7 Email address

Enter your email address:
[redacted]

8 Contact phone number

Enter your contact phone number:
[redacted]

9 Please select ‘opt in.’ if you wish to recieve future consultations on planning policy.

Opt in

Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

The Policies Map reflects some proposed land allocations that CPRE cannot endorse and others for which insufficient information is available (eg. the Manchester United Football Club redevelopment). It also fails to depict either the Carrington or Warburton peat mosslands or the TransPennine Trail. We therefore cannot support the map. See our answers to other questions, notably Q.2-1 and Q.2-3.

Chapter 1 - Vision

1 Do you agree with the proposed Vision for the Trafford Local Plan?

Please write your response here::

The 'Vision' covers many important social, environmental and economic topic areas but is incomplete. It needs to be expanded to include air quality and health. Too many parts of Trafford suffer from poor air quality – which has impacts on the population's health. In fact, according to the Scoping Report Addendum prepared for Trafford Council by TEP, The Environment Partnership, (V.5, March 2025), "Trafford had been identified as one of the highest emitting boroughs for carbon emissions and nitrogen oxides within Greater Manchester, due in part to the major roadways within its borders". The report points out that, as well as impacts on human beings, "Poor air quality can impact on the natural environment including on sensitive designated sites and other biodiversity assets" (para. 7.8. page 40).
These factors are also highlighted in other reports that TEP has prepared for Trafford Council and which we quote throughout our responses to this consultation. It is therefore essential that this key over-arching aim addresses them. Until they are included, we cannot support the borough's 'Vision'.

Chapter 1 - Strategic Objectives

1 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

Please write your response here::

As each of the 10 parts of this policy are missing important components, we cannot support them as they stand. We suggest the following additions (highlighted and underlined) to the strategic objectives:

SO1 This strategic objective should be: 'Deliver the low carbon homes that Trafford needs'.

SO2 The Climate Risk Assessment of the draft Trafford Local Plan by TEP, the Environment Partnership, points out, in paragraph 4.8 on page 16, that SO2 (Make Trafford Healthy) fails to tackle the issue of addressing Trafford's transport emissions. Doing so, they say, "will lead to improved air quality and health outcomes". This omission needs to be rectified. As a minimum, SO2 should be: 'Make Trafford healthy, with clean air, accessible and equal for all'.

SO3 'E' should be: 'Prioritise brownfield development by encouraging the reuse and redevelopment of previously developed land and buildings and the re-purposing of under-used or empty office and retail buildings and employment sites for housing where appropriate'. (NB 'Derelict land' is a narrow term which is not defined in the NPPF).

SO4 The Climate Risk Assessment that was conducted of the draft plan by TEP, The Environment Partnership, (Version 2), flags up (in paragraph 4.7 on page 16) that there are "missed opportunities to integrate consideration of climate change into the Strategic Objectives" and it cites SO4 (Sustain Trafford's economic growth) as one of them because it does not mention opportunities to invest in the Green Economy – despite the fact that policies such as EJ2 (Trafford Park) state that the council will support proposals for green, low carbon industry at Trafford Park. We therefore suggest that support for the Green Economy should be an item 'D' and we also suggest there should be an 'E' as follows: 'Ensure Trafford businesses set best practice by their adherence to climate change and employment regulations and standards'.

SO5 This strategic objective should be making a promise to address access to jobs for young people.

SO6 CPRE can support SO6A in principle as it recognises the need to diversify uses in town centres and can play an important role in meeting housing targets. (That said, the Council needs to take a pro-active stance via town centre action plans to ensure they comprehensively address potential problems such as avoiding new housing being too close to late night food and drink uses). We cannot support SO6B as it only offers a pro-active approach to town centres, saying it will 'Bolster' them. But it only plans to 'note' the role that District/Local Centres play. It should be offering to 'Promote', not just 'Recognise'.

SO7 'A' of this strategic objective should be 'Achieve biodiversity net gain, ideally in the same areas where biodiversity is lost, in line with priorities set out in the Greater Manchester Local Nature Recovery Strategy and ideally in areas affected by new development' (ref: [redacted]).

SO8 CPRE strongly recommends there should be another theme, 'Adopt a sustainable transport hierarchy'.
CPRE's transport hierarchy places digital communications at the top. Then, in descending order, walking, wheeling and cycling; public and shared transport; sustainably fuelled vehicles; ICE (internal combustion engine) vehicles; water transport and aviation. (Air travel being the least sustainable travel mode). Our transport policy is here: [redacted]

SO9 This strategic objective would be improved with the addition of words about sustainability, eg. 'Support the important role culture, tourism and leisure play in the local and regional economy, ideally in the most sustainable manner'.

SO10 We recommend that there should also be a theme about neighbourhood planning, eg. 'Promote and support neighbourhood planning'. It is a regrettable state of affairs within the Metropolitan Boroughs that neighbourhood planning has not been championed and has therefore not taken off. CPRE, along with the National Association of Local Councils (NALC), is a big advocate of neighbourhood planning.

Chapter 1 - Introduction, Vision and Strategic Objectives

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

We would like to make a general observation which applies across the board. There are many proposed Local Plan policies that we support as they stand and there are many more we would be able to support with some improvement. Our issue is with the need for robust monitoring, accurate data

collection and a willingness to act as and when policies are not working or are not being enforced, especially in view of Trafford's budget gaps and its need to tackle a deficit exceeding £12m. Trafford's financial problems have been well documented and we are aware that the Council will have to repay a loan of £9.6m to the MHCLG. Understandably, therefore, we have concerns about the soundness of the base on which the Local Plan will sit and about how rigidly it will be enforced.

Chapter 2 - Policy ST1: Core Growth Area (Trafford)

1 Do you support Policy ST1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE cannot support this policy due to major uncertainties. We note the comments in the TEP Integrated Assessment Report (V3) that, while this policy would help meet housing needs and improve economic growth, "Further development in the Core Growth Area has potential for negative environmental effects" (paragraph 5.5, page 12).

The Core Growth Area includes the Old Trafford football ground, the home of Manchester United Football Club. In March this year Manchester United and an Old Trafford Regeneration Task Force headed by Lord Sebastian Coe unveiled plans for developing a 100,000-seat stadium next to the current one which they hope to have built by 2030 – or 2032 at the latest. The UK government has backed a regeneration project around Old Trafford, (which envisages the provision of 17,000 new homes), but is only financially supporting surrounding projects, not the stadium itself – and three freight train terminals near the site pose significant challenges. CPRE promotes moving freight by rail and would not want to see any diminution of rail freight capacity. However, we cannot comment further on this project until more details are released (we understand consideration is being given to moving the freight terminals) and/or a planning application comes forward.

Chapter 2 - Policy ST2: Inner Areas (Trafford)

1 Do you support Policy ST2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Until a Masterplan is unveiled, CPRE can only give qualified support to this policy. The supporting text explains that the Civic Quarter Area Action Plan is an adopted part of Trafford's Development Plan, looking to deliver up to 4,000 new homes and up to 50,000 sq.m of commercial floorspace in an area at the south eastern end of the Gorse Hill and Cornbrook Ward. The Integrated Assessment of the Action Plan by Capita defines this area as one of high deprivation and calls for waste and health facilities to be put in place at the same time the main development goes ahead. This area appears to be a sustainable one for the type of development proposed. That said, we note the comment in the TEP Integrated Assessment (identical to that for the Core Growth Area) that "Further development in the Inner Area has potential for environmental effects" (para. 5.8, page 13).

Chapter 2 - Policy ST3: Southern Areas (Trafford)

1 Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE does not support this policy which includes the development areas of New Carrington and Davenport Green – otherwise known as the Timperley Wedge. CPRE lodged the strongest objections to the loss of Green Belt in both these areas during the examination in public into Greater Manchester's 'Places for Everyone' (PfE) Spatial Plan and, in the case of New Carrington, to the loss of a significant area of peat bog which is so crucial to the sequestration of carbon. (We were only able to support the re-use of the brownfield element of the New Carrington site).

CPRE also challenged the overall housing figures and presented evidence at the EIP from two economists that the employment land allocations were not justified. Despite this, New Carrington was subsequently designated as one of the largest allocations in PfE, with Policy JPA 30 sanctioning 5,000 homes and 350,000 sq.m. of employment space and Policy JPA 3.2 allocated 2,500 homes and 60,000 sq.m of employment space at Davenport Green/ the Timperley Wedge. These allocations have therefore been carried forward to the Trafford Local Plan. However, the fact that they have been endorsed through the planning process does not mean that we now agree with them and we would stress the need for great care to be taken at every stage of developing on the mossland.

We would also like to highlight what the Greater Manchester Ecology Unit have to say about the Manchester Mosses (which make up a significant part of the New Carrington site) in their Habitats Regulations Assessment of the Draft Trafford Local Plan. They describe the Manchester Mosses, which are a European designated site, as "fragile" and as being "vulnerable to external influences" (para. 4.1, page 10) and, in Appendix 1, they flag up the "potential impacts from diffuse air pollution arising from increased traffic flows" and "a potential for habitats to be affected by pollution" (page 47). CPRE believe it is an environmental tragedy in the making to build on precious peat land.

We would also comment that it is somewhat ironic that, during the course of this consultation, Trafford and all the other Greater Manchester authorities have adopted a Joint Supplementary Planning Document protecting Holcroft Moss just over the border with Warrington. Holcroft Moss is also part of the Manchester Mosses – all of which should be protected for the important job it does in absorbing carbon from Greater Manchester, not only a section of it. This is not just our view but that of Natural England who, in May, published an England Peat Map: https://england-peat-map-portal-ncea.hub.arcgis.com/. From that open-portal map it is possible to tell the depth of the peat in any given place as well as the extent of it. The Carrington Moss area is impressive and clearly of some significance, lying immediately to the south west of Manchester and the M60, to the east of Partington and north west of Altrincham,

between the River Mersey and the A6144 Manchester Road to the west and north and the A56 to the east. In many parts the peat here is over seven feet in depth.

Other factors relating to the Southern Areas are raised in the Scoping Report Addendum to the Integrated Assessment of the Trafford Local Plan, prepared by TEP, The Environment Partnership. It lists as 'Key Issues' for the South: "The protection of the conservation areas and heritage assets" and it goes on to say: "Ensure that the distinctive characteristics are not lost through development" and comments that "There is opportunity to maximise opportunities for recreation, eg. Stamford Park, the Trans Pennine Trail, the Bridgewater Canal" (page 65). We would endorse these sentiments.

Chapter 2 - Policy ST4: Sustainable Development

1 Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst, on the face of it, this policy is in line with national planning policy, CPRE cannot support it because of the omissions from it and the reality of the situation on the ground. The policy makes no mention of avoiding flood zones or sensitive areas or of protecting important open spaces, biodiversity, heritage, landscapes or air or water quality. Also, the fact that irreplaceable peatland and habitats are scheduled for development is not, by any measure, 'sustainable development'.

CPRE commend to Trafford Council the about-turn that Cheshire East Council are adopting in respect of peatland they were intending to develop. The South Macclesfield Development Area (SMDA), which is in the adopted Local Plan, stretches over very deep peat bog known as Danes Moss. Cheshire East are now working on their new Local Plan and are proposing to de-allocate much of this area for environmental reasons. (See: [redacted]

Chapter 2 - Policy ST5: Climate Change

1 Do you support Policy ST5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE supports what this policy has to say in as far as it goes. However, it does not go far enough – and that is not just our opinion but also that of TEP, The Environment Partnership, who conducted the Climate Change Assessment of the Draft Local Plan. Their assessment is: "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" (table 3, page 24).
The fact of the matter is that, according to the Scoping Report Addendum to the Integrated Assessment of the Draft Local Plan, produced by TEP, "Trafford still has the highest per capita emissions in Greater Manchester" and "this is partly due to its large concentration of industry" and "industrial emissions are multiple times higher than other Greater Manchester borough". This is despite the fact that Trafford has reduced its total emissions by 33% since it declared a climate emergency in 2018. (Para. 6.36, page 31). Consequently, it is very clear that this section of the Plan needs to be bolstered and so does the policy wording.

Our view is that this policy would also be improved if it specifically called for a reduction in carbon emissions and footprints. Carbon is mentioned in paragraph 2.40, but it is not in the draft policy itself. Also, there is no mention whatsoever of the need to improve air quality.

Chapter 2 - Strategy

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

The Local Plan may wish to refer to the latest report from the World Meteorological Organisation (WMO) which was published at the end of May. The 'WMO Global Annual to Decal Climate Update (2025-2029)' projects that global temperatures are expected to continue at or near record levels in the next five years, increasing climate risks and impacts on societies, economies and sustainable development [redacted]

Also, see our responses to questions 2-4 and 2-5.

Chapter 3 - Policy RT1: Carbon and Energy

1 Do you support Policy RT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write you response here::

CPRE cannot support this policy because it needs improvement. We would quote what TEP have to say in their Climate Change Assessment of the Draft Local Plan. They point out, in Table 3 on page 24, what they describe as "a clear omission". It is the lack of a policy setting out "where and in what circumstances proposals for large scale renewable energy generation would be supported .... To support the decarbonisation of the borough's energy

system and help to mitigate climate change". Such a policy, we would argue, would present a perfect opportunity to promote rooftop solar, not only on domestic buildings but on industrial and commercial buildings of which Trafford has so many.

CPRE supports the proposition that we need a rapid transition to clean power to tackle the climate emergency, but we do not believe the answer lies in erecting solar farms on land, especially on agricultural land. We commend to Trafford Council CPRE's campaign on 'rooftop solar' which can be seen here: [redacted]

Chapter 3 - Policy RT2: Decentralised Energy Generation

1 Do you support Policy RT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Heat networks are widely recognised as being sustainable and cost effective solutions for providing heating and cooling for homes and businesses, especially when powered by renewable and low carbon technologies. We support this concept.

Chapter 3 - Policy RT3: Overheating and the Urban Heat Island

1 Do you support Policy RT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

This sounds like a sensible policy which can be supported in principle.

Chapter 3 - Policy RT4: Sustainable Retrofitting

1 Do you support Policy RT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes, we support the principle of retrofitting so long as it does not have harmful impacts on heritage buildings. We note that the policy seeks to avoid this occurring, but there will need to be robust monitoring in place to ensure that old buildings of some standing are respected and not damaged.

Chapter 3 - Policy RT5: Circular Economy

1 Do you support Policy RT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We can support the aims of this policy.

Chapter 3 - Renewable Technologies and Methods

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

CPRE has been developing an alternative approach to planning renewable energy in the countryside. This approach recognises the importance of local landscapes, gives a voice to rural communities and empowers local people to pro-actively prepare for a future with more renewable energy. We commend our approach to Trafford Council: [redacted]

Also, see our response to q. 3-1 in this consultation.

Chapter 4 - Policy R1: Housing Delivery

1 Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE can support the emphasis that this policy places on the use of brownfield land and on delivering high density housing in the most suitable locations, but not the level of housing imposed on Trafford Council by the government. The Draft Local Plan stipulates that a minimum of 22,433 homes must be

delivered in Trafford by March 31, 2042. This increased figure (from the 18,547 identified in the 2021 version of the Draft Local Plan) is as a result of the government's new standard method for estimating the number of new homes needed. CPRE, along with a large number of other organisations, cannot condone the new standard method and continues to question it. That said, this is something that all local authorities have had imposed upon them by government and we understand this.

In view of the governmental pressures to build what many people regard as an unsustainable number of houses within an impossibly challenging time frame when there is a shortage of materials and trained labour, we strongly advocate for Trafford to have an up-to-date brownfield register. This will enable it to focus as much of its new development as possible on brownfield/ previously used land.

CPRE has previously presented evidence to show that Trafford's brownfield register needs updating – in its submissions to the examination in public on the Places for Everyone spatial plan. We would also refer Trafford Council to our report 'Recycling our land: state of brownfield', published in November 2021 (https://www.cpre.org.uk/resources/recycling-our-land-the-state-of-brownfield-report-2021/). This points up on page 8: "The net addition of sites to brownfield registers since their inception shows, again, that the brownfield land continues to be a renewable resource. In the past year alone, 756 hectares and 106,624 housing units have been added to the registers – 1 in 11 housing units on registers have been identified in the past 12 months". CPRE therefore urges all Councils to conduct an annual review of their site data. (Also, we followed up our 2021 report with another similar one I 2022: [redacted]

The brownfield register should also include assessing failing parts of town centres for conversion to housing. This would bring more business to the remaining retail and commercial units and would help to avoid building on greenfield/ Green Belt land, especially if it is used for food production.

Regarding the matter of agricultural land, we would flag up the recommendation made by TEP, The Environment Partnership, in their Integrated Assessment of the Draft Local Plan (V3). They say: "The proposed policy could specifically mention that best and most versatile agricultural land should be protected from inappropriate development" (Appendix C: Policies Assessment (V4), page 42).

Chapter 4 - Policy R2: Protecting Existing Homes

1 Do you support Policy R2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

In theory, this is supportable. We note, from the TEP Scoping Report Addendum (V5) that 3% of dwellings in Trafford are empty. (para. 7.2, 6th bullet point, page 37). It is to be hoped that the Council is doing its utmost to bring them back into use or to ensure the redevelopment of these previously used sites when this is not possible.

Chapter 4 - Policy R3: Affordable and Social Housing

1 Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE supports Policy R3. Also, we would point out that, according to the government's own statistics, social housing construction across the whole of rural England has collapsed by 32% since 2012 and rural homelessness affects nearly 28,000 people, an increase of 73% since 2018. CPRE is lobbying government to do more to address the situation [redacted]

2 Should 10% of all affordable and social housing be delivered as Truly Affordable Net Zero Homes (TANZ)?

Please write your response here::

Yes – as a minimum.

3 Should the Local Plan set an affordable housing requirement, including a tenure mix, for each locality (similar to Core Strategy policy L2) that reflects market conditions?

Please write your response here::

Yes, there should be a stipulated requirement for affordable housing in the Local Plan. The problem has been, however, that developers agree to meet these at outline planning application stage and then subsequently renegue on their promises, playing the non-viability card.

4 Should any other policy approaches to affordable and social housing be explored?

Please write your response here::

Yes.

Chapter 4 - Policy R4: Size and Type of New Homes

1 Do you support Policy R4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We support a policy that calls for a range and mix of dwelling sizes and types.

2 The intention is to set an appropriate house size and type requirements for new development in each Locality to meet housing needs across the borough. Do you agree with this approach?

Please write your response here::

The success of a policy like this depends on it being closely aligned with the Council's Design Guide.

3 Do you think specific size and type requirements should be set for major residential development sites in the borough, like Pomona and Wharfside, to align with a Locality approach?

Please write your response here::

Yes.

Chapter 4 - Policy R5: Housing Density

1 Do you support Policy R5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We welcome the fact that TEPs Integrated Assessment Report (V.3) stresses the need for the right design of housing in the right areas (para. 5.36, page 17) and we repeat the point we made in answer to question A.4-8, ie. the policy's success will depend on its alignment with the Council's Design Guide.

Chapter 4 - Policy R6: Older Persons Accommodation

1 Do you support Policy R6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes, CPRE can support this policy. More needs to be done to accommodate an ageing population and their needs to enable them to be self sufficient for as long as possible. Targets are essential to ensure the right type of housing is made available in the right places.

2 Should the Local Plan set a definition for what constitutes a Care Home, Extra Care and Assisted Living? If so, what should they be defined as?

Please write your response here::

Trafford could consider adopting the definition used by Age UK for assisted living/ extra care housing:

[redacted]

Chapter 4 - Policy R7: Adaptable and Accessible Housing

1 Do you support Policy R7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We very much support the concept of 'Lifetime Homes' and therefore can support this policy.

Chapter 4 - Policy R8: Homes for Children and Care Experienced Young People

1 Do you support Policy R8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The commitments made in this policy appear to be sound and sensible and are therefore supported.

Chapter 4 - Policy R9: Other Types of Homes

1 Do you support Policy R9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

It is essential that co-living arrangements are available, especially for students, but we think it would be a good idea if the policy were to set out a minimum standard that is acceptable.

2 Should the affordable housing requirement apply to student accommodation to enable a proportion of student accommodation schemes to be affordable to students from low-income backgrounds?

Please write your response here::

This seems to be a sensible concept.

3 Should nomination agreements be used to ensure that accommodation is reserved for students enrolled at a named institution?

Please write your response here::

We are unsure and therefore decline to answer this question.

Chapter 4 - Policy R10: Gypsies, Travellers and Travelling Showpeople Accommodation

1 Do you support Policy R10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

It is important that the Plan is informed by an up-to-date assessment of need for the different types of site provision (transitory, long stay, etc). The policy, appropriately, aims in the first instance to meet the need via the existing site supply and/or suitable allocated sites and by imposing a criteria-based policy. However, where the policy falls down is that it does not require brownfield sites to be utilised first and foremost. If this criterion was added, we could support this policy

Chapter 4 - Policy R11: Self-Build and Custom Housing

1 Do you support Policy R11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE is unable to support this policy because it specifically endorses building on the two major sites to which we are fundamentally opposed.

Chapter 4 - Residential Development

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

As indicated in our responses to this section, there needs to be emphasis, regardless of the fact it will involve some repetition, of the importance of focusing on brownfield/previously developed land first.

Chapter 5 - Policy EJ1: Employment Land Requirements

1 Do you support Policy EJ1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE cannot support this policy. When the revised draft of the Greater Manchester Spatial Framework (PfE) was published, CPRE commissioned an independent economic assessment of it. It concluded that the quantum of economic development was high. Two economists looked at the need for B2 and B8 employment sites over the previous two decades and found that the allocations had been significantly over-estimated. And this was before the effects of the Covid pandemic were fully understood and much higher home working statistics could be factored into the calculations. Here again, in this draft plan, the requirements appear to be very high. This is important because land is a finite resource and so is environmental capacity.

This leads us on to the issue we have with the omissions in this Trafford Local Plan policy. Whilst there are policies in PfE about climate change and air quality, there is not explicit mention of either in this Local Plan policy – and there needs to be.

TEP make the following point in their Integrated Assessment Report: “The delivery of further employment land will likely lead to more industrial activity, more HGVs on roads and more commuting traffic to workplaces. These factors would likely have a negative impact on air quality”.

CPRE wholeheartedly concurs with this assessment and also with the mitigation measures that TEP recommends, which are: “Encourage sustainable travel, effective monitoring and management of AQMAs and the introduction of specific measures to tackle and improve air quality. Ensure these provisions are addressed through policies and the infrastructure delivery plan”. (Appendix C, page 75).

Chapter 5 - Policy EJ2: Trafford Park

1 Do you support Policy EJ2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

It is fully understood and accepted that Trafford Park is a major industrial and employment area in the North West, indeed in the whole of England, but we are not convinced that this policy is strong enough to ensure it will become a very much more sustainable entity in future – with a lower carbon footprint and improved air quality, not only within the main Trafford Park zone, but around it.

Chapter 5 - Policy EJ3: Industry and Warehousing

1 Do you support Policy EJ3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE does not support this policy which explicitly states in Aii that it incorporates the New Carrington area to which we are opposed – for the reasons given in response to Q.2-3.

The long term impacts of an expansion of manufacturing and employment land is, quite rightly, labelled with a red flag by TEP in their Integrated Assessment of the Draft Local Plan. (Appendix C, Policies Assessment, page 77). Their red designation denotes “a major negative effect”. Mitigation recommended is: “Ensure policy covers encouragement of sustainable travel, the decarbonisation of industrial processes and an effective implementation of energy performance standards”.

Also, TEP’s Integrated Assessment Report (V.3) makes the point in relation to this policy: “Ensure effective monitoring and management of AQMAs and the introduction of specific measures to tackle and improve Air Quality should be ensured through policies and the infrastructure delivery plan” (paragraph 5.57, page 19).

These are all supportable measures but, quite apart from our objection to New Carrington, we would add that, where new manufacturing and employment land is being allocated, there should be a requirement for green spaces and landscaping. We note that the Integrated Assessment recognises that there will be “an overall negative impact” on Davenport Green/ the Timperley Wedge (Appendix C, page 90).

2 Do you agree with the proposed boundary shown on the policies map for Trafford Park?

Please write your response here::

We cannot find a sufficiently detailed map in the Draft Trafford Local Plan to be able to respond to this question.

3 Do you agree with the proposed boundary shown on the policies map for Broadheath Employment Area?

Please write your response here::

We cannot find a sufficiently detailed map in the draft Trafford Local Plan to be able to respond to this question.

Chapter 5 - Policy EJ4: Offices

1 Do you support Policy EJ4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE does not support this policy because it includes in it endorsement of office development on Davenport Green/the Timperley Wedge.

Chapter 5 - Policy EJ5: Safeguarding Trafford’s Employment Land

1 Do you support Policy EJ5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE does not support this policy because it seeks to protect land previously allocated for employment use, at a time when trends have changed and there is a need for more flexibility. There are many under-used or empty employment areas which could be changed to other uses. The need is for a full assessment to be carried out.

The impact of a growth in office employment uses is one of the few instances where TEP award a red long term impact designation in their Integrated Assessment report (Appendix C, page 92). The key point we would make here is that the demand for office space has reduced significantly post Covid. It does not seem appropriate that local authorities should continue to allocate large new areas of land for office space. A sizeable proportion of the population now works from home part or all of the time.

Chapter 5 - Policy EJ6: Data and Energy Storage

1 Do you support Policy EJ6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE does not support this policy because it needs improvement. We endorse the comment made by TEP in their climate change assessment of the Draft Local Plan. They say, in Table 3 on page 24: "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".

Chapter 5 - Policy EJ7: Rural Economy

1 Do you support Policy EJ7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The wording of this policy lends itself to being supported in principle. CPRE particularly welcomes the fact that it flags up the need to improve access to public transport in rural areas. As TEP's Climate Change Risk Assessment says: "This is the key to addressing rural transport emissions and mitigating climate change" (paragraph 4.30, page 19).

That said, it would be counter intuitive to offer unqualified support for any rural policy in Trafford's Local Plan when the plan itself proposes developing such vast areas of previously unbuilt land – 558 acres at Davenport Green and a significant part of the New Carrington site. New Carrington, we are aware, includes a former petrochemical site, but its 2,849 acres (1,153 hectares) also encompasses peatland, a site of special scientific interest (Brookheys Covert) and 8 sites of biological interest, plus another four on the periphery and is home to some seven birds listed as 'red'/endangered.

Together, Davenport Green and New Carrington will seriously reduce the amount of open countryside in the borough – as is apparent from both the Key Diagram (fig. 1-4) on page 18 of the Draft Local Plan and the 'Places for Everyone' Strategic Areas in Trafford diagram (fig. 2-2) on page 42. All of Davenport Green and a proportion of New Carrington were previously Green Belt, a status that was withdrawn from them through the 'Places for Everyone' planning process. There was also a loss of farmland.

Chapter 5 - Economy and Jobs

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

CPRE cannot support Policy EJ7 because of the omissions that exist. For instance, C (v) refers to impacts on the surrounding land, including existing ecology, landscape and soil quality – but nowhere is there a proviso about protecting the actual land proposed for development, regardless of what quality it is. Nor are there provisos about air quality, noise or light pollution. There are also other issues that come into play with new transport infrastructure, for instance community severance.

Chapter 6 - Policy TM1: Walking, Wheeling and Cycling

1 Do you support Policy TM1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE supports this policy and the commitment to better provision for cycling and walking – all of which very much aligns with its own transport policies and which can be viewed here: https://www.cpre.org.uk/resources/cpre-transport-policy/. On the same page, on our national website, is the evidence document behind our policy.

Chapter 6 - Policy TM2: Public Transport

1 Do you support Policy TM2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE supports this policy in as far as it goes as it very much aligns with its own transport policies, particularly the promise of better links to some Metrolink stops. That said, there is an important omission. There should be a commitment to carry out a feasibility study into the reopening of the rail line that used to run between Partington east and Timperley. We are aware that Partington Parish Council, Positive Partington, Friends of Carrington Moss and some principal authority councillors have all called for this in the past. Bearing in mind the projected level of housebuilding in Trafford and the fact that Partington is an area of low car ownership, this is something which should be properly investigated, along with other options for the corridor.

Chapter 6 - Policy TM3: Car Clubs

1 Do you support Policy TM3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE supports car clubs because they have been shown to lead to lower car ownership. Also, when people do use them, they make maximum use of the time they have with the vehicles (planning their journeys well) and, when they don't have the vehicles, they tend to use active travel to get around. We also note that increasing numbers of car clubs only offer electric vehicles.

Chapter 6 - Policy TM4: Mobility Hubs

1 Do you support Policy TM4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE supports the principle of mobility hubs.

Chapter 6 - Policy TM5: Local Highway Network

1 Do you support Policy TM5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE is only able to support 'A', 'D' and 'E' of this policy; not 'B' or' C'. CPRE does not support the expansion of the highway network other than in limited instances where there is a strong safety case.
We can endorse the recommendation of TEP, in their Climate Change Assessment of the Local Plan, ie: "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" (Table 3, page 24 of their report).

We do not endorse the Carrington Relief Road which is safeguarded by this policy. (Also see our response to consultation question 2-3 on Southern Areas). We note what the Integrated Assessment by TEP has to say about the Carrington Relief Road and the Western Gateway Infrastructure Scheme. Whilst referencing the fact that there are mitigating policies in 'Places for Everyone', it admits that the two schemes "have potential for negative environmental impacts such as landscape, heritage, air quality, land resources, water resources, biodiversity and flood risk" (para. 5.75, page 21). It goes on to say: "It is recommended that for new road development and upgrades to the local highway network, developers are required to submit information demonstrating that the impact of the development on climate change and flood risk has been considered and mitigation measures are put forward" (para. 5.76). Also, TEP's Climate Change Risk Assessment (V.2) admits: "The transport sector is a key contributor to carbon emissions both in Trafford and in the UK as a whole" (para.4.32, page 19) and: "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" (para. 4.34, page 19).

Chapter 6 - Policy TM6: The A56

1 Do you support Policy TM6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE supports this policy.

Chapter 6 - Policy TM7: Freight

1 Do you support Policy TM7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE supports this policy.

Chapter 6 - Policy TM8: Manchester Ship Canal

1 Do you support Policy TM8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE supports this policy. However, it is regrettable that – these days – the Ship Canal is a much under-used resource whose banks are mainly viewed as development opportunities. Little is done to promote the use of the canal for transporting non-perishable items.

Chapter 6 - Policy TM9: Potential Future Rail Route

1 Do you support Policy TM9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE does not support this policy – because of what it specifically mentions and what it does not.

What the draft policy supports

We have any number of objections to the proposal to safeguard land for a major new rail terminal.
A significant shortcoming of this concept is that it does not connect Manchester Airport to Manchester city centre. The new railway station envisaged would be located some distance away from the airport, alongside the M56, and therefore there would need to be separate provision to get passengers to and from the terminals and the station, making this an unattractive travel option.

This is in addition to the impacts on landscape and noise and the fact that it would lead to a further diminution of green open spaces in this area. And all of this is apart from the enormous logistical challenges and cost of having to tunnel beneath six miles of Greater Manchester to connect to a re-built Piccadilly railway station.

What the draft policy does not mention

Our other issue is with the fact that there is no reference to – or provisions made for – the new motorway service station which has been given planning permission by the government for between junctions 7 and 8 of the M56. This new facility, which covers 390 acres of Green Belt, is – literally – just over the border of the Bowdon part of Trafford with Cheshire East and in the same area as the safeguarded land for the rail proposal – immediately to the south of Hale. It makes no sense for the Local Plan to feature a proposal which is no more than a concept (the rail terminal) and not likely to be deliverable before the end of the next Local Plan and for it not to include a major new development, in the same vicinity, for which planning permission has been given (the new motorway service station).

The M56 service station scheme, to be called Tatton Services, not only encompasses a new motorway services building but also a 100-bed hotel, a farm shop and 96 EV charging spaces. Trafford Council objected to this development on a number of grounds and only withdrew their objections at the last moment because National Highways were supporting it.

The scheme received approval from the MHCLG in March, after it was called in by them. But, despite Trafford Council's opposition, it appears to be making no plans to deal with the consequences. These are expected to range from new traffic movements to impacts on Altrincham area businesses. The latter reason being because of the high quality food offering being promised by the scheme's joint promoters, the Westmorland family, owners of the two highest-ranking service stations in the country – Gloucester on the M5 and Tebay on the M6 in Cumbria – and land-owners Tatton Estates. Objectors argued that the facility would become a destination in its own right rather than just a stopping off point for long distance travellers and that it would take business away from other local food outlets.

Chapter 6 - Policy TM10: Parking Standards

1 Do you support Policy TM10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE does not support this policy because it lacks commitment to reduce parking provision in new developments. On the other hand, it is also deficient because it fails to make explicit provision for people with disabilities.

CPRE promotes maximum parking standards along with the provision of high quality public transport, good active travel facilities and excellent digital communications in order to reduce the need to travel by car. That said, we recognise the need for Councils to provide for people with disabilities. We agree with TEP who, in their Integrated Assessment Report (V.3), criticise the lack of any reference to providing set parking provision for disabled users. (Summary, para. 3.3, page 77).

Chapter 6 - Policy TM11: Lorry Management

1 Do you support Policy TM11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE cannot support this policy because of its failure to explicitly mention air quality or impacts on adjacent local roads or on neighbourhoods. Trafford already has air quality issues caused, to a large extent, by HGVs and van movements.

Chapter 6 - Policy TM12: Park and Ride

1 Do you support Policy TM12? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

There are many negative impacts from park and ride schemes. CPRE are pleased to note that some of them are recognised by TEP in their Integrated Assessment of the Draft Trafford Local Plan. This flags up impacts on landscape, local character, heritage, air quality, soils, water bodies (as a result of run-off) and biodiversity as well as the potential to increase flood risk.

Having studied park and ride sites over the years, CPRE has also clocked the fact that they can create extra traffic movements. People living between them and town/city centres often drive out to the P & R site to obtain free parking and take advantage of free or cheap trips into the urban centres. In addition, the sites often lead to the diminution of commercial bus services which cannot compete with the free or cheap services that run regularly between the sites and the city centres.

Also, academic research of the rings of P & R sites around Cambridge and Oxford found that the more popular sites would fill up first on weekday mornings and then there was the phenomenon of motorists driving around the cities from one site to another to find a parking space. More often than not, constructed on green spaces, they are far from the solution to town centre congestion they were originally claimed to be. It is far more environmentally friendly to have universal good quality public transport services that encourage people to do their whole journey without using private cars, not just the last few miles.

Chapter 6 - Policy TM13: Crowd Movement and Routes

1 Do you support Policy TM13? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

This seems to be a common-sense policy that CPRE can support. We particularly welcome the idea of an improved public realm ‘processional route’ between Old Trafford football and cricket grounds.

Chapter 6 - Transport and Movement

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

There is no policy which supports and sets out a sustainable transport hierarchy. (The diagram of CPRE’s adopted hierarchy is appended as an annex to the hard copy version of this submission). Nor is there a policy which mentions and sets out a plan to deal with the new motorway service station for which planning permission has been granted just over Trafford’s southern boundary in the same area as the proposed new railway station for which there is a policy. See our response to Q. 6-9. As National Highways were involved with and approved of this scheme, this seems to be the appropriate place in this consultation to mention it.

Also, because transport is the largest emitter of greenhouse gases and a major contributor to poor air quality, this section of the Local Plan would be greatly improved if it had a policy which committed to actions which do not promote more road traffic and to improved monitoring – both with a view to achieving climate change goals. As we point out in our answer to question 2-5 of this consultation, Trafford has the highest per capita emissions in Greater Manchester. This should be a matter of some shame to the local authority who need to be seen to be taking robust actions to address the situation.

Chapter 7 - Policy TC1: Hierarchy of Centres

1 Do you support Policy TC1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE supports this policy in as far as it goes, but it requires improvement. We would like to see commitment to re-assess failing peripheral areas of major centres, possibly with a view to changing use to housing. Ideally, this should take place as part of a master planning process. Introducing more housing into urban centres automatically provides the remaining retail and commercial units with more business. That said, it is important not to locate the housing immediately adjacent to commercial/retail units which could create a nuisance. We also make this same point in response to Q.4-1 (Meeting Housing Requirement).

2 Do you agree with all of the proposed boundaries for the Town, Other Designated, Local and Neighbourhood centres as shown on the policies map?

Please write your response here::

We cannot find a sufficiently detailed map in Trafford's Draft Local Plan to be able to answer this question properly but would pose the question – if New Carrington (which we oppose) is going to be delivered, then should not its centres be included?

Chapter 7 - Policy TC2: Role and Function of Centres

1 Do you support Policy TC2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

As members of the Smart Growth Coalition [redacted]/), CPRE wholeheartedly endorses the comment made by TEP in their Climate Change Assessment of the Trafford Local Plan. In response to policies TC2 and TC3 they said: "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" (table 3, page 24).

Chapter 7 - Policy TC3: Out of Centre Retail and Leisure

1 Do you support Policy TC3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

As members of the Smart Growth Coalition ([redacted], we wholeheartedly endorse the comment made by TEP in their Climate Change Assessment of the Trafford Local Plan. In response to policies TC2 and TC3 they said: "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" (table 3, page 24).

Chapter 7 - Town Centres and Retail

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

There should be a policy which commits to carrying out fully comprehensive master planning assessments of all major centres.

Chapter 8 - Policy GI1: Landscape Character Areas

1 Do you support Policy GI1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Landscape character is an issue of great importance to CPRE and the policy, as written, appears to be supportable. But the question has to be asked – what value can be placed on it? 'B' says: "Development will not be permitted where it would have significant adverse impact on the special quality and sensitivity of a landscape character type, as shown on the Fig 8-1". However, these words ring hollow in the context of the New Carrington site and the recently approved battery storage development north of Ashton Road (planning ref. 115169). Fig. 8-1 on page 197 clearly identifies 'Mossland', (in other words very precious peat land) and Carrington Mosses are specifically mentioned in the supporting text (para. 84, bullet four, page 196) as well as being identified on the map.
Despite this, it is Trafford Council's intention to build on part of this irreplaceable asset in the case of their plans for New Carrington. It is therefore not possible to give credence to this policy.

Chapter 8 - Policy GI2: Green Infrastructure Network

1 Do you support Policy GI2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

As with the previous policy, this one reads well and can be supported – at face value. The fact of the matter is, however, that the 'Green Infrastructure Network' has been much depleted from what it was and, when the allocated development areas have been built up, there will be less open land to enjoy, to absorb carbon or rainwater or foster wildlife. And, the supporting evidence base needs updating.

Chapter 8 - Policy GI3: Great Manchester Wetlands Nature Improvement Area (NIA)

1 Do you support Policy GI3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Promising to develop proposals for wetland improvements sounds commendable in theory. The reality on the ground is less encouraging, eg. the sanction given on May 15th to planning application no. 115160 for a containerised battery energy storage system to the north of Ashton Road, Carrington, which will take 20 hectares of peatland. To date, the approach to precious wetlands has been less than commendable.

Chapter 8 - Policy GI4: Mersey Valley

1 Do you support Policy GI4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The focus appears to be on improving access rather than on conserving biodiversity and the natural environment and nothing is said about improving the water quality of the River Mersey, which it should – even though water quality management is mentioned in the next policy. Consequently, we cannot support this policy.

Chapter 8 - Policy GI5: Green Infrastructure Opportunity Areas

1 Do you support Policy GI5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We note that the highlighted green areas are described as 'opportunity areas'. It is to be hoped that the major regeneration projects committed and underway do not lose sight of the need to have open spaces and green infrastructure wherever possible.

Chapter 8 - Policy GI6: Green Infrastructure in New Developments

1 Do you support Policy GI6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We support this policy.

Chapter 8 - Policy GI7: Trees, Woodland and Hedgerows

1 Do you support Policy GI7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE welcomes and supports this policy.

Chapter 8 - Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets

1 Do you support Policy GI8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

This is another example of a well-written policy which, on the face of it, can be supported. But the question has to be asked – how can this policy fit with the approval already given through the Places for Everyone spatial plan to build on so much virgin land at New Carrington and Davenport Green?

Chapter 8 - Policy GI9: Biodiversity Opportunity Areas

1 Do you support Policy GI9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Oddly, this policy makes no specific mention of and fails to address the issue of Carrington Moss and yet it lists other areas with far lower ecological ratings. We therefore cannot endorse it.

Chapter 8 - Policy GI10: Building Biodiversity into New Developments

1 Do you support Policy GI10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes, we can support this policy.

Chapter 8 - Green Infrastructure and Natural Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

As we say in response to question 8-4, there should be a policy about improving water quality in the River Mersey.

Chapter 9 - Policy OS1: Open Space

1 Do you support Policy OS1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE are unable to support this policy because the Open Space Assessment appears to have failed to take into consideration the Carrington Moss strategic allocation.

Chapter 9 - Policy OS2: Outdoor Sports and Recreation Facilities and Provision

1 Do you support Policy OS2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We do not support this policy because it does not mention horse riding, despite the proliferation of horses stabled around Carrington Moss in particular.

Chapter 9 - Policy OS3: Indoor Sports and Recreation Provision

1 Do you support Policy OS3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We cannot support this policy as it fails to address the issue of increasing the indoor sport and recreation offer in the light of the huge increase in population.

Chapter 9 - Policy OS4: Loss of Sport and Recreation Land or Facilities

1 Do you support Policy OS4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We can support this policy.

Chapter 9 - Policy OS5: Allotments and Growing Space

1 Do you support Policy OS5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We can support this policy.

Chapter 9 - Policy OS6: Cemeteries and Burial Grounds

1 Do you support Policy OS6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We can support this policy.

Chapter 9 - Open Space, Sport and Recreation

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

We question the value of using the number of planning applications as an indicator. A better one is needed.

Chapter 10 - Policy WA1: Managing Flood Risk

1 Do you support Policy WA1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The policy, as written, is supportable – but is the Council actually doing enough? We note that the Scoping Report Addendum (V.5) to the Integrated Assessment of the Trafford Local Plan, produced by TEP, warns that "Areas of Trafford are at risk from river and surface water flooding" and that this risk is increasing due to climate change (2nd bullet, para. 7.10, page 41). It is only as recently as January 1st this year that areas of Flixton were flooded when the River Mersey's banks overflowed and part of the Bridgewater Canal on the border of Warburton and Little Bollington gave way after a deluge of rain. The impacts of climate change are already evident everywhere and building on ever more land increases – and spreads – the risk of flooding. It should not just be a matter of not building in existing flood plains but of not building in areas adjoining them.

Chapter 10 - Policy WA2: Sustainable Drainage – Surface and Foul Water

1 Do you support Policy WA2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The issue of there being inadequate capacity to deal with all the surface water and foul drainage from the numbers of new houses being demanded by government has been much in the news lately. This is not something that was addressed during the Places for Everyone examination. Now the Environment Agency is starting to object to many new developments over the matter of sewage capacity. We do not have confidence that sufficient capacity exists locally to (a) supply the projected number of new houses with fresh water and (b) support them with adequate sewage capacity. At the time this submission is being made to Trafford Council (beginning of June) an official drought warning, imposed by the Environment Agency, exists throughout the north west following the driest start to spring for 69 years:

[redacted]

Chapter 10 - Policy WA3: Flood Storage Areas

1 Do you support Policy WA3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We do not support this policy as it fails to list Carrington Moss as a flood storage area.

Chapter 10 - Policy WA4: Water Efficiency

1 Do you support Policy WA4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE does not support Policy WA4 as worded because CPRE agrees with the comment on water efficiency made by TEP in its Climate Change Assessment of the Draft Trafford Local Plan. In Table 3 on page 24 it says: “It may be advantageous for this policy to include support for retrofitting water efficiency measures. This would help to reduce the risk of water shortages”.

Chapter 10 - Water, Flooding and Drainage

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

There is an ‘elephant in the room’ in respect of this section. Trafford Council is not alone in failing to address water and sewage capacity. The government itself is not addressing it when demanding that 1.5 million homes be built within the period of this parliament. Although government has indicated it is minded to build at least three new reservoirs, these could not be delivered within the next few years and, in any event, none of the locations which the government has pointed to are in the north west.

Chapter 11 - Policy CT1: Protecting Existing Community and Social Facilities

1 Do you support Policy CT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Sequential tests are very useful in very many cases but, when it comes to local community facilities and local services, they should only be a part of the analysis employed.

2 Do you think the Council should protect the loss of community facilities and local services through a sequential test (as set out in Policy CT1 above), or by requiring a statement setting out evidence as to why a particular facility is not needed?

Please write your response here::

There needs to be personal contact and on-site investigation before any decisions are made. Taking away important local services and/or facilities can destroy neighbourhoods. These are not decisions that should be made purely as desktop exercises.

Chapter 11 - Policy CT2: Loss of Community Facilities

1 Do you support Policy CT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

This policy can be supported.

Chapter 11 - Policy CT3: New Community and Social Facilities

1 Do you support Policy CT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE does not support this policy as it does not include provisos about traffic or air quality or the provision of catering, waste and toilet facilities. Nor does it mention light pollution or wildlife impacts.

Chapter 11 - Policy CT4: Fast Food

1 Do you support Policy CT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We can support this sensible and caring policy, drawn up in the best interests of young people.

Chapter 11 - Policy CT5: Social Value in New Developments

1 Do you support Policy CT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We require more information before offering support for this policy as it is unclear what constitutes 'major development' and why only such development will have to train and employ local labour.

Chapter 11 - Community and Social Infrastructure

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

It is not possible to tell from the Draft Local Plan or the Trafford Council website what is happening with Trafford's Citizen's Assembly. There should be something about it in this document.

Chapter 12 - Policy BE1: Design

1 Do you support Policy BE1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE does not support this policy because it needs improvement.

The Climate Change Assessment of the Draft Local Plan by TEP suggests a strengthening of this policy. In para. 4.52 on page 22, it recommends that the Council should require new large scale buildings to meet specific sustainability standards, for example requiring them to meet a certain BRREEAM Certification level. It goes on to say: "This would ensure that the environmental effects and carbon emissions associated with a new building would minimise the contribution of new buildings to climate change, reducing climate risks". We concur with this recommendation and the reasoning behind it.

Chapter 12 - Policy BE2: Tall Buildings

1 Do you support Policy BE2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Buildings over 30m. high in town and city centres have an important role to play in achieving land-efficient high density housing. However, CPRE believes that this policy could also be improved and therefore we do not support it as it stands.

Where it is appropriate to erect tall buildings, it is absolutely essential that they have adequate lift access for the disabled and the elderly. TEP, The Environment Partnership, agree with this in their comment in the Summary of their Integrated Assessment on the Draft Plan (V3), in paragraph 3.3 on page 77. Ideally, there should be a statutory requirement for lifts and stairs either side of tall buildings (as exist in some other countries) so that, if one side was affected by a fire, the other side would still be functioning.

Chapter 12 - Policy BE3: Elevated Green Spaces

1 Do you support Policy BE3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

This policy also needs improvement in its wording and therefore cannot be supported as it stands.

Elevated Green Spaces can and do work in many locations and it is important to artificially introduce green spaces to places that are otherwise devoid of them. It is also important that elevated green amenity spaces are accessible to disabled people – a point re-enforced by TEP, The Environment Partnership, in the Summary of their Integrated Assessment on the Draft Local Plan (V3) (para. 3.5, page 77). Wording to this effect needs to be added to the policy.

Chapter 12 - Policy BE4: Advertisements and Signage

1 Do you support Policy BE4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We do not support this policy because it is not robust enough and it does not specifically mention signage that can be seen from the M56 and/or the M60. It is the responsibility of local authorities to remove distracting and visually intrusive signs that sit alongside motorways. Landowners are often tempted by financial incentives to allow massive advertising hoardings on their land. However, the local planning authorities need to be resolute in seeing that they are removed.

Chapter 12 - Policy BE5: Heritage Assets

1 Do you support Policy BE5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE supports this policy.

Chapter 12 - Policy BE6: Designated Heritage Assets

1 Do you support Policy BE6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE supports this policy.

Chapter 12 - Policy BE7: Non-designated Heritage Assets

1 Do you support Policy BE7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

It is of some concern to CPRE that Trafford Council's Local List of non-designated heritage assets of architectural quality does not appear to be up-to-date. The supporting text to this policy admits "The List is not considered to be definitive". It is very important that the list is updated if assets of some merit are not to be lost.

Chapter 12 - Policy BE8: Noise and Vibration

1 Do you support Policy BE8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The considerate construction policy should not only apply to people but also to wildlife. Yorkshire Wildlife Trust advises that, where possible, materials should be stored off the ground and, where this is not possible, they should be well covered – especially if they are stored for any length of time. Otherwise, they may be used by hibernating animals or nesting birds.

Chapter 12 - Policy BE9: Land Contamination and Remediation

1 Do you support Policy BE9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE supports this policy.

Chapter 12 - Policy BE10: Digital Connectivity

1 Do you support Policy BE10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We support this policy in as far as it goes but would like to see a reference added to the provision of digital communications from satellites.

Chapter 12 - Built Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

There are several policies in this section of the Local Plan which would benefit from expansion. We have explained in each case where these are.

Chapter 13 - Policy CL1: Protecting and Supporting Existing Cultural, Leisure and Tourism Assets

1 Do you support Policy CL1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We could support Policy CL1 if an omission is corrected. We note that the Sale Waterside Arts Centre is listed in 'B' as an attraction (no. ix), but that the Altrincham Garrick Playhouse is not. It should be. The Garrick, which has existed for over a century, stages professional productions as well as amateur ones and it provides youth training in addition to offering a cinema quality picture house. It is also available for hire as is the Sale Waterside Arts Centre.

Chapter 13 - Policy CL2: New Culture, Leisure and Tourism Developments

1 Do you support Policy CL2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

CPRE cannot support this policy because it does not prioritise the provision of public transport and easy active travel access to any new cultural, leisure or tourism developments. It needs to be written in a way that requires these facilities to be provided first and foremost.

Chapter 13 - Culture, Tourism and Leisure

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Perhaps there should be a policy which covers the safety aspect of outside street events/ parties such as Hale Fest, organised annually by Hale Watch – a volunteer-led community group.

Chapter 14 - Policy IP1: Infrastructure Delivery and Planning Obligations

1 Do you support Policy IP1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst CPRE does not endorse all major developments that were approved through the Greater Manchester Spatial Plan, Places for Everyone, (notably the New Carrington and Davenport Green/ Timperley Wedge sites), we accept the need for all approved developments to be supported by sufficient infrastructure. That said, there is an omission in the policy proposed as a result of which we cannot support it. It does not commit to providing new infrastructure in the most sensitive way possible from an environmental perspective. We would like to see such a commitment.

Chapter 14 - Policy IP2: Managing and Monitoring Planning Obligations

1 Do you support Policy IP2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst we agree in principle with the imposing of a fee to ensure that monitoring takes place, we are not in possession of enough information to have an opinion about the level of the fees.

2 Do you agree that the Council should require a fee to monitor and report on all planning obligations?

Please write your response here::

Yes. It is absolutely essential that planning obligations are adhered to. If the only way to ensure this is to require a special/extra fee, then so be it.

3 Do you agree or have any observations or suggestions on the proposed planning obligation monitoring fees for either minor and/or major developments?

Please write your response here::

Whilst we agree in principle with the imposing of a fee to ensure that monitoring takes place, we are not in possession of enough information to have an opinion about the level of the fees.

Chapter 14 - Infrastructure and Planning Obligations

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Efficient managing and monitoring arrangements are essential where Infrastructure and planning obligations are concerned. We remain to be convinced that Trafford in its present financial position, is going to be in a position to fund these requirements in the way they need to be funded. (See below).

Integrated Assessment (IA) of the Draft Local Plan

1 Do you have any comments to make on the Sustainability Appraisal and its associated appendices?

Please write your response here::

2 Do you have any comments to make on the Health Impact Assessment?

Please write your response here::

3 Do you have any comments to make on the Equalities Impact Assessment?

Please write your response here::

IA: Climate Change Risk Assessment

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

Please write your response here::

The Local Plan may wish to refer to the latest report from the World Meteorological Organisation (WMO) which was published at the end of May. The 'WMO Global Annual to Decal Climate Update (2025-2029)' projects that global temperatures are expected to continue at or near record levels in the next five years, increasing climate risks and impacts on societies, economies and sustainable development

[redacted]

Also, see our responses to questions 2-4 and 2-5.

Response ID ANON-MFZ6-4QRT-E

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-09 12:30:23

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1 Forename

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Mélusine

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Velde

3 Organisation (if applicable)

Enter your organisation:
Cheshire Wildlife Trust

4 Position/title (if applicable)

Enter your position/title:
Planning & Advocacy Officer

5 Address

Enter your address:

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6 Postcode

Enter your postcode:
[redacted]

7 Email address

Enter your email address:
[redacted]

8 Contact phone number

Enter your contact phone number:

9 Please select 'opt in.' if you wish to recieve future consultations on planning policy.

Opt in

Chapter 8 - Policy GI4: Mersey Valley

1 Do you support Policy GI4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

A(i)
- "Reduce and / or mitigate the effects of flood risk from the Mersey Valley on the surrounding built environment"
- should add "particularly through nature-based solutions"

Chapter 8 - Policy GI5: Green Infrastructure Opportunity Areas

1 Do you support Policy GI5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

C
- “Proposals which strengthen green infrastructure links between the identified Green Infrastructure Opportunity Areas, improving connectivity and expanding the network, will also be supported and encouraged”
- “improving connectivity and expanding the network, particularly using the measures identified in the Local Nature Recovery Strategy”

8.23
- “The Greater Manchester Local Nature Recovery Strategy (LNRS) sets out an overarching vision, individual priorities and targets for both habitats and species, along with a mapped Nature Network for Greater Manchester. This includes many of the Green Infrastructure Opportunity Areas, as well as a network of other sites.”
- This paragraph sets out what the LNRS, but falls short of explaining how it will be used to help deliver the Local Plan Policies. More clarity would make this reference to the LNRS stronger

Chapter 8 - Policy GI6: Green Infrastructure in New Developments

1 Do you support Policy GI6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

B(v)
- “Green Infrastructure and landscaping must be designed to: [...] Optimise the benefit to wildlife habitat including biodiversity net gain.”
- We support this clear statement of landscaping in developments as contributing to wildlife. The statement could even be strong with the word “maximise” instead of or in addition to “optimise”.

D
- “Where it is considered that the development will have a detrimental effect on the quantity, quality or function of existing green infrastructure, then the development will not be supported unless it can be demonstrated that an assessment has been made and suitable mitigation measures proposed. Any mitigation measures should be of equal or greater value than that which is to be compromised or lost through development.”
- Mitigation measures are different from compensation measures, and both should be required.
- “any mitigation measures that do not limit the damage must by accompanied by compensation measures that are of equal or greater value than that which is to be compromised or lost through development”

8.25.
- “The context of the development site should be appraised to retain and enhance landscape across the site. Nature based solutions such as SuDS, including green roofs, and rain gardens, should be an integral part of a development’s green open space network. Development should aim to incorporate Green Infrastructure assets that are multi-functional by supporting as many of the benefits listed in Policy GI2 and requirements of this policy.”
- “should be appraised to retain and enhance landscape and biodiversity across the site”

8.26
- “Development proposals must demonstrate how they contribute to nature recovery and the aspirations of the LNRS through green infrastructure”
- We strongly support this policy

Chapter 8 - Policy GI7: Trees, Woodland and Hedgerows

1 Do you support Policy GI7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

C(ii)
- “Development proposals will be supported where: It can be demonstrated satisfactorily that the need for and benefits of the development clearly outweigh any loss or deterioration of woodlands, hedgerows or trees of high amenity value.”
- This should not be true for irreplaceable habitats such as ancient woodlands and veteran trees, which should be protected without exception

8.36
- “Consideration should be given to the most appropriate species of tree for the location, with regard to their key purpose, i.e. air quality, climate regulation – urban cooling, enhancing wildlife and habitat, improved health outcome, improved place, water quality and flood management”
- “with preference to native tree species”

Chapter 8 - Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets

1 Do you support Policy GI8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

E
- “This includes enhancing and maintaining wildlife corridors and ecological linkages that support the movement of species across the landscape.”
- Should include “in line with recommendations identified in the LNRS”

8.42
- “Plans should also promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”
- We strongly support this, in particular the inclusion of priority habitats and species

Chapter 8 - Policy GI10: Building Biodiversity into New Developments

1 Do you support Policy GI10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

8.55
- “Biodiversity net gain can be achieved through measures such as the creation of new wildlife habitats, provision of practical conservation equipment (including of swift bricks, hedgehog highways, bat boxes and access tiles), the planting of native species, and the inclusion of green infrastructure like green roofs, wildlife ponds, and sustainable urban drainage systems (SuDS) that provide ecological benefits.”
- “Net gains in biodiversity can be achieved…”
- “Biodiversity Net Gain” refers to the mandatory requirement for development, which makes this paragraph misleading since BNG can only be achieved through the creation/enhancement of habitats. Other measures such as “practical conservation equipment (including of swift bricks, hedgehog highways, bat boxes and access tiles), the planting of native species, and the inclusion of green infrastructure like green roofs, wildlife ponds, and sustainable urban drainage systems (SuDS)” are considered mitigation and enhancement measures separate from BNG and would be additional, but could be referred to as “net gains in biodiversity”. They nonetheless should be strongly encouraged.

Site Selection Methodology

1 Do you have any comments on the proposed Site Selection Methodology (Figure SS-1)?Are there any stages / questions / considerations which should be added and/or removed?

Please write your response here::

Stage 1: “unaffected by designated area(s) or assets” - should include something about high biodiversity value, or natural assets

2 Specific criteria will need to be identified to assess a sites performance at each stage of the site selection process.Do you have any comments on what these site criteria should include?What evidence should inform this assessment?

Please write your response here::

Presence of a Local Wildlife Site or any other designated site should preclude the site from selection unless it can be demonstrated that the features for which is has been designated will not be impacted, and that the site will not incur any loss to its biodiversity as a result of the land use.

Response ID ANON-MFZ6-4QA9-2

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-12 23:14:22

Personal details

1 Forename

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8 Contact phone number

Enter your contact phone number:
[redacted]

9 Please select ‘opt in.’ if you wish to recieve future consultations on planning policy.

Opt out

Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

Proposals for housing development and Industry and Warehousing Key Employment Areas on green belt land in Carrington and on Timperley Wedge is concerning - mitigation measures need to be put in place regarding to environmental impact e.g. the creation of wildlife crossings over new roads such as the relief road. We need to ensure a development of this size benefits the local community with increased buses especially those at socioeconomic disadvantage in Partington, Sale West and Broomwood who are in close proximity.

I support all allocations of Green Infrastructure and Natural Environment sites in an effort to increase biodiversity and reduce our climate change impact as a borough.

I'm aware of the Places for Everyone proposals but I think the strategic allocations of New Carrington and Timperley Wedge could be detailed on this map.

Chapter 1 - Vision

1 Do you agree with the proposed Vision for the Trafford Local Plan?

Please write your response here::

I agree with the overall proposed vision but have two concerns:

Trafford needs more social housing as we see increasing rates of rent in privately rented accommodation and increased poverty caused by this. I'm not confident that 'affordable housing' will encompass the amount of social housing required and housing development is more likely to be expensive larger homes.

I am concerned that a lot of proposed development puts greenspace and biodiversity in jeopardy. We cannot aspire to be addressing climate change whilst simultaneously building on greenspace such as Carrington Moss.

Chapter 1 - Strategic Objectives

1 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

Please write your response here::

I overall agree with the proposed strategic objectives.

Trafford needs more social housing as we see increasing rates of rent in privately rented accommodation and increased poverty caused by this. I'm not confident that 'affordable housing' will encompass the amount of social housing required and housing development is more likely to be expensive larger homes.

I am concerned that a lot of proposed development puts greenspace and biodiversity in jeopardy. We cannot aspire to be addressing climate change whilst simultaneously building on greenspace such as Carrington Moss.

Chapter 1 - Introduction, Vision and Strategic Objectives

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

I think the level of deprivation in some areas have not been noted such as Broomwood (Timperley Central Ward) and Sale West (Manor Ward).

When referring to 'Trafford West' there needs to be more distinction between Urmston/Flixton and Partington. The average figures for West do not illustrate the extremes between these two areas and the level of deprivation and isolation in Partington.

Chapter 2 - Policy ST1: Core Growth Area (Trafford)

1 Do you support Policy ST1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I acknowledge allocation of areas for growth are required but I cannot support the use of green space on New Carrington for this purpose.

Chapter 2 - Policy ST2: Inner Areas (Trafford)

1 Do you support Policy ST2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 2 - Policy ST3: Southern Areas (Trafford)

1 Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 2 - Policy ST4: Sustainable Development

1 Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The Local Plan provides an opportunity to improve the life chances for our most vulnerable residents who are at socioeconomic disadvantage by providing affordable homes (social housing), improved infrastructure and public transport to enable access to employment and services.

I think more focus could be placed on this within the Local Plan.

We need to ensure our most deprived communities are benefiting from large development plans, namely Partington, Sale West, Broomwood and Old Trafford which are in close proximity to strategically allocated areas.

Sustainable development in terms of the capacity of services and education facilities has not been mentioned. Increased housing needs to be accompanied by investment in to more school places and service capacity (both already under significant demand).

Congestion on Trafford's roads has not been addressed. There is simply too many vehicles on our roads leading to congestion and more housing and employment sites will worsen this. The metrolink is efficient but congested at rush hour and is accessible in terms of walking distance to stops to a minimal amount of our population. Our bus services are too unreliable (or too infrequent) for commuters to rely on buses as an alternative to get to work and employment.

Chapter 2 - Policy ST5: Climate Change

1 Do you support Policy ST5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

It's a great opportunity for any construction (housing or employment) to be built in an environmental sustainable way but can the Local Plan specify policies that will be enforced such as the inclusion of wildlife areas, walkways and wetland areas in new housing and employment developments (similar to Stamford Brook in Broadheath), can hedgehog highways be incorporated in to fenced gardens in new build housing, can green bridges be incorporated over new roads such as Carrington relief road to reduce wildlife fatalities, can existing trees be retained on proposed green belt development sites and new builds constructed around them and can the integration of swift bricks be enforced in the construction of these new buildings to support the decline of birds?

There are lots of options to consider which could aid in increasing wildlife diversity and tackling climate change and the Council should consider how the Local Plan can help to enforce these.

Chapter 3 - Policy RT5: Circular Economy

1 Do you support Policy RT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 4 - Policy R1: Housing Delivery

1 Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The most significant need for housing in Trafford is amongst our residents at socioeconomic disadvantage. It is not clear whether the Local Plan will prioritise the building of social housing to meet this growing need.

The Local Plan could provide an opportunity to alleviate the levels of poverty in our borough by ensuring more of our vulnerable residents are allocated a sustainable home.
.

Chapter 4 - Policy R2: Protecting Existing Homes

1 Do you support Policy R2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 4 - Policy R3: Affordable and Social Housing

1 Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

I'm very supportive of the proposal for percentages of social housing to make up major developments. Providing sustainable and affordable (to rent) homes for our residents at most socioeconomic disadvantage should be our priority. Having a permanent home is what will support our residents at multiple disadvantage to be able to improve their mental health and wellbeing and ultimately lead them to become more economically active.

2 Should 10% of all affordable and social housing be delivered as Truly Affordable Net Zero Homes (TANZ)?

Please write your response here::

3 Should the Local Plan set an affordable housing requirement, including a tenure mix, for each locality (similar to Core Strategy policy L2) that reflects market conditions?

Please write your response here::

I'd like more detail about the reason behind allocating different percentages to different localities. I presume it is the lack of current social housing, for example there is less in the South than in the North. I support the proposals but wonder whether this will appeal to developers who may try to negotiate with the Council to bring this percentage down in the South particularly where house prices are higher and they can make significant profit. Will we be able stick to the policies, turn down developers and risk not building the housing quota we need. If the Council can hold stead with the proposed policies the it's a good proposal as we need more social housing.

4 Should any other policy approaches to affordable and social housing be explored?

Please write your response here::

The high privately rented rates of properties in Trafford is driving our residents in to poverty, leaving them with little income to survive on after paying their rent.

We need to somehow mitigate the private housing development proposed from being purchased by private landlords who will charge rents too high for residents and families meaning they don't have enough income after housing costs to survive on. I'm not sure what policy would be a solution to this - developers selling homes only to people with connections to Trafford and not to those who have indicated a plan to purchase a landlord?

Chapter 4 - Policy R4: Size and Type of New Homes

1 Do you support Policy R4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

2 The intention is to set an appropriate house size and type requirements for new development in each Locality to meet housing needs across the borough. Do you agree with this approach?

Please write your response here::

3 Do you think specific size and type requirements should be set for major residential development sites in the borough, like Pomona and Wharfside, to align with a Locality approach?

Please write your response here::

Chapter 4 - Policy R5: Housing Density

1 Do you support Policy R5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 4 - Policy R6: Older Persons Accommodation

1 Do you support Policy R6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

2 Should the Local Plan set a definition for what constitutes a Care Home, Extra Care and Assisted Living? If so, what should they be defined as?

Please write your response here::

Chapter 4 - Policy R8: Homes for Children and Care Experienced Young People

1 Do you support Policy R8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Sustainable accomodation for Care Experienced Young People is incredibly important. They need to be able to remain in the borough, surrounded by their existing support networks and being able to live in sustainable and permanent homes.

Chapter 4 - Policy R9: Other Types of Homes

1 Do you support Policy R9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

2 Should the affordable housing requirement apply to student accommodation to enable a proportion of student accommodation schemes to be affordable to students from low-income backgrounds?

Please write your response here::

3 Should nomination agreements be used to ensure that accommodation is reserved for students enrolled at a named institution?

Please write your response here::

Chapter 4 - Policy R10: Gypsies, Travellers and Travelling Showpeople Accommodation

1 Do you support Policy R10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 4 - Residential Development

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Chapter 5 - Policy EJ4: Offices

1 Do you support Policy EJ4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

It is presumed that a needs assessment has been carried out to evidence the need for offices; however, because working from home has increased since COVID, it is difficult to understand whether this demand exists and whether it is worth losing green space on Timperley Wedge for example to office space which may end up being unused.

Chapter 5 - Policy EJ7: Rural Economy

1 Do you support Policy EJ7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We need to support what little rural economy we do have in Trafford and for this to benefit residents.

Chapter 5 - Economy and Jobs

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

We need to ensure the proposed employment areas become occupied by good employers offering the Real Living Wage to employees and mindful of employees' wellbeing. We should not be allowing businesses in to Trafford who are going to pay low wages and exacerbate the financial situations of our low skilled residents who feel forced to take employment that leaves them worse off than being in receipt of benefits.

The Council can develop policies that can enforce this.

Chapter 6 - Policy TM1: Walking, Wheeling and Cycling

1 Do you support Policy TM1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 6 - Policy TM2: Public Transport

1 Do you support Policy TM2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We need to use the Local Plan and proposed developments to improve bus services in our most isolated areas such as Partington and Sale West.

Poverty is increasing in Trafford meaning less car ownership and more reliance on public transport. These two areas in particular are served by infrequent and unreliable bus services (many buses are cancelled at short notice or don't turn up) meaning residents are unable to access employment and services.

We have an opportunity to use the proposed developments as a way to tackle this issue - this could be through social value and financial commitments from developers to help to fund new and more frequent bus services.

Chapter 6 - Policy TM3: Car Clubs

1 Do you support Policy TM3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 6 - Policy TM11: Lorry Management

1 Do you support Policy TM11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

An increase in warehousing and employment sites is going to lead to an increase on lorry traffic on our arterial roads through Trafford such as Carrington Lane and the A56 which is not sufficient to support heavy lorry traffic. Pedestrians are at high risk already when walking along the A56 from large vehicles passing. This impact needs to be considered and mitigated.

Chapter 8 - Policy GI1: Landscape Character Areas

1 Do you support Policy GI1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes - any policies supporting enhanced biodiversity and the maintainable and creation of green space are very important.

Chapter 8 - Policy GI2: Green Infrastructure Network

1 Do you support Policy GI2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes - any policies supporting enhanced biodiversity and the maintenance and creation of green space are very important.

Chapter 8 - Policy GI3: Great Manchester Wetlands Nature Improvement Area (NIA)

1 Do you support Policy GI3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Any policies supporting enhanced biodiversity and the maintenance and creation of green space are very important.

Chapter 8 - Policy GI5: Green Infrastructure Opportunity Areas

1 Do you support Policy GI5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes

Chapter 8 - Policy GI6: Green Infrastructure in New Developments

1 Do you support Policy GI6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

It's a great opportunity for any construction (housing or employment) to be built in an environmental sustainable way but can the Local Plan specify policies that will be enforced such as the inclusion of wildlife areas, walkways and wetland areas in new housing and employment developments (similar to Stamford Brook in Broadheath), can hedgehog highways be incorporated in to fenced gardens in new build housing, can green bridges be incorporated over new roads such as Carrington relief road to reduce wildlife fatalities, can existing trees be retained on proposed green belt development sites and new builds constructed around them and can the integration of swift bricks be enforced in the construction of these new buildings to support the decline of birds?

There are lots of options to consider which could aid in increasing wildlife diversity and tackling climate change and the Council should consider how the Local Plan can help to enforce these.

Chapter 8 - Policy GI7: Trees, Woodland and Hedgerows

1 Do you support Policy GI7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes - retaining and increasing tree cover is very important. We need to make sure new trees planted are the best possible species for wildlife and to help tackle climate change.

Developments should retain all existing woodland, trees and hedgerows - new buildings should be developed around them with them incorporated in to be plans as assets.

Chapter 8 - Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets

1 Do you support Policy GI8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes - we should be prioritising safe places for nature at all times.

Development will often hamper this goal but it's a great opportunity for any construction (housing or employment) to be built in an environmental sustainable way but can the Local Plan specify policies that will be enforced such as the inclusion of wildlife areas, walkways and wetland areas in new housing and employment developments (similar to Stamford Brook in Broadheath), can hedgehog highways be incorporated in to fenced gardens in new build housing, can green bridges be incorporated over new roads such as Carrington relief road to reduce wildlife fatalities, can existing trees be retained on proposed green belt development sites and new builds constructed around them and can the integration of swift bricks be enforced in the construction of these new buildings to support the decline of birds?

There are lots of options to consider which could aid in increasing wildlife diversity and tackling climate change and the Council should consider how the Local Plan can help to

Chapter 8 - Policy GI9: Biodiversity Opportunity Areas

1 Do you support Policy GI9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

It's a great opportunity for any construction (housing or employment) to be built in an environmental sustainable way but can the Local Plan specify policies that will be enforced such as the inclusion of wildlife areas, walkways and wetland areas in new housing and employment developments (similar to Stamford Brook in Broadheath), can hedgehog highways be incorporated in to fenced gardens in new build housing, can green bridges be incorporated over new roads such as Carrington relief road to reduce wildlife fatalities, can existing trees be retained on proposed green belt development sites and new builds constructed around them and can the integration of swift bricks be enforced in the construction of these new buildings to support the decline of birds?

There are lots of options to consider which could aid in increasing wildlife diversity and tackling climate change and the Council should consider how the Local Plan can help to enforce these.

Chapter 8 - Policy GI10: Building Biodiversity into New Developments

1 Do you support Policy GI10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

It's a great opportunity for any construction (housing or employment) to be built in an environmental sustainable way but can the Local Plan specify policies that will be enforced such as the inclusion of wildlife areas, walkways and wetland areas in new housing and employment developments (similar to Stamford Brook in Broadheath), can hedgehog highways be incorporated in to fenced gardens in new build housing, can green bridges be incorporated over new roads such as Carrington relief road to reduce wildlife fatalities, can existing trees be retained on proposed green belt development sites and new builds constructed around them and can the integration of swift bricks be enforced in the construction of these new buildings to support the decline of birds?

There are lots of options to consider which could aid in increasing wildlife diversity and tackling climate change and the Council should consider how the Local Plan can help to enforce these.

Chapter 8 - Green Infrastructure and Natural Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Green infrastructure and the natural environment should be retained and enhanced in all proposed developments. It's a great opportunity for any construction (housing or employment) to be built in an environmental sustainable way but can the Local Plan specify policies that will be enforced such as the inclusion of wildlife areas, walkways and wetland areas in new housing and employment developments (similar to Stamford Brook in Broadheath), can hedgehog highways be incorporated in to fenced gardens in new build housing, can green bridges be incorporated over new roads such as Carrington relief road to reduce wildlife fatalities, can existing trees be retained on proposed green belt development sites and new builds constructed around them and can the integration of swift bricks be enforced in the construction of these new buildings to support the decline of birds?

There are lots of options to consider which could aid in increasing wildlife diversity and tackling climate change and the Council should consider how the Local Plan can help to enforce these.

Chapter 9 - Policy OS4: Loss of Sport and Recreation Land or Facilities

1 Do you support Policy OS4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The reasons for all underused sporting and outdoor recreation facilities should be addressed. Some, such as the football pitches at Trafford College Altrincham Campus could be a valuable community asset but the land owner is not exploring this opportunity.

Chapter 11 - Policy CT1: Protecting Existing Community and Social Facilities

1 Do you support Policy CT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes - community facilities, many run by our VCFSE organisations, play an important role in ensuring residents have access to services to improve their health and wellbeing and to reduce social isolation.

2 Do you think the Council should protect the loss of community facilities and local services through a sequential test (as set out in Policy CT1 above), or by requiring a statement setting out evidence as to why a particular facility is not needed?

Please write your response here::

A comprehensive impact assessment should be done to understand the effect of losing a community facility on local residents. This would involve investigating in sufficient community engagement rather than speaking to a small cohort of people. We should incorporate this need for community engagement in the policy.

Chapter 11 - Policy CT5: Social Value in New Developments

1 Do you support Policy CT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We need to ensure social value meets the needs of local communities - we can do this by engaging with VCFSE organisations and residents. We can draw up a list of social value options to new employers and developers to chose from - options that we know will have a positive impact on communities.

Social Value does not just focus on employment - businesses can offer a whole host of support as social value such as volunteering, digital support to VCFSE organisations, digital equipment to schools and community groups, in kind legal and HR advice to VCFSE organisations, sponsorship to Community Hubs and donations of food and sanitary products.

We need to expand this section to incorporate all the possible opportunities - Caroline Lewis, Social Value Coordinator at the Council can help as well as Mitch Salter, Strategic Partnerships Manager.

Response ID ANON-MFZ6-4QAB-B

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-09 19:18:22

Personal details

1 Forename

Enter your forename:
Stephanie

2 Surname

Enter your surname:
Jenner

3 Organisation (if applicable)

Enter your organisation:

4 Position/title (if applicable)

Enter your position/title:

5 Address

Enter your address:

[redacted]

6 Postcode

Enter your postcode:
[redacted]

7 Email address

Enter your email address:
[redacted]

8 Contact phone number

Enter your contact phone number:

9 Please select ‘opt in.’ if you wish to recieve future consultations on planning policy.

Opt out

Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

Chapter 1 - Vision

1 Do you agree with the proposed Vision for the Trafford Local Plan?

Please write your response here::

Chapter 1 - Strategic Objectives

1 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

Please write your response here::

Chapter 6 - Policy TM3: Car Clubs

1 Do you support Policy TM3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Car clubs need to be widely available in all parts of Trafford, and within walking distance of a large proportion of the population

Chapter 6 - Policy TM6: The A56

1 Do you support Policy TM6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

A bus lane is required from the M60 all the way to the top end of the A56 to offer a realistic alternative to commuting by car

Chapter 9 - Policy OS5: Allotments and Growing Space

1 Do you support Policy OS5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Smaller areas of green space need to be made available/encouraged/supported for shared community growing. This could be raised beds in smaller spaces within residential streets or near parking areas for example. I've seen this work well in urban areas of London as a way of improving biodiversity, encouraging connection among the community (improving mental health and 'belonging') and improving knowledge and attitudes to healthy eating in a less daunting way than taking on the commitment of an allotment plot, particularly among younger people.

Chapter 11 - Policy CT4: Fast Food

1 Do you support Policy CT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Fully supportive of this policy

Response ID ANON-MFZ6-4QA3-V

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-10 11:26:55

Personal details

1 Forename

Enter your forename:
Benjamin

2 Surname

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Jesson

3 Organisation (if applicable)

Enter your organisation:
Na

4 Position/title (if applicable)

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Na

5 Address

Enter your address:

[redacted]

6 Postcode

Enter your postcode:
[redacted]

7 Email address

Enter your email address:
[redacted]

8 Contact phone number

Enter your contact phone number:
[redacted]

9 Please select ‘opt in.’ if you wish to recieve future consultations on planning policy.

Opt in

Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

Massively support this, especially keeping the green belt land

Chapter 4 - Policy R1: Housing Delivery

1 Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

My main concerns with this lie with problems faced in similar areas. To create affordable housing, companies are cutting corners. The quality of product used to build the houses are not as good as they are in pre 2000's homes. The products used to build the flooring and cabinets is commonly cheap as well. Not only this, but new builds are losing value as no one wants to buy them resale. Once they take this hit owners end up in negative equity and have to remortgage their homes. What was once affordable has put a new generation of home owners in debt, but they have no choice as few (between the ages of 20-30) can afford the old builds we have now. How do you plan to ensure that A - The new builds are up to the quality of old builds whilst still being a fair value, and B - the new builds will increase in value over the coming years and that there will be desire for people to be purchasing them through resale?

national highways

Our ref: [redacted]
Your ref:

Adam Johnson
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Piccadilly Gate
Store Street
Manchester
M1 2WD

Tel: [redacted]

Strategic Planning
Trafford Council
Trafford Town Hall
Talbot Road
Stretford
M32 0TH

9 June 2025

Dear Sir / Madam

Trafford Draft Local Plan (Policies) Regulation 18 Consultation

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015. We are responsible for operating, maintaining and improving the Strategic Road Network (SRN) in England, in accordance with the Licence issued by the Secretary of State for Transport (April 2015) and Government policies and objectives.

Our response to this consultation on the Trafford Draft Local Plan (Policies) Regulation 18 ('the Plan') is written in the context of statutory responsibilities as set out in National Highways' Licence, and in the light of Government policy and regulation, including the:

- National Planning Policy Framework (NPPF);
- Town and Country Planning Development Management (Procedure) Order (England) 2015 (DMPO); and
- DfT Circular 01/2022 The Strategic Road Network and the delivery of sustainable development ('the Circular').

As a statutory consultee in the planning system, National Highways has a regulatory duty to co-operate. Consequently, we are obliged to give consideration to all proposals received and to provide appropriate, timely and substantive responses.

Our desire to be a proactive planning partner goes beyond this statutory role and follows the spirit of the Licence which stipulates that National Highways should: "Support local and national economic growth and regeneration".

Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ
Highways England Company Limited registered in England and Wales number 09346363

disability confident COMMITTED

We encourage all parties promoting and preparing Plans that may have an impact on the SRN to engage with us as early as possible, to enable collaborative working and to deliver positive outcomes in a timely manner.

National Highways' Approach to Plan Making

The Circular, published December 2022, is national policy which sets out the framework for working with National Highways on the SRN that emphasises the need for developments to come forward in a sustainable manner. Paragraph 11 states:

> *The company* [National Highways] *will act in a manner which conforms to the principles of sustainable development. In this context, the company's licence agreement defines sustainable development as encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations.*

Paragraph 15 goes on to state a shift in policy from the traditional 'predict and provide' approach to transport planning, to planning for the outcomes that communities want to achieve in terms of sustainability and providing transport solutions for those outcomes.

With this in mind, National Highways seeks to encourage new developments that facilitate a reduction in the need to travel by private car and focussed on locations that are or can be made sustainable. In the first instance, new developments should give priority to walking, wheeling and cycle movements and facilitate access to high-quality public transport where possible. For residential-led developments, due consideration should be given to home and street layouts, broadband infrastructure, safe and secure cycle parking, and access to local amenities and open space in support of these aims, while mobility or micromobility hubs should be provided in larger schemes.

The Local Plan should be fully cognisant with further policies outlined in the Circular; particularly paragraphs 26 to 38 that details National Highways' strategy on 'Engagement with plan-making'.

The Circular also establishes National Highways' commitment to limiting its environmental impact. This includes the selection and allocation of development sites, to ensure that they are not reliant on the SRN for transport access. Rather, National Highways' approach is set out in Paragraph 28:

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When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport, and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.

Preparation of a Local Plan Transport Evidence Base

When producing the Local Plan, it is key to National Highways that any future development will not negatively impact the functionality and safety of the SRN, and that the transport evidence base ensures this. This is set out in Paragraph 26 of the DfT Circular:

In relation to the preparation of local plans and spatial development strategies, the government expects that the relevant authorities will engage with the company from the outset of this process, to understand the interaction between land use designations and the impacts on road safety and future performance of the SRN. The involvement of the company will ensure that the strategic transport evidence base will provide a robust assessment of any positive and negative impacts on the SRN and inform a transport strategy and the Strategic Environmental Assessment (SEA) for the study area that aligns with the safe operation and long-term integrity of the SRN.

In line with Paragraph 42 of the Circular, all parties preparing plans that could impact the SRN are encouraged to engage with National Highways at the earliest opportunity. We therefore welcome the early engagement on Local Plan Duty to Co-Operate matters.

The Local Plan's supporting evidence base will need to be robust. National Highways will wish to review technical papers to satisfy itself that the model development is robust and accords with DfT requirements. National Highways would also welcome other transport evidence such as accessibility assessments, and/or analysis of likely average vehicle kilometres generated by new development, associated with sites being considered for allocation in the plan. The preparation of the transport evidence will require a collaborative approach between Trafford Council, National Highways as the strategic highways company, the Greater Manchester Combined Authority (GMCA), Transport for Greater Manchester (TfGM) and neighbouring authorities.

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It is important that the Local Plan is based on transport evidence which demonstrates that suitable schemes and mitigation have been considered, and will be implemented, that will shift demand into less carbon-intensive forms of travel. This is set out in Paragraph 33:

> *A robust evidence base will be required, including demand forecasting models, which inform analysis of alternatives by accounting for the effects of possible mitigation scenarios that shift demand into less carbon-intensive forms of travel.*

The Local Plan should be produced in line with the Circular, paying due cognisance to its position as National Highways' policy.

Furthermore, the plan should be developed using the 'Transport Evidence Bases in Plan Making and Decision Taking' guidance which has been published by the Department for Levelling Up, Housing & Communities and the Ministry of Housing, Communities & Local Government. Whilst the full guidance should be reviewed and considered whilst preparing the Local Plan, the following key issues should be considered whilst preparing and developing the transport evidence base:

- *Assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social, and environmental terms.*
- *Assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport.*
- *Highlight and promote opportunities to reduce the need for travel where appropriate.*
- *Identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate.*
- *Consider the cumulative impacts of existing and proposed development on transport networks.*
- *Assess the quality and capacity of transport infrastructure and its ability to meet forecast demands; and*
- *Identify the short, medium, and long-term transport proposals across all modes.*

The MHCLG guidance provides further advise and detail) on the preparation of a Local Plan evidence base in relation (but not limited to) the following:

- *When the transport assessment of the Local Plan be undertaken.*
- *What baseline information should inform a transport assessment of a Local Plan.*
- *What detailed information is required for the transport assessment of the Local Plan.*

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- *How a transport assessment of the Local Plan be undertaken.*
- *How safety considerations be addressed, and accident analysis used effectively in the transport assessment of the Local Plan.*
- *How the impact of land allocations should be considered in assessing the transport implications of Local Plans.*

Both the Circular and the Transport Evidence Bases in Plan Making and Decision Taking guidance should be thoroughly considered whilst preparing a Local Plan.

Approach to Traffic Assessment and Modelling

It is anticipated that the assessment methodology and supporting traffic modelling tools may involve all tiers of traffic models:

- Strategic Modelling (such as SATURN).
- Micro-Simulation Modelling (such as PARAMICS or VISSIM).
- Local Junction Modelling (ARCADY, PICADY and LINSIG).

Early engagement with National Highways is therefore important and should be undertaken to agree the approach to traffic assessment so that key parameters and assumptions for elements can be agreed such as, but not limited to:

- The traffic Data being used.
- The type(s) of traffic modelling tools being used and their location.
- The Calibration / Validation of any Base Traffic Models/Modelling.
- The traffic forecasting Methodology and Local Plan scenarios that are to be tested.

National Highways highlight the need for Trafford Council to ensure that sufficient time is allowed for the evaluation of the transport evidence given the need for iteration throughout its development.

National Highways is committed to working with local authorities and plan-making bodies prior to and between formal consultation periods to contribute to the thinking, and to support the analysis of options and development of strong plans and proposals that take full account of highways issues.

The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and

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encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.

In framing our contribution to the development of Local Plans, our aim will be to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the SRN. To that end, we look forward to gaining an understanding of the likely impact of any proposed allocations and policies on the SRN, and where work is being undertaken to develop a Transport Strategy for the borough.

In order to develop a robust transport evidence base, we will look to work with Trafford Council to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety. Such assessments should be carried out in line with current Department for Transport guidance or on a basis otherwise agreed with the National Highways.

Through the production of Local Plans, development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives, and which support existing business sectors as well as enabling new growth.

We will look to work with Trafford Council and developers to identify opportunities to introduce travel plan and demand management measures through the Local Plan. These will be based on existing and proposed patterns of development in a manner that will support sustainable transport choice and retain capacity within the transport network so as to provide for further development in future Plan periods.

Net-Zero Carbon Transition

The Climate Change Committee's 2022 Report to Parliament notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The National Planning Policy Framework supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

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Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of PAS2080 promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be taken into account within any relevant Local Plan policies to ensure that future planning decisions are in line with the necessary transition to net zero carbon.

Strategic Road Network

The M60 runs through the borough from the south-east to the north-west, whilst the M62 and M56 run nearby to the north and south of Trafford, respectively. These motorways provide access to other boroughs within Greater Manchester, as well as to a wider North-West region and national locations.

Junctions 6 to 10 of the M60 are situated within the borough, with Junction 5 and 6 of the M56 forming the southern border of the borough. The A556 is an all-purpose SRN link which connects with M56 Junction 7 and heads south into Cheshire. Junction 5 of the M60 is also impacted by traffic flows in from Trafford and Manchester given the location of the motorway being close to the border of Trafford.

Places for Everyone Joint Plan

National Highways would expect any Plans and supporting Infrastructure Development Plans within Trafford to be in conformity with the Places for Everyone Joint Plan (PfE). It should be noted that as part of the PfE process, a Statement of Common Ground (SoCG) was jointly agreed and signed by National Highways and the Greater Manchester Combined Authority (GMCA) representing the nine Greater Manchester Districts involved in the PfE.

Section 5 of the SoCG set out the requirement for future collaboration between National Highways and the nine PfE Local Authorities as follows:

> *On-going work will be required to confirm the details and phasing of any enhancements that may be required to the SRN and adjacent local highway network in the short, medium, and longer term.*

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Dependant on the locations in question, and potential for additional traffic generation impacting the operation of the SRN, this ongoing workstream will include:

- *Masterplanning (including phasing) of the larger sites to better understand the timescales within the plan period when significant impacts are expected as a result of the PfE allocations;*
- *Further, more detailed studies to develop the detail of schemes that may be required to mitigate the potential impacts of the PfE allocations on the SRN, broadly in accordance with when those sites come forward in the planning process (building on masterplanning work where appropriate);*
- *Use of the most appropriate traffic modelling tools supported by observed traffic data that is reflective of prevailing traffic conditions of the strategic and local road network being considered; and*
- *Inclusion of the schemes required to mitigate traffic impacts on the SRN within Local Implementation Plans (LIPs).*

Each of the nine Local Authorities will continue to engage with National Highways on the development of their:

- *Local Implementation Plan for the GM Transport Strategy 2040.*
- *Local Plan.*
- *Local Transport Plan and local transport strategy.*

A summary of key considerations and areas which are currently the subject of studies and ongoing collaboration with National Highways for Trafford was set out as follows

Trafford

i. Trafford Council will continue to work collaboratively with National Highways in respect of developments coming forward at New Carrington, including the Carrington Relief Road, and at Timperley Wedge.

ii. Trafford Council will coordinate with National Highways and neighbouring districts in respect of potential cumulative impact on the SRN of the development pipeline, for example development in the vicinity of the Airport and HS2, with Manchester City Council through the South Manchester Highway and Transport Study, and in the Western Gateway area with Salford City council.

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iii. *Trafford Council notes the ongoing work by National Highways in respect of the North West Quadrant Study and looks forward to working closely both with National Highways, and neighbouring Local Authorities, on the next stages of scheme development.*

Comments Regarding the Local Plan

Below are National Highways' comments on policies within the draft Plan.

Site Selection Methodology

The draft site selection approach appears to be reasonable and suitable, supporting sustainable development. It is important for National Highways that sites are chosen with sustainable access in mind rather than being in areas of poor connectivity, both in terms of public transport and active travel. This helps to reduce reliance on both the local and strategic networks for short journeys that might otherwise be undertaken sustainably.

Strategic Approach and Objectives

National Highways supports the adoption of a vision-led approach, which is advocated in the Circular and can be used to support greater uptake of sustainable travel modes, reducing traffic impacts on the SRN. National Highways also supports a Plan-led approach to growth and infrastructure planning, with the Plan-making stage typically presenting the greatest opportunities to influence positive sustainable travel outcomes.

The Vision references that Trafford's town centres and existing sporting and cultural attractions will be enhanced. Additionally, investment and businesses are sought to be retained and attracted. The desired sustainable growth will require key infrastructure improvements. National Highways are involved in working groups with Trafford Council and other key stakeholders, including TfGM and the GMCA, to understand these requirements, and though it is noted that this relates to the PfE, due consideration should be made to this in the Local Plan.

Where proposed development has a predominance of road-reliant land use classes (logistics, for example), a vision-led approach needs to recognise this to form a realistic view of the infrastructure requirements at the SRN, and any potential mitigation measures which would be required in a timely and appropriate manner.

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Regarding the Plan's Strategic Objectives, there is a clear focus on growth and development, particularly housing delivery. In order that growth does not result in a detrimental impact on the transport network, particularly cumulative impact of development, strong strategic objective wording such as that under 'sustainable movement' is required.

Strategy

Policy ST1: Core Growth Area
Due to the size and scale of the proposed development areas, National Highways will work closely with Trafford Council to ensure that these can be delivered whilst reducing the overall impact on the SRN, particularly the M60 through the borough. This will be inclusive of identification of mitigation opportunities both physical and holistic which can reduce the impact of vehicle traffic as a result of these identified Core Growth Areas.

Policy ST2: Inner Areas
Whilst it is viewed that, due to the location of these identified areas, proposed developments will predominantly look towards Manchester City Centre, quantitative appraisal of developments will be required to assess the impacts on local highways. If a single development, or multiple cumulative developments are shown to have an impact on the SRN through Trafford, National Highways should be consulted on mitigation proposals available.

Policy ST3: Southern Areas
National Highways will continue engagement with Trafford Council in their role as statutory consultee to enable the PfE allocations to be brought forward whilst mitigating potential impacts of these developments on the SRN.

Policy ST4: Sustainable Development
National Highways is supportive of this approach, as it aligns with the Circular and additional policy documentation aligning with sustainable development. Additionally, the approach of identifying key mitigation measures required for sites may require engagement between National Highways and Trafford Council, which will be welcomed in the first instance with regards to any proposed development being brought forward in the vicinity of, or impact to, the SRN.

Policy ST5: Climate Change
This approach is supported by National Highways, aligning with sustainability policies identified within the Circular.

Local Plan Policies Map
The allocations for industry, warehousing and key employment areas connect with the

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SRN at various locations and are typically road-reliant in their operations. Any sites impacting the SRN will need to meet the requirements set out in the Circular in terms of mitigating their impacts.

The New Carrington strategic allocation is relatively isolated in terms of existing infrastructure to serve a site of this size and type, and as such impact on the SRN will need to be assessed and adequate infrastructure delivered to enable sustainable growth. The Davenport Green (Timperley Wedge) strategic allocation is directly adjacent to the SRN at M56 J5 and J6 and, again, will need to consider its impacts on the SRN.

Renewable Technologies and Methods

Policy RT1: Carbon and Energy
National Highways is supportive of this approach of minimising emissions and the use of renewable energy, aligning with the paper *Decarbonising Transport: A Better, Greener Britain*. As set out within this paper and the *Cycling and Walking Investment Strategy*, plan-making should reinforce the promotion of public transport and active modes where possible, reducing the traffic impact of new development on the SRN.

Policy RT2: Decentralised Energy Generation
National Highways has no comment on this aspect of the Local Plan.

Policy RT3: Overheating and the Urban Heat Island
National Highways is supportive of this approach; the retrofitting and installation of green infrastructure will encourage modal shift away from private vehicles, reducing the impact of new and existing development on the SRN.

Policy RT4: Sustainable Retrofitting
National Highways supports this approach to development due to retrofits reducing the requirements for additional development plot sites which may impact the SRN. Additionally, through adaptive re-use of materials on site or nearby, there is the potential for reduced wear and tear on the SRN, and it is encouraged that both Trafford Council and any applicants for development scope an appropriate Demolition Plan with National Highways to mitigate for this.

Policy RT5: Circular Economy
National Highways is supportive of this approach and has no further comment on this aspect of the Local Plan.

Residential Development

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Policy R1: Housing Delivery
National Highways is supportive of this approach following from the Government's recent update to the NPPF in promoting the use of brownfield and 'grey belt' sites. National Highways would like to see further detail regarding 'grey belt' sites in the Plan, as these developments are most likely to impact the SRN. It is recommended that these are shown on the local policies map, or additional supplementary mapping as part of the Local Plan published information.

Policy R2: Protecting Existing Homes
National Highways has no comment on this aspect of the Local Plan.

Policy R3: Affordable and Social Housing
National Highways recognises the desired outcomes of National Housing Policy to increase the supply of homes (including affordable housing) and as such acknowledges the approach outlined in the draft Trafford Local Plan.

Policy R4: Size and Type of New Homes
It is identified by this Policy that all new residential development must deliver a range and mix of dwelling sizes and types, with all applications including identification of how the scheme would contribute to the particular need for family housing. It is important when deciding on the size, type and location for new homes whether this might build in a propensity for homeowners to travel by private vehicle rather than public transport or other sustainable means. For example, building large homes with garage space for multiple vehicles in unsustainable locations is likely to increase reliance on private vehicles.

Policy R5: Housing Density
It is suggested that the proposed varying densities of the PfE Allocation Sites (New Carrington, Davenport Green) are shown on the presented figure, as these sites both encompass development plans which specify increased densities within their proposed new Local Centres.

In localities where major proposed developments are to have a potential impact on the SRN, it is recommended that scoping with National Highways be undertaken to identify any impacts and mitigations which may be required.

Policy R6: Older Persons Accommodation
National Highways has no comment on this aspect of the Local Plan.

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Policy R7: Adaptable and Accessible Housing
National Highways has no comment on this aspect of the Local Plan.

Policy R8: Homes for Children and Care Experienced Young People
National Highways has no comment on this aspect of the Local Plan.

Policy R9: Other Types of Homes
National Highways has no comment on this aspect of the Local Plan.

Policy R10: Gypsies, Travellers and Travelling Showpeople Accommodation
Whilst the sustainability and visual integration statements are welcomed, the specific criteria which will be used to determine whether a site has "suitable and safe vehicular access to the highway network" or is "visually integrated into the local and wider landscape" is not clear. Without clarity on this, there is a risk that unsustainable sites will not be able to be challenged.

Whilst a site having access to the highway network is mentioned, there is no statement around capacity, demand or impact – this needs to be understood and used as part of the criteria to determine if a site is sustainable or could have a potential impact at the SRN if it is sited in close proximity to the SRN.

Policy R11: Self-Build and Custom Housing
National Highways has no comment on this aspect of the Local Plan.

Economy and Jobs

Policy EJ1: Employment Land Requirements
If any new or redeveloped sites come forward in proximity to the SRN, or where there may be an impact on the SRN due to the expectation of an increase in the number of vehicles travelling to and from the site, it is expected that National Highways will be consulted to allow input into any potential mitigation measures to alleviate this.

The policy statement considerations do not include access or mention of traffic impacts. A forecast of traffic impact is therefore required to be understood to inform a decision on the delivery of sustainable development, as per National Highways' policy documents and the NPPF.

National Highways is supportive of the statement to incorporate measures to encourage active travel and low emission vehicle infrastructure as part of the proposals as this

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adheres to the principles of sustainable development as set out within the Circular.

Policy EJ2: Trafford Park

As per the previous comment, the policy statement considerations do not include access or mention of traffic impacts. A forecast of traffic impacts is therefore required to be understood to inform a decision on the delivery of sustainable development. This aspect of the Local Plan should also take into account wider redevelopment coming forward within the vicinity of Trafford Park, such as Therme, the Trafford Centre, and Trafford Waters. These developments should all be considered when assessing impacts of developments within the area.

National Highways is also supportive of the statement to incorporate measures to encourage active travel, low emission vehicle infrastructure and sustainable urban drainage infrastructure as part of the proposals, as this adheres to the principles of sustainable development as set out within the Circular.

Warehousing operations and employment sites such as Trafford Park by their nature are typically road-reliant given the expected movement of materials and goods. Any development of this kind is expected to demonstrate how there will not be a detrimental impact to the SRN. Strategic employment sites such as Trafford Park should have operational Areawide Travel Plans to monitor impacts.

The need for adequate lorry parking is recognised in the NPPF and the Circular. Where B8 development is encouraged such as this, particular focus on adequate lorry parking facilities needs to be considered.

Policy EJ3: Industry and Warehousing

National Highways is supportive of this Policy, however if any large employment sites identified may unduly impact the SRN through significant workforce or HGV movements, appropriate mitigation should be identified and scoped with National Highways and the Council. This Policy should also be cognisant of National Highways Net Zero ambitions.

As per the previous comment, industry and warehousing operations by their nature typically involve significant road-reliant movement of goods and materials. Demonstration of the severity of impact to the SRN as a result of increased development will be required. Strategic development sites such as Trafford Park, New Carrington and Broadheath Employment Area should be accompanied by Travel Plans.

The need for adequate lorry parking is recognised in the NPPF and the Circular. Where B8 development is encouraged such as this, particular focus on adequate lorry parking facilities needs to be considered.

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Policy EJ4: Offices
National Highways are supportive of this Policy, with the aspects of cycle parking and public realm improvements aligning to the NPPF and Circular 01/2022. Strategic sites regardless of land use type should be accompanied by Travel Plans.

Policy EJ5: Safeguarding Trafford's Employment Land
National Highways has no comment on this aspect of the Local Plan.

Policy EJ6: Data and Energy Storage
Where energy storage facilities (in particular Battery Energy Storage Systems (BESS)) are to be sited in close proximity to the SRN, it is important that safety concerns regarding them are assessed during the planning application stage. This is of particular concern if these are to be placed near to structures. BESS sites are a novel technology, and National Highways must be satisfied that there would not be an impact to the SRN as a result of a failure within the site.

Policy EJ7: Rural Economy
National Highways are supportive of this Policy and encourage the use of Active Mode and Public Transport for rural economies for transportation purposes, reducing the impact on the SRN.

It is noted that there are relatively large areas which are rural in nature in the Borough, and the existing infrastructure network is limited in these locations. Any new development in rural areas should demonstrate no detrimental impact on the SRN and will be required to demonstrate infrastructure associated with proposals to ensure sustainability.

Transport and Movement

Policy TM1: Walking, Wheeling and Cycling
National Highways supports the policy, in particular, the statements around encouraging a modal shift in transportation from private car to active travel and public transport. This specifically supports the Circular as it states the following about sustainable transport:

> *"New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable. In this regard, recent research on the location of development found that walking times between new homes and a range of key amenities regularly exceeded 30 minutes, reinforcing car dependency. Developments in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas."*

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Facilities to support active modes (e.g. secure parking) are welcomed and it is recommended that associated quantitative volumes of parking requirements are developed/updated.

Policy TM2: Public Transport
National Highways supports the policy, and the improvements and introduction of new public transport schemes. This aligns with the principles of sustainable development as set out within the Circular and will reduce the impact on the local road network and therefore potential impact to the SRN.

Additionally, National Highways is supportive of the use of sustainable transport, as this adheres to the Circular, as per the previous comment. Additionally, Travel Plans should be used as a tool to monitor the uptake and success of public transport in the borough.

Policy TM3: Car Clubs
National Highways supports this policy particularly with the statement of targeting areas with poor access to public transport links. Car clubs in conjunction with other active travel and transport policy initiatives support sustainable development.

Policy TM4: Mobility Hubs
National Highways supports the policy particularly with the statement of reducing overall levels of vehicular traffic on the borough's highway network. Mobility hubs in conjunction with other active travel and transport policy initiatives support sustainable development.

The statement regarding new and improved mobility hubs not leading to unacceptable levels of traffic congestion is welcomed, however, National Highways recommends clarity on how "acceptability" will be measured and methods to enable appropriate mitigation.

Facilities to support active modes (e.g. secure parking) are welcomed and it is recommended that associated quantitative volumes of parking requirements are developed/updated.

Policy TM5: Local Highway Network
National Highways is supportive of this policy but would ask that:

- Further detail and clarity is provided on the improvements to the Western Gateway Infrastructure Scheme (WGIS) being referred under this policy.
- Reference to the role of the SRN is made in the policy wording given the importance of the SRN in Trafford for the operation of the local highway (and SRN itself) along with the function it will need to provide to support housing,

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employment, retail and leisure growth in Trafford.

Policy TM6: The A56
National Highways is supportive of the above policy, in particular, the statements around encouraging a modal shift in transportation from private car to active travel and public transport, supported by the Circular.

Proposals should align with TfGM Streets for All guidance.

Policy TM7: Freight
National Highways is supportive of this approach of transitioning freight movements to alternative modes of travel. The policy also supports the *Future of Freight* plan (2022), which has the development of a National Freight Network (NFN) of alternative freight movements as its first objective.

The need for adequate lorry parking is recognised in the NPPF and the Circular. Where freight and logistics developments are encouraged, particular focus on adequate lorry parking facilities needs to be considered.

Policy TM8: Manchester Ship Canal
National Highways is supportive of this policy as modal shift for freight to the Manchester Ship Canal may reduce the impact of long-distance HGV trips on the SRN, reducing the requirements for maintenance on identified structures.

In addition, the provision of new crossings for public transport or active travel is supported as this may remove longer distance trips by vehicle.

Policy TM9: Potential Future Rail Route
National Highways acknowledges that the policy outlines Trafford's support for future rail improvements via the route outlined. Where there might be interactions with the SRN or potential traffic impacts from the provision of a new station, National Highways will need to be involved in that process to determine if mitigation measures are required for any increase in traffic around the station.

Policy TM10: Parking Standards
Where applicable, National Highways will work with Trafford Council to implement the expansion of electric vehicle charging infrastructure, in adherence to this policy. National Highways would also welcome further quantitative demand assessments on travel impacts based on the policy wording of "not adversely impacting highway safety, or the movement of other road users", which does not provide absolute clarity on how this

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will be achieved. Further information should be provided within the policy wording to alleviate these concerns.

Quantitative parking standards will need to be developed and published in order for new development to align with the policy.

Policy TM11: Lorry Management
This policy aligns with the National Highways *Future of Freight* report (paragraph 46), with the need for adequate lorry parking recognised in the NPPF and DfT Circular. As such, this policy is supported with the note that it should be taken in consideration with Policy EJ3 and Policy TM7.

Policy TM12: Park and Ride
National Highways is supportive of the above policy, in particular, the statements around encouraging a modal shift in transportation from private car to active travel and public transport. This specifically supports policies identified within the Circular.

Policy TM13: Crowd Movement and Routes
National Highways has no comment on this aspect of the Local Plan.

Town Centres and Retail

Policy TC1: Hierarchy of Centres
National Highways has no comment on this aspect of the Local Plan.

Policy TC2: Role and Function of Centres
National Highways is supportive of the above policy, in particular, the statements around encouraging a modal shift in transportation from private car to active travel and public transport. This specifically supports the Circular.

Policy TC3: Out of Centre Retail and Leisure
National Highways will work with the Council if the Impact Assessment demonstrates potential for impact at the SRN.

Green Infrastructure and Natural Environment

Policy GI1: Landscape Character Areas
National Highways has no comment on this aspect of the Local Plan.

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Policy GI2: Green Infrastructure Network
National Highways has no comment on this aspect of the Local Plan.

Policy GI3: Great Manchester Wetlands Nature Improvement Area (NIA)
National Highways has no comment on this aspect of the Local Plan.

Policy GI4: Mersey Valley
National Highways has no comment on this aspect of the Local Plan.

Policy GI5: Green Infrastructure Opportunity Areas
If any new green infrastructure opportunity area was to come forward where there may be an impact on the SRN due to highway constraints caused by the new links, it is expected that National Highways will be consulted to allow for appropriate consideration and comment.

National Highways is supportive of the statement that community facilities or services are accessible by walking, wheeling and cycling.

National Highways will work with the Council when appropriate to ensure opportunities identified to increase the level of green infrastructure align with the Circular and the Design Manual for Roads and Bridges (DMRB) where relevant so that they can be supported.

Policy GI6: Green Infrastructure in New Developments
National Highways is supportive of this Policy and has no further comment.

Policy GI7: Trees, Woodland and Hedgerows
National Highways has no comment on this aspect of the Local Plan.

Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets
National Highways has no comment on this aspect of the Local Plan.

Policy GI9: Biodiversity Opportunity Areas
National Highways is supportive of this Policy and has no further comment.

Policy GI10: Building Biodiversity into New Developments
National Highways has no comment on this aspect of the Local Plan.

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Open Space, Sport and Recreation

Policy OS1: Open Space
National Highways is supportive of the statement of positive contributions to pursue more active lifestyles as part of new development on sites within the Borough. As well as improving air quality and other pollution, as this adheres to the principles of sustainable development as set out in the Circular.

Further detail on 'walkable accessibility standards' is requested – it is suggested that TfGM Streets for All guidance is followed as well as Local Transport Note 1/20 principles.

Policy OS2: Outdoor Sports and Recreation Facilities and Provision
National Highways is supportive of this Policy and has no further comment.

Policy OS3: Indoor Sports and Recreation Provision
National Highways is supportive of this Policy and has no further comment.

Policy OS4: Loss of Sport and Recreation Land or Facilities
National Highways is supportive of this Policy and has no further comment.

Policy OS5: Allotments and Growing Space
National Highways has no further comment on this aspect of the Local Plan.

Policy OS6: Cemeteries and Burial Grounds
National Highways has no further comment on this aspect of the Local Plan.

Local Plan: Water, Flooding and Drainage

Policy WA1: Managing Flood Risk
National Highways supports the policy above to minimise negative impacts to the water drainage system, as per the NPPF Paragraph 59, reducing the requirement for reactive maintenance when flooding events occur which may impact the SRN.

Policy WA2: Sustainable Drainage – Surface and Foul Water
National Highways supports the policy above to minimise negative impacts to the water drainage system, as per the NPPF Paragraph 59, as stated in the previous comment.

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Policy WA3: Flood Storage Areas
National Highways has no further comment on this aspect of the Local Plan.

Policy WA4: Water Efficiency
National Highways has no further comment on this aspect of the Local Plan.

Local Plan: Community and Social Infrastructure

Policy CT1: Protecting Existing Community and Social Facilities
National Highways has no further comment on this aspect of the Local Plan.

Policy CT2: Loss of Community Facilities
National Highways has no further comment on this aspect of the Local Plan.

Policy CT3: New Community and Social Facilities
National Highways is supportive of this Policy and has no further comment.

Policy CT4: Fast Food
National Highways has no further comment on this aspect of the Local Plan.

Policy CT5: Social Value in New Developments
National Highways has no further comment on this aspect of the Local Plan.

Local Plan: Built Environment

Policy BE1: Design
National Highways is supportive of the statement enabling effective public transport and active travel within new developments. This adheres to the principles of sustainable development as set out within the Circular.

The policy statement could be strengthened from:

> *"Promoting sustainable development by locating developments in well-connected areas that are accessible via public transport and where possible, high quality active travel nodes,"*

to:

> *"Promoting sustainable development by locating developments in well-connected areas that are accessible via public transport and high quality active travel nodes."*

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And from:

> *"Ensuring, where appropriate, that streets and public spaces are designed to provide safe and attractive environments for people walking, wheeling and cycling"*

to:

> *"Ensuring that streets and public spaces are designed to provide safe and attractive environments for people walking, wheeling and cycling."*

Policy BE2: Tall Buildings
National Highways is supportive of this Policy and has no further comment.

Policy BE3: Elevated Green Spaces
National Highways is supportive of this Policy and has no further comment.

Policy BE4: Adverts and Signage
National Highways is supportive of this Policy and has no further comment.

Policy BE5: Heritage Assets
National Highways is supportive of this Policy and has no further comment.

Policy BE6: Designated Heritage Assets
National Highways has no further comment on this aspect of the Local Plan.

Policy BE7: Non-designated Heritage Assets
National Highways has no further comment on this aspect of the Local Plan.

Policy BE8: Noise and Vibration
National Highways has no further comment on this aspect of the Local Plan.

Policy BE9: Land Contamination and Remediation
National Highways has no further comment on this aspect of the Local Plan.

Policy BE10: Digital Connectivity
National Highways has no further comment on this aspect of the Local Plan.

Local Plan: Culture, Tourism and Leisure

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Policy CL1: Protecting and Supporting Existing Cultural, Leisure and Tourism Assets
National Highways is aware through publicly available information of ambitious plans for the regeneration of the Old Trafford area, centred around a new 100,000-seater stadium and a wider aspiration of development of the surrounding area to support 17,000 new homes.

At this stage National Highways is supportive of Policy CL1 and Policy CL1N in principle but recognises that the proposed regeneration of Old Trafford is at an early stage with the transport evidence to support the proposed regeneration yet to be prepared. Given this, the potential impact at the SRN (and the Greater Manchester transport system) is yet to be understood by National Highways and the relevant transport authorities.

National Highways will be required to be consulted during the development of the Old Trafford regeneration project, and during the scoping of the transport evidence and supporting studies. This is to ensure that any impacts at the SRN are understood and appropriately mitigated.

Policy CL2: New Culture, Leisure and Tourism Developments
At this stage National Highways is supportive of Policy CL2 in principle but recognises that the transport evidence needed to support proposals brought forward under this policy is yet to be prepared; therefore, the potential impact at the SRN (and the Greater Manchester transport system) is yet to be understood by National Highways and the relevant transport authorities.

Local Plan: Infrastructure and Planning Obligations

Policy IP1: Infrastructure Delivery and Planning Obligations
National Highways is supportive of this Policy but would comment that the policy also needs to be able to cover instances where new development (in isolation or cumulatively) demonstrates the need for enhanced infrastructure at the SRN (including the adjacent local highway network). Necessary mitigation for allocations should be considered at the Local Plan stage, in line with the Circular at paragraph 29:

> *"29. New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure..."*

Policy IP2: Managing and Monitoring Planning Obligations
National Highways has no further comment on this aspect of the Local Plan in regards to any charges which may be levied against developments, but it is important that National

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Highways is involved within ongoing monitoring of impacts from larger allocations and developments. This is to ensure that impacts to the SRN are being considered throughout the life of the development.

Implementation, Monitoring and Review

Implementation
National Highways has no further comment on this aspect of the Local Plan.

Monitoring
National Highways has no further comment on this aspect of the Local Plan.

Review
National Highways has no further comment on this aspect of the Local Plan.

Trafford Integrated Assessment

Integrated Assessment Overview
National Highways acknowledges the appraisal undertaken in the Integrated Assessment (IA), as it is beneficial to score the IA objectives against the policy themes and policies within to help understand the alignment of each objective with the policy themes in the Plan and, if needed, how the policies can be amended and/or improved.

It should be noted that in relation to the transport objectives, National Highways agrees with improving digital infrastructure and promoting sustainable access to and from centres, employment and recreational opportunities.

Trafford Habitat Regulations Assessment

Policy Screening and Assessment
National Highways understands that the Habitat Regulations Assessment (HRA) is a key assessment to protect the integrity of protected sites and is in line with the policies surrounding environment, climate resilience and biodiversity protection. Therefore, National Highways is supportive of the recommendations made in the HRA for this draft Local Plan.

Sustainable Travel and the Vision-led Approach to Planning

National Highways is supportive of plans that aim to focus on sustainable travel ahead of private vehicle use. This is best achieved through promoting development sites that are

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already in sustainable locations, or sites that can be made sustainable through the use of travel planning and the delivery of public transports and active travel measures.

Importantly for National Highways, the vision-led approach to planning, as outlined in the Circular, requires that applicants consider this sustainability at the earliest stages. This vision would then form part of both the Transport Assessment and the Travel Plan.

Paragraph 33 of National Highways' Planning for the Future guide states:

> *33. In broad terms, a vision-led approach can be summarised as follows:*
>
> 1. *Establish a vision - understand the relevant national and local policy context; identify the drivers of change/key external factors acting on the plan or proposed development; set-out a place-based vision statement with associated outcomes that supports the principles of sustainable development.*
>
> 2. *Develop scenarios - develop plausible future scenarios that help to understand the uncertainties that may impact on the ability to deliver the vision.*
>
> 3. *Generate options – generate, sift and prioritise options that can help achieve the vision.*
>
> 4. *Test options – test how the prioritised options perform in each of the plausible future scenarios (for example, is every option effective in all scenarios or are some less resilient and have some significant risks?).*
>
> 5. *Produce a vision strategy – produce a strategy for realising the vision that accounts for the identified uncertainty and includes a 'monitor and manage' approach to identify and address when the vision is unlikely to be achieved.*

Although primarily discussing assessments, the 'vision strategy' for the application should feed into the Travel Plan, be specific to the site, and include wherever possible clarity on the funding and deliverability of proposed measures. For example, National Highways would be more supportive of applications and Travel Plans that contained fully costed and approved transport measures, than one which simply highlighted a future need without clarity of funding. This should include an element of monitoring the site to ensure that the proposed measures had the desired effect of reducing single occupancy vehicle travel, and that impacts to the SRN had been minimised.

Additionally, it should be noted that a vision-led approach does not mean that public transport is suitable for all movements in all scenarios. For example, the vision for a new

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warehousing development or a site within another road-based sector is likely to include a large proportion of HGVs that should be factored into the vision, alongside measures to encourage staff and other visitors to travel sustainably. The vision for a housing development though should always look at sustainability first, and the SRN should not be relied upon for development aside from applications within those road-based sectors which require long-distance strategic access.

Future Engagement

We welcome further engagement with Trafford Council as you progress your Local Plan, and to that end will be keen to arrange future meetings to discuss the Plan's progress and how we might assist in its development.

In the meantime, if you would like to discuss anything further, please let me know at the email address below.

We look forward to working with you as your Local Plan develops.

Yours faithfully

[redacted]

Adam Johnson
Spatial Planning Team
Email: [redacted]

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ANBP Design Group: Response to Trafford Local Plan consultation

9 June 2025

Dear Sirs,

I write as chair of the Altrincham Neighbourhood Plan design group (ANBP). The design group has met to discuss the Trafford local Plan consultation document, please find our comments below.

The design group is encouraged by the work undertaken with the Local Plan (and the design code previously) and we wish to support Trafford Council to deliver the local plan with regards to Altrincham town centre. We are pro-development and our comments below are points of detail.

Please note that these comments are mostly limited to Altrincham town centre only and we have focused on the sections for Town Centres and Built Environment.

These same comments have been returned via the online survey on the Trafford Council website.

Kind regards,

Damian Utton, Chair ANBP Design Group

[redacted]

[redacted]

SECTION 7: TOWN CENTRES AND RETAIL

Policy TC1: Hierarchy of centres

Question 7.1 *Do you support Policy TC1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.*

ANBP response: The ANBP design group supports policy TC1

Question 7.2 *Do you agree with all the proposed boundaries for the Town, other designated, local and neighbourhood centres as shown on the policy map?*

ANBP response: The proposed Altrincham town centre boundary is different (and smaller) than the Altrincham Neighbourhood Plan boundary. As the neighbourhood plan is part of planning policy, the town centre boundary should be the same as the neighbourhood Plan boundary for consistency

Policy TC2: Role and Function of Centres

Question 7.3 *Do you support Policy TC2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant*

ANBP response: Item Bii ‘ Avoid the loss of ground floor active frontages’ is very important to maintain life, activity and interaction at street level.

If there is to be an increase of residential use in town centres there is no mention of a need to increase health provision. Whilst Altrincham town centre does have the hospital, Sale, Stretford and Urmston town centres should have health provision encouraged.

There is no mention of potential mix of residential use in town centres. A mix of assisted living, affordable housing and private housing enables vibrant communities to flourish.

There is a conflict between residential use in town centres and the noise generated by the night-time economy. Proposed bars, restaurants, etc in residential areas require close scrutiny whereas proposed residential use in established night-time economy areas should have acoustic measures conditioned as part of any planning consent. Appreciate that one cannot legislate for opening windows but an owner/occupier moving into new accommodation within an established town centre should accept there will be noise in the evening.

Would too much residential development in town centres stifle regeneration if there are restrictions on other night-time economy uses?

There is no mention of office space in town centres? With hybrid working the norm has there been any survey/research undertaken to assess demand for office space in Altrincham (and other) town centre? Office workers spend money in town centres, at lunchtime and after work.

Whilst there is a Travelodge and Premier Inn in Altrincham town centre, additional hotel accommodation should be encouraged. Anecdotal evidence shows that demand for hotel/air b’n’b accommodation increases across Trafford when Manchester United play at home. These visitors spend money in bars, pubs and restaurants.

Policy TC3: Out of Centre Retail and Leisure

Question 7.4 *Do you support Policy TC3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.*

ANBP response: The development of out-of-town retail offers and the detrimental effect on town centres is well documented. The threshold of 500sq.m is supported by the ANBP design group.

Whilst Altrincham town centre has Tesco, Sainsbury and M&S it should be noted that the town centre lacks a smaller convenience store.

Monitoring

ANBP response: There are no set targets for the additional indicators, just general statements. Could fixed targets be set?

Question 7.5 The local plan should be read alongside the Places for Everyone plan and national policy/guidance. Where possible the local plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider missing and which should be included in the local plan?

ANBP response:

The Places for Everyone policy JP-Strat12: Main town centres states: *The role of the main town centres as local economic drivers will continue to be developed, providing the primary focus for office, retail, leisure and cultural activity for their surrounding areas. Development here will offer a significant opportunity to reduce levels of poverty and deliver inclusive growth.*

Opportunities to further increase the population catchments of these centres will be taken, including significantly increasing the resident population of the main town centres by providing a mix of type and size of dwellings supported by the necessary infrastructure and amenities including new and improved public spaces and green infrastructure. This will be achieved alongside, rather than displacing, the range of non-residential uses in the centres

This chimes with our response to question 7.3

SECTION 12: BUILT ENVIRONMENT

Policy BE1: Design

Question 12.1 *Do you support Policy BE1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant*

ANBP response: This policy aligns with the Trafford design code but does not mention the design code. Should there be reference to the Trafford design code?

There is no mention of community engagement as an integral part of the design process?

Could developers be encourages to address public realm space immediately outside a development site e.g. improve surrounding street, pavements, etc to a site? Could a Section 106 agreement be used to provide funds for improvement/maintenance of the immediate surrounding area?

There is no mention of SUDS as part of sustainable development? Flooding is an increasing issue with climate change.

Is there a design guide/strategy for shopfronts?

Policy BE2: Tall Buildings

Question 12.2 *Do you support Policy BE2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant*

ANBP response: The threshold of six storeys/30m height is supported.

Item C(iv) An active frontage to tall buildings is essential.

In Altrincham town centre the only realistic site left for tall buildings is the Altair site.

Does the Trafford design guide reference tall buildings?

Policy BE3: Elevated Green Spaces

Question 12.3 *Do you support Policy BE3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant*

ANBP response: green roofs and elevated amenity areas with fixed planting green space is supported.

However, green walls are not supported require continuous and costly long-term maintenance, use considerable amounts of plastic in their construction and large quantities of water in their maintenance. Instead, street level planting of trees, planting beds, etc. should be encouraged.

Policy BE4: Advertisements and Signage

Question 12.4 *Do you support Policy BE4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant*

ANBP response: is there a shopfront design guide/strategy? The content of policy BE4 is supported but how well can this be enforced? The bright yellow fascia to KMC legal on Ashley Road, Hale is an example of an inappropriate shopfront

Policy BE5: Heritage Assets

Question 12.5 *Do you support Policy BE5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant*

ANBP response: There should be a greater balance in this policy, as written this policy is about preserving existing heritage assets with no consideration to the potential for contemporary design to complement and enhance a heritage asset.

Conservation/heritage should not stifle modern design and development.

Design and access statements should require how a contemporary design complements a heritage asset.

Development sites adjacent to or near a heritage asset should not have the design compromised by its location near to a heritage asset. New and old buildings can co-exist and good design can complement a heritage asset and this should be encouraged.

We note that the current Conservation Area management plans date from 2016. Could these be updated?

Policy BE6: Designated Heritage Assets

Question 12.6 *Do you support Policy BE6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant*

ANBP response: Can ‘substantial harm or loss’ be better defined?

There should be a greater balance in this policy, as written this policy is about preserving existing designated heritage assets with no consideration to the potential for contemporary design to complement and enhance a designated heritage asset.

Conservation/heritage should not stifle modern design and development.

Design and access statements should require how a contemporary design complements a designated heritage asset.

Development sites adjacent to or near a designated heritage asset should not have the design compromised by its location near to a designated heritage asset. New and old buildings can co-exist and good design can complement a designated heritage asset and this should be encouraged.

We note that the current Conservation Area management plans date from 2016. Could these be updated?

Policy BE7: Non-designated Heritage Assets

Question 12.7 *Do you support Policy BE7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant*

ANBP response: There should be a greater balance in this policy, as written this policy is about preserving existing non-designated heritage assets with no consideration to the potential for contemporary design to complement and enhance a non-designated heritage asset.

Conservation/heritage should not stifle modern design and development.

Design and access statements should require how a contemporary design complements a non-designated heritage asset.

Development sites adjacent to or near a non-designated heritage asset should not have the design compromised by its location near to a non-designated heritage asset. New and old buildings can co-exist and good design can complement a non-designated heritage asset and this should be encouraged.

We note that the current Conservation Area management plans date from 2016. Could these be updated?

Policy BE8: Noise and vibration

Question 12.8 *Do you support Policy BE8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant*

ANBP response: There is a conflict between residential use in town centres and the noise generated by the night-time economy. Proposed bars, restaurants, etc in residential areas require close scrutiny whereas proposed residential use in established night-time economy areas should have acoustic measures conditioned as part of any planning consent. Appreciate that one cannot legislate for opening windows but an owner/occupier moving into

new accommodation within an established town centre should accept there will be noise in the evening.

Would too much residential development in town centres stifle regeneration if there are restrictions on other night-time economy uses?

Policy BE9: Land Contamination and Remediation

Question 12.9 *Do you support Policy BE9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant*

ANBP response: This policy is supported by the ANBP design group.

Policy BE10: Digital Connectivity

Question 12.10 *Do you support Policy BE10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant*

ANBP response: Section C '*internet connections will be operational and immediately accessible to network providers when occupiers move into new properties'* – BT Openreach provide the infrastructure cabling for almost all network providers and have been known to take months to install and postpone their work. This could be unfair to developers as they would not be able to hand over buildings until Openreach have completed their work, which is largely out of a developer's control. Would 'provide the ducting and draw-wires to enable broadband connections to be made' be a fairer wording?

When underground infrastructure is installed, can utilities companies be required to reinstate surfacing back to its original condition on completion? It should be noted that areas of black tarmac surrounded by a lighter colour paving can be perceived as a hole by people with visual impairments or dementia.

Telecommunication masts: these policies are supported as poorly located masts can have a detrimental visual impact.

Monitoring

ANBP response: the additional indicators targets for the tall buildings and number of listed buildings is supported. Could targets be set for the other two indicators?

Question 12.11 The local plan should be read alongside the Places for Everyone plan and national policy/guidance. Where possible the local plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider missing and which should be included in the local plan?

ANBP response: There is no specific built environment section in the Places for Everyone document

Trafford Local Plan April 2025

Regulation 18 Consultation Draft – Response.

Comments from Mr E P Beckmann, [redacted]

Regulation 18 Consultation Draft – Response.Draft Trafford Local Plan.

Vision for Trafford

I do not believe that 'addressing the climate crisis locally , with ambitious targets for new development' is possible, nor that the delivery of resilient and well-adapted sustainable communities will in any way assist in achieving carbon neutrality by 2038. It is simply not possible to develop on extensive areas of peat moss without massively increasing carbon release. I and many others have consistently argued this point both in the previous Local Plan consultation of 2021 and in the P4E Examination. Ignoring the point does not make it go away.

I accept that P4E has determined that New Carrington will go ahead. I do not accept that it is feasible with current funding restrictions and with construction techniques. Even if such development does go ahead I suggest it will be so riddled with problems that the developers will have to resort to the wholesale excavation and removal of the contaminated peat at vast costs and with ruined reputations.

Trafford's vision of being carbon neutral by 2038 is not even remotely possible if proposed development on Carrington Moss and other moss land in the Borough is built upon. The Inspector's report in P4E proposed that the deeper levels of moss land under development could remain wet while development takes place on top. This would presumably require piling and other specialized construction and 'floating' roads on top of the peat. This would be inordinately expensive for both houses and roads. I have not found any justification for the development on the moss, even the housing crisis is a poor excuse as there are areas without moss which could be developed. Mosslands are Britain's most effective carbon sinks, at least 10 times more effective as a carbon sink than the equivalent area of dense woodland. To develop on mossland is, I believe, far worse than the mass clearance of the jungles of Amazonia.

I note that Cheshire East have very recently decided not to proceed with development of Danes Moss, near Macclesfield as such development would not be in accord with their carbon neutral policies. The development of Carrington Moss clearly cannot be in accord with Trafford's own Carbon Neutral Action Plan of December 2022, even though the latter does not appear to mention the moss – by far the largest accumulation of carbon in Trafford.

Carrington Moss is already emitting carbon and has been doing so for many years (not mentioned in Trafford's Carbon Neutral Report), development on top will inevitably dry out more mossland and lead to even greater volumes of carbon being emitted. The mossland also acts as a flood water regulator, absorbing water in periods of flood and gradually releasing it over time. It is hard to visualize how areas of Carrington Moss will cope with increased surface water run-off. Construction of large balancing ponds would inevitably mean excavating and removing peat leading to still more carbon release.

Unsustainable development is already commencing within the New Carrington Plan are as exhibited by the proposed Redrow housing development in Warburton. The Appeal decision

APP/Q4245/W/19/3243720 found that, '..the development would not be well integrated with Partington or contribute to improving the sustainability of that settlement. This is an important strategic objective of the development plan and the conflict with it is a matter of very significant weight.' I believe this still applies to the new application, which has 'jumped the gun' in not being considered in the New Carrington Consultation. If the current scheme is approved it will be clearly not sustainable.

I do not believe Trafford's biodiversity will be enhanced and its natural assets protected for future generations as a result of new development. Trafford will have destroyed a natural asset of huge biodiversity potential, with potential green and blue spaces far better than could be created around new housing.

Trafford will not have a sustainable transport network as long as it builds housing in relatively remote areas (such as Warburton). If anything it will have an increasingly unsustainable transport network and will be dependent for road connections to the south on increasingly dangerous outdated roads, such as Warburton Lane, where the accident toll is increasing every year and residents are too frightened to use the footways.

Trafford may meet its housing requirements, but they will be the wrong type of houses, in the wrong place and I suggest will nowhere near meet the acute need for affordable housing. I believe there is a risk of creating the very same 'overspill housing' of the 1960s and 70s where 'affordable' housing will simply dump residents in areas where car ownership is essential and the roads so choked with traffic as to make commuting hell.

I hope Trafford's town centres etc will be successful, but town centres are undergoing massive change and I am unsure if Trafford has the measure of this. Certainly town and city centre residential development is continuing at pace, in Manchester and parts of Salford, but I have not seen much evidence of this in Trafford.

Strategic Objectives

SO1 Deliver the homes that Trafford needs – I agree.

SO2 Make Trafford healthy, accessible and equal for all – I agree.

SO3 Ensure Trafford's resilience and carbon neutrality – Why can't all new development be carbon neutral now? The best way by far to counter climate change would be to re-wet large areas of Carrington Moss, 'minimising the impact of new development on the environment, whilst protecting the character of the built environment within the borough'. This would create a large areas of green and blue environments which would very strongly mitigate 'Climate Change and its effects' and 'strengthen resilience to the impacts of flood risk, extreme heat and weather events'. I strongly agree about prioritizing brownfield development, particularly if the sites are in urban or suburban areas.

SO4 Sustain Trafford's economic growth – I agree, but the economic investment development must be sustainable and any produce must be sustainable.

SO5 Champion Trafford's workforce and young people – I agree.

SO6 Support vibrant town and designated centres – I agree.

SO7 Protect and improve the natural environment and connect green assets – I strongly agree except for the 'Achieve biodiversity net gain'. This is a very 'woolly' statement and surely needs

to be expanded. Achieving biodiversity net gain is now a National requirement. What is surely needed is to maximise biodiversity net gain, wherever possible within the locality? Offsetting biodiversity is not much use to Trafford.

SO8 Sustainable movement – I agree, but north-south connections also need improvements.

SO 9 Support cultural and leisure assets – I agree.

S19 Design, heritage and placemaking – I strongly agree.

Sustainable Development

Policy ST4; Sustainable development – I agree, but sustainable development should be built from the central areas outwards. Development such as the Redrow sites is not sustainable as their will be no additional roads to take the traffic which will otherwise add large numbers to an already overloaded system.

2.37 and 2.38 The Redrow sites do not comply with the three dimensions mentioned in 2.37, nor are they sustainable as in 2.38

Climate Change

Policy ST5: Climate Change – I don't agree. How will the Council judge development proposals entirely on peat? According to this policy Application 115160 for a battery storage site on 19.9 hectares of deep peat (reserving a mere 1.15ha as compensation) would never get off the ground? The present proposals include scrub planting for screening, which will help dry out the peat. I believe the mitigation measures are totally inadequate, which makes me dubious about the Council's judgement. In respect of ST5 B no design in New Carrington will be able to mitigate in any meaningful way the loss of an irreplaceable habitat. Increasing biodiversity elsewhere will I am sure be suggested, but simply re-wetting substantial parts of the peatland would have a massive biodiversity increase and act as a carbon sink.

Carbon and Energy

Policy RTI: Carbon and Energy – I don't agree with A. What is the point of new development supporting Trafford Council's commitment for the borough to be carbon neutral by 2038 if the Carbon Neutral Report ignores the carbon which will be produced from Carrington Moss? It cannot be ignored and must be addressed? The rest of the policy I am happy with, but I notice that solar farms are not mentioned and neither are wind turbines.

Policy RT2: Decentralised Energy Generation – I agree. I suggest you might look at water powered generation using, for instance, the disused weir on the River Bollin at Warburton.

Policy RT3: Overheating and the Urban Heat Island – I agree. However, greatly increased urban street tree planting would be of considerable assistance and could also be connected with flood water management systems. This is an area requiring considerable initial investment but with considerable benefits. You have mentioned this in item E, but only in respect of Green Infrastructure. It could be extended much further.

Updating and Adapting Existing Buildings

Policy RT4: Sustainable retrofitting – I agree

A New Greener Economy

Policy RT5: Circular Economy – I agree. I suggest major developments should also include sewage waste in the Circular Economy Statement, both during the construction phase and after.

Policy EJ7: Rural Economy

A – This should surely include the long-term economic viability of individual holdings in the event that development should make them unviable. i.e. ensure that their viability is retained by some form of compensatory land being made available?

Monitoring

This should include monitoring carbon release from development on Carrington Moss and the results of remediation through habitat restoration schemes?

Active Travel Routes.

The Trans-Pennine Route does not appear to be mentioned. There are a number of routes which could connect to this with relatively small amounts of engineering works and these need to be encouraged.

Wetlands Nature Improvement Areas

Bizarrely, the NIA boundary cuts straight through the middle of Warburton Moss, the deepest part of which is just outside the boundary. There are considerable opportunities here to recreate wetland which will be missed if not included in this section.

Unfortunately, due to pressure of work I do not have enough time to complete my comments.

E. P. Beckmann

The Housing and Regeneration Agency

Homes England

Strategic Planning
Trafford Council
Trafford Town Hall
Talbot Road
Stretford
M32 0TH

By email: localplan.consultation@trafford.gov.uk

10th June 2025

Dear Sir / Madam

Consultation on the Draft Trafford Local Plan Policies

Homes England Response

As a prescribed body, we would firstly like to thank you for the opportunity to comment on the above consultation.

Homes England is the government's housing and regeneration agency. We will drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places people are proud to call home.

Homes England does not wish to make any representations on the above consultation at this time. We will however continue to engage with you as appropriate and as the Local Plan progresses.

Yours faithfully,

[redacted]

P.P Lucinda Taylor
Head of Planning and Enabling – North West

Homes England
2nd Floor
Three New Bailey
Salford
M3 5AX

Please send all Local Plan and related consultations to [redacted]

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@HomesEngland
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Trafford Town Hall,
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M32 0TH

SENT BY EMAIL
localplan.consultation@trafford.gov.uk
6/12/2025

Dear Planning Policy Team,

TRAFFORD LOCAL PLAN: DRAFT LOCAL PLAN (POLICIES) REGULATION 18

1. Thank you for consulting with the Home Builders Federation (HBF) on the Trafford Local Plan – Draft Local Plan (Policies) Regulation 18 consultation.

2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

3. The HBF notes that paragraph 234 of the 2024 NPPF states that *'for the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply: (c) the plan includes policies to deliver the level of housing and other development set out in a preceding local plan (such as a joint local plan containing strategic policies) adopted since 12 March 2020'*. It goes on to state that where paragraph 234(c) applies the plan will be examined under the relevant previous version of the Framework.

4. We would like to submit the following comments upon selected policies within the Draft Local Plan consultation document. These responses are provided to assist the Council in the preparation of the emerging local plan. The HBF is keen to ensure that Trafford produces a sound local plan which provides appropriate policies for the area. The HBF notes that this consultation relates only to the policies of the draft Trafford Local Plan, and that any site allocations and designations will be the subject of a separate future consultation later in 2025.

Plan Period

5. The Plan Period is identified as 2022 to 2042. The NPPF[1] states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery. The HBF considers that the Council may want to be looking to prepare a new Local Plan that will look forward to at least 2045 to ensure that it covers the 15-year period, they may also want to consider whether any strategic sites require the Council to plan over a longer period for these areas.

Vision and Objectives

6. The vision states that *'Trafford will have met its housing requirement; it will have addressed its acute need for affordable housing to ensure that people have the types of homes that they both want and need'*. Strategic Objective 1 looks to deliver the homes that Trafford Needs.

7. The HBF considers that meeting the current and future housing needs should be a key part of the vision and objectives for the Plan, this includes the housing needs for market housing, family homes, homes for older people and homes for first-time buyers.

Policy ST4: Sustainable Development

8. This policy states that when considering all development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development.

9. The HBF considers that this policy is generally laudable, and elements such as the Council working proactively with applicants to find solutions that mean that proposals can be approved wherever possible without delay are generally supported. However, the HBF would query whether the content of this policy is actually a policy, or a statement of intent. The HBF considers that it is completely unnecessary to state that applications that accord with the policies in this Local Plan when taken as a whole will be granted permission unless material considerations indicate otherwise.

Policy ST5: Climate Change

10. This policy states that development proposals which contribute towards the Council's net zero ambitions and / or mitigate against the impacts of climate change will be supported. It also states that new development 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.

11. The PPG[2] provides examples of mitigating climate change by reducing emissions: through reducing the need to travel and providing sustainable transport; providing opportunities for renewable and low carbon energy technologies; providing opportunities for decentralised

[1] NPPF December 2023 Paragraph 22 / NPPF 2024 Paragraph 22
[2] PPG ID: 6-003-20140612

energy and heating; and promoting low carbon design approaches to reduce energy consumption in buildings. The HBF recommends that the Council seek to ensure that they produce a sustainable Plan which supports a balance of homes and employment and is in line with the guidance provided by the NPPF and the PPG.

12. The HBF generally supports the Council in seeking to minimise carbon emissions and considers that supporting proposals which contribute towards the Council's net zero ambitions is potentially an appropriate way to do this. The HBF does, however, have concerns about how this policy will actually be implemented and how development will be expected to demonstrate how climate change has been considered. The HBF considers that the Council should ensure that this policy is only implemented in line with the December 2023 Written Ministerial Statement[3] which states that *'a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes'*. It goes on to state that '*the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current, or planned building regulations, should be rejected at examination if they do not have a well-reasoned and robustly costed rationale'*.

Policy RT1: Carbon and Energy

13. This policy states that new development must support Trafford Council's commitment for the Borough to be carbon neutral by 2038. It states that all developments should seek to reduce carbon emissions in accordance with the energy hierarchy in JP-S2. The policy goes on to state that development proposals must demonstrate how the design of the scheme has responded to the First Step Priority Areas and the Long Term Priorities set out in the locality policies. The locality policies set first step priorities such as public EV charging hubs and heat pumps in the Northern area and Solar PV and Retrofit in the Southern area. Long-term Priorities include district heat networks, heat pump prevalent zone and hydrogen heat opportunity areas.

14. Policy JP-S2: Carbon and Energy of the PfE sets out the energy hierarchy: Firstly, minimise energy demand; then, maximise energy efficiency; then, use renewable energy; then, use low carbon energy; and finally, utilise other energy sources.

[3] [redacted]

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15. Whilst the HBF would agree with the Council that there is a need to act to reduce carbon emissions and generally considers that the energy hierarchy is an appropriate consideration, we would disagree that this needs to be undertaken through the local plan. The HBF has been working with Government through the Future Homes Hub to develop a route map to ensuring new homes are zero carbon ready, and given that the Future Homes Standard (FHS) is expected to implemented in the near future, this national standard will mean that all homes will emit no carbon once the national grid decarbonises. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the county, in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensures that improvements to building standards are actually deliverable from the point at which they are introduced.

16. The HBF does, however, have concerns about how this policy will actually be implemented and how development will be expected to demonstrate how they have responded to the first step priority areas and the long term development areas. The concerns as to the deliverability of alternative ad hoc local standards are reflected in the December 2023 Written Ministerial Statement[4], which remains relevant planning guidance. The WMS notes for example that *'compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes'* and that local standards can *'add further costs to building new homes by adding complexity and undermining economies of scale'*.

17. Therefore, whilst HBF considers the most effective approach to reducing carbon emission for new homes, whilst maintaining the delivery of those homes, is through building regulations, if the Council chooses to require a higher standards it must ensure that development not only remains viable but that the approach chosen will not impact on delivery. It must be able to show that there are the requisite skills in the labour market and supply chains in place for key products to ensure that delivery of new homes in the short and medium term is not affected. As set out previously, the PPG sets out how the Local Plan can mitigate climate change by reducing emissions through reducing the need to travel, providing opportunities for renewable and low carbon energy technologies, providing opportunities for decentralised energy and heating and promoting low carbon design approaches. It does not suggest that this is done by setting additional local standards for homes over and above those already set in national policy and through building regulations.

Policy RT2: Decentralised Energy Generation

18. This policy states that all major developments within Heat and Energy Network Opportunity Areas must assess the feasibility of connecting to an existing or planned decentralised energy network. It goes on to state that major developments that do not connect to a network will be required to contribute financially to the Council's decentralised energy initiatives in the area. The locality policies identify the Heat and Energy Network Opportunity Areas.

[4] [redacted]

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19. The HBF notes that decentralised energy networks are not always compatible with the Future Homes Standard (FHS). Its suitability needs to be considered on a site-by-site basis based on the specific site constraints. The HBF notes this is also often a very ineffective policy, which is unpopular with residents, locking them into expensive to maintain systems, without the ability to switch to alternative suppliers.

20. The HBF could find not find any evidence that the Council has considered the impact of this policy on the delivery of new homes, including the skills, supply chains and capacity available to ensure these standards can be delivered whilst maintaining the delivery of new homes as set out in the housing trajectory. For example, the HBF would have expected some consideration to have been undertaken as to whether there is sufficient grid capacity to cope with the increase amounts of decentralised energy that will be fed into the national grid during the period when there is excess electricity generation compared to what is being used. Should there be a need to increase grid capacity as a result of these policies there is a risk that new development will be hindered by a lack of grid capacity to export power.

21. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies.

22. Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, a consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies.

Policy RT3: Overheating and the Urban Heat Island

23. This policy states that all new developments must be designed to minimise overheating risks and reduce reliance on active cooling systems, such as air conditioning. The policy goes on to state that where feasible, developments should include green roofs, vertical gardens, and strategic tree planting to provide cooling.

24. To be consistent with national policy, the HBF requests that the Council rely on the Building Regulations process as the way to minimise overheating and reduce reliance on active cooling systems, and as such suggest that this policy does not need to be included in the Local Plan. The HBF considers it would be appropriate to make reference to the Future Homes Standard and Part O (overheating) of the Building Regulations as the appropriate standards for development.

25. The HBF notes that green roofs and walls can add significant weight to the building structure particularly when saturated with water, and require significant maintenance to ensure their continued benefits. As such they are not always the most sustainable option for development, and this should be a consideration for the Council in looking to take this element of the policy forward.

Policy RT5: Circular Economy

26. This policy suggests that all developments should use resources efficiently, follow circular economy principles and aim to achieve net zero waste. It sets five criteria that major development must undertake these include utilising materials with a low embodied carbon content and submitting a Circular Economy Statement.

27. National planning policy is silent on the issue of embodied carbon standards as are building regulations. The HBF would therefore question why the Council consider that this policy is necessary in Trafford. The HBF considers it is best that such matters are addressed at a national level to avoid different approaches and standards being set in different areas. The housebuilding industry is working with the Future Homes Hub to develop a roadmap to reducing embodied carbon and whilst Councils may want to go further and faster the HBF have concerns that this will impact on the deliverability of development with a disproportionate impact on SME developers. Given that the Government has been clear that it does not want to see a proliferation of different standards across the country, the HBF would suggest that the approach being taken by the Council in setting such a standard is not consistent with the approach advocated in the WMS[5].

28. The HBF is also concerned that planning may be too early in the building process to fully assess the carbon impact of a design. It may be that further decisions are made post planning, which do not require further consent which would impact on the carbon emissions. The HBF considers that if the Council is to introduce a policy in relation to embodied carbon it will have to closely consider how it will be monitored and what the implications are for the preparation of any assessment, particularly in relation to how easily accessible any data is. The Council will also have to consider how the policy will interact with other policies for example in relation to design, energy efficiency or resilience to heat, as well as the viability and delivery of development.

29. The HBF would be interested to know which officers within the Council will be considering the Circular Economy Statement, and what knowledge and skills they have to make a judgement on this Statement. How will the decision-maker determine if the Statement is appropriate and implementable. The HBF would also be interested to know how the Statement will be monitored and enforced, and at what stage any action would be taken.

[5] [redacted]

30. The HBF considers that if this policy were to be introduced then the Council should provide a transitional period to give the industry time to adjust to the requirements, to upskill the workforce as needed and for the supply chain to be updated or amended as required.

31. The HBF also considers that this requirement should not apply to all developments and should recognise the scale of development in relation to the significant requirements of this policy.

Policy R1: Housing Delivery

32. This policy states that between 1 April 2022 and 31 March 2042 (the plan period) a minimum of 22,443 net additional dwellings will be delivered in Trafford. The phasing of Trafford's housing requirements is stepped across the Plan period at an average of 1,122 dwellings per annum (dpa). The Council proposed to deliver 817dpa in the period 2022-2025, 1,122dpa in 2025-2030, and 1,224dpa in the period 2030-2039 and 1,122dpa in the period 2039-2042.

33. The Places for Everyone (PfE) document identifies a housing requirement of 1,122 dpa. This is stepped with 817dpa in the period 2022-25, 1,122dpa in the period 2025-30 and 1,224 in the period 2030-39. The Plan notes that as a joint plan the PfE document has redistributed some of Trafford's housing needs amongst other districts to reflect the availability of land and strategic priorities for the conurbation.

34. The HBF considers that the Council should plan for growth, this would be in line with the NPPF[6] which states that Plans should be prepared positively, in a way that is aspirational but deliverable. The HBF notes that the local housing need (LHN) as identified by the current standard method is 1,599dpa, this is an increase from the LHN identified under the previous standard method of 1,399dpa and an increase from the housing requirement set out in the PfE document. The HBF does not consider that it is appropriate for the Local Plan to continue with the lower housing requirement from the Places for Everyone document post the end of the PfE Plan period. The HBF considers that at that point this Plan should revert to the figures identified by the Standard Method. The HBF considers that this would be in line with the NPPF seeking to Plan in a positive manner, and in line with the Building the Homes we Need Written Ministerial Statement in relation to taking the tough choices needed to improve affordability, turbo charge growth and build the 1.5 million homes the Government have committed to deliver. This would increase the housing requirement in the period 2039-2042 to 1,599dpa, and increase the overall housing requirement to 23,874 dwellings.

35. The justification text sets out the distribution of development between each locality, it suggests 18,704 net additional homes in the North, 3,860 homes in the South, 677 homes in the Central area and 5,072 homes in the West.

[6] NPPF 2023 Paragraph 16

36. The HBF considers that the distribution of development can only be considered appropriate, if it ensure that the vision, aims and objectives are met and housing needs for all members of the local community are met. In order for the distribution to be appropriate, it may be that the Council needs to ensure flexibility in distribution so that all of the housing needs of all groups of the local community are met, these include those that need affordable housing, family housing and housing suitable for older or disabled people. It may also be that whilst there is a focus on previously developed sites within the existing urban areas that this does not prevent development elsewhere within the Council area, particularly where it helps to meet housing need eg family housing or affordable homes.

37. The HBF considers that whilst it is appropriate to support the use of previously developed sites and to give weight to the value of using brownfield sites this needs to be done in the right way and should not prevent the delivery of other sustainable sites or sustainable developments. The Council will need to be able to demonstrate with evidence that this strategy is deliverable and developable over the Plan period, will meet the varied housing needs and will not lead to a shortage of homes being delivered.

Policy R3: Affordable and Social Housing

38. This policy states that all major residential developments will be required to provide on-site affordable housing, with a tenure mix of 60% rented (40% social rent and 20% affordable rent) and 40% affordable home ownership. The locality policies set the required affordable housing providing ranging from 25% in Trafford North to 45% in Trafford South. The policy goes on to state that a minimum of 10% of affordable homes must be Totally Affordable Net Zero (TANZ) homes.

39. The HBF notes that the Council has not undertaken a Viability Assessment at this point, and that it will be undertaken to support the next stage in the production of the Local Plan. The HBF supports the need to address the affordable housing requirements of the borough. The NPPF[7] is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The HBF considers that the Council will need to thoroughly test the viability of any affordable housing requirement to ensure that it is deliverable alongside the other policy requirements in this Plan.

40. The HBF considers that it is appropriate for the Council to plan for the affordable needs of its community, and to ensure that it does this in line with the requirements in the NPPF[8]. This should ensure that any affordable housing requirements are clearly set out, and are evidenced as viable through an assessment, and that flexibility is provided within the policy where viability may be an issue. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery.

[7] NPPF2024 paragraph 35
[8] NPPF 2024 paragraph 63 - 66

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41. The HBF is concerned by the requirement for 10% of affordable homes to be provided as Totally Affordable Net Zero (TANZ) homes. The HBF also notes that the definition of a TANZ homes is not provided within the Plan, and that this could be an issue for the implementation of this policy. The HBF is concerned about the additional extra costs that this will add to the viability of homes. The HBF considers that this element of the policy should be deleted.

Policy R4: Size and Type of New Homes

42. This policy states that all new residential development proposals must deliver a range and mix of dwelling sizes and types in accordance with the relevant Locality policy. The policy goes on to state that the Council will not support major development applications which would result in an over concentration of a particular dwellings size or type, where they do not meet an identified local need. There is only one locality policy and this is for Trafford North where development within the wards of Old Trafford, Gorse Hill and Cornbrook will be primarily apartment-led schemes, with 80% apartments and 20% ground floor duplexes.

43. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; requiring a mix that does not consider the viability of the site; or requiring the applicant to provide significant amounts of additional evidence. The HBF would expect the Council to ensure that the policy is applied flexibly and makes allowance for home builders to provide alternative housing mixes as is required by the market.

44. The HBF is concerned that the Plan will not meet the housing needs of all members of the community. The HBF notes that the justification text for Policy R1 sets out the distribution of development between each locality, with a focus for development in the North with 18,704 dwellings in this area, this equates to 83% of the housing requirement. The HBF also notes that this policy looks for major development in several wards in the North to be apartment-led with 80% apartments. Whilst the affordable housing policy looks for proposals within Trafford North to provide 25% affordable housing, this is the lowest of the affordable housing requirements. The NPPF[9] is clear that the size, type and tenure of housing need for different groups in the community should be considered and reflected in planning policies these include those that require affordable housing, families with children, older people and people who wish to build their own homes. The HBF does not consider that the Plan provides for the needs of those seeking affordable homes or family homes.

Policy R5: Housing Density

45. This policy refers to PfE JP-H4, and identifies the designated town centres and other designated centres, in line with the PfE policy. The policy also states that the minimum density

[9] NPPF Sept 2023 paragraph 62

requirements across Trafford are shown on Figure 4-1. The density requirements range from 120 dwellings per hectare (dph) to 35 dph.

46. The HBF notes that Policy JP-H4: Density of New Housing of the PfE states that new housing development should be delivered at a density appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport. It suggests that minimum densities range from 120 dwellings per hectare (dph) within 400m of rail stations and Metrolink stops and in designated town centres to 35dph in all other locations.

47. Therefore, the HBF does not consider that this policy is required, and instead it would be beneficial to signpost to the PfE document in relation to density requirements, as part of explanatory text in the Plan. Unless, the Council has more up to date evidence and wishes to provide a more up to date policy within its own Local Plan.

Policy R6: Older Persons Accommodation

48. This policy states that the Council will seek to meet the needs of older persons through the provision of approximately 4,500 homes of the overall housing land target to be developed as new housing for older persons households, including approximately 2,500 C3 homes, 1,000 C2 extra care homes and 600 C2 residential bed spaces.

49. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. Whilst there is general support for such development, the HBF would recommend that the Council should be more proactive in working with providers of this type of development to identify appropriate sites for allocation. This approach would provide far more certainty to the council that the need for such accommodation will be met in full. The HBF considers that the Council should note the difference between homes suitable for older people and specialist housing for older people, and the difference in need and demand for these types of homes.

50. The PPG[10] states that the need to provide for older people is critical, and that offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. It goes on to state that Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people and that Plans need to provide for specialist housing for older people where a need exists[11]. It also notes that allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. As such, the HBF considers that the Council needs to work closely with the providers of older persons housing to identify appropriate sites or to provide appropriate policies.

[10] PPG ID: 63-001-20190626
[11] PPG ID: 63-006-20190626 & ID: 63-012-20190626

51. The policy states that major development of 10 or more dwellings (or equivalent C2 care bed spaces) will need to be in accordance with the affordable housing requirements set out in Policy R3. However, the HBF considers that Older persons' housing differs from main-stream housing with key variables such as build costs, marketing and sales periods, unit size, non-saleable community space, empty property costs and benchmark land values. These all affect viability and it is inappropriate to apply generic affordable housing targets, especially without appropriate viability testing.

Policy R7: Adaptable and Accessible Housing

52. This policy states that in accordance with PfE policy JP-H3 all new dwellings must be built to the accessible and adaptable standard in Part M4(2) unless specific site conditions make this impracticable. It also states that proposals of 50 or more homes will be required to provide at least 4% of new homes to be built to Part M4(3) wheelchair accessible and adaptable standard. The Council encourages and supports the use of 'Lifetime Homes' design standard.

53. The HBF notes that Policy JP-H3: Type, Size and Design of New Housing of the PfE states that all new dwellings must be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations unless specific conditions make this impracticable.

54. If the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. PPG[12] identifies the type of evidence required to introduce a policy seeking the use of the M4(3) standard, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Trafford which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.

55. The PPG[13] also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access can not be achieved or is not viable.

56. The HBF considers that if the Council has the evidence to introduce this policy, it may want to consider the most appropriate way to deliver the homes they require to meet their needs. The HBF considers that this may not always be in the form of M4(3) homes, and may need further consideration.

[12] PPG ID: 56-007-20150327
[13] PPG ID: 56-008-20160519

57. Part C states that the Council will encourage the delivery of homes which meet Lifetime Homes standards. The Council will probably be aware that the Lifetime Homes standard is no longer applicable following the Government's Housing Standards review. Lifetime Homes have now been replaced by the optional Building Regulations accessibility standards (M4(2) and M4(3)).

Policy R11: Self-Build and Custom Housing

58. This policy states that on sites of more than 100 houses at least 5% of dwellings will be made available as serviced plots for sale to custom builders. It goes on to state that each custom build plot must be marketed for at least 24 month period, and suggests that where plots remain unsold after the marketing period they will either be further marketed or will be transferred to a Registered Provider for the provision of affordable housing.

59. The HBF would be keen to understand the evidence to support the need for custom and self-build housing in Trafford, and how it has informed the requirements of Policy R11. The PPG[14] sets out how custom and self-build housing needs can be assessed. The justification text suggests that they are 294 applicants as of 30th October 2024 on the Trafford Self Build Register, with just under half of those registered currently living outside of Trafford. There is no evidence in relation to the existing provision of self-build and custom-build homes.

60. The HBF does not consider that the Council has appropriate evidence to support the requirement for developers on sites of 100 dwellings or more to provide at least 5% of all new homes as service plots for custom or self-build housing. The HBF is concerned that as currently proposed this policy will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes.

61. The PPG[15] sets out how local authorities can increase the number of planning permissions which are suitable for self and custom build housing. These include supporting neighbourhood planning groups to include sites in their plans, effective joint working, using Council owned land and working with Home England. The HBF considers that alternative policy mechanisms could be used to ensure a reliable and sufficient provision of self & custom build opportunities across the Borough including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.

62. Part D of this policy states that each plot must be marketed for at least 24 months and where plots remain unsold after the marketing period they will either be further marketed for a period as agreed by the LPA or will be transferred to a Registered Provider for the provision of affordable housing at affordable housing land values. The HBF considers that there

[14] PPG ID: 67-003-20190722
[15] PPG ID: 57-025-20210508

is no reason to require a site to be retained on the open market following the 24-month period nor is there any justification for having to transfer these plots to a registered provider. These are plots that would have been available for market housing and as such they should return to the developer to be built out after the marketing period. The Council should therefore amend the policy accordingly.

63. The HBF agrees that if demand for plots is not realised, it is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible from the commencement of development because the consequential delay in developing those plots presents further practical difficulties in terms of coordinating their development with construction activity on the wider site. The HBF suggests if this element of the policy is retained it is amended to 6-months rather than 24-months.

Policy TM10: Parking Standards

64. This policy states that new development will be expected to make provision for electric vehicle charging infrastructure, with all dwellings with a dedicated garage or driveway parking space providing access to electric vehicle charging infrastructure for at least one vehicle and for residential developments with shared parking areas there will be a requirement for active EV charging facilities.

65. The HBF considers that the provision of electric vehicle charging capability is unnecessary as Part S of the Building Regulations now provides the requirements for Electric Vehicle charging in residential developments, including identifying where exceptions may apply. The HBF considers that it is important that the Council does not set its own standards for development which may differ from the approaches set out in other consenting regimes.

Policy GI6: Green Infrastructure in New Developments

66. This policy states that all development proposals must demonstrate how they will contribute to the protection, enhancement (including quality and/or the multi functionality), and expansion of the Green Infrastructure network. It goes on to state that all development proposals must demonstrate how they will contribute to the protection, enhancement (including quality and/or the multi functionality), and expansion of the Green Infrastructure network. It states that, that plan will be required to include an Urban Greening Factor (UGF) demonstrating a UGF score of 0.4 as a minimum for residential development on brownfield development sites and 0.5 as a minimum for residential development on greenfield development sites.

67. Natural England has developed an Urban Greening Factor for England, as one of a suite of five Headline Green Infrastructure Standards within the Green Infrastructure Framework – Principles and Standards for England[16]. The Urban Greening Factor (UGF) is a planning tool

[16] Urban Greening Factor for England – Development and Technical Analysis - Green Infrastructure Framework - Principles and Standards for England (January 2023) h[redacted]

to improve the provision of Green Infrastructure (GI) particularly in urban areas. The HBF notes that this document suggests a target UGF score of 0.4 for predominantly residential development, it also sets out proposed UGF Surface Cover Weightings.

68. The HBF considers that if the Council wishes to include a policy on urban greening it will need to justify the requirement set, it is not clear what evidence has been used to justify the requirements for an UGF of 0.4 or 0.5. It will also need to consider how this could impact on the viability and deliverability of sites going forward. The HBF recommends that if the Council chooses to take a UGF policy forward it should ensure that this policy is applied flexibly taking into account other considerations such as the density of development, embodied carbon, design, energy efficiency, proximity to open spaces, local character, and other site-specific elements. It may be that in some cases the urban greening target means that other policy requirements cannot be met or become significantly more costly.

Policy GI7: Trees, Woodland and Hedgerows

69. This policy states that for major development a Tree Canopy Cover Assessment must be provided that demonstrates how the development will incorporate trees on site and where there is no existing tree canopy cover provide a minimum of 20% tree canopy and where there is existing tree canopy cover provide a minimum increase of 10% tree canopy cover.

70. The HBF is concerned that there is a considerable tension between the proposed density requirements for development, the design policies of the Plan and the need for 20% tree canopy cover or an increase in 10% tree canopy cover. The HBF is concerned by the tree canopy policy proposed, this could have significant potential implications in terms of viability of the development, not only due to the tree provision costs but also in terms of efficient land use, site layout and highways considerations. The HBF considers that it will be important for the Council to gather appropriate evidence in relation to this policy that considers its practical implementation, and how it sits alongside other plan requirements.

Policy GI10: Building Biodiversity into New Developments

71. This policy states that all development proposals should seek to enhance biodiversity beyond the minimum mitigation requirements, where appropriate and practical. It goes on to state that all new development will be expected to incorporate measures to support biodiversity where appropriate and practical.

72. The HBF does not consider it is appropriate for this policy to seek to enhance biodiversity beyond the minimum mitigation requirements. In considering the soundness of this policy it is necessary to consider paragraph 74-006-20240214 of PPG which states that:
"… plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented".

73. It is important to note that the starting point is that the Local Plan should not seek a higher requirement. This is different to a permissive policy allowing local plans to seek a higher level of BNG where justified, and the HBF would argue that it should be considered a high bar with regard to the evidence required to justify such a policy.

74. Turning to the delivery of a biodiversity requirement it is necessary for the Council to recognise that BNG is site specific depending on both the existing site characteristics and the ability of development to both mitigate and provide additional gain without an understanding of the baseline level of biodiversity it is difficult to gauge the cost of meeting the higher requirements in this local plan. Whilst broad assumption can be used it must be remembered that the level of BNG required could be significantly higher than expected increasing costs or substantially reducing developable area of a site. However, without a viability report it's not possible to comment on whether this biodiversity requirement is viable.

Policy WA4: Water Efficiency

75. This policy states that all new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.

76. The HBF does not consider that it is necessary for development to adopt, as a minimum, measures to limit water usage including the implementation of the optional technical standards for water efficiency. The optional water standard is 110 litres per person per day, the Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure.

77. A policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG. PPG[17] states that where there is a *'clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day'*. PPG[18] also states the *'it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement'*. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The North West and Trafford are

[17] PPG ID: 56-014-20150327
[18] PPG ID: 56-015-20150327

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not considered to be an area of Water Stress as identified by the Environment Agency[19]. Therefore, the HBF considers that requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability and should be deleted.

Policy CT5: Social Value in New Developments

78. Many residential developments will bring with them social benefits, through the provision of new more sustainable homes and potentially through the provision of affordable homes and other infrastructure provided through planning obligations. In 2024 the HBF and Lichfields' produced a report on The Economic Footprint of House Building in England and Wales[20] this document not only highlighted the economic benefits but also the social benefits. It highlighted that in 2023 house building created nearly 834,000 jobs, supported 6,000 apprentices, 900 graduates and 3,300 other trainees, provided £10.8bn of new affordable homes, £1.5bn provided for infrastructure including £677m on new and improved education facilities, £216m invested in open space, youth, community, sport and leisure facilities and an additional £6.8bn spent in local shops and services by residents of these new homes.

79. This policy requires major development proposals to use local labour and training agreements through planning obligations and other mechanisms where appropriate. The HBF considers that the Council will need to consider how this would work for the home building industry, particularly in relation to the construction period and what this would mean for longer term job stability. Whilst increasing the numbers of people working in the construction industry, along with upskilling and increasing the diversity of the workforce is a top priority for the HBF, this needs to be done in the right way.

80. The HBF Industry Attraction and Skills Team already works with home builders in relation to employment and skills, this includes ensuring that the skills levy that housebuilders pay to the Construction Industry Training Board is deployed effectively to increase the number of people entering the industry and the quality of the skills training they receive.

81. The HBF considers that the Council will also need to consider the costs that would be associated with this policy and ensure that it is considered as part of the viability requirements. This may have a particular impact on the SME builders in the area who may not have the job opportunities available or the resources to provide appropriate training.

Policy BE10: Digital Connectivity

82. This policy states that all new development will be required to incorporate full fibre connections, including ducting to industry standards for efficient connections to existing networks, unless it can be proven that it is technically unfeasible.

[19] 2021 Assessment of Water Stress Areas Update: [redacted]

83. The HBF considers that a policy that would generally encourage and support the provision of digital connectivity could be appropriate, however, any requirements on developers should not go beyond the provision of infrastructure as set out in the statutory Building Regulations. The HBF considers that the Council should work closely with the providers of digital infrastructure, to ensure that appropriate provision is provided, and that the onus is placed on those who can actually provide the appropriate infrastructure. The HBF does not consider that it is necessary to provide a policy to incentivise the development industry, the industry is already well aware of the benefits of infrastructure and the requirements of those looking to purchase a new homes and can self-police the cost/benefit of this provision with regards to site viability.

Monitoring

84. The HBF notes that PfE include a Monitoring Framework and that the Local Plan includes a monitoring section at the end of each chapter. The HBF notes that the monitoring Framework within the Local Plan only includes an Indicator and Target. The HBF recommends that the Council include an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. The HBF recommends that the Council provide details as to how the Local Plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.

Viability

85. The Council will also need to ensure that they have considered viability, viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative costs of all relevant policies will not undermine deliverability of the Plan. The Council needs to ensure that policy requirements should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned development to be deliverable without need for further viability assessment at the decision-making stage.

Future Engagement

86. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

87. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

Home Builders Federation
HBF House, 27 Broadwall, London SE1 9PL
T: 0207 960 1600 | E: info@hbf.co.uk | hbf.co.uk

Registered in England and Wales Registered office: HBF House, 27 Broadwall, London SE1 9PL Company Reg No 0276 4757 | Vat No 882 6294 86 | Printed on recycled paper ♻

HBF Home Builders Federation

[redacted]

Joanne Harding
Planning Manager – Local Plan (North)
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The Planning Bureau Limited

Bournemouth • Coventry • Hatfield • Manchester • Ringwood • Woking • York

Strategic Planning,
Trafford Council,
Trafford Town Hall,
Talbot Road,
Stretford,
M32 0TH

Via email: localplan.consultation@trafford.gov.uk 10th June 2025

Dear Sir / Madam

McCARTHY STONE & CHURCHILL LIVING RESPONSE TO THE TRAFFORD LOCAL PLAN REGULATION 18 CONSULTATION

Thank you for the opportunity to comment on the draft Trafford Local Plan.

McCarthy Stone (MS) and Churchill Living (CL) are independent housebuilders specialising in specialist housing for older people. Together, they are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing. Both operators are therefore well placed to provide comment on the policy barriers that may have the potential to restrict supply within the sector.

Please find below our comments on the draft local plan insofar as they impact the delivery of specialist accommodation for older persons. These comments are intended to assist the council in formulating approaches which are both workable in practice and avoid stymying the delivery of a housing typology which the PPG describes as 'critical' in terms of addressing housing need.

Policy ST5: Climate Change
In order to ensure that any policy requirement to mitigate against the impacts of Climate Change is achievable and viable, it should be 'stepped' in line with Government targets and the building regulations. The entire industry needs to adjust to zero carbon requirements in line with the advancement of technology, scaling up and economies of scale. Where policies seek to go beyond this curve, there is a danger that these requirements result in a significant reduction in housing delivery within those areas due to financial viability constraints.

This approach is confirmed within the Ministerial Statement (statement no : Statement UIN HCWS123 available from Written statements - Written questions, answers and statements - UK Parliament) released on 13th December 2023. The ministerial statement confirms that with respect to the net zero goal….

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'*The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale'* and '*To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one'*.

Recommendation

The policy should be amended in line with Government targets and Building Regulations

Policy RT1: Carbon and Energy

As per our response in respect of question 2-5 any policy requirement for development proposals to mitigate against the impacts of Climate Change should be 'stepped' in line with Government targets and the proposed changes to the building regulations, to ensure that any requirement is achievable and viable.

Recommendation

The policy should be amended in line with Government targets and Building Regulations

Policy RT2: Decentralised Energy Generation

The policy specifies that all major developments within Heat and Energy Network Opportunity Areas must assess the feasibility of connecting to an existing or planned decentralised energy network, in accordance with the requirements of PfE Policy JP-S3 Point C. of the policy states that major developments that do not connect to a network will be required to contribute financially to the Council's decentralised energy initiatives in the area.

Decentralised energy networks are not always compatible with the Future Homes Standard (FHS) and are unsuitable for Older Persons' Housing. This form of energy generation is also unpopular with residents as it removes opportunities to switch to cheaper suppliers when/if appropriate. The cost implication of the policy should be factored into the viability testing for the different housing typologies.

Recommendation

The policy should be amended in line with Government targets and Building Regulations

Policy RT5: Circular Economy

The policy requires major development to submit a Circular Economy Statement. However, insufficient detail is provided to assess how this policy will be implemented, or indeed by whom the Statement would be assessed. Again, we refer to the Ministerial statement of the 13th December 2023 which states that '*the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations'.*

Recommendation

The policy should be amended in line with Government targets and Building Regulations

Policy R3: Affordable and Social Housing

Policy R3 says that all major residential developments will be required to provide on-site affordable housing. Although we appreciate this consultation is an early stage of plan production, we note that no supporting viability evidence has been published. A Viability Assessment will be a crucial element of the evidence base informing policy and deliverability directly, and must be open to scrutiny and comment.

Paragraph 59 of the NPPF places increased emphasis on Local Plan viability testing and the Viability PPG states that "*The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan"* (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the council's planning obligations and building requirements should therefore be robust and ensure it includes all policies not just the affordable housing requirement. In addition, once the viability assessment is drafted this must be consulted on alongside any affordable housing requirement to be set prior to any submission draft being published.

One of the key risks in bringing forward proposals for older persons housing development is the general expectations in relation to affordable housing and other planning obligations which inevitably lead to viability negotiations. This aspect of a planning application is often uncertain and protracted and is a key risk for investors in the sector given the issue is technical and often misunderstood by key stakeholders. Expectations should therefore be established appropriately at the plan level in line with NPPG requirements.

The viability of specialist housing for older people is more finely balanced than 'general needs' housing **and we are strongly of the view that these housing typologies should be robustly assessed separately to mainstream housing**. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. "*A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period*. If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion about other policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need.

We would direct the Council towards the Retirement Housing Consortium paper entitled 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 ('RHG Briefing Note'). The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods and significantly variable benchmark land values.

With the difference in viability to mainstream housing it would be inappropriate for the council to apply generic affordable housing targets to older persons housing. Rather, a bespoke affordable housing policy with a reduced requirement is appropriate.

We have engaged in considerable local plan representations over a number of years and can point to several recently adopted or emerging local plans where suitable bespoke affordable housing policies have been brought forward.

We would draw the Council's attention to Paragraph 5.33 of Policy HP5: Provision of Affordable Housing in the now adopted Fareham Borough Local Plan which advises that:

> *5.33… The Viability Study concludes that affordable housing is not viable for older persons and specialist housing. Therefore, Policy HP5 does not apply to specialist housing or older persons housing.*

Furthermore, policy in Swale exempts older persons housing from affordable housing in light of viability constraints and emerging policy in BCP, Birmingham and Charnwood also exempt older persons housing from the provision of affordable housing.

BCP

> *The Local Plan viability assessment indicates that for greenfield sites we can continue to seek 40% affordable housing provision on site. For brownfield sites we will seek 10-15% affordable housing, but due to viability, this will not apply in Bournemouth and Poole town centres, or for specialist forms of housing (e.g. build to rent, student housing, care/nursing homes (Use Class C2) or for retirement housing (sheltered housing) and extra care (assisted living) housing (both Use Class C3).*

Birmingham

> *"Due to the specific viability challenges of delivering older persons' housing, the evidence suggests on the basis of the market research, appraisal inputs and policy requirements, Older Person's Housing is exempted from Affordable Housing provision".*

Charnwood

> *"Our viability evidence shows that neither sheltered housing nor extra care housing developments are likely to be viable if a contribution towards affordable housing is sought".*

The respondents are of the view that similar conclusions would be made in this case in respect of housing for older people whereby a reduced or even zero affordable housing requirement would be more appropriate.

Recommendation

We strongly recommend that for any policy requirement for older persons' housing to provide affordable housing to be considered justified, a viability assessment should be run for sheltered and extra-care housing using the assumptions set out within the RHG guidance. These assumptions reflect the inputs and assumptions consistently agreed on a site-by-site level and are therefore appropriate to apply as part of a plan wide viability assessment.

Our extensive experience is that the viability of specialist housing for older people will differ from mainstream housing. Policy targets which reflect actual viability constraints will allow providers of specialist housing for older people to derisk the planning process and provide confidence for investors in the sector.

Point C. of Policy R3 states that a minimum 10% of affordable homes must be Totally Affordable Net Zero (TANZ) homes. The Plan does not define 'TANZ' homes and therefore the policy is unclear. It is also unjustified and as it will involve additional costs that have not been the subject of any viability testing.

Recommendation

Delete Point C

~~*C. A minimum 10% of affordable homes must be Totally Affordable Net Zero (TANZ) homes*~~

Policy R4: Size and Type of New Homes

Policy R4 requires all new residential development proposals to deliver a range of dwelling sizes and types. It says that the Council will not support applications for major development that would result in an over concentration of a particular dwelling size or type, where they do not meet an identified need. In view of the nationally recognised critical need for OPH, as well as an identified local need, it is appropriate to specifically state that OPH will be supported by the Council.

Recommendation

Amend Point C as follows:

C. The Council will not support applications for major development which would result in an over concentration of a particular dwelling size or type (based solely on bedroom numbers), where they do not meet an identified local need. The Council will support applications for Specialist Older Persons' Housing as meeting an identified local need.

Policy R6: Older Persons Accommodation

Point B of the policy says that the Council will *'seek to meet the needs of older people through the provision of approximately 4,500 homes of the overall housing land target to be developed as new housing for older person households. This includes approximately **2,500** C3 homes, **1,000** C2 extra care homes and **600** C2 residential care bedspaces'.*

However, the Housing Need Study (HNA) September 2023 (arc[4]) says that the additional need for specialist Older Persons' Housing includes: ' **2,662** C3 dwelling units, **1,104** C2 Extra Care units and **673** C2 residential care bedspaces'. The correct figures of the HNA should be reflected in the Policy otherwise there is a loss of over 300 units when the HNA specifically states that '*There is a particular need for leasehold sheltered housing, enhanced sheltered housing and Extra Care housing for sale*.

Recommendation

Amend Point B to include the correct figures:

Council will 'seek to meet the needs of older people through the provision of approximately 4,500 homes of the overall housing land target to be developed as new housing for older person households. This includes approximately <u>2,662</u> C3 homes, <u>1,104</u> C2 extra care homes and <u>673</u> C2 residential care bedspaces'.

Point C of the emerging policy requires major development of 10 or more dwellings to comply with the affordable housing requirements set out in policy R3.

We refer back to our commentary to Policy R3 Affordable Housing as set out above. Across the country it has been commonly found completely unviable to expect specialist housing to also provide affordable housing, as demonstrated by the various policy examples set out within this representation.

Recommendation

Remove Point C until further testing has been undertaken and it is subsequently confirmed whether affordable housing is viable or not for this housing typology.

~~Major development of 10 or more dwellings (or equivalent C2 care bed spaces) will need to be in accordance with the affordable housing requirements set out in Policy R3~~

Question 4-12 Should the Local Plan set a definition for what constitutes a Care Home, Extra Care and Assisted Living? If so, what should they be defined as?

Recommendation

Definitions should be set in accordance with NPPG Housing for Older and Disabled People.

Policy R7 Adaptable and Accessible Housing

Point C. says that the Council encourages and supports the use of 'Lifetime Homes' design standard to ensure homes are accessible and adaptable.

The Council will probably be aware that t*he government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes. The government set out its policy on the application of these standards in decision taking and plan making in a written ministerial statement,*

Lifetime Homes have now been replaced by the optional Building Regulations accessibility standards M4(2) and M4(3)and the term Lifetime Homes is no longer applicable. The council however should be aware that delivering homes to M4(2) and M4(3) standards has a cost implication and any requirement should be included as an additional cost is any forthcoming viability study.

The Council is, however, correct in the accompanying text to the policy referring to standards such as Happi as guidance. It should be made clear in the accompanying text that the guidance is an aspiration and not a requirement.

Policy GI10: Building Biodiversity into New Developments

The policy seeks to secure enhanced biodiversity beyond the minimum mitigation requirements, where appropriate and practical. The Council is reminded that this is contrary to paragraph 74-006-20240214 of NPPG which states:

> *"… plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented".*

As such no evidence has been provided on need or impact on viability the policy should be amended so that it only requires a minimum of 10% net gain in line with legislation.

Recommendation

The policy should be amended in line with NPPG

Policy GI6: Green Infrastructure in New Developments

The Council is reminded that it will be important to assess the cost of this policy when testing the viability of the various housing typologies, including for Older Persons' Housing. The policy may affect the viability and deliverability of OPH.

Policy CT5: Social Value in New Developments

The policy requires all major development to enter into local labour and training agreements through planning obligations and other mechanisms where appropriate. However, this requires agreement to an unspecified percentage target for local labour as well as a commitment to an agreed proportion of local procurement of services and supplies. Both requirements are ambiguous and, particularly in the case of local procurement of services and supplies, there is no evidence provided to justify the requirement, or acknowledgement of the additional cost involved. Again this may adversely the affect viability and deliverability of much needed OPH.

Policy GI7: Trees, Woodland and Hedgerows

For major development the policy states that where there is no existing tree canopy cover, proposals must provide a minimum of 20% tree canopy cover (upon maturity) across the whole site area;

NPPF para 16. identifies that 'plans should b) be prepared positively, in a way that is aspirational but deliverable'. Para 136 provides guidance specifically associated with trees and states 'Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-led, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users'.

Requiring a 20% tree canopy cover, especially for small brownfield sites is not deliverable or realistic and could compromise sustainability development and is therefore contrary to NPPF. Any requirement would also need to be fully evidenced, and the requirement incorporated into the viability study.

Recommendation

The council should therefore reconsider this element and ensure any such policy approach introduces more flexibility or is deleted.

Policy IP1: Infrastructure Delivery and Planning Obligations.

Recommendation

In response to Point F which deals with financial contributions in-lieu of on-site provision any contribution must meet the requirements set out in para 58 of the NPPF and CIL Reg 122(2)

> *Para 58: Planning obligations must only be sought where they meet all of the following tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development.*

Any obligations including off site commuted sums should also address Paragraph: 004 Reference ID: 23b-004-20190901 of the NPPG Planning obligations - GOV.UK. The Trafford Plan will therefore need to set out a commuted sum in lieu of on site AH tariff and test this within their local plan viability study to demonstrate this is viable and meets the CIL Reg 122(2) requirements.

Thank you for the opportunity for comment.

Yours faithfully

[redacted]

Jane Vlach
Group Planning Associate

Altrincham Town Centre Cycle Route

Bridgewater Canal Crossing Background

Trafford BC have recognised that the access for cyclists to Altrincham town centre from the north is challenging as it necessitates the crossing of the Bridgewater Canal and the options for this are limited.
The options are:-

a) Timperley Bridge (Park Road)
b) Altrincham Bridge (Manchester Road – A56)
c) Seamons Moss Bridge (Oldfield Brow)

Travelling towards Altrincham

a) Crossing at Timperley Bridge will take you in an easterly direction towards Timperley village unless you turn right into Canal Road – see below
b) Crossing at Altrincham Bridge necessitates negotiating the A56 for some distance before the bridge though after crossing a turn left into Navigation Road is an option. The A56 throughout the borough is a daunting experience for all but the most experienced of cyclists.
c) Crossing at Seamons Moss Bridge is rather 'out-of-the-way' and not an appealing option unless approaching from the northwest of the town.

Travelling towards Sale

a) Using Timperley Bridge is not an attractive option unless accessing it from Canal Road - see below.
b) Using Altrincham Bridge demands approaching it along Manchester Road from the Barrington Road junction – a more hazardous stretch is difficult to imagine.
c) Using Seamons Moss bridge is just as 'out-of-the-way' when travelling north.

Canal Road

Canal Road is a challenge for all users – motorists, cyclists and pedestrians - and its hazards are well recognised by all users having two sections of single line working and a very narrow pavement. Turning, at its southern end, into Deansgate Lane, one is confronted by the Deansgate Lane level crossing and the probability of regular delays of 30 secs to 3 minutes or more.

Bridgewater Way

When the Bridgewater Way was created about fifteen years ago (it was done in stages between 2009 and 2012 as funds became available) it was a condition of the upgrade that it be re-designated 'cycling permissive'. Almost immediately it became a popular cycle route for those travelling between Altrincham and areas to the north of the borough but accessing it was the challenge. Being on the Bridgewater Way in the commuting windows, morning and afternoon/ evening, one immediately experiences how much it is used by cyclists.

Improved access to Altrincham Town Centre

Recognising all the foregoing it was proposed, about eight years ago, that an additional bridge across the canal, for pedestrians and cyclists only, was the only solution. The obvious location was at the end of Viaduct Road, at the site of the old railway bridge long since demolished.
This option did, however, present considerable challenges as to the route to be followed once having crossed the canal from the Bridgewater Way to the south-east bank.
Plans for a bridge of utilitarian design were prepared and costed but when tenders were invited, it transpired that the figures submitted were significantly in excess of estimates due to the necessary foundation works being much greater than anticipated due to prevailing sub-soil conditions not previously discovered.
The plan was put on hold pending a future budget allocation.

Alternative proposal

The justification for a canal bridge to meet the need is still there since cyclists in particular are ongoingly confronted by the same challenges.
The unsuitability of the Viaduct Road site is still to be overcome unless an alternative site is found.
The proposed bridge was to be a rigid structure demanding a clearance above water level of around 4 metres to allow the passage of larger, wide beamed barges and canal maintenance vessels.
This, in turn, would require much greater access structures on both sides to give a gradient of no greater than 5% to be DDA compliant [probably, in view of the proximity of water, it would have to have a half-way level platform]. All this requires a much greater shadow in an area where space is very limited since uninhibited passage of the Bridgewater Way must still be provided.

The map reference of the Viaduct Road site is approx. 770892.
The map reference of an alternative site could be approx. 773895.
This is about 400 metres northeast of the original site.
The proposed bridge would be in total contrast to that previously conceived.

A very common design of bridge on canals is the Lift Bridge with which readers will be familiar and, where the site conditions demand it, lift bridges are still being constructed in the 21st century.

The proposed site would, it is assumed, not have the sub-soil problems found at the previously proposed site at Viaduct Road.
The bridge design proposed would require the platform to be only (approx.) 2 metres above water level which would allow the uninhibited passage of eights down to scullers from the rowing club up to regular narrow boats with a superstructure of up to 1.9 metres.
Vessels greater than 1.9 metres could operate the lift action of the bridge to give unlimited clearance.
Only such vessels would have the ability to operate the lift action.
Since the bridge platform would be only (approx.) 2 metres above water level the approach would need to be that much smaller and it would be proposed that since the design is only to carry ultra-light loads, it could be an earth embankment with a gradient of about 4% on the Bridgewater Way side of the canal. The access embankment need not be from both directions but only from the north – the number of people requiring access approaching from the south would be minimal.
If the access is a contained embankment, the 1.8m wide path/cycleway could pass by more easily.
On the opposite bank an access structure would be required but it would, again, be modest since it would rise to only 2 metres.
On the opposite bank the subordinate part of the bridge would be opposite Deansgate Lane which could quite easily be upgraded to provide a safer route for users. There is already a public footpath from Houldsworth Avenue leading into Navigation Recreation Ground and on to Navigation Road providing safe and easy access to the town centre – the alternative is to cross the level crossing and stay on Deansgate Lane.

Operation of the lift action

As has been indicated, the bridge would rarely need to be lifted, possibly as few as 10-20 times a year.
The lift action would only need to lift the platform to 45°.
With such infrequent operation, the power to operate the lift action could be provided by solar panels.
All the lift drive (including batteries) could be hidden underground.

Visual appeal

The original design had little or no visual appeal.
A purpose designed bridge such as is proposed would, most importantly, have a much lower profile, have both visual and novelty appeal even becoming a tourist attraction if the regular maintenance lift were advertised.

Proposal prepared by: Ian Stuart [redacted] [redacted] June 2025

Date: 10 June 2025
Our ref: 510671
Your ref: Trafford Local Plan - Draft Local Plan - Call for Sites

Customer Services
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CW1 6GJ

T 0300 060 3900

The Strategic Planning Team
Trafford Council MBC

BY EMAIL ONLY

localplan.consultation@trafford.gov.uk

Dear The Strategic Planning Team,

Planning consultation: Draft Trafford Local Plan Regulation 18 Consultation

Thank you for your consultation on the above dated and received by Natural England on 24 April 2025.

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

Consultation Request

Natural England's statutory remit covers a wide range of natural environment issues and areas, and our advice is focused only on those areas which are relevant to our remit. We have previously been engaged with Integrated Assessment on 05 March 2025 (reference 500060).

We welcome the opportunity to provide comments on the below documents:

- Habitats Regulations Assessment of the Trafford Local Plan: Strategy, Vision and Objectives and Thematic policies (dated March 2025)
- Integrated Assessment Report, Document Reference: 10993.004 (dated April 2025)
- Scoping Report Addendum, Document Reference: 10993.001 (dated March 2025)
- Trafford Local Plan Regulation 18 consultation Draft Policies (dated April 2025)
- Climate Change Risk Assessment: 10993.003 (dated April 2025)
- Policies Map

Key Evidence

Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to the plan area:

- Green and Blue infrastructure strategies
- Local Nature Recovery Strategies
- Biodiversity plans and strategies
- Rights of Way Improvement Plans
- River basin management plans
- National Landscape and National Park management plans.

- Relevant landscape plans and strategies

Please see the attached **Annex A** for our advice on sources of local plan evidence on the natural environment.

Habitats Regulations Assessment

Natural England notes that your authority, as competent authority, has undertaken an Appropriate Assessment of the plan in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the Appropriate Assessment stage of the Habitats Regulations Assessment process.

Your Appropriate Assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal and alignment with Places for Everyone, Natural England advise that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in policy wording.

Integrated Assessment Report

Natural England welcome that our previous comments have largely been addressed within the Integrated Assessment Report. We outline our further recommendations below:

Appendix A: Integrated Assessment Objectives and Assessment Criteria

3. Support improved health and wellbeing of the population and reduce health inequalities

You may wish to consider assessment criteria questions such as: Ensure that places are designed to support improved access to recreation opportunities and natural greenspace? Support active travel?

7. Conserve and enhance landscape, townscape, and the character of the borough

The Plan should include a policy to reduce light pollution. Lighting can be harmful to wildlife and undermine enjoyment of the countryside or night sky, especially in intrinsically dark landscapes, such as protected landscapes and nature reserves. Where appropriate, the Plan should identify areas of tranquillity and include policies to protect them. You may wish to include assessment criteria questions such as: Will it reduce light pollution?

10. To conserve and protect land and soils, whilst reducing land contamination

You may wish to amend the assessment criteria to read: Avoid loss of best and most versatile agricultural land (Grade 1,2 or 3a) *as informed by Agricultural Land Classification (ALC) survey*?

Whilst, we support the development of brownfield sites, Natural England highlight some brownfield sites are important for historic importance, wildlife and can be of high environmental value. Particularly invertebrate diversity. You may wish to refer to Open Mosaic Habitat Inventory as starting point for assessing environmental value: Open Mosaic Habitat (Draft) - data.gov.uk which is a priority habitat. Update to the table may be required to reflect the balance which must be met.

12. Conserve and enhance biodiversity and promote nature conservation

We recommend specific reference to Local Nature Recovery Strategy (LNRS), climate change resilience, irreplaceable habitats and peat within the assessment criteria.

14. Reduce per capita greenhouse gas emissions

Peat can play an important role in carbon storage and climate change resilience. However, when lost or degraded it can emit greenhouse gases. You may wish to consider this in the assessment criteria.

16. Ensure communities, developments and infrastructure are resilient to the other effects of expected climate change

The Local Plan should contain policies to mitigate and adapt to climate change impacts on the

natural environment. The Local Plan should recognise that climate change mitigation and adaptation and biodiversity loss are interlinked. Many habitats provide essential ecosystem services to allow adaptation to climate change e.g. natural flood management, as well as mitigation e.g. through tree planting and retaining peat as a carbon store. Policies should set out appropriate nature-based solutions for climate mitigation and adaptation such as woodland or wetland creation or peatland restoration. Consideration also needs to be given to the likely impacts of climate change on protected sites, habitats and species. See the Climate Change Adaptation Manual, Carbon Storage and Sequestration by Habitat and National biodiversity climate change vulnerability model.

Trafford Local Plan Reg 18 Draft Policies

Natural England outline our specific comments on this document below:

Strategy Objectives

SO7: Protect and improve the natural environment and connect green assets

Natural England are of the opinion that more specific goals are set to achieve nature recovery and enhancing biodiversity assets such as designated sites, irreplaceable habitat, peat, notable and protected species and habitats.

SO3 Ensure Trafford's resilience and carbon neutrality

Peat can play an important role in climate change resilience, and we would welcome specific reference to this asset.

Sustainable Development

ST4: Sustainable Development

Natural England highlight S4: Sustainable Development also has cross-theme relationships with GI6: GI in New developments, GI8: Protection of Locally Designated Sites and Natural Environment Assets, and BE1: Design, and take into consideration of biodiversity, including designated sites and peat presence.

Natural England understand a call for sites exercise is under way and outline our advice on site allocations within **Annex B**.

Policy ST5: Climate Change

Natural England welcome reference to climate change and its influence on the natural environment and the role Green Infrastructure can play in climate change resilience.

The Local Plan should recognise the opportunities and role nature plays in providing key services for climate change adaption such as cooling, shading, and clean water, as well as building in resilience accommodating changes in the neutral environment by restoring natural process. This may include greater emphasis on nature-based solutions such as peatland restoration, and woodland creation. Nature-based solutions can help communities become more resilient to climate change, whilst enhancing nature and biodiversity.

There is a large presence of peat within the catchment area as illustrated within the England Peat Status Greenhouse Gas and Carbon (GHG and C) which should be recognised as a key issue and opportunity. The importance of peat should be recognised as both a key issue and opportunity as a nature-based solution for climate change adaption and resilience. Natural England do not support the principle of developing on peat and we do not support peat extraction in light of Natural England's statutory purpose (Section 2 of the Natural Environment and Rural Communities Act 2006) and the Environmental Improvement Plan 2023.

Peatlands are England's largest terrestrial carbon store, containing hundreds or even thousands of tonnes of carbon per hectare. Their importance for climate change mitigation has been reviewed in detail by Natural England in Gregg et al, 2021: see Carbon Storage and Sequestration by Habitat 2021 - NERR094. Excavating and draining peat leads to high emissions of greenhouse gases. Degraded state of peatlands has made them the largest source of emissions of greenhouse gases

to the atmosphere from land use in the UK, exceeding carbon uptake in forests. More information can be found within the Implementation of an Emissions Inventory for UK Peatlands.

Development on peat leads to a permanent loss of an irreplaceable habitat through extraction or sealing. Natural England do not support the principle of development or extraction of deep restorable peat. The removal of peat on-site can cause implications to the natural drainage of wider peat assets, beyond the Application Site. This leaves areas of peat fragmented due to a severance of water supply and can cause localised draw down in the water table. The modification of the deep restorable peat renders the proposal area and wider landscape difficult, if not impossible to restore in the future. The sealing of peat with impermeable surfaces will also fundamentally change the nature of the underlying peat, as natural processes cannot continue.

The natural environment can play a vital role in tackling the climate crisis as healthy ecosystems take up and store a significant amount of carbon in soils, sediments and vegetation. Alongside many other negative impacts, the destruction and degradation of natural habitats has resulted in the direct loss of carbon stored within them. Restoring natural systems can start to reverse this damage at the same time as supporting and enhancing biodiversity, alongside delivering co-benefits for climate change adaptation, soil health, water management and society. Green Infrastructure (GI) proposals should seek to restore degraded natural habitats where possible. Further information on carbon storage and sequestration by habitat can be found here: Carbon Storage and Sequestration by Habitat 2021 - NERR09.

We advise this section could be strengthened through the acknowledgement of GI, Local Nature Recovery Strategies, Nature Recovery Network and the role of peat. The importance of peat should be recognised as both a key issue and opportunity as a nature-based solution for climate change adaption and resilience. Therefore, Natural England recommends the policy references biodiversity, nature-based solutions, peat presence and Green Infrastructure within the box containing the main policy wording.

Renewable Technologies and Methods

This section has cross reference themes with Policies those relating to GI2- Green Infrastructure Network, GI6 – GI in New developments, GI8 - Protection of Locally Designated Sites and Natural Environment Assets, and GI10 - Building Biodiversity into New Developments. We advise the locations of any potential allocations have regard for biodiversity assets such as designated sites, peat presence, soil, notable and priority species and habitats, alongside any landscape considerations.

Residential Development: R1: Housing delivery

Economy and Jobs

Our Site of Special Scientific Interest Impact Risk Zones (SSSI IRZs) are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website. Magic Maps is another useful tool which utilises SSSI IRZs and guidance on it use is provided here.

In addition, we advise that all development allocations consider aerial pollutants arising from traffic emissions during construction and operational phases may have the potential to harm designated sites. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required.

We strongly recommend that as part of the assessment process, employment site options will need to follow Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). APIS provides a searchable database and information on pollutants and their impacts on habitats and species.

We signpost Places for Everyone, Policy JP-C8: Transport Requirements of New Development and the Adopted Holcroft Moss Planning Obligations Joint Supplementary Planning Document (SPD).

You may wish to consider whether development meets the criteria to cause an adverse effect on Manchester Mosses Special Area of Conservation (SAC), specifically Holcroft Moss Site of Special Scientific Interest (SSSI).

EJ1: Employment Land Requirements

Natural England advice there are policy relationships with ST4 Sustainable development, EJ7 Rural Economy, GI2- Green Infrastructure Network, GI6 - GI in New developments, GI8 - Protection of Locally Designated Sites and Natural Environment Assets, and GI10 - Building Biodiversity into New Developments.

Wider Places for Everyone Allocations

We note EJ3 industry and Warehousing Key employment area: New Carrington Employment Area are also linked to Places for Everyone. We support the alignment of policies and requirements. We have provided extensive comment on Policy Allocation JPA30 New Carrington and are in the process of reviewing the masterplan. Development within this allocation is required to undertake hydrological and ground investigations as necessary to inform the **comprehensive** masterplan and use of suitable construction techniques to ensure any loss or deterioration of irreplaceable habitat which includes deep restorable peat presence, and adverse impacts on the hydrology of undeveloped areas, is minimised. Where loss and deterioration of peat is unavoidable, a suitable compensation strategy is required, and the allocation must achieve an enhanced delivery of ecosystem services. Please refer to the Places for Everyone Inspector's comments and our previous responses.

Economy and Jobs

Policy EJ3S: Other Industry and Warehousing within Trafford South - Dairyhouse Lane Employment Site

Natural England have reviewed the England Peat Status Greenhouse Gas and Carbon Storage open data and confirm that this tool highlights a deep peat presence with Dairyhouse Lane Employment Site. Natural England do not support the extraction or development on deep restorable peat.

In addition, there are potential impacts on Dunham Park Site of Special Scientific Interest (SSSI) and Brookhey Covert SSSI, which may include construction related impacts such as silt/contaminate laden run-off and other hydrological changes during the operational phase. Further information can be found at Designated Sites View.

EJ7: Rural economy

We advise the Local Plan should include a policy to protect Best and Most Versatile (BMV) agricultural land (Grades 1, 2, 3a). Policies should avoid the loss of BMV land.

The Plan should recognise that development has an irreversible adverse impact on the finite national stock of BMV land. Any development proposed on BMV land should be informed by a detailed soil survey.

Transport and Movement: The Highway Network

TM5: Local Highway Network

Natural England highlight the relationship between Policies ST4 sustainable development, EJ7 Rural Economy, and GI8 Protection of Locally Designated Sites.

Transport proposals offer opportunities such as new habitats/connect habitats, e.g., railway embankments and highway verges and should be recognised as an opportunity. The green infrastructure associated with the transport network can play an important role in ecological connectivity contributing to wildlife corridors and stepping stones as referred to in paragraph 185 of the National Planning Policy Framework (NPPF).

Transport networks should be designed and managed to maximise ecological connectivity and reduce severance impacts. Natural England have launched the Green Infrastructure Framework which provides a set of GI Principles; GI Standards; a Mapping Toolkit; Planning and Design

Guides; and Process Journeys that should be adhered to when designing and delivering good quality GI. In addition, we also signpost the GI Mapping Toolkit and Valuing the Benefits of Blue-Green Infrastructure.

You may also wish to refer to our previous comments relating to the Carrington Relief Road under reference 504487, dated 24 March 2025.

National Infrastructure Schemes

Policy TM9: Potential Future Rail Route

Natural England highlight the relationship between Policies ST4 sustainable development, EJ7 Rural Economy, and GI8 Protection of Locally Designated Sites.

We advise impacts to designated sites, peat and wider biodiversity assets are considered as part of the policy wording. This may include hydrological and air quality impacts.

Green Infrastructure and Natural Environment

Policy GI5: Green Infrastructure Opportunity Areas and Policy GI6: GI in New developments

Natural England support the reference to safeguarding and enhancing existing areas of valued habitats and site of Biological importance, as well as the ambition to improve public accessibility and opportunities.

There is an opportunity to link active movement with: green neighbourhoods, green/blue spaces and green routes. Which all support: active lifestyles, sense of place, community cohesion and nature connections that benefit physical and mental health, wellbeing, and quality of life.

Wherever feasible, footpaths, bridleways and cycle lanes should be separated from motor vehicles to improve safety and encourage more people to take up cycling and walking. National Cycle Infrastructure Design Guidance (LTN 1/20) indicates that cyclists must be physically separated and protected from high volume motor traffic, both at junctions and on the stretches of road between them. Where traffic-free paths for cyclists, wheelchair users, horse riders and pedestrians are not available, streets and roads may also need to be greened, and speed limits reduced to promote an active lifestyle and improve access to green space.

To encourage their use, green and blue spaces and pathways must be aesthetically pleasing, inclusive, spacious, and flexible, to provide space for all types of activity and sport and to accommodate future needs. The attractiveness of green spaces will come, in part, from a strong sense of place. It is also important that places are tranquil and free of excessive noise. Greater Manchester Local Nature Recovery Strategy will map opportunities for nature recovery, including within Greenspace networks, adding to their attractiveness, increasing access to nature and delivering associated mental as well as physical health benefits.

We refer you to Green Infrastructure Home (naturalengland.org.uk (the Green Infrastructure/ GI Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 GI How Principles (naturalengland.org.uk). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

The following material may be useful: Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation (ENRR526) and Countryside Code.

Within the National Design Guide, movement is listed as one of the ten characteristics of a well-designed place and is defined as accessible and easy to move around within the guide. Natural England's GI Planning and Design Guide acknowledges this and sets out a grid detailing the importance of integrating GI into well-designed places with reference to movement (see pages 23 to 26). Natural England encourage that Trafford Council utilise these resources and guides in order to

create a high quality and multifunctional area that meets the needs of its community whilst increasing biodiversity.

Natural England promote the use of Local Nature Recovery Strategy (LNRS) and best use of the associated Greater Manchester Nature Network Map. LNRS considers opportunities to achieve wider nature-based solutions. The potential opportunities identified in these strategies can include actions to address other environmental objectives that are also positive for biodiversity; for example river flood management and climate change mitigation through tree planting and peatland restoration. Another ambition of LNRS is to try and align efforts for example to help direct the location of Green Infrastructure through Local Plans.

Policy GI7: Trees, Woodland and hedgerows

Irreplaceable habitats (including ancient woodland and ancient and veteran trees) should also protect from loss or deterioration and seek their enhancement wherever possible. Further advice can be found in Natural England's standing advice- Ancient woodland and veteran trees: protecting them from development.

Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets

Natural England acknowledge that the Local Plan does not aim to repeat sections of Places for Everyone, however we are of the opinion that the wording of the policy refers to internationally and nationally designated sites, priority habitats and species, irreplaceable habitat and peat presence.

Policy GI10: Building Biodiversity into New Developments

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the National Planning Policy Framework (publishing.service.gov.uk) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is also applies extended to small scale development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

Biodiversity Net Gain guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the Biodiversity Net Gain Planning Practice Guidance (gov.uk).

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on Sites of Special Scientific Interest: managing your land.

Water, Flooding and Drainage

We highlight that this policy should also include reference to the opportunities presented by nature-based solutions. Natural England advise that sustainable drainage systems can perform a range of functions including improved flood risk management, provision of accessible green/blue space, climate change adaptation and biodiversity enhancement.

Peat is a valuable ecosystem service provider of climate change mitigation including carbon storage, improved water quality & natural flood management.

Built Environment

Policy BE1: Design

Natural England's GI Design Guide provides details of what good GI design looks like. The guide is linked to the ten characteristics of well-designed places set out in the National Model Design Code and the National design guide. Landscape and townscape character assessments can also inform good design.

Infrastructure Delivery and Planning Obligations

You may wish to refer to the Adopted Holcroft Moss Planning Obligations Joint Supplementary Planning Document (SPD) and the Places for Everyone, Policy JP-C8: Transport Requirements of New Development.

Monitoring Indicators

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 117).

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 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. Whilst, it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.

Biodiversity:

- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance
- Percentage of major developments generating overall biodiversity enhancement.
- Hectares of biodiversity habitat delivered through strategic site allocations
- Hectares of peat lost to development/ hectares of peat in restoration

Landscape:

- Amount of new development in AONB/National Park/Heritage Coast with commentary on likely impact

Green infrastructure:

- Percentage of the city's population having access to a natural greenspace within 400 metres of their home
- Length of greenways constructed
- Hectares of accessible open space per 1000 population

In addition, where monitoring of the emerging local plan is proposed, it would be useful to include opportunities to capture nature recovery achievements as a result of the local plan, using the Local Nature Recovery Strategy (LNRS) as a baseline, including within the appraisal of the local plan. The priorities and actions in the LNRS (both mapped and unmapped) can steer appraisal and policy development to ensure that opportunities for nature recovery, and the wider environmental benefits of that approach to development and land use change, are embedded in economic and social policies and decision making. Recent planning guidance advocates for Local Planning Authorities to have regard to LNRS in decision making and this further supports use of the LNRS as an evidence base for both the local plan and its appraisal to support that approach.

Climate Change Risk Assessment: 10993.003 (dated April 2025)

Natural England's key focus in terms of climate change are:

- Nature based solutions (NbS) to contribute to meeting 'net zero'. Tree planting and peatland restoration are the biggest opportunities. However, many habitats and ecosystems can contribute to carbon storage and sequestration.
- Nature based solutions to reduce risks to people from climate change (often termed Ecosystem-based Adaptation), for example natural flood management and urban cooling from green infrastructure.

- Building the resilience of and accommodating change within the natural environment by restoring natural processes and habitats.
- Adapting conservation objectives for designated sites and management techniques to adjust to changes that have already happened or are inevitable. This is to ensure these sites, their habitats, species, or geological features can adapt to inevitable changes

Peat Presence

Natural England utilises the England Peat Status Greenhouse Gas and Carbon Storage to identify locations which are situated on deep peat. In light of Natural England's statutory purpose (see Section 2 of the Natural Environment and Rural Communities Act 2006) and the Environmental Improvement Plan 2023 - GOV.UK (www.gov.uk) which states that degraded lowland peat accounts for 3% of England's overall greenhouse gas emissions. Reducing these emissions, by rewetting our agricultural peat soils, is essential to meeting legally binding net zero targets, Natural England do not support the principle of developing on restorable peat.

Peat can play an important role in carbon storage and climate change resilience. However, when lost or degraded it can emit greenhouse gases. Natural England do not support the principle of developing on peat. We believe peatlands should be protected from inappropriate development for their carbon store and habitat value. Opportunities should be sought to restore and enhance this irreplaceable asset.

Local Nature Recovery Strategy

The Greater Manchester Local Nature Recovery Strategy (GM LNRS) is being prepared for publication in Summer 2025 having been out to consultation ending on 31 January. Please note that the consultation draft of the GM LNRS is being revised as per comments received during the consultation but the Priorities and Actions remain broadly as they are written in the draft. LNRS are a system of spatial strategies for nature and environmental improvement required by law under the Environment Act 2021. Each strategy agrees priorities for nature's recovery; maps the most valuable existing areas for nature; and maps specific opportunities for creating or improving habitat for nature and wider environmental goals.

Recent planning guidance advocates for Local Planning Authorities to have regard to LNRS in decision making: *The Local Nature Recovery Strategy is an evidence base which contains information that may be a 'material consideration' in the planning system, especially where development plan documents for an area pre-date Local Nature Recovery Strategy publication. It is for the decision-maker to determine what is a relevant material consideration based on the individual circumstances of the case. In cases where there is a draft Local Nature Recovery Strategy that has been consulted upon but not yet finalised and published, the draft strategy may contain useful evidential information that can support appropriate decision making.*

Draft LNRSs can be used to identify opportunities to meet enhanced biodiversity duty under the Environment Act and meet cross-departmental target. By delivering actions identified for nature recovery where development is planned will help manage climate change, by creating more resilience and adaptation to climate change, including flooding, droughts and extreme heat.

Green Infrastructure

Green infrastructure proposals should take into account, and be resilient to, the impact of climate change and include natural solutions/measures to alleviate the impact of climate change, e.g., through carbon sequestration, natural flood/surface water management, helping with urban cooling and provision of SUDs, microclimate adaptation etc.

Part 4 of the Climate Change Adaptation Manual provides information and examples of climate change adaptation via green infrastructure.

We advise that your authority consider the role green infrastructure can play in enabling species to move from less favourable habitats to more favourable ones as the climate changes. Green infrastructure can be part of an overall nature recovery network. Advice on nature recovery networks can be found here: Nature Networks Evidence Handbook (NERR081). The local approach to green infrastructure should be informed by the forthcoming Local Nature Recovery Strategies (LNRS)

Local Nature Recovery Strategies (LNRS) which will set out what sort of habitats/features are priorities for an area and in what locations.

The natural environment can play a vital role in tackling the climate crisis as healthy ecosystems take up and store a significant amount of carbon in soils, sediments and vegetation. Alongside many other negative impacts, the destruction and degradation of natural habitats has resulted in the direct loss of carbon stored within them. Restoring natural systems can start to reverse this damage at the same time as supporting and enhancing biodiversity, alongside delivering co-benefits for climate change adaptation, soil health, water management and society. Green infrastructure proposals should seek to restore degraded natural habitats where possible. Further information on carbon storage and sequestration by habitat can be found here.

Water Management

We would advise that water management should include measures to ensure good water quality as well as focusing on flooding. There may be opportunities to retrofit SUDs in some areas which would be beneficial in terms of flooding, water quality and biodiversity and your authority may wish to explore this further.

Other advice

We are aware of the below guides and standards which you may find useful:

- TCPC-Report: The Climate Crisis – a guide for local authorities on planning for climate change
- TCPA Practical Guides - Guide 14: Building climate resilient large-scale new communities
- Building with nature
- First Steps in Urban Heat for Built Environment Practitioners
- Overheating for homes
- Forest Research- Urban Tree Manual
- Designing Blue Green Infrastructure (BGI) for water management, human health, and wellbeing: summary of evidence and principles for design

Please send further correspondence to [redacted] quoting our reference.

Yours faithfully

Rachel Whitaker

Sustainable Development Higher Officer
Cheshire to Lancashire Area Team
Natural England

Annex A: Sources of Local Plan Evidence

Contents

- Access
- Air quality
- Climate change
- Designated sites
- Green infrastructure
- Habitats and species
- Heritage and historic environment
- Landscape
- Marine / coast
- Natural capital
- Net gain
- Soils including peat
- Water

SD: Spatial data layer available for download from link provided (unless otherwise indicated)
M: indicates also available to view on MAGIC mapper [redacted]

Key evidence sources	Data Published by	Link to open data or information	SD
ACCESS			
National Trails	Natural England	[redacted]	✓M
King Charles III England Coast Path	Natural England	**Open Route:** Route: [redacted] Coastal margins: [redacted] **Sections in progress:** [redacted]	✓M ✓M
Public Rights of Way (on the Ordnance Survey base map) and Rights of Way Improvement Plans	Local Planning Authorities		
Countryside and Rights of Way Act 2000 – Section 15 land (England) Countryside and Rights of Way Act 2000 – Access Layer (England)	Natural England	[redacted]	✓M ✓M
Local Nature Reserves	Local Planning Authorities and Local Wildlife Organisations –	[redacted]	✓· M

	published by Natural England		
National Nature Reserves (England)	Natural England	[redacted]	✓· M
Country Parks	Local Planning Authorities	Natural England have mapped Country Parks using data from Local Planning Authority data [redacted]	✓· M
People and Nature Survey	Natural England	People and Nature Survey since 2019 [redacted] Replaced the Monitoring Engagement with the Natural Environment (MENE) survey dashboard – replaced by The MENE survey dashboard [redacted]	
AIR QUALITY			
Nitrogen Decision Framework	Joint Nature Conservation Committee (JNCC)	[redacted]	
Air Pollution Information System (Data on air pollution related to designated sites)	Various including Natural England	[redacted]	✓·
CLIMATE CHANGE			
'Climate Change Adaptation Manual' Second Edition 2020 (NE751)	Natural England	[redacted]	
The National Biodiversity Climate Change Vulnerability Model	Natural England	Report: [redacted] (data not downloadable)	✓· M
Species Risks and Opportunities Maps	Natural England	[redacted] (pdf maps, data not downloadable)	✓·
DESIGNATED SITES			
Boundaries of Sites of Special Scientific Interest (SSSIs)	Natural England	[redacted]	✓ M
Boundaries of Special Protection Areas (SPAs)	Natural England		✓ M
Boundaries of Special Areas of Conservation (SACs)	Natural England		✓· M

Boundaries of Ramsar Sites	Natural England	[redacted]	✓· M
Boundaries of Marine Conservation Zones	Joint Nature Conservation Committee (JNCC) (published by Natural England)		✓· M
SSSI Impact Risk Zones	Natural England		✓M
SSSI, SAC and Conservation Objectives	Natural England		
SAC, SPA, Site Improvement Plans (SIPS)	Natural England		
Local Wildlife Sites and Local Geological Sites	Local Planning Authority and/or Local Environmental Records Centre and/or Local Wildlife Trust		
Potential Special Protection Areas	Natural England		✓· M
Possible Special Areas of Conservation	Natural England		✓· M
Existing HRA compensation sites	Local Planning Authority and Natural England		
Details and locations of existing strategic solutions	Local Planning Authority and Natural England		
GREEN INFRASTRUCTURE			
Green Infrastructure Map	Natural England	[redacted] National Green Infrastructure mapping database, with Links to data sources used in GI mapping: [redacted]	
Green Infrastructure Framework – Principles	Natural England		

and Standards for England, including Accessible Greenspace Standard (AGS) and Urban Greening Factor (UGF)			
Green Belt boundaries	Ministry of Housing, Communities and Local Government (MHCLG)	[redacted]	✓ **M**
Open Space Assessments	Local Planning Authority		
Urban Forestry	Forestry Commission	How to protect and manage the urban forest [redacted]	
UK Ward Canopy Cover	Forestry Commission		✓·
HABITATS AND SPECIES			
Ancient Woodland	Natural England	[redacted]	✓ **M**
Ancient and Veteran Trees	The Ancient Tree Inventory Woodland Trust and Natural England	The Ancient Tree Inventory [redacted]	✓·
	Natural England	The wood pasture and parkland inventory	✓ **M**
Priority Habitat Inventory s41 habitats	Natural England		✓ **M**
Priority Habitat Creation and Restoration by the Environment Agency	Environment Agency		✓·
Open Mosaic Habitat on Previously Developed Land Inventory (draft)	Natural England		✓ **M**
Local Biodiversity Action Plans (LBAPs) and Local Geodiversity Action Plans (LGAPS)	Local Planning Authority		
Priority habitats and species as listed under Section 41 of the NERC Act, 2006 and UK	Local Environmental Record Centres		

Biodiversity Action Plan (UK BAP).			
National Forest Inventory on Trees and Woodland 2020	Forestry Commission	[redacted]	✓ **M**
Local Nature Recovery Strategies (NB few are yet to be completed)	County Authorities / Responsible Authorities	Nature Recovery Network Evidence Handbook: [redacted]	✓.
HERITAGE and HISTORIC ENVIRONMENT			
National Heritage Register including scheduled monuments, listed buildings, Conservation Areas, registered parks and gardens, registered battlefields and protected wrecks	Historic England	[redacted]	✓**M**
World Heritage Sites	Historic England	[redacted]	✓ **M**
National Historic Landscape Characterisation 250m and 500m grid	Natural England	[redacted]	✓ **M**
Heritage Coasts	Natural England	[redacted]	✓.
Heritage Coast Management Plans	Local Planning Authority		
LANDSCAPE			
Areas of Outstanding Natural Beauty boundaries	Natural England	[redacted]	✓ **M**
National Park boundaries	Natural England	[redacted]	✓ **M**
National Park and Area of Outstanding Natural Beauty (AONB) management plans	Conservation Boards/ AONB Partnerships and		

	National Park Authorities		
Landscape National Character Areas (England)	Natural England	[redacted]	✓M
All England Strategic Landscape Mapping Hub	Natural England		✓·
Local landscape character assessments	Local Planning Authority		
Landscape and Visual Impact Assessments	Local Planning Authority		
Landscape capacity and sensitivity assessments	Local Planning Authority		
Tranquillity and light pollution	Campaign to Protect Rural England (CPRE)		✓·
MARINE / COAST			
MMO marine planning evidence base	Marine Management Organisation (MMO)		
MEDIN Marine Data Portal	The National Oceanography Centre		
Shoreline Management Plans	Environment Agency		
Coastal erosion maps/ Coastal Change Management Area data/strategies	Environment Agency / Local Planning Authority		
NATURAL CAPITAL			
Natural Capital Atlases: Mapping and Mapping Indicators for County and City Regions (NECR318)	Natural England		✓·
Nature Improvement Areas	Natural England		✓M
National Habitat Network (England)	Natural England		✓M
Living England Habitat Map	Natural England		✓M
Enabling a Natural Capital Approach	Defra		
Natural Capital Ecosystem Assessment (NCEA)	Natural England under development	n the long term, the NCEA will provide a comprehensive programme that will provide high quality (national and local) data to assess the state and condition of biodiversity, ecosystems, and natural capital assets in the	

		terrestrial, aquatic & marine environment which will transform decision making for critical environmental policies and interventions to meet the 25 Year Environment Plan	
NET GAIN			
Biodiversity Net Gain guidance and metric	Defra and Natural England		
Environmental Benefits from Nature Tool (Beta Test Version)	Natural England		
SOILS and PEAT			
Provisional Agricultural Land Classification (ALC) Maps	Natural England		✓**M**
Strategic mapping assigning the likelihood of BMV agricultural land (created as a companion to the Provisional ALC maps)	Natural England		
Detailed ALC reports – post 1988 ALC survey	Natural England		✓· **M**
Peaty Soil Location	Natural England		✓·
England Peat Status Green House Gas and Carbon Storage	Natural England		✓·
General mapped information on soil types, including peaty soils, is available as 'Soilscapes'. This also includes a simple ecosystem services provision guide.	National Soil Resources Institute (NSRI)		✓· **M**
WATER			
Strategic Flood Risk Assessments	Local Planning Authority led		

Local Flood Risk Management Strategies	Lead Local Flood Authorities		
Water Resource Management Plans	Environment Agency / Water Authorities		
River Basin Management Plans	Environment Agency	[redacted]	
Catchment Flood Management Plans	Environment Agency		
Nutrient Impacts	Natural England Local Planning Authority	A summary guide and frequently asked questions (NE776): [redacted] Tools and resources for calculating nutrient neutrality. [redacted] nformation on Nature Based Solutions as Nutrient Mitigation (NBS2024) [redacted]	

Annex B: Site Allocations - Site Selection Methodology

The strategy for allocating land for development should:

- avoid protected sites and apply the biodiversity mitigation hierarchy (NPPF 180a)
- give great weight to conserving and enhancing designated landscapes
- avoid the loss of best and most versatile agricultural land.

Selecting sites and setting design principles for their delivery should conserve and enhance the natural environment. This includes considering potential impacts and opportunities as well as the issues set out in the table below secured through planning policy.

Evidence	An appropriate evidence base should be used to support the selection of sites and inform the policies for their delivery. This should include: • Landscape and Visual Impact Assessments, Landscape Sensitivity Assessments and Landscape Character Assessments. • Soil surveys and mapping (Agricultural Land Classification available on Magic maps) • Ecological surveys, green infrastructure and biodiversity opportunity mapping
Assessments	Site selection must also be informed by the relevant environmental assessments. These are: • **Sustainability Appraisal incorporating Strategic Environmental Assessment**: it should be clear how this has informed and provided justification for the sites selected for allocation assessed against reasonable alternatives. Recommendations and findings from the assessments should also be used to inform mitigation measures and design principles for the allocated sites • **Habitats Regulations Assessment**: mitigation and avoidance measures identified through the HRA should be secured through policies in the Plan. Where mitigation or avoidance is not possible the site should not be allocated
Environmental requirements	Plans should set requirements, opportunities and detailed design guidance for site allocations to conserve and enhance the natural environment. This should include measures secured through policy covering: • **Biodiversity Net Gain:** This could include specifying whether and what BNG should be delivered on-site given the scale of development anticipated, or if off-site provision will be required. Site allocations should be supported by a baseline assessment of biodiversity value for example using the latest version of [redacted] • **GI strategy:** Allocations should set out measures to protect, enhance and improved connectivity of GI within and beyond allocation sites. Consideration should also be given to setting appropriate [redacted] for allocation sites • **Landscape features:** Allocation policy should incorporate and enhance existing landscape features within the development This could include hedgerows, walls, ancient and veteran trees, woodland and wildlife corridors • **Agricultural land and soils:** Allocations should be based on a detailed soils survey and have policies should secure a soil management plan

	• **Peat:** Allocations should avoid development on deep restorable peat • **Access**: Policies for allocations should incorporate and enhance public access to the natural environment. This includes Public Rights of Way that run through or adjacent to allocated sites, as well as linking from the site to the wider route network

NHS Property Services

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10 June 2025

BY EMAIL ONLY

RE: Consultation on Trafford Local Plan – Regulation 18

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS).

NHS Property Services

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

General Comments on Health Infrastructure to Support Housing Growth

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

NHS Property Services

Detailed Comments on Draft Local Plan Policies

Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Local Plan in a way that supports sustainable growth. When developing any additional guidance to support implementation of Local Plan policies relevant to health, for example in relation to developer contributions or health impact assessments, we would request the Council engage the NHS in the process as early as possible.

(Qu. 2-5) Draft Policy ST5: Climate Change

Draft Policy ST5 seeks to support development proposals which contribute towards the Council's net zero ambitions. NHSPS is supportive of Policy ST5 and recognises the Council's intent to support developments which consider wider net zero goals. In considering the implementation of policies related to net zero, we would highlight that NHS properties could benefit from carbon offset funds. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.

(Qu. 4-3) Draft Policy R3: Affordable and Social Housing

NHSPS supports the principle of delivering affordable housing in order to meet identified local needs. In undertaking further work on understanding local housing needs, we urge the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.

Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:

- Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners.
- Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies).
- Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.

Draft Policies BE1 Design, OS1: Open Space, OS2: Outdoor Sports and Recreation Facilities and Provision and OS5: Allotments and Growing Space.

Draft Policies BE1 sets the Council's expectation for new developments to be of a high design standard. Policies OS1, OS2 and OS5 seek to ensure new developments promote healthier lifestyles and improve overall health and wellbeing through the inclusion of a range of facilities and spaces

NHS Property Services

which can facilitate this. NHSPS support the inclusion of policies that support healthy lifestyles. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.

Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities. The Council should consider the use of Health Impact Assessments for relevant scales/types of development.

(Qu. 11-1 and 11-2) Draft Policy CT1: Protecting Existing Community and Social Facilities

Draft Policy CT1 focuses on seeks to ensure there is sufficient provision of existing social and community facilities for local residents. This requires the application of a sequential test in relation to the change of use of existing community facilities. NHSPS supports the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be effective in its current form. Where healthcare facilities are included within the Local's Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community.

The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community.

All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services.

Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land or submission of onerous information, including through a sequential test. To ensure the Plan is positively prepared and effective, NHSPS are seeking the following modification (*shown in red italics*) to Draft Policy CT1 or in supporting paragraphs to ensure the principle of alternative uses for NHS land and property will be fully supported:

Proposed Modification to Draft Policy CT1 or supporting paragraphs:

NHS Property Services

Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, the requirements listed under parts (i) to (iii) of the Policy will not apply.

(Qu. 11-3) Draft Policy CT2: Loss of Community Facilities

In relation to Policy CT1, draft Policy CT2 sets out the additional requirements where the requirement to submit detailed evidence to justify the loss of community facilities under Policy CT1 has not been sufficiently met. For the avoidance of doubt and to ensure clarity within the implementation of the policy, in line with our comments above, NHSPS recommend that the supporting text clearly sets out that where health facilities have been declared by the NHS as surplus to requirements, or will be changed as part of wider NHS estate reorganisation and service transformation programmes, that this will sufficiently satisfy the requirements for detailed evidence of the policy.

(Qu. 14-1) Draft Policy IP1: Infrastructure Delivery and Planning Obligation and CT3: New Community and Social Facilities

Draft Policy IP1 sets out the overarching policy for ensuring development makes a positive contribution to sustainable growth through the delivery of appropriate infrastructure in a timely manner. Draft Policy CT3 specifically highlights this in relation to the provision of new community facilities, including health, to ensure the appropriate facilities support major largescale residential developments.

We note the inclusion of health facilities in the list of infrastructure where planning obligations may be sought (paragraph 14.11 of the Draft Local Plan). Health infrastructure should be clearly identified in the Local Plan as essential infrastructure, with an expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. Additionally, the significant cumulative impact of smaller housing growth and the need for mitigation must also be considered by the Plan.

NHSPS is concerned that the existing draft policy wording for part e) of Policy IP1 is unfeasible. The Council's emphasis on delivering 'all obligations on-site in the first instance' does not allow the NHS and its partners enough flexibility when determining the most appropriate form of mitigation. The requirement for an on-site new build primary care facility will not be operationally viable in all instances. We therefore recommend the Council to amend part e) of Policy IP1 to ensure that this policy is not applicable to healthcare providers.

The Local Plan should emphasise that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures. NHSPS recommends that the Council engage with NHS Greater Manchester Integrated Care Board (NHS GM ICB) to add further detail within the Local Plan and supporting evidence base (Infrastructure Delivery Plan) regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. As a starting point, we suggest the following process:

- Assess the level and type of demand generated by the proposal.
- Work with the NHS GM ICB to understand the capacity of existing healthcare infrastructure and the likely impact of the proposals on healthcare infrastructure capacity in the locality.

- Identify appropriate options to increase capacity to accommodate the additional service requirements and the associated capital costs of delivery.
- Identify the appropriate form of developer contributions.

Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be emphasised that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures.

Integrated Assessment Report

As part of setting out the integrated assessment outcomes, supporting paragraph 6.17 states that community facilities will be protected. In line with our response to draft Policy CT1, flexibility should be provided for the disposal of health facilities in instances where facilities have been declared surplus to NHS requirements, either as part of wider NHS estate reorganisation and/or service transformation programmes.

Supporting paragraph 6.17 further sets out that sustainably located development will provide residents with better access to healthcare. When planning for future growth, the Council should be aware that primary care planning operates at a different spatial area whereby each primary care facility has a respective catchment area. There is no obligation to modify catchment area boundaries.

NHSPS and other NHS partners welcome the opportunity to engage with the Council throughout the preparation of the Local Plan, particularly with regard to strategic sites and appropriate primary care mitigation.

(Qu. SS1) Call for Sites – Draft Site Selection Methodology April 2025

NHSPS currently have existing estate in Trafford and welcome the opportunity to put forward sites as part of the Local Plan consultation. At this stage, NHSPS have not identified sites to be considered as part of this consultation but would note that this may be subject to change in the future. To ensure that future submitted sites suitably meet the Council's requirements, NHSPS have recommended additional modifications to the Draft Site Selection Methodology in the below.

The Site Selection Methodology (Section 4 and Figure SS-1) assesses each submitted site across three different stages. Stage 1 includes demonstration of the availability of the Site within the next 10 years. It is unclear as to what this part of the assessment specifically requires and pertains to and how this requirement can clearly be evidenced.

For avoidance of doubt and to ensure clarity within the interpretation of the methodology requirements, we would request that additional guidance is provided by the Council to set out the evidence which would be acceptable to justify a site's availability within the 10-year timeframe.

As stipulated above, all NHS land disposals must follow a rigorous process for a site to be declared surplus to local health requirements. NHSPS therefore recommend that where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider

NHS estate reorganisation and service transformation programmes, that this will sufficiently satisfy the requirements of the policy.

Stage 2 further sets out that sites will be assessed as to whether they are 'likely to be viable and deliverable'. As with the above, we request that clarity is provided on the level and type of evidence/information required to suitably meet the requirements of the assessment.

General Comments on Evidence Base relating to Healthcare Infrastructure

The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. We recommend the Council engage with the NHS, particularly NHS GM ICB, on an on-going basis as part of preparing the Infrastructure Delivery Plan (IDP). A sound IDP must include sufficient detail to provide clarity around the healthcare infrastructure required to support growth, and to ensure that both planning obligations and the capital allocation processes for the CIL effectively support and result in capital funding towards delivery of the required infrastructure.

Related to this, appropriate healthcare costs should be factored into the Local Plan Viability Assessment for relevant typologies. Such an approach means that developers are adequately informed in advance that they may be required to make contributions towards healthcare infrastructure. A separate cost input for health infrastructure in the plan viability assessment would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligations necessary to mitigate the full impact of a development. This is particularly important in situations where a viability assessment demonstrates that proposals are unable to fund the full range of infrastructure requirements.

Conclusion

NHSPS thank Trafford Council for the opportunity to comment on the Local Plan. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.

NHSPS would be grateful to be kept informed of the progression of the Local Plan and any future consultations via our dedicated email address, [redacted]

Yours faithfully,

Hyacynth Cabiles
Town Planner
E: [redacted]

For and on behalf of NHS Property Services Ltd

[redacted]

From: judie collins [redacted]
Sent: 11 June 2025 10:06
To: Local Plan Consultation
Subject: [redacted]

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: LP April 2025 comment

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

I shall do a separate email for Live Well and the GMCA Ageing Hub and if you need any more information please ask.

Altrincham and Bowdon Civic Society which I chair is part of Civic Voice and works with IPM on a regular basis on neighbourhood planning issues Altrincham has an adopted Neighbourhood Business Plan for the Town Centre and the Design Working Group chaired by [redacted] which I attend has submitted separately. The two issues in the NBP outstanding were the community grocery which has just been addressed by Coop coming to Stamford Quarter and Parking and Signage Strategy for the town centre. We also worked with [redacted] on the updating of the Conservation Area appraisals and management plans and more recently the boroughwise local listing with Salford University.
The Society played a major part in Altrincham Forward which under [redacted] turned the town round to be so successful and we have regular meetings with Altrincham BID and with the ward councillors.
We also look after Bowdon (we share a Webmaster with Bowdon Conservation Group) and look forward to oncoming plans for the Jubilee Centre site.We seem to have reached something of a stalemate with Oldfield Brow which hopefully can be resolved after more than a decade.
We do spend a great deal of time with Broadheath where we first became involved with industrial heritage but then with various developments now sit on the Broadheath Partnership

ALTRINCHAM
Although the town centre is thriving this can easily falter Marks and Spencer have moved out of town centres elsewhere in Greater Manchester on to retail parks. We did discuss them moving on to Altair during the CPO inquiry;They have stores in Sale and Hale focusing on food and with adjacent car parks and the Altrincham store carries limited ranges of clothing .George Street falters at the Regent Road end with Iceland closing and not much for the new residents and businesses nearby. The promised restoration of memorial garden, community noticeboard and swift boxes has not happened. The heritage contribution of Bravest Little Street cannot be underestimated.More publicity for the carpark is needed .We appreciate promotion of greenspace ,walking wheeling etc but some people will always want to drive.
Community groups suffer from a lack of places to meet The Hub is in an area badly lit and with poor pavements especially in the evening and winter.We are very grateful for free space provided by Bruntwood and HSBC and would welcome for this to happen with more businesses through the councils Economy and Communities staff.
Health facilities in the town are not delivering as promised so no holistic working together of the Hospital and Health and Wellbeing Centre as promised. Downgrading of hospital a great concern. If Trafford General is the alternative then better public transport is essential.

Site delivery will obviously major on Altair.Concern is raised over Trafford Centre and Manchester Storm plans. The physical links with the town centre have all gone and Lidl's basket store which enabled them to fulfil the sequential test looks in doubt especially as they are eyeing Dobbies for a store.

Altrincham Interchange is the only multi modal public transport facility in Greater Manchester and backs on to Altair. There is little communication between the modes apart from the Friends and Mid Cheshire Rail Users.If the station at Cheadle goes ahead it will limit an already poor hourly service via Stockport to Manchester with 2 hours on Sunday. The Mid Cheshire Line is a leisure line with Altrincham.Knutsford,Delamere Forest and Chester and of course a swap over for both United and City fans coming in on trains and switching to Metrolink. Much more could be done with support from TMBC.

Housing site wise apart from Altair we wonder about the future of the Cresta Court which seems unlikely to return to a hotel.Altrincham badly needs a boutique hotel and housing .

Social Housing in the town centre has been very neglected and long dwelling residents in the town centre have been moved to out of town complexes and in some cases to care homes. We continue to be very concerned about L&Q who after the New Street buildings are completed still have much more that will need to be rebuilt and without a council presence on their board the future looks very uncertain.

BROADHEATH

Industrial heritage means Broadheath could be a tourist destination and rival Trafford Park in some of the American firms who set up there. Much of the area is still zoned for industry which is impractical traffic wise and developers have indicated they would like to build more housing. Public transport is dreadful ,unreliable and confusing. Consultations re Stamford Brook led to many promises unfulfilled. Perhaps this is a lesson to be learned. Social Housing is often tenants who have been there for decades and Stamford Brook is young families The community does what it can and the Partnership now led by Community chairs is proving very successful

Watling Gate in Broadheath ward is a shameful loss of important heritage.When estates came back in house we had hoped for more.

GREENSPACE

The dedicated Friends of Parks groups in Trafford find working with One Trafford very frustrating and those of us who remember training for Friends Groups and support are mostly gone. We appreciate officers are doing what they can but Green Flags do not a community make. There has been more success with Public Realm since the early days of Shared Streets and we appreciate having Plan-it in Altrincham However maintenance needs to be built in .

It is not that nothing works well in Trafford it is that communication could be much better We do not celebrate successes enough.

We very much appreciate the hard work of the Strategic Planning Team in putting the Local Plan Together and the consultation events. It is very hard to get residents to comment until the excavators are on their front lawn. We all know that. I have been very much involved in Places for Everyone in Carrington and Davenport Green and it is very difficult reconciling that with the Local Plan so again efforts by the team are appreciated.

Other Civic Societies don't like developers or planning officers. We beg to differ and are very grateful

[redacted]

From: judie collins [redacted]
Sent: 11 June 2025 10:26
To: Local Plan Consultation
Subject: Judie Collins GMCA Ageing Hub Live Well and Ageing in PlaceHub,

Follow Up Flag: Follow up
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Categories: LP April 2025 comment

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

I chair Housing and Neighbourhoods for Greater Manchester Older Peoples Network, sit on the GMCA Ageing Planning Panel and am on the Steering Group for Ageing in Place Trafford in Old Trafford ward. When Trafford and Stockport were not part of Ambition for Ageing I pressed for the final years funding which we got We were not funded for Ageing in Place but the officers and the community have delivered to an amazingly high standard Well done Trafford Community Collective.

When the SDF was first mooted the only borough to consider Older Peoples housing was Stockport. From day one I asked [redacted] about where we could be included. After Places for Everyone was adopted she said it was up to the Local Plan.
GMOPN work closely with GMCA though we are independent and we are working with them and the Mayor on Housing First and Live Well.
The Ageing Well leads are Public Health and Trafford has the best one in Greater Manchester He knows much more about housing now as we work so well together. Although Ageing Place is a major project it has not really dealt with housing it being presumed that older people will stay where they are or go into supported housing or care.
So what I would like in the Local Plan is the questions I put to Mayor Burnham
What about right sizing? Much is made of older people in too big houses .GMOPN with Care and repair did a major survey on what advice was available. The answer that mostly came back was "only in a crisis" It is obvious that older people staying independent is going to be much cheaper
What about retrofit ? Home owners often live in houses unsuitable for the present day advances
What about the much vaunted Landlords Charter Does this apply to Housing Associations who through a loophole do not have to answer FOI requests.
Should older people be separated from their communities or be intergenerational. Should they be in town centres .Should they be able to visit a bank and get advice.
Because Mayor Burnham was summoned to 10 Downing Street he was answering on line and has promised an in person meeting to address these points.
GMOPN has three working groups but the other two Health and Social Care and Transport and Out and About also have important links to Housing and Local Plan.
I have presented on housing and planning nationally and internationally and am due to present at Housing 25 at the end of the month. I wish I had more to say about Trafford.

June 2025
Jeremy Hinds
[redacted]

Trafford Council 2025 Draft Local Plan
Freightliner

Representations on Behalf of Freightliner

1. Introduction

1.1. Trafford Council are seeking feedback on their draft Vision and Strategic Objectives alongside draft policies covering a wide range of important topics such as climate change, residential and employment development, transport, town centres and retail, green spaces and the natural environment, and water and sustainable development.



Figure 1: Indicative plan showing Freightliner Land edged in red

1.2. Savills have been instructed by Freightliner to submit representations to Trafford's Regulation 18 Local Plan Draft, with specific regard to Trafford Wharfside-related elements and employment policies affecting the Freightliner site. Overall, Freightliner are supportive of the Local Plan which provides a positive start with regards to guiding development across the Borough, namely that in the Trafford Wharfside area which is highlighted as a key area for growth throughout the draft document.

1.3. Freightliner support this approach and are keen to be a part of conversations moving forward, given their prominent position directly adjacent to the existing Manchester United Old Trafford Football

June 2025
Jeremy Hinds
[redacted]

Stadium. This document aims to be the starting point for these conversations, as they assess their assets in the area.

1.4. The representations focus on the following topics:

a. Trafford Wharfside Regeneration

b. Employment related policies

June 2025
Jeremy Hinds
[redacted]

2. Trafford Wharfside Regeneration

2.1. The Freightliner site sits in the Trafford Wharfside area, adjacent to the Manchester United Old Trafford Football Stadium, and within the 'Core Growth Area' as highlighted in Policy ST1. This policy sets out areas where development opportunities will be identified, and includes Trafford Wharfside.

2.2. This is upheld in Paragraph 2.20 which sets out regarding the Old Trafford Stadium that *'the surrounding area is the focus of future improvements / regeneration*'. Freightliner is supportive of this positive support for development and regeneration, as a sustainable site in the built up area, there is ample opportunity to enhance and support the existing and future envisioned offer.

2.3. It is then highlighted in Paragraph 2.47 that this will be *'considered further as part of additional work on the site allocations'* and points to Chapter 13 as the current draft overarching policy position for the area. As such, this section will comment on the relevant parts of Chapter 13 with regards to the Trafford Wharfside area.

2.4. The following minor wording addition is suggested into Policy CL1N, highlighted by red text:

Policy CL1N: Manchester United Football Stadium and Immediate Surrounds

- *A. Improvements to and/or redevelopment of the existing football stadium to increase match day capacity with will be supported.*
- *B. All new development at/of the stadium must:*
  - *i. Be of the highest quality design and incorporate new public realm and green spaces across and throughout the wider stadium district.*
  - *ii. Respect and have regard to its immediate surroundings and neighbours.*
  - *iii. Be fully accessible for everyone.*
  - *iv. Be wholly sustainable over its lifecycle.*
  - *v. Connect to and/or make passive provision for future connection(s) to renewable heat and power networks; and vi. Incorporate renewable heat and energy generation measures onsite, alongside heat and energy reduction measures.*
- *C. Access to and from the stadium by walking cycling must be improved, with permeability significantly enhanced and increased in all directions. In particular, new and improved pedestrian and cycling routes will be required:*
  - *i. Over the Cheshire Lines Committee (CLC) railway line to the south of the stadium district.*
  - *ii. Over the Bridgewater Canal to the north; and*
  - *iii. Along the Bridgewater Canal in the vicinity of the stadium district.*
- *D. Proposals to reduce the quantity of surface match-day car parking will be supported and encouraged.*
- *E. Applications for new surface car parking will not be supported.*
- *F. Provision of fan coach parking will only be acceptable where it is provided in accordance with the Council's Park and Ride facilities, and a permanent plan, agreed with the Council, to move fans to/from the facilities is provided and funded by the club.*
- *G. The Council will support a mixture of residential, commercial, retail, education, community, leisure and hotel uses around the stadium district to ensure that it is a*

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Jeremy Hinds
[redacted]

both a destination and a sustainable vibrant local community on match and non-match days.

H. *High-quality, publicly accessible and activated spaces within the area stadium district that complement other planned public realm/spaces and link with key existing and future walking and cycling routes will be required.*

I. *All development proposals will be required, where possible and viable, to support and contribute towards the delivery of:*
   i. *New and improved walking and cycling connections across the Manchester Ship Canal to/from Media City.*
   ii. *An extension of the Processional Route (Policy CQ9 of the Civic Quarter Area Action Plan) into the stadium district*
   iii. *Improved bus services and infrastructure along the A56.*
   iv. *Improvements to Metrolink services and infrastructure; and*
   v. *A new and/or improved design and delivery of the White City Circle Interchange.*

J. *Proposals which would compromise the re-opening or relocation of the Manchester United Football Ground railway station for either match day or general passenger use will not be supported*

2.5. Overall, Freightliner strongly support the policy as currently worded, which represents support for development and regeneration in the Trafford Wharfside area, particularly that immediately adjacent to the football stadium, and is sufficiently flexible to enable a wide range of development to come forward to ensure that it can evolve as a sustainable vibrant community on match and non-match days.

2.6. It is important that this is maintained as the Local Plan progresses and should be reflected in the masterplan coming forward for the area. Freightliner would like to ensure they are part of the conversation that brings this vision to fruition, as a major landowner in the immediate vicinity of the stadium.

June 2025
Jeremy Hinds
[redacted]

3. Employment Protection

3.1. A further consideration, in the context of the location as an important growth area, is the protection afforded to existing industry / employment sites. Freightliner has operated from the site for many years and is a well-established employer in the area. Policy EJ1 sets out the protection of existing employment uses at Part D. This is reiterated with specific regard to the Freightliner site as paragraph 5.25, which sets out that '*existing employment areas will continue to play a vital role in supporting the economic growth of Trafford. The employment role of major industrial and warehousing locations e.g. Trafford Park and associated infrastructure such as Trafford Park Freight Terminal will be protected in line with PfE. There is significant pressure to redevelop existing employment land and premises into non-employment uses, particularly at Trafford Park'.*

3.2. Further, Policy EJ4 supports the sustainable development of offices within key employment areas, which includes Wharfside and Pomona. The policy is supportive of office employment uses (Use Classes E(c)(i), E(c)(ii), E(g)(i), E(g)(ii) and similar employment uses). Paragraph 5.27 refers to The Quays (Wharfside) as a primary office market outside of the city centre.

3.3. The Policy wording itself should be clearer in its differentiation of where office development will be supported, as it is important that there is no tension between the push for regeneration and a range of uses to achieve a vibrant community in the Wharfside area, and the support for offices. The risk with the latter being that an overly strong office support in this location could result in an imbalance of other uses, impinging on other sectors i.e. nighttime economy.

3.4. Policy EJ5 aims to safeguard Trafford's employment land. Part E of the policy sets out that *'non-employment uses (non B2, B8 or E(g)) on land and/or buildings that are currently in employment use outside of places listed in all EJ3 and EJ4 policies, will only be supported where proposals can accord with Part B, C and D'.*

3.5. This policy is currently overly restrictive with regards to the Freightliner site. It only allows non-employment development on an existing employment site where it is supporting another employment use elsewhere. This would restrict the Freightliner site from coming forward for development as part of the Trafford Wharfside development and as such represents a potential tension between the emerging Local Plan and the future masterplan for the area.

3.6. Furthermore, with regards of paragraph 5.25 set out above, the removal of this sentence should be considered as there is a risk that this could impinge development coming forward in the future on what is a highly desirable site which could help the Council achieve its vision in the Wharfside area. By removing this reference, and amending the wording of Policy EJ5, it ensures the Freightliner site is futureproofed and the Local Plan as a whole remains coherent and collaborative, by ensuring it accords with the wider vision throughout.

Trafford Local Plan
Regulation 18 Consultation Draft - Policies
Consultation Response

Submitted by:

Chris Taylor, Head of Planning and Consents

Progressive Energy Ltd

11 June 2025

Progressive Energy Ltd welcomes the opportunity to respond to the Regulation 18 consultation on the Trafford Local Plan. As the originators of the HyNet North West industrial decarbonisation cluster and coordinators of the HyNet Alliance, we are committed to delivering low-carbon hydrogen production, hydrogen to power (H2P), carbon capture and storage (CCS), and associated infrastructure across the North West, including Greater Manchester.

We strongly support Trafford Council's ambitious vision to achieve carbon neutrality by 2038. This target is both commendable and necessary, and we believe Trafford is well-positioned to lead the way in industrial decarbonisation. In this response we have proposed a number of changes or additions to the proposed policies designed to support this carbon neutrality vision.

The Role of Energy and Industry in Trafford's Emissions

We welcome the consultation's recognition that 80% of Trafford's carbon emissions are attributable to energy use. This underscores the urgent need to transition to low-carbon energy sources across all sectors. Industry is a particularly significant contributor, accounting for approximately 40% of Trafford's total carbon emissions. Decarbonising this sector is essential to achieving the borough's net zero ambitions.

We welcome the Local Plan's support for hydrogen for heat, particularly in Trafford Park and West Trafford. However, we recommend broadening this support to explicitly include:

- Hydrogen for use in manufacturing industries, where it can play a vital role in replacing natural gas in high-temperature processes and other applications, particularly where electrification is not possible or not practicable[1]
- H2P, which by providing dispatchable low carbon power generation not only helps to balance the electricity grid, but enables the deployment of greater levels of intermittent renewables, such as wind and solar, at a national level

[1] Funded by central Government, hydrogen use at commercial scale has recently been demonstrated at Kellogg's Trafford Park plant and although this plant is set to close in 2026, the evidence produced can be applied to enable decarbonisation of a range of other manufacturing sites

Strategic Opportunity at Carrington
We would like to highlight that the proposed HyNet hydrogen pipeline will connect into Carrington and Partington, providing a direct supply of low-carbon hydrogen to support both industrial and H2P uses. This infrastructure will enable the replacement of fossil fuels with clean hydrogen, supporting Trafford's decarbonisation goals and enhancing the strategic value of the New Carrington allocation.

Support for Low-Carbon Power
We welcome the draft Local Plan's target (paragraph 3.21) to increase total renewable and low-carbon energy generating capacity. However, we note that the Plan currently lacks specific policies to support this target and believe it is vital for the Local Plan to provide these.

We recommend the inclusion of new or revised policies that:

- Support low-carbon power generation, including H2P
- Identify suitable locations for such infrastructure, including Carrington
- Safeguard land and infrastructure corridors for hydrogen and CO_2 pipelines and associated facilities to enable future connectivity to areas such as Trafford Park

This approach aligns with the National Planning Policy Framework (NPPF), which encourages local planning authorities to develop a positive strategy for renewable and low-carbon energy and to support infrastructure that helps reduce greenhouse gas emissions (paragraph 165).

Summary of Policy Recommendations

1. Explicit Recognition of HyNet

   Reference HyNet North West as nationally significant infrastructure supporting Trafford's decarbonisation strategy and carbon neutrality vision.

2. Carrington – Hydrogen-Enabled Growth Area

   Amend policies for Carrington to reflect its strategic role in delivering low-carbon energy. The proposed HyNet hydrogen pipeline will connect to Carrington, providing a direct supply of low-carbon hydrogen for industrial and H2P uses. The Local Plan should support hydrogen-ready industrial development, hydrogen-fuelled power generation, and safeguard infrastructure corridors necessary for pipeline integration.

3. Safeguarding Hydrogen and CCS Infrastructure

   Introduce a policy to safeguard land and corridors for hydrogen and CO_2 pipelines, compression stations, and storage facilities to facilitate future connections to the HyNet network and other decarbonisation infrastructure.

4. Industrial Decarbonisation Requirements

   Require major industrial developments to assess opportunities for hydrogen fuel switching, CCS readiness, and connection to low-carbon heat networks.

5. H2P Power Generation

   Introduce policies to support H2P generation and identify suitable locations, including Carrington, in line with the NPPF.

6. Cross-Boundary Collaboration

   Encourage collaboration with neighbouring authorities and the Greater Manchester Combined Authority to coordinate planning for hydrogen and CCS infrastructure.

We would welcome the opportunity to engage further with Trafford Council to support the implementation of these recommendations and to provide technical input on hydrogen infrastructure planning.

Contact:
Dr Chris Taylor
Head of Planning and Consents
Progressive Energy Ltd
[redacted]

June 2025
Jeremy Hinds
[redacted]

Trafford Council 2025 Draft Local Plan
Wellacre Academy

Representations on Behalf of Brookhouse Group

1. Introduction

1.1. The representations below are made with specific regard to policies regarding education and land use allocations affecting Wellacre Academy. Brookhouse is making representations on other topics separately.

1.2. The context of the representations is the long standing conversations and ideas being put forward to develop land at Wellacre Academy in order to generate funds to be invested in the Academy to improve its educational offer.

1.3. The representations focus on the following topics:

a. Green Belt

b. Education related policies.

June 2025
Jeremy Hinds
[redacted]

2. Green Belt

2.1. We note the comment at paras 2.12 and 2.13 that the council is not making alterations to the green belt boundary because a review of the green belt in Trafford was undertaken as part of the PfE.

2.2. However, since that review there has been a significant change in green belt policy as set out in NPPF (The Framework) that introduces the case to alter green belt boundaries in order to meet identified needs. In doing so, The Framework also intrudes the concept of "Grey Belt", being land in the green belt that is either previously developed land, or land that does not make a strong contribution to 3 of the 5 purposes of land being designated green belt as set out at para 143 of The Framework. Namely:

A. To check the unrestricted sprawl of large built-up areas

B. To prevent neighbouring towns from merging into one another

C. To assist safeguarding the countryside from encroachment.

2.3. With regard to land at Wellacre Academy, the green belt allocation covers land that is developed, namely the education estate, as well as its playing fields. Neither does the land concerned make a strong contribution to any of the purposes of designating land as green belt as set out above.

2.4. In this regard we note that proposed Policy G14 headed "Mersey Valley", identifies the boundaries of the protected area comprising Mersey Valley at Figure 8-4 headed "Mersey Valley and Opportunity Areas". The Mersey Valley Corridor excludes land at The Academy, comprising land that is both developed and are playing fields.

2.5. It seems to us that it is appropriate to remove the Academy and it's estate from the green belt allocation in accordance with advice in The Framework.

June 2025
Jeremy Hinds
[redacted]

3. Education Policies

3.1. The Draft Plan contains very few policies specifically for Schools. Schools are defined as a social and community use at para 11.7, and grouped under the sub-category "Education and Childcare Facilities".

3.2. The general objective of policies in Chapter 11 is to protect existing social and community uses, as well as enhancing provision. Brookhouse supports the general objective, but suggests that provision should be included in the reasoned justification for Policy CT1 that enhancement to existing facilities may require enabling development, given the general lack financial resources available to such facilities. Such additional text could be added at para 11.8.

Brookhouse Group Limited

June 2025

Land North of Dane Road, Sale

Trafford Council Call for Sites 2025 and Representations to the Local Plan Consultation

savills.co.uk

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1. Introduction and Background

Background

1.1. Savills UK Limited ('Savills') is instructed by Brookhouse Group Limited ('Brookhouse') to prepare and submit representations in response to the Regulation 18 consultation on the draft Local Plan for Trafford. This document also provides information relating to land North of Dane Road, Sale (herein 'the Site'), which the Brookhouse Group control, to promote it for development in response to the Trafford Council Call for Sites 2025.

1.2. A Site Location Plan detailing the extent of the land for promotion is included at **Appendix A**.

1.3. On behalf of Brookhouse, Savills engaged with the previous Local Plan consultation in February 2021. At that time, the Site was put forward as part of the Call for Sites to promote it for development. A good deal has progressed since then, including supporting technical work to demonstrate its deliverability, and significant changes to national policy.

1.4. Since the previous Call for Sites and Local Plan consultation, progress on a new Local Plan for Trafford has been paused whilst Places for Everyone Plan progressed through to adoption. Further information about the current stage of the new Local Plan preparation is provided at Section 2 of this document.

Brookhouse Group

1.5. Brookhouse Group is a privately-owned property group that is based in Trafford, with offices in Sale. The Group was founded in the 1930s and has long-established relationships with Local Authorities. Brookhouse has had previous joint venture arrangements, including with Rochdale Council, Knowsley Council and Oldham Council, where it has been jointly delivering development for over 30 years.

1.6. Lancet Homes is the residential development arm of the Brookhouse Group. Lancet Homes has extensive experience delivering high-quality residential developments in the North West and Cumbria. Accordingly, the Brookhouse Group has a long-established track record of delivering developments and new homes.

1.7. Brookhouse Group has a landholding in Sale that it has previously promoted for development though the 2021 Trafford Call for Sites. The Group see the current 2025 Call for Sites and draft Local Plan consultation as an opportunity to actively promote the land so that it can make a positive contribution to meeting the development needs of Trafford.

The Site

1.8. The Site lies to the north-east of Sale, within the Sale Central ward of Trafford Council. The Site is bounded to the north by an established line of mature tall trees with Priory Gardens open space and the M60 motorway beyond.

1.9. The eastern boundary is formed by Arnesby Avenue and a public bridleway that runs the length of the Site. Existing buildings associated with the Sale Conservative Club and Mersey Court retirement housing block off Dane Road (B5397) form the southern Site boundary. The boundary to the west is an established line of dense trees and hedges with Priory Gardens beyond. The Site is therefore surrounded by mature and tall trees, and is enclosed from surrounding areas.

1.10. The Site extends to approximately 3 hectares and is used predominantly for equestrian activities in relation to Brookhouse Stud. Parts of the Site are previously developed, including a private residential property, as well as indoor stables and associated outbuildings. The land has various areas of hardstanding associated with internal access routes and car parking areas. The current access to the Site is provided directly off Dane Road, where there is a private entrance gate adjacent to Mersey Court.

1.11. The Site is available for development.

Purpose and Structure

1.12. This purpose of this document is to provide comments on the vision, strategic objectives and relevant policies in the draft Local Plan in response to the Regulation 18 Local Plan Consultation. This document also responds to the Call for Sites 2025 by providing information to promote land north of Dane Road to be put forward for a residential development allocation in the new Local Plan.

1.13. This document is comprised of three main sections (A, B and C) that are linked. The structure of this document is as follows:

- Section 1: Introduction and Background
- Section 2: Local Plan Context

Part A – Representations on the Draft Local Plan

- *Section 3: Representations – Draft Vision and Strategic Objectives*
- *Section 4: Representations – Draft Policy R1: Housing Delivery*
- *Section 5: Representations – Other Draft Policies*

Part B – Call for Sites 2025 Submission

- *Section 6: The Opportunity*

Part C – Green Belt Assessment

- *Section 7: Green Belt Assessment*

- Section 8: Conclusions and Recommendations

2. Local Plan Context

Consultation Context

2.1. The adopted Development Plan for Trafford Council comprises the following documents:

- Places for Everyone (Adopted in March 2024)
- Trafford Local Plan Core Strategy (Adopted in January 2012)
- Saved policies of the Revised Unitary Development Plan (Adopted in June 2006)
- Greater Manchester Joint Waste Plan (Adopted in April 2012)
- Greater Manchester Joint Minerals Plan (Adopted in April 2013)
- Civic Quarter Area Action Plan (Adopted in January 2023)

2.2. In 2021, a Regulation 18 consultation was held which sought feedback on a Local Plan for Trafford. At that time, Savills engaged with the consultation on behalf of Brookhouse to promote the land North of Dane Road for development.

2.3. Work on the preparation of a new Local Plan was then paused while Places for Everyone (PfE) was progressed. PfE is a joint Development Plan Document for nine Local Authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) in Greater Manchester.

2.4. PfE focuses on strategic-scale allocations and allocates land for development and establishes various policies to set an overall spatial strategy for the region, covering a timeframe from 2022 to 2039. PfE sets a housing requirement for each constituent authority and amended Green Belt boundaries. PfE was adopted in March 2024 and forms part of the Development Plan for all nine authorities, including Trafford.

2.5. Since the adoption of PfE, new NPPF has been adopted, superseding several policies therein.

2.6. Now that PfE is adopted, progress on a new Local Plan for Trafford has recommenced. The new Local Plan will replace all current and saved policies in the Core Strategy and Unitary Development Plan and will sit alongside PfE and other Development Plan Documents as part of the statutory Development Plan for Trafford.

2.7. Trafford Council is holding a Regulation 18 consultation on draft policies of the Local Plan from the 24th April to the 12th June 2025. The consultation seeks feedback on the 'Vision' and 'Strategic Objectives' of the new Plan as well as draft policies. There will be an additional consultation (anticipated in September 2025) on the second part of the new Local Plan, which will cover site allocations and designations. Accordingly, these representations respond to the relevant draft policies as well as the Strategic Objectives and Vision of the draft Local Plan.

3. Representations – Draft Vision and Strategic Objectives

Vision for Trafford

3.1. The draft Trafford Local Plan has an overarching vision that sets out what type of place Trafford aspires to be at the end of the plan period, responding to local challenges and opportunities, looking ahead to 2042 and setting the direction of travel for Trafford.

3.2. The draft vision states that the Plan will ensure that by 2042 all residents, businesses and communities are addressing the climate crisis locally*, 'with ambitious targets for new development'*. Savills support the element of the vision that aims to set '*ambitious*' development targets that will meet the needs of the Borough, however it is considered that the housing target is not high enough, as explained in detail at Section 4 of this document.

3.3. In terms of housing development, the vision states that by the end of the Plan period, *'Trafford will have met its housing requirement; it will have addressed its acute need for affordable housing to ensure that people have the types of homes that they both want and need'*.

3.4. Savills acknowledge the critical importance of addressing the need for affordable housing in Trafford and the principal role of the Local Plan in setting a housing requirement for the Borough that accurately responds to the specific housing demands of local communities. Savills also note the element of the vision that aims to provide homes that people *'both want and need'*, emphasising that the identified requirement for housing must take into account the various types of homes people '*want and need'*, in the right areas.

Strategic Objectives

3.5. The draft Local Plan includes 10 strategic objectives that are linked to the overall vision and help to inform the strategic policies contained in the Plan. The strategic objectives are based on the key roles of the planning system as set out in the NPPF (social, environmental, economic).

3.6. In general terms, the broad aims of the strategic objectives, such as supporting town centres, delivering homes, sustaining economic growth and integrating sustainable movement are all supported in principle.

3.7. The strategic objective that is considered to be most relevant to these representations is SO1 *('Deliver the homes that Trafford needs'*).

<u>SO1 – Deliver the homes that Trafford needs</u>

3.8. SO1 has three strands:

A. *Deliver homes for the residents of Trafford within distinct and attractive neighbourhoods.*
B. *Promote a good choice of high quality, accessible, energy efficient housing people can afford in sustainable locations, of a size, mix, density and tenure needed.*
C. *Address the housing shortage through the provision of affordable and social rented housing in the right mix to support the needs of all, including an ageing population.*

3.9. Savills supports the primary objective of the plan that aims to promote a *'good choice of high quality, accessible, energy efficient housing people can afford in sustainable locations'.* It is essential that the Plan provides an appropriate framework to deliver a range of housing in sustainable locations across the Borough.

3.10. In particular, Savills emphasise the key aspect of SO1, which is to promote a '*good choice*' of high-quality housing in sustainable locations. This means providing a range of different housing options in various locations across the Borough, to meet the diverse housing needs of the local population. For example, the provision of homes for families and older people must be taken into consideration as part of the Plan. A significant focus on urban regeneration and apartment-dominated developments will not achieve this *'good choice'.*

4. Representations – Draft Policy R1: Housing Delivery

Draft Policy R1: Housing Delivery

4.1. Part A of draft Policy R1 (Housing Delivery) states that *'The Council will ensure that a suitable range of sites are allocated and made available across Trafford, to meet the borough's housing requirement.'*

Housing Requirement

4.2. In terms of the number of homes that are required in Trafford over the Plan period, the draft Plan reflects the housing requirements set under Policy JP-H1 of PfE, with additional requirements for the extended Local Plan period up to 2042 (PfE plan period is 2022 to 2039).

4.3. As per the draft Local Plan, a minimum of 22,443 net additional dwellings will be delivered in Trafford over the Plan period, which is 2022 – 2042. This equates to an average delivery of 1,122 dwellings per annum (dpa). The draft Plan explains that the housing requirement has been calculated by taking the PfE requirement for Trafford and using the same annual average of 1,122dpa to cover the additional Plan period to 2042.

4.4. As a joint Plan, PfE considered housing requirements across the Plan area and redistributed the overall housing requirement between authorities in accordance with the overall spatial strategy. The overall spatial strategy is based on the 9 authorities as a whole Plan area and therefore does not comment on how development should be distributed within local authority areas. In the case of Trafford, this meant that some of its housing requirement was distributed out of the Borough to be met in other authorities in the Plan area.

4.5. The draft Local Plan sets the local housing requirement in response to specific localised needs in Trafford. It is noted that the current Local Housing Need (LHN) for Trafford, calculated using the most recent iteration of the Standard Method (May 2025), is 1,621dpa. This represents an increase from the previous LHN, as established by the previous Standard Method (December 2024) of 1,599dpa and is also a sizeable and significant increase compared to the PfE requirement for Trafford, which is an average of 1,122dpa.

4.6. In light of the above, it is considered inappropriate to adopt a local housing requirement beyond the PfE period that is based on an out-of-date Standard Method (which is now well below identified needs) and a spatial strategy that redistributes local housing requirements outside of Trafford.

4.7. Further, the Inspector's Report on the Examination of the PfE Plan specifically noted (at Paragraph 15) that, while PfE identifies the amount of development (including housing) required across the Plan area and allocates land development, ***'it is not the role of the Plan alone to identify sufficient land to ensure that all objectively assessed needs for housing and other uses can be met, as much of the supply will be brought forward through local plans'*** (our emphasis added).

4.8. The Inspector's Report also highlights at Paragraph 16 that *'each of the nine authority's local plan will be essential to ensure that sufficient land is identified to allow development needs, including those set out in the Plan, to be met in a timely and plan-led manner.'*

4.9. In light of the above, there is a clear emphasis that the role of PfE is to set overall, strategic development requirements, however local plans are '*essential'* in ensuring local needs are identified and met in full and in a timely manner.

4.10. Savills consider that it would be most appropriate to use the current Standard Method figure (1,621dpa) as the housing requirement for the period beyond the PfE plan period up to 2042. This would result in an increase from 1,122dpa to 1,621dpa from 2039 – 2042 and an overall housing requirement for Trafford of 23,490 dwellings.

4.11. The suggested approach would be in accordance with the NPPF, which states (at Paragraph 16) that plans should *'be prepared positively, in a way that is aspirational but deliverable'.* This would also be in accordance with the Government's ambition to significantly boost housing delivery, as established in the *'Building the Homes we Need*' Written Ministerial Statement.

4.12. At Paragraph 62, the NPPF is clear that *'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method'.* It follows that in order to ensure consistency with the NPPF, Trafford Council should use the latest Standard Method to determine its housing requirement for the period between 2039 – 2042, as outlined above.

Distribution of Housing

4.13. As outlined above, the draft Plan for Trafford states that a minimum of 22,443 new homes are required to be delivered over the Plan period (2022 – 2042). The projected housing delivery will be distributed across the Borough in accordance with the relevant policies in the draft Local Plan. For the purposes of housing distribution, the draft Plan divides Trafford into four 'Localities' (North, South, Central, West). A plan showing the Localities is provided on Page 8 below.

4.14. It is acknowledged that the draft Local Plan Strategy is aligned to the overarching Spatial Strategy as established in PfE. Since the PfE Spatial Strategy has been duly tested on its legal compliance and the relevant tests of soundness and is now formally adopted, it is considered to be reasonable and justified that the draft Plan Strategy follows the PfE strategy in terms of directing growth and development in Trafford.

4.15. However, it is unclear why the approach has been taken to divide Trafford into four 'Localities' for the purposes of housing distribution. The four Localities are not reflective of the draft Strategy and do not take into account local existing local housing market areas. Therefore, it is questioned as to whether the Localities are suitable geographies between which to distribute housing delivery effectively, in a way that responds to the specific needs of different parts of the Borough.

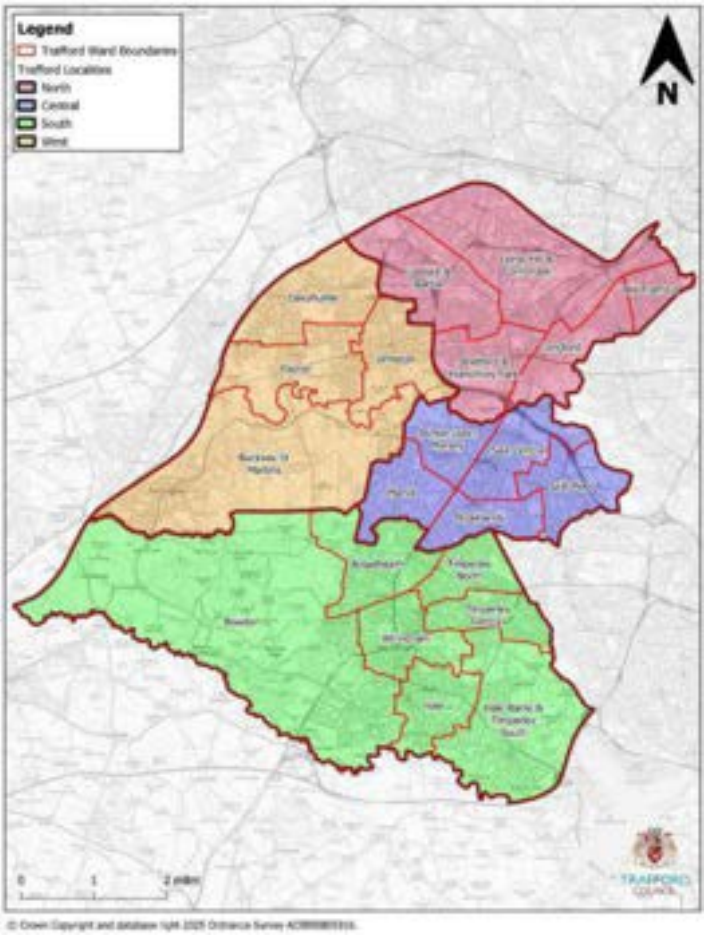


Figure 1: Trafford Localities

4.16. The Locality approach is inconsistent with the previous spatial strategy in the adopted Core Strategy, which (at table L1) distributes housing into various Strategic Locations, as well as 'Other Trafford Park / North Trafford Area Sites', 'South City Region Area Regeneration / Town Centre Schemes' and 'Other South City Region Sites'.

4.17. Whilst the passage of time since the Core Strategy was adopted is significant and a revised approach may well be appropriate, there is no apparent evidence to justify why the proposed approach to distribution of housing within Trafford has been taken in the draft Plan.

4.18. Table 4-2 of the draft Local Plan sets out the net additional homes that will be delivered over the Plan period in each of the four localities. The proposed distribution of housing is as follows:

- North – 18,704 net additional dwellings
- South – 3,860 net additional dwellings
- Central – 677 net additional dwellings
- West – 5,072 net additional dwellings

4.19. The draft Plan forecasts an uneven distribution of housing delivery in Trafford. An overwhelming majority (83%) of new homes are planned to be delivered in North Trafford, whereas a minority (only 3%) of homes will be delivered in Central Trafford.

4.20. The 677 homes attributed to Central Trafford equates to approximately 30 net additional dwellings per year across the Plan period. This nominal annual target is significantly below the scale of housing delivery that is required to meet the LHN and arguably contradicts the Plan vision which is to set '***ambitious*** *targets for new development'.* In effect, the 677 homes apportioned to the Central Locality would place a near moratorium on housing delivery in this part of the Borough, which is contradictory to the vision of the Plan itself as well as national policy and as such, is considered to be inappropriate.

4.21. Part E of draft Policy R1 states that the Council will support the provision of new housing that makes as much use as possible of previously developed land, or 'brownfield land' within the existing urban area. The Plan has a focus on housing delivery in existing urban areas particularly in Trafford North.

4.22. Part F of the same policy states that the Council will seek to ensure the efficient use of land, concentrating higher density development in the most sustainable locations, at lowest risk of flooding, close to services and facilities as well as public and active transport links; where it can be demonstrated that it is consistent with other policies in the Plan.

4.23. The distribution of new housing that is set out in the draft Plan is explained by the sustainability of the North Locality and the opportunity to develop brownfield sites, such as Pomona, the Civic Quarter, Trafford Waters and Old Trafford Stadium District (including Wharfside). Strategic housing allocations in PfE; New Carrington and Davenport Green (Timperley Wedge) contribute to delivery in the West and South Localities. The draft Plan indicates that the general distribution of housing is consistent with the overall spatial strategy which is linked to PfE.

4.24. Savills acknowledge that a 'brownfield first' approach to the distribution of new housing development is justified and consistent with the NPPF. Notwithstanding this, it is considered that the draft housing distribution is disproportionately skewed towards regeneration opportunities the North Locality and fails to take full account of sustainable locations in other Localities, such as Central Trafford, which should be apportioned greater contributions to housing delivery.

4.25. It is recognised that there are significant opportunities in Trafford North for housing delivery through regeneration, although the ability of such projects to contribute sufficiently to the need in Trafford for family homes is questioned. Whilst it is appropriate to support the use of previously developed land for housing, an overreliance on this should not prevent the delivery of other sustainable sites. The Council will need to demonstrate that this strategy is deliverable (not least in respect of viability), will meet the varied needs for housing and will not lead to a shortage of homes being delivered.

4.26. It is suggested that the need for a variety of housing should be met in other parts of Trafford (for example, Central and South Localities) where there are strong existing housing markets and the market could deliver at a scale that exceeds the housing delivery that is apportioned in the draft Local Plan, within the Plan period.

4.27. The Trafford Economic Viability Study (2009, 2011 update) identified that Trafford does not perform as a single uniform property market but can be characterised as a series of sub-market areas. The Study identified eight distinct submarkets, which are: Altrincham, Carrington, Old Trafford, Partington, Rural Countryside, Sale, Stretford and Urmston. The sub-markets were divided into 'hot', 'moderate' and 'cold' markets to reflect spatial market performance. Sale, along with Stretford and Urmston was categorised as a 'moderate market location'.

4.28. Sale, in particular, is a well-established residential settlement in a highly sustainable location. The sustainability of Sale town centre and surrounding neighbourhoods is commented on further at Section 6 of this document. It is considered that Sale should be attributed a higher apportionment of housing to reflect the local housing market demands and the sustainability of the location, which make it a suitable and appropriate location for housing development.

Trafford Central Locality

4.29. Trafford Central includes the five Council wards: Ashton upon Mersey, Brooklands, Manor, Sale Central and Sale Moor.

4.30. The Central locality is categorised as a 'Sothern Area' under Policy ST3 of draft Plan. According to the draft Plan, Southern Areas *'are characterised by residential neighbourhoods, some with high house prices and relatively high incomes, as well as significant affordability issues'.* All of Trafford's town centres (Altrincham, Sale, Stretford and Urmston) are located in the Southern Area.

4.31. The Central locality is largely residential in character, with over 23,000 dwellings (2021 Census). The average gross income in the Central locality is above the national average and 69.5% of homes are owner-occupied, which is also above the national average of 62.3%. The 2023 Trafford Housing Needs Assessment noted the average market price for a home as £392,602 in Central Trafford, compared to the national average of £302,000 and Greater Manchester average of £254,000.

4.32. Strong existing market conditions can support a rate of housing delivery within the Plan period in a way that other parts of the Borough cannot. This is particularly important for the delivery of affordable homes, since affordable housing can be secured as part of new residential developments where there are already strong market demands for housing.

4.33. In consideration of the above, the distribution of housing as set out in the draft Plan should be reviewed. Sale, and Trafford Central more widely, should be attributed increased housing numbers as these areas can suitably support significantly more growth than what is currently (draft) planned for. This is particularly the case for affordable housing delivery, where there is an acute need.

5. Representations – Other Draft Policies

Draft Policy R3: Affordable and Social Housing

5.1. Policy R3 states that all major residential developments will be required to provide on-site affordable housing, with a tenure mix of 60% rented (40% social rent and 20% affordable rent) and 40% affordable home ownership.

5.2. The minimum proportions of Affordable housing required are set according to the locality policies as follows:

- North – 25%
- South – 45%
- Central – 30%
- West – 30%

5.3. The policy states that as a minimum, 10% of affordable homes must be Totally Affordable Net Zero (TANZ) homes.

5.4. At this stage in the preparation of the Plan, a Viability Assessment has not been undertaken by the Council, however it will be undertaken to inform the next stage in the production of the Plan. Savills note that affordable housing policy must not only take account of need but also viability and deliverability.

5.5. As commented on at Section 4 of this report, an overwhelming majority of housing growth is distributed to the North locality, where there is a proposed 25% affordable housing contribution. To ensure deliverability of affordable and market housing, it is considered that the distribution of homes should reflect areas where it can be demonstrated that housing development is deliverable and viable, where there are strong market conditions.

Draft Policy R4: Size and Type of New Homes

5.6. Policy R4 states that all new residential developments must deliver a range and mix of housing types and sizes.

5.7. Policy R4 is accompanied by only one locality-specific policy, which is for Trafford North. In the North locality, major residential development within Old Trafford, Gorse Hill and Cornbrook wards will be primarily apartment schemes which must deliver 80% apartments and 20% ground floor duplexes.

5.8. Savills consider that the draft Plan may not meet the housing needs of all members of the community. The NPPF is clear that the size, type and tenure needs of different groups in the community should be considered and reflected in planning policies including those that require affordable housing, families with children and older people.

6. Call for Sites: The Opportunity

6.1. The Site is promoted as part of the Call for Sites exercise as it presents a good opportunity, in an appropriate and sustainable location, to contribute to meeting the identified housing needs in Trafford during the Plan period.

6.2. Technical work has been undertaken to support this submission and to indicate the scale of development that could be achieved at the Site. This Site is demonstrably **deliverable.** This is illustrated through an indicative masterplan (**Appendix B**) which responds to technical site-specific considerations, such as drainage, ecology and access.

6.3. Initial feasibility work, taking into consideration existing and emerging planning policies and physical site constraints, indicates that the Site has potential to accommodate approximately 100 new homes. This would make a significant contribution to meeting the local housing requirement in the Central Locality of Trafford. The concept masterplan envisages an apartment-led housing development, with a mix of housing at various densities with open space, landscaping and internal access routes. Further commentary of the approach that has been taken to design and masterplanning is provided below.

6.4. This section of the document sets out key information about the Site to demonstrate that it is consistent with the Vision and Strategic Objectives of the draft Local Plan and is a suitable and deliverable opportunity for development. It is considered that the Site should be included the new Local Plan as an allocated site for housing.

Site Description

Context

6.5. The Site is in the Central Locality as defined in the draft Plan. It is located in a sustainable location approximately 1.2km to the north east of Sale Town Centre and approximately 1km to the north of Sale Moor Town Centre.

6.6. The Site is located to the south of the M60 motorway between Junctions 6 and 7, to the east and west respectively. The Site benefits from existing direct highway access off Dane Road (B5397). While primary vehicular access to the Site is currently taken off Dane Road, a new, more suitable, access is proposed to serve the Site, to be taken off Arnesby Road. The Site will have multiple pedestrian and cycle access points, including directly to Dane Road.

Ownership

6.7. The Site (as shown on the Location Plan at **Appendix A**) is under the control of Brookhouse Group and is available for development.

Connectivity

6.8. In terms of public transport routes, the Site is conveniently positioned in close proximity to Dane Road Metrolink stop. The Site lies just 650m away from the Metrolink stop, which equates to an average 8-minute walking distance.

6.9. Dane Road is served by the Green and Purple Metrolink Lines, with frequent direct services between Altrincham and Picadilly, Etihad Campus and Bury. The journey time from Dane Road to St Peter's Square is approximately 16 minutes, and approximately 13 minutes from Dane Road to Altrincham.

6.10. The Site is also very well-connected by bus. Clarendon Crescent bus stop is located within 100m of the Site (average 1-minute walking distance) and is served by the 248 Bee Network route (Manchester Airport – Eccles). The 248 route includes key local destinations and interchanges: Trafford Park, The Trafford Centre, Urmston, Flixton, Carrington, Sale, Baguley, Wythenshawe and Manchester Airport.

6.11. In terms of existing connectivity to the local highway network, Dane Road connects to the A56 to the west and the A6144 to the east, both of which provide access to the M60 (Manchester Outer Ring Road).

6.12. The Site is clearly well-connected by various modes of public transport and is conveniently located nearby to Sale and Sale Moor town centres, which both host local community facilities. The Site is therefore a highly sustainable location for residential development as it has strong existing connections by public transport to local facilities, thus significantly reducing reliance on single occupancy car travel.

Characteristics

6.13. The Site comprises an area of approximately 3 hectares which is predominantly associated with equine facilities used for the Brookhouse Stud. There are some existing buildings at the Site, including a residential property, brick-built stables and a timber stable block, with ancillary sheds. Part of the Site is therefore previously developed brownfield land, as discussed further below.

6.14. In terms of ground levels, the Site is generally flat. A topographical survey has been completed which confirms that there is a gentle fall from the south to the north across the Site, with levels varying from around 27.2m AOD at the access to the south to approximately 24.57m AOD at the northern end of Site.

6.15. The Site benefits from strong, naturally defined (and defensible) boundaries which are created by existing tall trees and hedges on three sides of the plot. Mature tree lines at the north, west and east of the Site means the Site has an existing enclosure and the development of the Site would be well-contained within the existing boundaries.

Planning Policy Designations

Places for Everyone

6.16. The entire Site is designated as Green Belt under Policy JP-G9 of PfE. Policy JP-G9 reflects the five purposes of the Green Belt as set out in the NPPF. It should be noted that since the adoption of PfE (in March 2024), the NPPF has been updated (in December 2024) and significant changes to Green Belt policy were introduced. PfE was therefore prepared and examined against a version of the NPPF that is now superseded.

6.17. A comprehensive appraisal of the Site in terms of its contribution to the function of the Green Belt is included at Section 6 below.

Technical Considerations

Flood Risk and Drainage

6.18. A Technical Note has been prepared by Cole Easdon to support this Call for Sites submission. A copy of the Note is provided at **Appendix C**. The Note confirms that the Site is located in Flood Zone 1, meaning it is at low risk of fluvial flooding and no mitigation is required in that respect. The Site is also at low risk of flooding from artificial sources, groundwater, public sewers and drains.

6.19. The Note identifies a moderate risk of pluvial flooding at the Site. The majority of the Site is at low chance of flood depths reaching 20cm in depth. The Note recommends that the masterplan should take into consideration existing areas of pluvial flooding at the Site, with potential built development located outside of pluvial flood zone extents where possible. Development could be considered within areas of pluvial flooding up to 20cm in depth, providing sufficient mitigation measures are taken.

6.20. There are some areas of surface water flooding on the current Environment Agency (EA) mapping, however the majority of the Site (including access) does not have any surface water flooding areas. Whilst in theory, at present, the surface water mapping could potentially reduce the developable area slightly, we anticipate that as the Plan progresses, the EA mapping will have been updated, which may reduce, or remove, the extent of surface water flooding at the Site. In any event, the revised PPG on flood risk is due to be issued imminently and it is expected that the update will provide greater clarity to this issue (on surface water flooding in particular).

6.21. The Site is considered to be suitable for residential development.

Arboriculture

6.22. A Preliminary Arboricultural Assessment (May 2025) has been prepared by Envance in support of these representations (included at **Appendix D**). The Assessment identifies that three are no Category A trees at the Site that potentially be affected by development.

6.23. There are 15 Category B trees (as well as 9 groups, 1 hedge and 1 woodland) at the Site, as well as 10 Category C trees (10 groups and 3 hedges) and a single Category U tree that could be affected by development of the land. As part of the development, comprehensive landscaping scheme would be secured and delivered to include significant additional planting of various species.

Heritage

6.24. There are no statutory listed buildings located within the Site, and it does not fall within a designated Conservation Area.

6.25. There are no listed buildings surrounding the Site that could present any constraint to development of the land. The Bridgewater Canal Aqueduct over the River Mersey is a Grade II listed structure (Entry Number: 1067872) which is approximately 1.5km to the north west of the Site.

6.26. Development of the Site is not considered to result in any adverse heritage impacts.

Air Quality

6.27. An Air Quality Constraints Note has been prepared by WSP to support this Call for Sites submission (included at **Appendix E**). The Note confirms that the greatest influence on the quality of air at the Site is emissions from road traffic on the surrounding road network. The M60 motorway is the dominant potential pollutant source. The Site itself is not located in an Air Quality Management Area, however there are two AQMAs within a 2km radius of the Site.

6.28. The Note fully assesses potential constraints and concludes that the existing air quality is acceptable for the residential development of the Site and is not anticipated to pose a constraint to development.

Acoustics

6.29. This submission is supported by a Noise Constraints Assessment which has been prepared by WSP (included at **Appendix F**). The Assessment identifies a 'medium risk' due to road noise which is primarily generated by the M60. The report considers standard approaches to demonstrate the noise generated by the road could best be mitigated through the location and orientation of buildings. This includes locating any multi-storey buildings towards the north of the Site to provide acoustic screening from the M60.

6.30. The Assessment confirms that, by following good acoustic design principles, the Site is considered to be suitable for residential development.

Highways and Access

6.31. A Transport Technical Note has been prepared by Mode Transport Planning to assess the highway and access impacts of the development of the Site (included at **Appendix G**). The Note concludes that the Site can be accessed via sustainable modes of travel, including walking, cycling and public transport. This means that alternatives to single occupancy car trips are available.

6.32. In terms of access to the Site, the Technical Note proposes that vehicular access to the Site would be most suitably provided off Arnesby Avenue on the eastern boundary. There are considered to be no highways constraints to providing access via Arnesby Avenue, as evidenced through the Note.

6.33. Overall, the Note confirms that the development of the Site would accord with paragraphs 115 and 117 of the NPPF where it requires sustainable modes of transport to be provided and public transport connectivity to be prioritised. The Note also confirms that based on evidence and analysis, the Site is considered to be suitable for residential development in accordance with current highways and transport planning guidance.

Public Rights of Way

6.34. There are no Public Footpaths or Rights of Way that traverse the Site. There is a public bridleway that runs along Cow Lane on the eastern boundary of the Site, which is accessible off Arnesby Avenue. The presence of the bridleway is not considered to present a constraint to development.

6.35. Any development of the Site would be designed in a way that would create a link from the proposed development to the surrounding pedestrian and vehicular routes, including the bridleway. As such, pedestrian and cycle connectivity of the Site and surrounding areas would be significantly enhanced as a result of the development of the Site. This would result in a wider community benefit.

Ecology and Biodiversity

6.36. A Preliminary Ecological Appraisal (PEA) (available at **Appendix H**) has been prepared by Envance to support this submission. The PEA confirms that the Site supports various habitats, including artificial unvegetated unsealed surface, developed land, sealed surface, modified grassland and ornamental pond. The PEA identifies four statutory designated Sites within 2km of the Site, including Chorlton Water Park, Kenworthy Woods, Chorlton Ees & Ivy Green and Broad Ees Dole Local Nature Reserves. All non-statutory sites are considered to be sufficiently separated from the Site that their designated features will not be directly or indirectly impacted by the development of the Site.

6.37. The PEA confirms that there are no areas of Ancient Woodland within 2km of the Site.

6.38. In terms of protected species, the PEA confirms that there is no suitable terrestrial habitat preset within the Site for Great Crested Newts (GCN), however the surrounding woodland may be suitable. As such, further consideration may be required through detailed assessment, at planning application stage.

6.39. A Biodiversity Assessment Report (**Appendix I**) has been prepared based on the findings of the PEA. The Report presents the baseline biodiversity value of the Site and the projected biodiversity units based on the current indicative masterplan.

6.40. The Report confirms that there are no irreplaceable habitats at the Site and none of the existing site habitats are considered to be part of any significantly valuable ecological corridor.

6.41. The estimated baseline biodiversity value of the Site is 12.61HU for area-based habitats and 2.13WU for hedgerow habitats.

6.42. The report calculates a biodiversity value of 14.03 HU and 2.63 HeU for the Development Area, post-development. This represents a gain of 1.42 HU (11.22%) for area-based habitats, and 0.50 HeU (23.45%) for hedgerow habitats. Therefore, the biodiversity net gain would be in excess of the statutory minimum of 10%.

6.43. Any lost habitats as a result of the development of the land would be replaces with large areas of modified grasslands, mixed scrub as well as significant tree planting throughout the Site. A pond at the north-east corner is also proposed as part of the indicative masterplan that would provide biodiversity contributions and attenuation.

Summary of Technical Considerations

6.44. In summary, a considerable amount of technical work has been undertaken in order to indicate whether the Site is suitable and deliverable for residential development. No fundamental constraints have been identified in regard to flooding, heritage, air quality, noise, highways, arboriculture or ecology that would be insurmountable or preclude development for new homes.

6.45. Any matters identified are considered to be able to be comprehensively mitigated through either detailed design matters, or the imposition of standard planning conditions. The Site is therefore considered to be suitable and deliverable in the absence of any demonstrable site-specific constraints that cannot be overcome as part of the planning application process.

Masterplan vision

6.46. A concept masterplan framework has been created by Stantec to demonstrate the deliverability of the Site. It is an indicative masterplan that responds directly to the technical considerations that are discussed above. A copy of the masterplan is provided at **Appendix B**.

6.47. The masterplan illustrates that the Site can deliver approximately 100 homes of various types and sizes at a mix of densities. The eastern parcels of the Site have a higher indicative density of up to 70 dwellings per hectare (dph), which can accommodate approximately 59 homes, and the western parcels have an indicative density of 45 dph, resulting in approximately 41 homes. The indicative densities are in full accordance with the relevant policies contained in PfE.

6.48. The Site benefits from some existing trees which will be retained wherever possible and incorporated into the design of the development. In addition, the masterplan envisages areas of open green space which will see additional landscape planting.

6.49. In terms of internal access, the masterplan framework includes a series of interconnected pedestrian, cycle, shared and primary routes within the Site. Development of the Site would include pedestrian links to the existing bridleway on Cow Lane, which will enhance its already strong pedestrian connectivity. In addition, accessible walking routes will be created to Priory Gardens, which will introduce direct access to a key local green space.

6.50. The indicative primary access is to be taken from Arnesby Avenue. Where the access enters the Site at the south east, the masterplan shows an open space, with landscape planting and a Local Area for Play (LAP).

7. Green Belt Assessment

7.1. The draft Local Plan makes clear at Policy R1 (E) that the Council will support the provision of new housing that makes as much use as possible of previously developed land within the existing urban area. The 'brownfield first' approach to releasing land for housing is supported and is consistent with national guidance.

7.2. The draft Plan claims that sufficient land has been identified within the existing urban areas and strategic allocations to meet development requirements and therefore it does not propose any review of the Green Belt in Trafford.

7.3. As set out in Section 4 of these representations, Trafford should Plan to meet its LHN figure in full beyond the PfE plan period. This would inevitably require Green Belt release to deliver those homes and as such, national policy provides that exceptional circumstances exist to do so. Notwithstanding this, our view is that to deliver even the reduced number of homes identified in the draft Plan, Green Belt release is still necessary to ensure that allocations are demonstrably deliverable and to provide the necessary mix of different homes (including affordable homes) in the places where they can be delivered, in accordance with the Plan's vision.

7.4. The NPPF (paragraph 146) states that where exceptional circumstances (including where an authority cannot meet its identified needs for homes) exist, authorities *'should review Green Belt Boundaries […] and propose alterations to meet these needs in full'.*

Green Belt Release – Hierarchy

7.5. Where it is necessary to release Green Belt land for development (and as set out above, we consider that it is), the NPPF (at paragraph 148) sets a hierarchy for how Green Belt land should be considered. The hierarchy for releasing Green Belt Land is as follows:

- Previously developed land
- Grey belt (which is not previously developed)
- Other Green Belt locations

7.6. As established earlier in these representations, a large part of the Site is previously developed land and as such, it should be considered under the first tier of the above hierarchy in accordance with NPPF paragraph 148. Notwithstanding that the Site is partly previously developed, it can be demonstrated that the Site meets the requirements to be considered as grey belt, as set out below. Therefore, as expressly set out in the NPPF hierarchy, the Site should be given priority to be considered for release from the Green Belt as it is partly previously developed and also qualifies as grey belt.

Grey Belt Assessment

7.7. The NPPF defines grey belt as:

'…land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'

7.8. The first stage in assessing whether a site could qualify as grey belt is whether any of the 'Footnote 7' exclusions apply. In the case of the Site north of Dane Road, it is not designated as a Site of Specific Scientific Interest, nor is it a Local Green Space, National Landscape or designated heritage asset. Development of the Site would therefore not adversely affect any of the statutory or other designations listed at Footnote 7.

7.9. Secondly, the Site is assessed in terms of whether it 'strongly contributes' to any of purposes (a), (b) or (d) as set out in paragraph 143. These purposes are taken in turn below.

a) to check the unrestricted sprawl of large built-up areas;

7.10. The specific spatial and landscape characteristics of the Site means it does not contribute strongly to purpose (a) of the Green Belt. The Site benefits from having clearly defined and defensible boundaries, which would naturally prevent any perceived sprawl. The development of the site would effectively result in an infill development.

7.11. The Site is bound to the north by an established tree line, consisting of mature, tall trees. Beyond the northern site boundary is open space associated with Priory Gardens and the M60. The M60 is a defined barrier to development that would restrict any sprawl of the built-up area. As such, it can be expressly demonstrated that the Site does not function to check the unrestricted sprawl of large built-up areas.

b) to prevent neighbouring towns merging into one another

7.12. The Site lies between Dane Road and the M60 motorway. Beyond the M60 to the north is Sale Water Park and associated open space. The location of the Site means that the release of the land for development would not result in neighbouring towns merging into one another and therefore it can be demonstrated that the Site does not strongly contribute to purpose (b) of the Green Belt.

c) to preserve the setting and special character of historic towns; and

7.13. The Site is not in a location of a town with special heritage character or significance. Development of the Site would not adversely affect the setting or special character of any historic town and as such the Site does not strongly contribute to purpose (c) of the Green Belt.

The 'Golden Rules'

7.14. The NPPF (paragraph 156) requires that where land is released from the Green Belt for housing, specific contributions (known as *'Golden Rules'*) should apply. The golden rules relate to higher contributions of affordable housing, improvements to infrastructure and provision of green spaces than would be required for land that is not in the Green Belt.

7.15. Development of the Site could meet all of the golden rules. For affordable housing, this means 45% of homes to be delivered would be affordable (against current policy requirements), in accordance with the NPPF.

7.16. Golden rule (*b*) as set at paragraph 156 of the NPPF, is that necessary improvements to local or national infrastructure should be delivered where land is released from the Green Belt for residential development. The development would meet this requirement by contributing to the local highway network and making necessary improvements to other local infrastructure, as required by the Local Authority.

7.17. The development of the Site would incorporate new green spaces that are accessible to the public. The Site benefits from its proximity to the Priory Gardens open space, which is immediately adjacent to the west. As part of the development of the Site, new and improved access from the Site to Priory Gardens will be provided, which is in accordance with golden rule (c) as stated in the NPPF.

Summary

7.18. Our view is that Trafford should release land from the Green Belt in order to ensure a sufficient supply of deliverable housing land is available to meet its housing need in full within the Plan period. This is the case irrespective of whether it is intends to meet the housing requirement as set out in the draft Plan, or whether it intends to meet the Standard Method requirement, which, in our view it should (as per Section 4 of this document).

7.19. As the Site is part previously developed land in the Green Belt, it falls under the first tier of the Green Belt release hierarchy as defined by paragraph 148 of the NPPF. It follows that the Site should be considered first by the Council for release from the Green Belt for housing development. Notwithstanding this, the Site also meets the grey belt criteria, as outlined above. As such, it should be given priority when it is assessed under the second tier of the hierarchy for Green Belt release.

7.20. Development of the Site would meet all of the required Golden Rules, including a significant proportion of affordable housing that the Borough has identified is needed.

8. Summary, Recommendations and Conclusion

Summary

8.1. This document provides comments on the policies, vision and strategic objectives of the draft Local Plan in response to the Regulation 18 consultation. This document also promotes land north of Dane Road as part of the Call for Sites 2025.

8.2. Savills broadly support the intentions of the vision and strategic objectives contained in the draft Plan however, the draft housing targets are not ambitious enough since they do not reflect the most up to date housing requirement as calculated using the Standard Method.

8.3. Concerns are raised in relation to the scale of housing delivery that is proposed in the Plan. It is considered that the most appropriate approach, which is consistent with the NPPF, would be to adopt the Standard Method LHN figure where the Plan period extends beyond that of PfE (i.e. 2039 – 2043).

8.4. In terms of housing distribution, Savills considers that the Plan has an overreliance on delivering homes on previously developed land in urban areas and, in its current draft form, fails to take full account of other sustainable locations, particularly in the Central Locality, that can make a significant contribution to the range of housing needs in Trafford.

8.5. Whilst those previously developed sites should be explored, there is insufficient evidence to suggest that the Council will be able to deliver sufficient homes to meet its housing need through previously developed land and PfE strategic allocations alone. As such, exceptional circumstances exist and the Council is therefore required, as per the NPPF, to consider sites within the Green Belt.

8.6. In response to the Trafford Call for Sites 2025 and on behalf of Brookhouse, Savills is promoting land North of Dane Road for development and inclusion in the new Local Plan as an allocation. The same Site has been put forward previously as part of the 2021 Call for Sites and considerable work has been undertaken since then to demonstrate the potential and deliverability of the Site.

8.7. A large part of the Site is brownfield and is in a highly sustainable location, where there is an established demand for housing and excellent existing public transport connections. There are no technical site-specific constraints that would prohibit the development of the land. Initial feasibility work indicates that the Site can accommodate approximately 100 homes of various sizes and at densities that are entirely policy compliant and appropriate for its context.

8.8. As part brownfield land, the Site should be considered first for release from the Green Belt, in accordance with the NPPF. In addition, as demonstrated in Section 7 above, the Site meets the necessary criteria to be grey belt, as per the NPPF and so should be considered for release from the Green Belt. As grey belt, the Site would be subject to the 'Golden Rules'. All of the required golden rules would be met as part of the development of the Site.

8.9. As such, the Site is suitable and deliverable and presents a realistic opportunity to make a significant contribution to delivering the homes that Trafford needs.

Recommendations

8.10. The following recommendations are put forward as part of the Local Plan consultation and Call for Sites:

1. The Council should adopt a housing requirement that is consistent with the LHN as calculated using the Standard Method for the part of the Plan period that extends beyond the PfE period.
2. The Council should reassess its housing distribution policy to allow flexibility to enable residential development to come forward in a variety of sustainable locations across Trafford, including in Sale.
3. The Council should include the Site (north of Dane Road, Sale) as a residential development allocation in the new Local Plan.

Conclusion

8.11. The Site is in a highly sustainable location and is suitable for residential development. The Site is demonstrably deliverable within the Plan period and would directly contribute to the Plan's Vision, being that '*Trafford will have met its housing requirement; it will have addressed its acute need for affordable housing'.*

8.12. It is intended that the Site will deliver a significant proportion of affordable homes in accordance with the policy requirements which would directly contribute to the Plan's vision to '*ensure that people have the types of homes that they both want and need'.*

8.13. Development of the Site for housing would; address the shortage of homes in Trafford, provide a good choice of high-quality homes and deliver an attractive neighbourhood in a sustainable location, in accordance with Strategic Objective 1 of the draft Local Plan.

[redacted]

From: Jerrome, Daniel
Sent: 11 June 2025 22:13
To: Local Plan Consultation
Subject: Trafford Green Party Response - Local Plan Draft Policies

Follow Up Flag: Follow up
Flag Status: Completed

Categories: LP April 2025 comment

A Trafford Green Party response to Trafford Council's Local Plan draft policies with comments and questions.

Trafford-Local-Plan-Regulation-18-Consultation-Draft-Policies-April-2025.pdf

2. Strategy

COMMENT

SO1 Deliver the homes that Trafford Needs

COMMENT:

- Trafford needs to build up instead of out, that means increasing density across the built-up areas of Trafford and protecting the green space that is not previously developed.
- Planning needs to enable large apartment blocks to be built on streets that currently have only very large houses.
- If the planning system stops us increasing density it contributes to the housing crisis; threatens our green spaces; and has socially unjust impacts in 'preserving' wealthy areas at a lower density, while poorer areas become more crowded.

COMMENT:

COMMUNITY ENERGY

Omission of the role that community energy schemes can play in reaching our Net Zero targets. Trafford should be promoting, encouraging and should move into the role as a facilitator.

Bristol Local Plan example:

2. Supporting Community Energy:
Community Energy Fund:
Bristol City Leap provides funding for a range of community energy projects, including renewable energy generation, energy efficiency improvements, and support for communities to reduce energy use.

3. Facilitation and Support:
Bristol City Council (BCC) acts as a facilitator for community energy projects, helping groups navigate council processes and connecting them with other stakeholders.

Trafford Council should express the following in their Local Plan as a key strategic goals:

- Harness community power schemes to empower its environmental, societal and economic wealth.

- Trafford Council to access grant funding to set up its own Community Energy Fund so it can oversee and facilitate project funding [redacted]
- Work with Community Energy England to develop a knowledge base and community toolkit for project development

Policy ST4: Sustainable Development (p52)
A. When considering all development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development as set out in national planning policy.

National policy heading for net zero 2050 cf 2038?

How does this relate to solar panels? Trafford LAEP (Local Area Energy Plan) presumes solar installation on all suitable roofs SE to SW. We have current restrictions in conservation areas which perhaps could be eased given the importance of this? Should housing layout consider orientation to max solar potential on all new developments?

This is perhaps an example that helps? [redacted] *Ivers, Bucks* –'the policy therefore provides a means by which planning officers can give more weight to achieving a higher energy efficiency standard in the planning balance, providing the scheme does not significantly harm the character area.'
The LEAP has *135 hectares of ground mounted solar pv across Trafford – some Bowdon, some Hale/Timperley (does acknowledge it needs to consider public acceptability). Perhaps even more needed if we don't maximise solar on roofs*

4. Residential Development

Policy R3: Affordable and Social Housing (p84)

QUESTION:
B. A minimum 10% of affordable homes must be Totally Affordable Net Zero (TANZ) homes
Is there a need for this? If all are net zero and the amount of affordable homes is prescribed.... Not sure I understand why this is needed?
Also
E. Only in limited and exceptional circumstances where it is robustly demonstrated via a Viability Assessment, that on-site provision is not feasible, will the Council consider:
i. A reduction in the overall proportion of on-site affordable housing,
ii. A change in the tenure mix,
iii. Provision of an off-site financial contribution in lieu of on-site provision, in accordance with Policy IP1, or
iv. A combination of the above.
Can any financial contribution be ring-fenced for affordable housing?

6. Transport and Movement

COMMENT:

Trafford Green Party calls for our Local Plan to meet the Transport for New Homes Charter as a minimum:

[redacted]

"We believe that everyone should have access to attractive housing, located and designed to ensure that people do not need to use or own cars to live a full life. We therefore support new housing that promotes walking, cycling and public transport and avoids dependence on cars. Equally, we oppose developments that will not achieve this outcome.

Transport for New Homes aims for new developments to be linked to sustainable transport networks leading to traffic reduction, in order to address climate change and congestion as well as to provide good, healthy living environments.

Specifically, Transport for New Homes calls for:
1. New housing to be located and configured to avoid people being dependent on cars, and to enable low and decreasing travel by private car;
2. Local authorities, working with their neighbouring authorities and transport providers, to plan housing developments along corridors with frequent public transport, or in places where they will facilitate such provision;
3. New housing to be laid out to prioritise walking and cycling as the main means of access to local facilities, adjacent areas, and public transport stations and stops;
4. Large-scale new housing to be designed around streets, places and spaces that are pleasant and interesting to be in, sociable and environmentally sustainable;
5. Large-scale new housing to be built with a range of community facilities on site, or within easy reach by sustainable modes;
6. New housing developments to benefit adjacent and nearby communities in terms of extra or better quality local amenities and sustainable transport provision, especially on routes that fill gaps in existing networks."

6.52 Off – Airport Car Parking

COMMENT

Trafford Council needs to oppose Manchester Airport expansion if it is serious about tackling its carbon emissions. As a shareholder it must consider measures to tackle frequent flyers and measures to tackle an increase in parking. There should be a levy on parking to help mitigate this at least.

See Climate Emergency Manchester report:
[redacted]

Policy TM2: Public Transport - C Bus
Trafford Council needs to take Demand Responsive Transport (DRT) seriously. As we have an urban, semi-rural, and rural demographic, this could help tie together our transport needs and better serve our communities.
See the government DRT toolkit and advice for local authorities:
[redacted]

7. Town Centres and Retail

COMMENT

[redacted] I see the draft Local Plan doesn't mention the severance of the town centre in Altrincham. No mention of any crossings between the Cresta and charcoal road.

- Trafford should push for strong limitations on parking.
- Most of Trafford should have resident only parking schemes, so that visitors come on other modes of transport.
- Parking should have no footprint, so Trafford isn't losing any space to it. So if you want parking you have to put something on top of it, or it on top of something else. The borough should also build on top of, or

remove all surface car parks, especially those at train and tram stations where alternative transport is so abundant.
- Trafford Council urgently needs a just kerbside strategy.

8. Green Infrastructure and Natural Environment

Questions
P197 – Wooded River Valley should be E of A56, North of M56 if checked on map?
P217 – Shouldn't we be aiming for higher UGF (Urban Greening Factor) on brownfield developments and probably non-residential too?

10. Water, Flooding and Drainage

QUESTIONS:
What about impermeable surfaces currently being adopted by homeowners? Can the council work with local businesses and residents to encourage better surfacing?
P269 Monitoring
The number of new developments that are agreed with the council, should they be incorporating the Sustainable Drainage System (SUDS) to Ciria standard.
Seems that the target of 'Increase' is weak. Surely this should be standard in all new developments?

Thanks to officers for all the hard work that has gone in to getting us to this stage so quickly.

Regards,

Dan Jerrome [redacted]
Green Party councillor for Altrincham
Green Group Secretary
[redacted]

emery PLANNING

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Regulation 18 Local Plan Consultation
Strategic Planning
Trafford Council
Trafford Town Hall
Talbot Road
Stretford
M32 0TH

12 June 2025

[redacted]

Dear Sir/Madam

Re: Representations to Draft Trafford Local Plan and Call for Sites: Land adj to Flixton Railway Station, Flixton Road, Urmston, M41 6JL – Branley Homes Ltd

We are instructed by our client, Branley Homes Ltd, to submit representations to the Trafford Regulation 18 Local Plan consultation.

We have submitted our client's site, which is identified at Appendix EP1 of this letter, through the Trafford Local Plan Call for Sites exercise. We have also provided an indicative layout plan by Grays Architecture Ltd showing how the site could be developed for a residential development comprising 44 no. apartments with a large area of land provided as public open space and subject to beneficial ecology and arboricultural works and a management plan. This scheme could take the form of all 100% affordable units or a mixture of open-market and affordable units.

Our client's site formed part of a much larger draft site allocation in the 2016 Greater Manchester Spatial Framework (GMSF) for circa. 750 no. homes (Ref: WG4 – Land at Flixton Station). This draft allocation was subsequently removed for subsequent versions but it remains the case that the land is highly sustainable and suitable for major residential development and release from the Green Belt.

In terms of the Draft Trafford Local Plan, there is no review of the existing Green Belt boundaries. A new Green Belt review must be undertaken in accordance with the new Framework December 2024 e.g. paras. 147 – 149. It should also identify areas of 'Grey Belt' in accordance with the definition provided through the Framework.

In terms of that part of our client's site in the current Green Belt, most of this land performs no meaningful Green Belt function for the purposes of paragraph 143 of the Framework:

- Flixton Station, railway line and platform is to the northern boundary and this encloses the land in visual/functional/physical terms and prevents any encroachment/sprawl northwards.
- Residential development at The Grove and St Michael's CofE Primary School is to the southern boundary and this encloses the land in visual/functional/physical terms and prevents any encroachment/sprawl southwards.

- The built-up area of Flixton is to the western boundary and this encloses the land in visual/functional/physical terms and prevents any encroachment/sprawl westwards.
- The site performs no function in terms of preventing the merging of towns or safeguarding the setting of historic towns.

Our client's land should be removed from the Green Belt notwithstanding development needs given that it performs no meaningful Green Belt function. Given its location directly adjacent to Flixton Station, it also provides an opportunity for the LPA to secure a residential development comprising of much-needed housing (e.g. apartments for affordable units and low cost housing) in a highly sustainable and accessible location.

The release of this land from the Green Belt would accord with paragraphs 147 and 148 of the Framework:

- It is partly previously developed.
- It is Grey Belt land.
- It is highly sustainable in accessibility terms given its proximity directly adjacent to Flixton Station and the centre of Flixton itself.

Our client represents an opportunity to address unmet housing needs in a highly sustainable manner through the release of land directly adjacent to a railway station and close to the centre of Flixton.

In terms of draft policies of the Trafford Local Plan:

- Regarding Policy RT1, the housing requirement should reflect 'standard method', which is 1,599 dwellings per annum, rather than the adopted PfE figure, which is 1,112 dwellings per annum. The former is the actual underlying housing need for the Borough and reflects the Government's Plan for Change and WMS July 2024.
- The above would help the Council to address significant unmet affordable housing needs (there is over 7,000 no. people on the housing waiting list as of December 2024 in Trafford).
- Policy R3 should be subject to viability testing in terms of affordable housing provision. It is not known what is meant by Totally Affordable Net Zero homes means in practice.
- There are a number of draft policies that are onerous and go significantly over and above building regulations standards, are difficult to interpret in practice and should be subject to viability testing. This includes arbitrary requirement for tree canopy of a certain % at GI7 and such matters should be considered on a case-by-case basis, a requirement to go over and above BNG requirements at GI10 which is contrary to PPG advice, a requirement for Urban Greening of a certain factor at GI6 and a requirement for energy efficiency at ST5 that should simply align with building regulations standards.

We trust that this clarifies our client's position. Should you require any further information at this stage, please do not hesitate to contact us.

Yours sincerely
Emery Planning

[redacted]

Gareth Salthouse BA (Hons), Mplan, MRTPI
Director

[redacted]

Enc:
EP1 – Location Plan and Indicative Site Layout Plan.

[redacted]

From: Ennis, Shaun (Councillor)
Sent: 12 June 2025 11:12
To: Local Plan Consultation
Subject: Submissions by Cllr Ennis

Follow Up Flag: Follow up
Flag Status: Completed

Categories: LP April 2025 comment

Good morning,

I'm writing to submit some ideas for the Local Plan. I'd also like to say a huge thank you to the Strategic Planning team on behalf of the Liberal Democrat Group for the work that is being done against a challenging time frame; and for the time you have given elected members at the Timperley and Sale drop in events we attended. Please reach out if you would like to discuss any of the below:

Chapter 4 Residential, Policy R3S – *To include a firmer commitment on social housing to be met through Places for Everyone*

"Noting the Greater Manchester-wide target to deliver 1,000 new social homes by 2028, Council will stipulate the number of social housing units expected to be delivered withing Places for Everyone allocations."

Chapter 7 Town Centres, Policy TC1 – *Solidifying a commitment to local place plans for all District Centres*

"Council will set an aspiration for each 'district centre' to have its own local place plan which is continually reviewed."

Chapter 7 Town Centres, Policy TC2 – *Pairing smaller local centres to the appropriate District Centre, not just the Town Centre as is currently the case*

"Local Centres' and 'Neighbourhood Centres' should sit under a 'parent' District Centre. For example, the parade of shops in Broomwood currently sits under Altrincham as a Town Centre, but it should also be linked to Timperley as a parent District Centre. This relationship between the various tiers of localities would make more sense and would allow smaller centres to feature in place-based planning at a district level in a more holistic way."

Best wishes,

Cllr Shaun Ennis
Timperley Central Ward
Leader of Trafford Liberal Democrats

[redacted]

From: Ennis, Shaun (Councillor)
Sent: 12 June 2025 12:14
To: Local Plan Consultation
Cc: [redacted]
Subject: Submission from Cllr Ennis - Trafford Leisure

Follow Up Flag: Follow up
Flag Status: Completed

Categories: LP April 2025 comment

Chapter 13, Culture, Tourism and Leisure – Recognising the role of the Trafford Leisure Strategy and codifying equal treatment of Trafford's Leisure Centres.

"Council recognises the important role of our local leisure centres, all of which are at varying stages of redevelopment at the time of drafting this Local Plan. Redeveloped Leisure Centres can serve as a hub for health and wellbeing initiatives. All five of Trafford's Leisure Centres should be treated with parity in terms of on-going and future development.

Council will explore ways to link hyper-local leisure, sport and community clubs and groups to a 'parent' local leisure centre."

ST/ST/P19-0009/L002v3

18th March 2021

Trafford Council
Planning Policy
Trafford Town Hall
Talbot Road
Stretford
M32 0TH

Submitted via email: localplan.consultation@trafford.gov.uk

Dear Sir/Madam

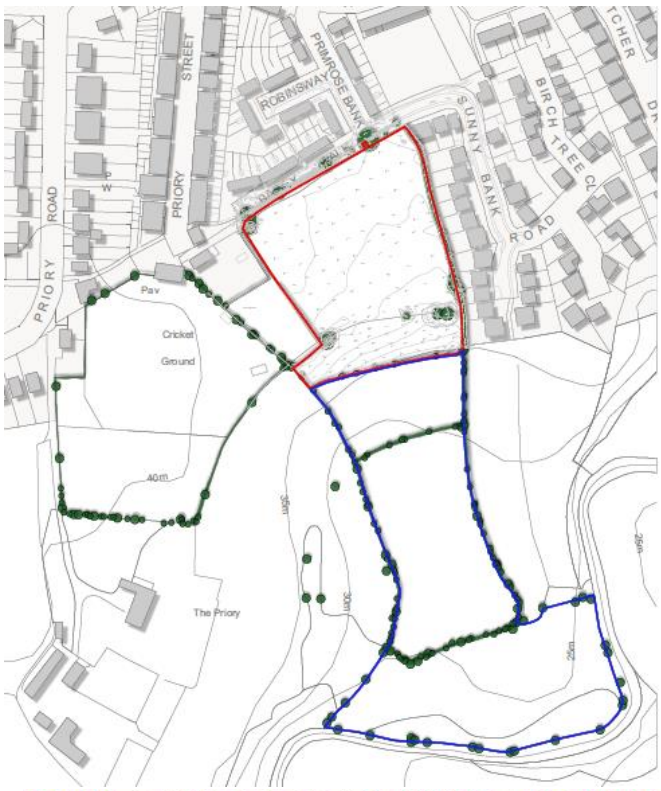
Trafford Local Plan Representations (Regulation 18)
Bailey Walk, Bowdon

Introduction

We have been instructed on behalf of our client, P&D Northern Steels Executive Pension Fund (P&D), to submit representations to the Trafford Local Plan Regulation 18 consultation (4th February-18th March 2021).

As we explain in greater detail later in these representations, P&D are promoting the Bailey Walk site as a suitable candidate for Green Belt release and for residential allocation through the emerging GMSF process and also consider the Trafford Local Plan process should take account of the site and other policy representations made.

*Bailey Walk Site Location (see **Appendix 1**)*



The location of the Bailey Walk site is denoted by the red line area below and is deemed suitable for the delivery of a mix of moderate sized market and affordable family homes together with a large area of land for additional public open space that runs up to the River Bollin, which directly connects to a Trafford Council owned area of open space to the immediate east and south of Sunny Bank Drive.

Before discussing the Bailey Walk site, we provide some general comments on the contents of the Regulation 18 consultation document, as outlined below.

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales
Registered Office: Pegasus house, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

Housing Need and Green Belt Release (Draft Policy H01)

Draft policy HO1 looks at Trafford as a whole and is proposed to reflect the contents of the latest Greater Manchester Spatial Framework (GMSF) draft, outlining how Trafford will deliver on average **1,091 dwellings per year** up to 2037. This is despite the fact that Trafford's annual housing requirement, as per the Government's December 2020 standard housing methodology calculation, is now **1,369 dwellings per annum**.

This approach is predicated on the GMSF's approach to housing distribution across the constituent GM authorities, with the GMSF treating the whole of Greater Manchester as one housing market area and looking to deliver higher levels of housing growth within the central and northern districts. This results in some authorities, including Trafford, delivering a lower housing need requirement than the government's standard housing method.

We have a number of concerns with this approach, which Pegasus have raised separately on behalf of a number of parties in the separate GMSF process. The approach to housing distribution will be strictly scrutinised at any forthcoming GMSF examination, amongst other factors such as the implications of Stockport's withdrawal from the plan as well as Manchester City Council needing to deliver a 35% uplift to their housing requirement. In light of this, it is highly likely that Trafford's housing requirement will increase from the currently suggested 1,091 dwellings per annum figure and should be at least 1,369 dpa, in line with the standard method figure.

It is also important to note that the governments standard method very much represents the **minimum starting point to calculate a local plan's housing requirement**. Indeed, the PPG[1] notes how there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. Such circumstances include economic growth strategies in an area and whether an authority needs to take on unmet need from neighbouring authorities. We are of the view that there are a number of factors which justify a housing requirement in Trafford, which as previously noted will be robustly scrutinised as part of the emerging GMSF Examination.

Trafford's high housing requirement is a product of chronic affordability issues in the area but also the high demand for housing, noting it is a very desirable area and one that attracts a high proportion of Greater Manchester's high net worth individuals. Moreover, Bowdon is well known as a housing 'hot spot' with chronic supply and affordability issues. Indeed, the Bowdon Ward is characterised by reference to the following statistics:

- **Highest** % of population over 65 in Trafford – 25.5%
- **Lowest** ward population in Trafford – 9,549
- **Highest** median age in Trafford – 49 years
- **Highest** old age dependency ratio in Trafford – 46.4
- **Lowest** population density in Trafford – 401.1 people per sqkm
- **Highest** median house price in Trafford - £650,000

Trafford's high housing requirement also points towards a strong case for Green Belt release in the Borough. In this regard, we repeat the sentiment of the HBF's concerns in relation to draft policy HO1.9 and HO1.12. Part HO1.9 of the policy states that the Council will support the provision of new housing that makes as much use as possible of previously developed land, within the existing urban area. Part HO1.12 states that the development of greenfield land will only be considered favourable where it can be demonstrated that the proposed development will be capable of creating sustainable communities; will contribute significantly to the Development Plan's overall objectives; and will not compromise the

[1] Paragraph: 010 Reference ID: 2a-010-20201216

Council's achievement of its brownfield land priority over the plan period, and that without its release, the Council's 5-year housing land supply could not be delivered.

Whilst we are entirely supportive of the brownfield first approach to development, which is in line with paragraph 117 of the NPPF, it must be ensured that the prioritisation of previously developed land (PDL) does not compromise the delivery of homes in other sustainable locations to meet local needs. This includes a number of highly sustainable and suitable Green Belt sites adjacent to existing settlement boundaries. It is also important to note that brownfield land and capacity within the urban areas will be insufficient to meet Trafford's emerging housing requirements alone, which is clear from current delivery rates.

Indeed, the 2020 Housing Delivery Tests for Trafford confirm **the Borough only delivered 61% of its requirement in the last three years with a shortfall of 1,387 homes over this short period**. This means the presumption in favour of sustainable development now applies, particularly when bearing in mind the age of the current Core Strategy and Saved UDP Policies.

Put simply, emerging Local Plan policies need to clarify that Green Belt release will be required and is acceptable in suitable locations in order to facilitate the delivery of emerging housing requirements. A variety of sites, of a mixture of sizes which are both brownfield and greenfield in nature, will need to be allocated in order for the emerging Local Plan to be found sound. Simply allocating and relying on existing brownfield sites that are already available (with many, such as Pamona Dock, having featured in previous development plan documents) will not deliver homes. Such sites are already in the system and available. This Local Plan should be looking to what is required over and above these existing sites. The GMSF and release of its very large, strategic Green Belt sites will help in part but the delivery of Carrington and Timperely Wedge will take a significant amount of time to come forward and will not provide a sufficient spread of sites that offers genuine flexibility and scope to meet the wider ranging needs within the Borough. Critically, such allocations will not assist with the Council's inability to currently demonstrate a 5 year supply of housing.

We also reiterate the HBF's comments that it will be important to consider the future deliverability of intensely developed residential schemes, which will be dependent on the viability of PDL and demand for high density urban living post Covid-19.

To conclude, brownfield, greenfield and Green Belt sites will need to be allocated in order to ensure that Trafford's emerging housing requirements are met. A PDL approach only will not suffice, most notably evidenced by the fact that there are insufficient amounts of PDL in Trafford, with the Council's latest 5-year housing land supply position being just 2.4 years[2]. Furthermore, a PDL only approach would be at the cost of sustainable development, not meet local housing needs on the ground and simply not reflective of changing housing demand, which has been sped up by the impacts of Covid-19. The Bailey Walk site should be considered for Green Belt release by the Council, as it is suitable for residential development as we explain later on in these representations.

Housing Sites and Policy GT2 (Green Belt)

In relation to draft Policy HO2 (Land release for new residential development) we again repeat the sentiment expressed above in relation to the need to release sites from the Green Belt as well as developing brownfield sites. We also echo the HBF's comments in that housing delivery is optimised where a wide mix of sites is provided-i.e., strategic and non-strategic (smaller-medium size sites).

[2] https://www.trafford.gov.uk/planning/strategic-planning/Five-year-land-supply-position-statement-as-at-31st-March-2020.aspx

Indeed, paragraph 67 of the NPPF clearly states that a sufficient supply and mix of sites should be addressed in planning policies taking account of availability, suitability and likely economic viability. Paragraph 68 also confirms that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-our relatively quickly. The Bailey Walk site would fit into this category.

To facilitate housing delivery, the widest possible range of sites by both size and market location are required so that small, medium and large developers have access to suitable land to offer the widest possible range of homes. It is important to provide choice and competition in the housing market and to provide housing in areas of high demand - such as Bowdon.

It is also crucial to avoid an over-concentration of homes in particular locations (i.e market saturation), with a more holistic approach to spatial distribution across a number of market and geographical locations being best placed to deliver emerging housing needs.

On this matter, we also raise concerns with draft policy GT2 (Green Belt). Part GT2.1 states that the Council will continue to protect the Green Belt in accordance with national policy in the following four broad areas:

a) To the south of Hale and Bowdon to the Bollin Valley and Trafford's southern boundary;

b) Between Bowdon, Broadheath, Sale, Carrington, Partington, the Ship Canal and Trafford's southern boundary incorporating the villages of Dunham Town, Dunham Woodhouses and Warburton;

c) Along the Mersey Valley from its junction with the Ship Canal to the Manchester boundary;

d) Along the Timperley Brook between Timperley, Hale and Davenport Green.

We strongly disagree with the Council's current stance to not release any Green Belt to the south of Bowdon and around the Bollin Valley. As explained above, it is important to take a holistic approach to spatial distribution across a number of market and geographical locations. There is a compelling case for Green Belt release in Trafford and indeed around Bowdon, which we will provide further justification for as part of future Local Plan Representations. Indeed, as we come on to shortly, there is an opportunity to provide access improvements to the remaining Green Belt in the wider Bollin Valley area if the Bailey Walk site was to be developed for residential purposes by creating more publicly available land and a river parkland area that would be accessible to all within the local community and help with connections between existing routes and other areas of public open space and providing net gains for biodiversity. This is entirely in line with paragraph 138 of the NPPF, which states that plan making authorities should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Paragraph 170 of the NPPF also promotes policies that deliver net gains for bio-diversity.

We recommend that the Council re-consider their currently suggested approach to Green Belt release, at both the borough-wide and Bowdon locality level.

Policy HN1 (Dwelling size, type and tenure)

Policy HN1.5 states that the Council will seek to achieve a target of 50% small (1 and 2 bedrooms) and 50% large (3 or more bedrooms) in size mix of homes in all locations. We are not supportive of this policy, which is overly prescriptive and could prevent housing developments coming forward. Moreover, such a wide embracing policy requirement does not accurately reflect the fact that Trafford is a very diverse urban and suburban borough. Indeed, it has 'regional centre' sites located in the north near Manchester City Centre to typical 19th century Victorian terraced streets around Stretford

and other locations to large, multi-million pound homes and plots located in and around Hale and Bowdon.

The purpose of this Local Plan should be to allocate a range of sites so differing needs can be met within different areas of Trafford and some sites will offer better opportunity to deliver 100% smaller 1-2 bed apartments, other sites will be most suited to delivering a mixture of family homes where the above policy requirements might be applicable, and other locations will be best suited to very large family homes.

Instead, we advocate the HBF's flexible approach to housing mix, which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

If the Council are to introduce a prescribed housing mix, this will need to be supported by a robust evidence base which demonstrates need as well as full consideration of viability matters. We reserve the right to comment on this matter further at a later date.

If the Council are insistent on this mix as a general rule, an alternative option would be to add a caveat within the policy that states 'unless an alternative mix is prescribed within a specific site allocation policy provided within this local plan or it is agreed with the local authority that an alternative mix would be more fitting for the site's location and character of the area'.

Policy HN2 (Affordable Housing)

Policy HN2.1 confirms that the affordable housing requirement will be 40% provision of proposals of 10 residential dwellings or more. Across Trafford, the tenure split for the provision of affordable housing would be expected to be 60% intermediate tenure (which should include a 25% provision of First Homes) and 40% rented.

At this stage we do not have any particular comments to make on the proportion of affordable homes requested, other than to note that the emerging affordable housing requirement must be fully assessed in terms of deliverability and viability considerations.

Policy HN2.2 states all proposals are to provide their full affordable housing requirement on site, unless there are 'exceptional circumstances' which can be demonstrated to justify off site contributions. This goes well beyond national planning policy which does not use the term 'exceptional circumstances' in this context. Whilst national policy promotes on-site provision it applies the following two caveats:

a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and

b) the agreed approach contributes to the objective of creating mixed and balanced communities.

In terms of the mix/tenure requirements expressed in H2.3, it is considered the terminology used should align with the new definitions of affordable housing in Annex 2 of the NPPF, which includes:

- Affordable housing to rent
- Starter Homes
- Discounted market sales housing; and
- Other affordable routes to home ownership, including:
    - shared ownership,
    - equity loan options,
    - low cost homes for sale at least 20% below local market value; and

- rent to buy options

We welcome the flexibility introduced into the policy at sections HN2.4 for split sites or sites in close proximity that allow the affordable housing offer across both sites to be considered comprehensively.

Recognition of a reduced affordable housing requirement on previously developed sites with vacant buildings at HN2.6 is welcomed and consistent with national planning policy, as is the ability to provide a case-by-case viability assessment at HN2.8.

In the context of the site we are promoting as part of these representations, there would clearly be the ability to provide on-site affordable homes and this would reflect existing housing in the immediate area.

Whilst we would not seek to suggest they would be affordable homes, if the site is delivered as self build plots, this in itself provides a more affordable route to providing a home in this part of the Borough when compared to buying an existing home in the vicinity. Many of the more recent homes built in the immediate surrounding area are bespoke, design and build homes of a 'grand design' nature.

Policy HN5 – Other Housing Needs

We welcome the inclusion of a specific policy on self-build and custom house builders but the policy is not pro-active and does not specifically address or positively support the evident high need for such homes. As expressed in the supporting text, there were 141 applicants at 30th October 2019 on the Trafford Self Build Register. This is a high requirement that needs to be addressed properly.

The policy seeks to rely on larger sites of 100 or more homes to provide self-build plots. It is not specific in terms of a percentage requirement and the obligation can be avoided if there is no take up after 24 months.

Neither this policy, Policy HO2 or the list of housing allocation sites at Appendix 2 of the Local Plan cite the number of homes that can be built on each allocation. This means a self-builder cannot easily identify those sites that might offer self-build plots in the future. Moreover, there will be a number of sites such as Pomona Docks where it is simply not practical or desirable to provide self-build plots on what is clearly a major, brownfield site that will only ever be developed for large apartment blocks. As such, even if a site is over 100 homes, there is no certainty within the policy to indicate that it will offer this type of housing.

Indeed, any developer of 100 homes is unlikely to want to provide self-build plots. Such plots may not provide the architectural scope or flexibility desired by a self -builder (as they may have to tie into a specific character area being developed on the wider site) and they are not readily available sites placed on the market now. Indeed, their delivery is incumbent on major developers offering up their land as part of much wider development proposals that will become laden with other requirements, reports and often complex legal agreements.

The very purpose of a self-build plots is so the builder/occupant can take direct control of their development, which is simply unrealistic for a site and development of such a large scale. We also note that many of the sites that are to be over 100 homes will be allocated within the GMSF where similar self-build policies are not applicable. Unless the Trafford Local Plan is adopted at the same time as the GMSF, the Council cannot therefore guarantee that these larger, strategic allocations will deliver the necessary self-build requirement.

As expressed in footnote 26 of the NPPF, Local Authorities are subject to duties under sections 2 and 2A of the Act to have regard to the Local Register and give enough suitable development permissions to meet the identified demand.

Whilst Policy HN5.2 does confirm smaller sites may be considered suitable it is still too vague and is not considered to be a positively prepared policy that meets the identified need. Again, it does not identify which sites would be specifically suitable.

Supporting national guidance on Self Build homes states the following[3]:

'How can relevant authorities communicate and promote their actions to support self-build and custom housebuilding?

As well as publicising the data which the register holds, relevant authorities should consider using a dedicated webpage to promote:

- *the purpose of the register and how to apply for entry on it;*
- *eligibility criteria, including any local eligibility criteria (setting out the justification and review date);*
- *activities undertaken* ***information on sites for self-build and custom housebuilding including suitable development permissions, local and neighbourhood plan allocations and other opportunities provided for by local planning policies****; and*
- *details on activities to promote self-build and custom housebuilding;*

Providing information on one well signposted and easily accessible site may help to reduce any risk of complaint or challenge that an authority is not complying with its duties under the under the 2015 Act *and reduce the amount of correspondence asking for an update on progress.'*

The guidance is clear that information on suitable and available self-build sites should be provided if the Council are to clearly satisfy their obligations of the 2015 Act. This Local Plan provides the perfect and most appropriate opportunity for the Council to clearly signpost those who want a self-build plot as to where to look. At present, Policy HN5 fails this requirement. Instead, the Council should be actively seeking to allocate a number of sites that are primarily or solely allocated for self-build housing, particularly in locations where there is evidence that such development is or has taken place recently, is a viable location and will be attractive to those that have registered an interest with the Council.

Policy HN6 (Adaptable and Accessible Housing)

This draft policy requires all new dwellings to be built to M4(2) standards. If the Council are to adopt these optional technical standards, they must apply the criteria set out in the PPG. The PPG[4] identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. This evidence has not been provided at this stage, albeit we do note that this policy is reflective of the GMSF's approach and its supporting evidence base.

[3] https://www.gov.uk/guidance/self-build-and-custom-housebuilding

[4] PPG ID: 56-007-20150327

There is also a need to consider other site-specific factors, including vulnerability to flooding, site topography and other circumstances.

In short, the Council must provide a robust evidence base to justify the introduction of the optional technical standards. Furthermore, flexibility needs to be added into the policy wording to allow for exemptions to the policy where it may not be possible to achieve the standards due to site-specific matters or viability considerations.

Policy CC2 (Low Carbon and Renewable Energy)

Draft policy CC2 states that there is an expectation that all new development will be zero net carbon from 2028. This is ahead of the national Government's target of net zero carbon by 2050.

Whilst P&D are supportive of the policy drive to move towards zero net carbon, we echo the sentiment of the HBF that this is best achieved via a nationally consistent set of standards and a timetable for achieving any enhancements which is universally understood and technically implementable. A set of universally applied standards provides more clarity and certainty to developers, therefore we recommend that this policy is revised to correspond with emerging national policy on zero net carbon (i.e. target to be achieved by 2050).

Policy ST6 (Car Parking Standards)

Draft policy ST6 states that all development will be expected to make provision for Electric Vehicle Charging Points (EVCP) appropriate to the scale and type of development.

The Government has consulted on EVCP provision in residential buildings, with the Government's preferred option to introduce a new functional requirement in the Building Regulations which is expected to come into force shortly. The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCP in new buildings across the country.

Subject to the proposed building regulations changes being formally confirmed, this aspect of policy ST6 should be deleted to avoid duplication and confusion. However, should Building Regulations not alter, we support the inclusion of this policy and can confirm the proposed site we have put forward as part of these representations would be capable of meeting this requirement.

Policy TC1 (Development within designated retail centres)

We note that Vicarage Lane, Altrincham is designated as a Neighbourhood Centre within Trafford's emerging retail hierarchy (Policy TC2). This shopping area is located circa 1.1 miles to the north-west of the Bailey Walk site. A number of local facilities are located along Vicarage Lane, including a co-op store, post office, pharmacy, beauty salon, takeaway, hairdressers, laundrette and specialist comparison retail shops (flooring/interiors). It therefore provides an important retail offer to the local community.

Appendix 1 of the 2019 Retail Study, prepared by Nexus Planning, confirms that Vicarage Lane falls within the Zone A (southern-Altrincham) retail catchment area. Appendix 2 of the Retail Study, which contains the Household Survey, highlights the following key points in relation to the Co-op store at Vicarage Lane:

- Under question 14 (where did you last undertake your top up shopping), the co-op store attracted 8.8% of all respondents within the Zone A retail catchment area.

- This is a high figure when compared with other stores in the Zone A catchment area, indicating a comparatively strong retail draw for Vicarage Lane. For example:
  - Iceland in Timperley attracts 6.7%
  - Sainsburys Local in Timperley attracts 0.5%
  - Tesco express in Hale attracts 0.5%
  - The 8.8% Vicarage Lane figure is only slightly lower than the co-op store in Timperley, which attracts 11.7%
  - The 8.8% Vicarage Lane figure is only slightly lower than much bigger stores, such as Asda in Altrincham (9%)
- The results under question 15 also indicates that the Vicarage Lane store is popular for repeat customers. This question asks where did respondents undertake their top up food shopping the time before their last visit to the destination they stated in Question 14. 9.6% of respondents within the Zone A catchment area stated the Vicarage Lane store.

There is therefore evidence which confirms that the co-op store at Vicarage Lane attracts a lot of the top-up shopping results under Questions 14 and 15 of the 2019 Retail Study. This indicates that the store plays an important role in meeting local retail needs within the retail catchment area.
We therefore consider there to be merit and justification for Nexus to re-assess the entire Vicarage Lane Neighbourhood Centre for potential Local Centre status. There is evidence to suggest that Vicarage Lane could be performing higher than its current Neighbourhood Centre status, therefore this should be assessed further as part of the next stages of the emerging Local Plan process.

Policy OS1 (Open Space Sport and Recreation) / Policy OS3 (Outdoor Sports Facilities)

We note the Council's desire to protect sites that offer open space, sport and recreational use through Policies OS1 and OS3. However, in the case of the Bailey Walk site, the designation of the site as a playing pitch on the Policies Map is erroneous and should be deleted. This designation will apply to the neighbouring cricket club located to the west but the Bailey Walk site is not used for sporting provision and there is no evidence of a sports pitch on site.

Part of the site has been historically designated as local open space (through previous Unitary Development Plan documents), which has erroneously been carried forward through the adopted Trafford Core Strategy and this designation remains in the emerging Trafford Local Plan. However, this benefit has never been enjoyed by the local community due to the site being in continuous private ownership with no public rights of way traversing the site. Indeed, this designation stems back to when the site was previously used by a private school as a school sports pitch but this use was abandoned a number of decades ago.

In 1998 planning permission was granted on a temporary basis in the upper field for a series of static caravans (ref: H/45996). These were placed on hardstanding (which remains under the top soil) and obliterated any evidence of previous sports pitches that might have existed on the site. The caravans were used to accommodate residents of the Irwell Valley housing project whilst the neighbouring development took place. After that the site has not been used and has not benefited from any lawful public access whatsoever.

As such, the proposed OS1 and OS3 designation that falls upon the site is erroneous and should be deleted.

Extract from Proposed Policies Plan showing Bailey Walk site as falling under Policy OS3



Policy NE1 (Natural Environment)

The Bailey Walk site is located within a designated Landscape Character Area on the draft proposals map, therefore policy NE1 applies. The policy map does not clarify the name of the Landscape Character Area, albeit it considered likely to be the 'Wooded River Valley- east section of River Bollin from M56 to A56' landscape character area. Clarification on this matter should be provided by the Council. Furthermore, no evidence has been published yet to discuss these Landscape Character Areas as part of the Trafford Local Plan process, their detailed boundaries and the justification for their designation in any detail. We therefore wish to provide detailed commentary on this matter at a later date, when the evidence base has been published.

Until this evidence base has been provided in relation to the Landscape Character Areas (and indeed the other natural assets listed in the policy), it is not possible to provide detailed commentary on the robustness or justification of the proposed policy wording. This evidence must be provided in order to assess the justification for such landscape character areas and whether they merit specific policy protection under draft Policy NE1.

Policy GT1 (Green Infrastructure)

The whole of the Bailey Walk site is located within the designated green infrastructure network on the proposals map, therefore policy GT1 applies.

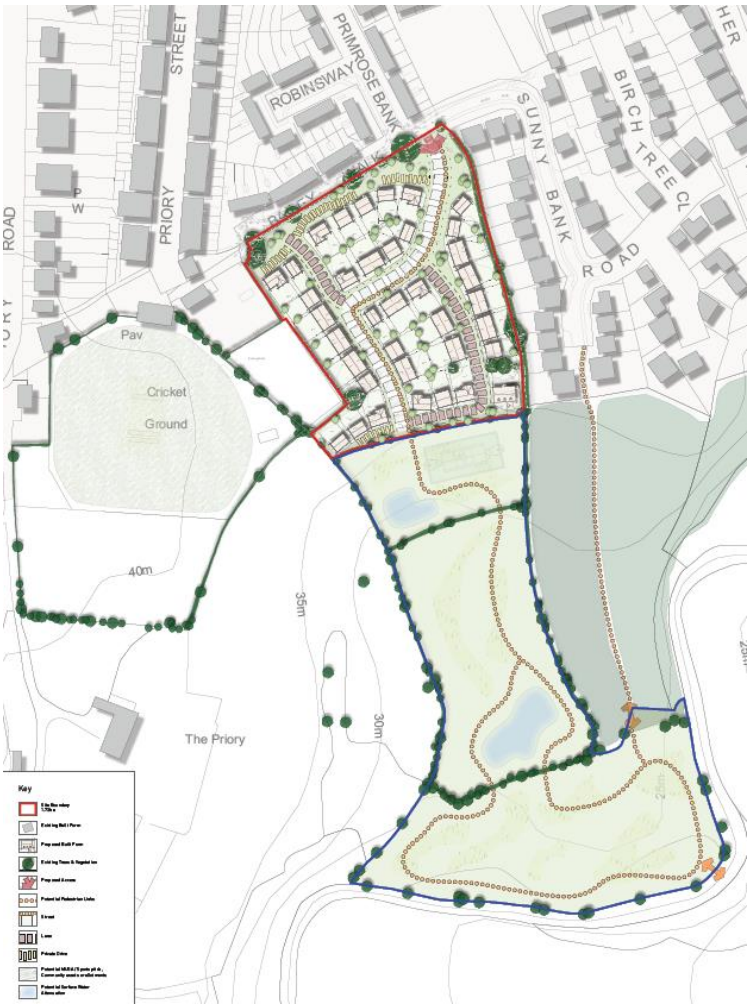
Part GT1.1 of the policy states that the Council will seek to protect, enhance and manage Trafford's Green Infrastructure as a network of connected multi-functional green and blue spaces to provide a

wide range of services and benefits for people, places, the economy and the local environment. These include supporting nature recovery networks and the movement of wildlife species; providing sustainable and active travel routes; climate change adaptation and mitigation; water management and quality; increasing physical activity; health and wellbeing; quality of place and economic growth.

In this regard, it is important to note that the release of the Bailey Walk site from the Green Belt could help to directly assist the Council's strategic aims for improvements to the green infrastructure network, as we discuss below.

Bailey Walk Proposed Development

Illustrative Masterplan for Bailey Walk Site (see Appendix 2)



The entire, single ownership extends to 4.46 ha as illustrated by the red and blue line boundaries on the masterplan opposite and provided at **Appendix 2**. However, only the northernmost part of the site is being promoted for approximately 70 homes (red edge boundary).

The site being promoted for housing development is 1.45 ha and therefore 70 homes would represent a density of 40 dwellings per ha which is consistent with densities in this immediate locality.

The site is tightly juxtaposed to existing urban development on three sides. The northern boundary is defined by residential properties fronting Bailey Walk.

The eastern boundary is defined by the rear gardens of residential properties facing Sunny Bank Road, the western boundary is defined by a single residential dwelling and a bowling club and cricket club, whilst the southern boundary is bound by an existing hedgerow. The remainder of the land slopes down into the Bollin Valley.

The proposed development zone ensures that the developed part of the site extends no further than the building line of the residential development located to the east. As such, it will be a congruous extension to the existing settlement pattern in this part of the Borough. Moreover, the undeveloped 3

hectares will be made accessible, providing some formal public open space and a number of dedicated footpaths through the ownership thereby allowing the local community to access the river valley for walks and recreation and provide connections to the neighbouring Trafford Council owned public open space / woodland to the immediate east, which currently accommodates a 'dead end' permissive route.

Deliverability of The Site including Necessary Infrastructure

The Bailey Walk site could deliver approximately 70 homes within the 1 -2 years of an adopted GMSF or Local Plan, in an area where demand is incredibly high. It also has the potential to deliver accessible open space to the local community (thereby more than offsetting the current albeit defunct local open space designation). A number of house building companies have made speculative approaches to acquire the land, highlighting the desirability and deliverability of the site.

Unsurprisingly, the Council identify this particular area as a 'hot' property market area, where the highest level of affordable housing provision is necessary, which further highlights the desperate need for additional market and affordable housing provision in this area. Given the site is in a single ownership and is of a moderate scale, it would be capable of delivering much needed family housing and affordable homes quickly and as soon as the site was released from the Green Belt (subject to relevant planning approvals). Whilst considering this benefit, it is pertinent to note the aforementioned market signals confirm Trafford is the only authority in the Greater Manchester area where house prices are above the national average. Most stark is the fact that Trafford house prices increased by 347% between 1996-2006 compared to 264% across Greater Manchester. Over the last ten years, price increases have been more tempered but they have still increased by a further 36%, indicating Trafford's house prices have quadrupled in the last 20 years. The need for new homes in this particular part of the Borough is clear.

The site does not require any strategic infrastructure investment for it to come forward. Vehicular access and utility connections can be readily gained off Bailey Walk and there are no capacity issues with either access or utilities. New residents will also be able to utilise and provide patronage and custom to existing nearby services.

Rather than being seen as a reason to not allocate the site, this should be seen as a positive reason to allocate the site because it can deliver benefits quickly and early on in the GMSF plan period. Indeed, the allocation of the land at Bailey Walk, Bowdon would enable an immediate contribution to be made to housing delivery rates, at a time when the any larger proposed strategic allocations or SUE's are yet to begin delivering housing numbers and may never in the volumes and at the pace expected.

Importantly, using the industry average sales pace of 2.4 home sales per month, it is expected that the site would deliver all of its capacity within the first five years post the GMSF or Local Plan being adopted and therefore it would positively contribute towards this national planning policy requirement.

As a standalone site allocation, is unlikely to warrant significant infrastructure requirements by virtue of its impacts. Even so, the Council have adopted a Community Infrastructure Levy that deals with this matter directly and ensures the Council would receive levied payments from the development of all market homes in this location. Payments are directly related to the level of floor space proposed and whilst this is not fixed at this stage, we have estimated that a payment of around £400,000-£600,000 is likely. This would go towards local infrastructure requirements as listed in the Council's Regulation 123 List that is relevant at the time. The latest list was adopted in March 2014 and includes transport infrastructure, primary schools, sporting facilities and strategic green infrastructure.

There is no ability to opt out of these CIL payments unless you fall within specific areas identified on the Council's Exceptional Circumstances Document adopted in March 2014. Bailey Walk is not within

one of these areas and therefore the provision of infrastructure captured by CIL (or any presumed inability to provide it) cannot be cited as a reason to not allocate the site.

If other infrastructure, not captured by CIL, is deemed necessary to ensure the site is delivered without undue impacts, future planning policies can be adopted to control the development of this site or any other site. Indeed, the allocation of either just one or all of the Green Belt sites in this area, could be planned and mitigated properly through site policies embedded within the GMSF and/or Local Plan, thereby de-risking the potential for unplanned, piecemeal, windfall development elsewhere in the Borough.

As highlighted in the attached Accessibility Assessment (see **Appendix 3**), the site is within 500 meters walking distance from two primary schools and well within 2 km from the senior schools within the area. Sustainability principles, and the Council's own educational admission policies dictate that priority should be given to residents that are closest to schools to facilitate sustainable travel modes.

At the moment, the available evidence points to many residents travelling to the two closest primary schools from further afield who could equally have chosen a school place closer to their residents (further east or north). Indeed, at present, only 40% of the pupils attending Bowdon Church school reside in the Bowdon Ward. This is not entirely surprising given the level of pupils from the Bowdon Ward attending prep schools. The remaining pupils coming from the Altrincham schooling area. This would suggest that the Bowdon Church school is more than fit for purpose in terms of serving the Bowdon community but struggles with capacity because of overspill from elsewhere.

As such, all the development will do is displace the pressures and whilst these pressures will need to be addressed as a whole, it should not be at the expense of meeting housing needs given there are various mechanisms to available to address necessary education investment and any CIL contributions accumulated by the development can lawfully be targeted to meeting needs elsewhere in the Borough.

Socio-Economic Benefits

The development of the site would deliver a range of other key socio-economic benefits including:

- circa 70 new family homes in an area of high demand;
- A proportion of affordable homes to meet local policy requirements (currently 40-45%);
- Approx. 3 ha of open space and areas of open countryside made accessible up to the public;
- Approx. £2,800,000 - £4,200,000 in new local expenditure per annum for local businesses and services;
- Approx. £1,200,000 - £180,000 in New Home Bonus contributions;
- Approx. £200,000 - £300,000 a year in Council Tax receipts;
- Approx. £400,000 - £600,000 in CIL payments; and
- Approx. 60-90 on-site jobs for each year of the development (around 2-4 years).

Impact on Green Belt Function

A key consideration relating to whether the site should be released from the Green Belt relates to its function and how it contributes to the five purposes of Green Belt. We note that LUC have carried out the GMSF Green Belt Assessment.

Whilst the Bailey Walk site only forms a very small part of the Green Belt parcel that LUC assessed (under Parcel TF51), it is pertinent to note that LUC conclude that the parcel does not serve any separation function. Unfortunately, LUC's assessment in relation to the other purposes is less relevant because it assesses a far larger area. However, we have considered the 5 functions in relation to the Bailey Walk site in our supporting Landscape and Green Belt Appraisal and can comfortably conclude that the purpose of the Green Belt in this particular location would not be undermined by the development of the Bailey Walk site for the following reasons:

- **The Green Belt boundaries have already been breached and have not prevented urban sprawl** - The Green Belt in this particular location already includes a lot of built form including approximately 10 residential properties immediately to the east, the bowling club, and a residential dwelling on the south side of Bailey Walk. This characteristic would require an alteration to the Green Belt boundary in any event.

- **The site benefits from strong defensible boundaries that would align with existing built form –** The existing urban boundary is located to the north and east. Development on the site would not extend any further south than the existing urban form and neighbouring residential dwellings in the area and would run along an existing hedgerow and could run along the bowling club to include the residential dwelling located within the Green Belt to the south of Bailey Walk (see suggested boundary on plan shown on page 2 of this letter).

- **The site does not provide a significant contribution to the open countryside** – One characteristic of the open countryside is its intrinsic beauty. However, in this instance the northern boundary is defined by a large metal and concrete post fence and there is no public access across the site for the open countryside to be experienced. The development of this site provides for an opportunity to increase public access through the remaining undeveloped parts of the site down towards the River Bollin. Bearing in mind one of the objectives of Green Belt is to encourage access into the countryside, this should be seen as a positive benefit.

- **The site does not act as an important strategic gap between settlements**. There could be no suggestion that the development of this site would merge Greater Manchester with villages and towns located in Cheshire East. Indeed, whilst assessing a larger tract of land (including the Bailey Walk site and others), the supporting Green Belt assessment to the GMSF came to very similar conclusions and confirmed that it provided 'no contribution' in terms of separation/merger of settlements under purpose 2 (see Appendix 4.10, Site Ref: TF51 GMSF Green Belt Assessment – attached for ease of reference).

- **The site does not contribute to the historic setting of a town** – The development of the site would not adversely impact on any local heritage assets. Moreover, it is noteworthy that the principal function of the GM Green Belt around Trafford was not to protect the historic setting of a town as was the case with settlement such as Chester and York.

- **The site would not impinge on urban regeneration within the area.** We note that this function has not been assessed by LUC for the GMSF Green Belt Assessment. However, it is clear that there are very few urban regeneration sites within Bowdon or Trafford that would be adversely effected by the development of much needed family dwellings in this location.

Wider Strategic Allocation for Bollin Valley

The approach referred to above would align with the wider strategic aspirations for Bollin Valley that are being led by P&D and other NW partners to create a 'Great Northern Way' (see **Appendix 4**) along the River Bollin, which essentially promotes the valley as an area providing for:

- Recreation, sport and health and well-being activities;
- Improved accessibility and connections with nature and the open countryside;
- Sustainable travel links with cycle paths and enhanced footpaths;
- Climate change mitigation through flooding and air quality management and carbon offsetting;
- Biodiversity enhancements and habitat creation.

However, these objectives could be better achieved if the Council considered the wider area as a strategic allocation / opportunity area / area of search for suitable sites for development that could also contribute to the above aspirations. Indeed, there are other sites along the urban boundary of Bowdon and Hale that have been put forward during previous call for site exercises associated with the GMSF process. Responses from Trafford Council to date infer that each of these promoted sites to the south of Hale and Bowdon would represent 'piecemeal development' that could not provide the necessary strategic infrastructure to support them. We contest this view as it is perfectly achievable to devise and draft area based policies or site allocation policies that collate various sites together under one overarching policy.

Each site will clearly generate its own infrastructure requirements and could be brought forward independently. However, the Council should positively consider if these individual sites and other neighbouring land parcels could be bound together under one strategic allocation / policy and test this option as a reasonable alternative within any supporting evidence base and Sustainability Appraisal. Indeed, the GMSF is allocating large sites that are under multiple ownerships and could easily be split into separate defined sites. There is no reason why sites on the urban fringe of Bowdon and Hale and along the River Bollin could not be considered in the same way under a single, strategic 'River Bollin' housing allocation, particularly if the aim of this allocation was to also bring forward environmental benefits to the River Bollin and positively address the objectives of paragraph 138 of the NPPF through the delivery of a Bollin Valley Country Park / Great Northern Way. We understand a number of these sites could also contribute to the provision of suitable land for development whilst also offering up land for additional open space, footpath and cycle path connections and new/enhanced sporting facilities.

Indicative Bollin Valley Strategic Allocation Area with Country Park



The image provided above simply highlights a basic example of how such a policy / plan could take shape. It shows four individual sites that we are aware of that we know have been put forward for development within Trafford. Those shown would deliver circa 250 homes and could deliver a connected piece of green infrastructure along the River Bollin if a co-operative approach was undertaken amongst Trafford Council, the respective landowners, P&D and Cheshire East Council.

Conclusions

To conclude, P&D are keen to proactively engage with Trafford Council as they continue to prepare their emerging Local Plan. As discussed earlier in these representations, we have concerns regarding the current approach relating to Green Belt release. Whilst we fully support the brownfield-first approach to development, this approach alone will be simply insufficient to meet Trafford's emerging housing requirements which are substantial. Indeed, emerging housing requirements are likely to be higher than that currently suggested (1,091 dwellings per year) for a number of compelling reasons, not least due to the fact that this figure does not even represent the **minimum** housing figure for Trafford as per the Government's standard method (which is 1,369 dwellings per annum).

The emerging Local Plan will need to make it clear that Green Belt release is acceptable in suitable locations. In this regard, there are a number of compelling planning reasons as to why Green Belt release is justified to the south of Hale and Bowdon. Not only is it important to meet a wide range of housing needs in Trafford, across the geographical and housing market spectrum, but this area also provides an excellent opportunity to improve the remaining Green Belt land in this area through compensatory measures. Indeed, P&D are exploring options for a new River Bollin Valley Park (which is within their wider land ownership), which would provide a number of health and recreational benefits to the local community. Such proposals would also meet the strategic aims of national policy to deliver compensatory improvements to remaining Green Belt land, as per NPPF paragraph 138.

I trust that out Representations are helpful and clearly articulate the benefits and proposals at Bailey Walk, Bowdon. Should you have any queries on the proposals, please do not hesitate to contact me on the details provided below.

Yours sincerely

[redacted]

Sebastian Tibenham
Executive Director
[redacted]

cc – Paul Martin – P&D

REGULATION 18 DRAFT TRAFFORD LOCAL PLAN
CONSULTATION JUNE 2025

Thank you for consulting Sport England with regard to the latest Draft Local Plan for Trafford. Comments relating to individual policies are provided below, together where relevant, Sport England's previous comments shown in red.

Evidence Base for Open Space and Recreation

It is noticeable that all evidence base documents, other than the Playing Pitch Strategy and Physical Activity Vision, are out of date. Most were undertaken pre-2010 so the baseline data on which they are based is very much out of date. It is recommended an Open Space Study is undertaken to help inform and underpin the Open Space related policies. There is also no Indoor Sports Facility Strategy, and it is recommended an assessment and strategy are undertaken to help inform and underpin policy OS2 and the Altrincham Leisure Centre Housing Allocation (2389). Sport England has issued guidance on undertaking Indoor Sport Facility Strategies called 'Assessing Needs and Opportunities' and the regional Sport England Planning Manager can assist. For contact details please see covering email.

The updated Open Space Assessment April 2024 refers on page 86 paragraph 8.9 to 'playing fields and the role of Fields in Trust. Sport England wish to note that The Town and Country Planning (Development Management Procedure) (England) Order 2015 has a specific definition of playing field, also outlined within Sport England Playing Field and Policy Guidance. In addition it refers to their role as providing benchmark guidance for 'outdoor sport.' The relevant guidance in relation to assessing outdoor sports provision is Sport England's Playing Pitch Strategy Guidance and Assessing the Needs and Opportunities Guidance and should be done with regard to the NPPF paragraph 103.

In addition the footnote link 40 does not work and takes the reader to an incorrect area of the document.

All other evidence base documents appear to be out of date and you are referred to Sport England's previous comments above. Trafford is currently undertaking work to draft their Playing Pitch and Outdoor Sport Strategy which, once internally approved, should by included in the Council's draft Local Plan evidence base in relation to Open Space and Recreation.

STRATEGY

Questions 1-3 - Strategic Objectives

Policy S01: Deliver the homes that Trafford needs

Sport England would welcome the inclusion of the Active Design principles within this objective. Active Design promotes activity, health and stronger communities through the way we design and build our towns and cities.
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

The inclusion of Active Design in this strategic objective will reflect the objectives and ambitions of Sport England's 'Uniting the Movement' Strategy which aims to create active environments. It is suggested this objective can be strengthened by including the following text:

'Create homes for the residents of Trafford within distinct and attractive neighbourhoods that provide opportunities for physical activity and Active Travel by incorporating the principles of Active Design'

This previous comment still applies and Sport England request it to be fully considered.

Policy SO2: Make Trafford healthy, accessible and equal for all
This should be linked to Sport England's request to incorporate Active Design as set out above under SO1.

Policy S06: Support vibrant town and designated centres
The role of indoor sport is becoming more prevalent within town centres with gyms and health and fitness centres serving people who live, work and socialise within Town Centres. Suggest strengthening the policy to say:

'which will be the focus for office, retail, sport, leisure and cultural activity.'
Sport England's previous comment still applies.

Policy S07: Protect and improve the natural environment and connect green assets
This objective is supported because it makes the distinction between open spaces and outdoor sports facilities, rather than including sports facilities within a generic open space typology.
Sport England's previous comment still applies.

Policy SO8: Sustainable movement
This objective is welcomed but suggest including the following wording to make the clear distinction between open space and sports facilities and to create consistency with S07:

'Integrate development so that housing, employment, retail, open space, sports facilities, community facilities.'
Sport England's previous comment still applies.

This is an opportunity to include Active Design principles to achieve this and additional wording :
"Provide opportunities for physical activity and Active Travel by incorporating the principles of Active Design'

Policy SO9: Support cultural and leisure assets
This objective is generally supported but it does not recognise the role sport plays in the local economy. Sport and physical activity can grow the local economy, provide jobs and purpose, integrate different groups, help tackle antisocial behaviour, respond to the threat of climate change and save public expenditure. For that reason, Sport England consider including the benefits of sport and physical activity to achieve an inclusive economy in this objective is strongly recommended.

Sport England's previous comment still applies.

The following wording is suggested:
'*Support the important role culture, tourism, sport and leisure play in the local and regional economy'*

Core Growth Area
Question 2-1
Policy ST1: Core Growth Area (Trafford)
This is an opportunity to include Active Design principles to achieve this and additional wording :

"Provide opportunities for physical activity and Active Travel by incorporating the principles of Active Design'

This provides an opportunity to identify the need for development to delivery appropriate infrastructure based on demand through financial contribution where it is not provided on site.

Sport England require further individual site details for any allocations to advise on any impact on playing field and/or sports facilities.

Question 2-2
Policy ST2: Inner Areas (Trafford)
This is an opportunity to include Active Design principles to achieve this and additional wording :

"Provide opportunities for physical activity and Active Travel by incorporating the principles of Active Design'

This provides an opportunity to identify the need for development to delivery appropriate infrastructure based on demand through financial contribution where it is not provided on site.

Sport England require further individual site details for any allocations to advise on any impact on playing field and/or sports facilities.

Question 2-3
Policy ST3: Southern Areas (Trafford)
This is an opportunity to include Active Design principles to achieve this and additional wording :

"Provide opportunities for physical activity and Active Travel by incorporating the principles of Active Design'

This provides an opportunity to identify the need for development to delivery appropriate infrastructure based on demand through financial contribution where it is not provided on site.

Sport England require further individual site details for any allocations to advise on any impact on playing field and/or sports facilities.

Question 2-4
Policy ST4: Sustainable Development
Suggest revising wording to reflect the importance of the health of the community. This is an opportunity to include Active Design principles to achieve this and additional wording :

"Provide opportunities for physical activity and Active Travel by incorporating the principles of Active Design'

This provides an opportunity to identify the need for development to delivery appropriate infrastructure based on demand through financial contribution where it is not provided on site.

RENEWABLE TECHNOLOGOED AND METHODS
Question 3-2
Policy RT2: Decentralised Energy Generation
Sport England require further individual site details as indicated in Figure 3-1 (Heat and Energy Network Opportunity Areas) for any allocations to advise on any impact on playing field and/or

sports facilities. Any proposals which affect playing fields will need to meet the requirements of NPPF paragraph 104 and Sport England's Playing Field Policy and Guidance.

Question 3-3
Policy RT3: Overheating and the Urban Heat Island
E. Sport England suggest that this should include reference to the avoidance of use of playing field land for tree planting.

TRANSPORT AND MOVEMENT
Question 6-1
Policy TM: Walking, Wheeling and Cycling
Sport England supports the policy aims and would welcome the inclusion of the Active Design principles within this policy. Active Design promotes activity, health and stronger communities through the way we design and build our towns and cities**.**
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

Question 6-6
Policy TM6: The A56
Sport England supports the policy aims and would welcome the inclusion of the Active Design principles within this policy. Active Design promotes activity, health and stronger communities through the way we design and build our towns and cities**.**
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

Question 6-10
Policy TM10: Parking Standards
Sport England supports the policy aim to ensure the provision of cycle parking within developments and would welcome the inclusion of the Active Design principles within this policy. Active Design promotes activity, health and stronger communities through the way we design and build our towns and cities.
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

Question 6-13
Policy TM13: Crowd Movement and Routes
Sport England supports the policy aims and would welcome the inclusion of the Active Design principles within this policy.
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

TOWN CENTRE AND RETAIL
Question 7-1
Policy TC1: Hierarchy of Centres
Sport England would welcome the inclusion of the Active Design principles within this policy. Active Design promotes activity, health and stronger communities through the way we design and build our towns and cities and encourages the co-location of facilities as one of its key drivers.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

Queston 7-4
Policy TC3: Out of Centre Retail and Leisure
Sport England would welcome the inclusion of the Active Design principles within this policy. Active Design promotes activity, health and stronger communities through the way we design and build our towns and cities and encourages the co-location of facilities as one of its key drivers.
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT
Queston 8-2
Policy GI2: Green Infrastructure Network
Sport England would welcome the inclusion of the Active Design principles within this policy. Active Design promotes activity, health and stronger communities through the way we design and build our towns and cities and encourages the integration of green and blue assets within developments to promote this.
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

Queston 8-3
Policy GI3 - Great Manchester Wetlands Nature
Sport England require further individual site details for any allocations to advise on any impact on playing field and/or sports facilities. Any proposals which affect playing fields will need to meet the requirements of NPPF paragraph 104 and Sport England's Playing Field Policy and Guidance. Sport England would advise against the use of playing fields for this purpose and would prefer this to be embedded within the policy wording.

Queston 8-4
Policy GI4 - Mersey Valley
Sport England would welcome the inclusion of the Active Design principles within this policy. Active Design promotes activity, health and stronger communities through the way we design and build our towns and cities and encourages the integration of green and blue assets within developments to promote this.
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

Queston 8-5
Policy GI5: Green Infrastructure Opportunity Areas
Sport England require further individual site details for any identified areas to advise on any impact on playing field and/or sports facilities. Any proposals which affect playing fields will need to meet the requirements of NPPF paragraph 104 and Sport England's Playing Field Policy and Guidance. Sport England would advise against the use of playing fields for this purpose and would prefer this to be embedded within the policy wording.

Sport England would welcome the inclusion of the Active Design principles within this policy. Active Design promotes activity, health and stronger communities through the way we design and build our

towns and cities and encourages the integration of green and blue assets within developments to promote this.
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

Queston 8-6
Policy GI6: Green Infrastructure in New Developments
Sport England would welcome the inclusion of the Active Design principles within this policy. Active Design promotes activity, health and stronger communities through the way we design and build our towns and cities and encourages the integration of green and blue assets within developments to promote this.
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

The policy should be clear as to the separation of the assessment of need for any outdoor sports facilities which should be based on the latest evidence base and Playing Pitch and Outdoor Sports Strategy in accordance with NPPF paragraph 103.

Sport England require further individual site details for any identified areas to advise on any impact on playing field and/or sports facilities. Any proposals which affect playing fields will need to meet the requirements of NPPF paragraph 104 and Sport England's Playing Field Policy and Guidance. Sport England would advise against the use of playing fields for this purpose and would prefer this to be embedded within the policy wording.

Queston 8-7
Policy GI7: Trees, Woodland and Hedgerows
The policy wording should be clear that new tree and hedge planting should not take place on playing fields which would potentially compromise its use for the marking out of playing pitches.

Queston 8-8
Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets
Sport England require further individual site details for any identified areas to advise on any impact on playing field and/or sports facilities. Any proposals which affect playing fields will need to meet the requirements of NPPF paragraph 104 and Sport England's Playing Field Policy and Guidance. Sport England would advise against the use of playing fields for this purpose and would prefer this to be embedded within the policy wording.

Sport England has provided comments on The Greater Manchester Local Nature Recovery Strategy (LNRS) on this basis and this should be considered as part of this policy development.

Queston 8-9
Policy GI9: Biodiversity Opportunity Areas
The policy wording should be clear that new tree and hedge planting should not take place on playing fields which would potentially compromise its use for the marking out of playing pitches.

Sport England has provided comments on The Greater Manchester Local Nature Recovery Strategy (LNRS) on this basis and this should be considered as part of this policy development.

Queston 8-10
Policy GI10: Building Biodiversity into New Developments
Any proposals which affect playing fields will need to meet the requirements of NPPF paragraph 104 and Sport England's Playing Field Policy and Guidance. Sport England would advise against the use of playing fields for this purpose and would prefer this to be embedded within the policy wording.

OPEN SPACE, SPORT AND RECREATION
Question 9.2
Policy OS2: Outdoor Sports and Recreation Facilities and Provision
B. i. – this determines a narrow identification of pitches and does not include the wider playing field. 'Playing field' protection, in their wider function, is important as they provide a flexibility of use for a variety of pitch sports – including those not listed e.g. rounders, American football, Australian football, hurling, shinty, baseball, polo. The requirements for the use of playing fields for pitch sports is determined through the Councils' evidence base through the Playing Pitch and Outdoor Sports Strategy and is an evolving process. This policy wording will severely limit the flexibility of sites to deliver the areas sporting requirements based on need. Sport England would wish to see the definitions in B.i. replaced with 'playing fields' – playing field includes in most cases AGP's which are over 0.2ha.

C. The wording in this part of the policy limits the extent to which existing facilities could be improved. Sport England does not support this limiting of future sports provision which should be based on the Council's evidence base and local need. This part of the policy also relies on B. the wording of which as stated above, is not supported by Sport England.

D. The wording in this part of the policy limits the extent to which existing facilities could be improved or new facilities provided through new development. Sport England does not support this limiting of future sports provision which should be based on the Council's evidence base and local need. The approach in the current policy wording is 'standards based' which Sport England does not support. This part of the policy also relies on B. the wording of which as stated above, is not supported by Sport England. This approach could lead to new developments accessing sports facilities which is not needed by the new population to the detriment of actual evidenced need.

E. As above with regard to D. Sport England encourages the provision of new sports facilities within developments where evidence base shows there is a need, but will support off-site provision through financial contributions where this needs to be achieved off-site. The reference to D should be removed.

F. Sport England welcomes this approach, but facilities should also be co-located to support and encourage active lifestyles. We would encourage the inclusion of the Active Design principles within this policy. Active Design promotes activity, health and stronger communities through the way we design and build our towns and cities**.**
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

9.18 Should include reference to the Council's evidence based and NPPF paragraph 103.

Question 9-3
Policy OS3: Indoor Sports and Recreation Provision
A.i. the use of the phrase 'make the most of' is vague and will not necessarily delivery the sports provision that the Council needs. A should include reference to the Council's evidence base which should include a Built Facilities Strategy to fully meet the requirements of NPPF 103 and clearly establish the Council's indoor sport and recreational needs. It does not fully align with A.iii. which identifies this requirement.

B. By listing facilities in this way, the Council is limiting what facilities will be protected. This should relate to 'existing sports and recreational buildings' in accordance with the NPPF 104.

C. The wording in this part of the policy limits the extent to which existing facilities could be improved or provided through new development. Sport England does not support this limiting of future sports provision which should be based on the Council's evidence base through a Built Facilities Strategy as this is based on local need. The approach in the current policy wording is 'standards based' which Sport England does not support. This part of the policy also relies on B. the wording of which as stated above, is not supported by Sport England. This approach could lead to new developments accessing sports facilities which is not needed by the new population.

D. The wording in this part of the policy limits the extent to which existing facilities could be improved or new facilities provided through new development. Sport England does not support this limiting of future sports provision which should be based on the Council's evidence base and local need. The approach in the current policy wording is 'standards based' which Sport England does not support. This part of the policy also relies on B. the wording of which as stated above, is not supported by Sport England. This approach could lead to new developments accessing sports facilities which is not needed by the new population

E. This approach is supported but could be strengthened to indicated that any new sport and recreational development 'should' include full community access through a Community Use Agreement.

F. This part of the policy is unclear and could have consequences for established sporting needs. The Council's needs should be determined through a Built Facilities Strategy as part of their evidence base which will then inform any proposals affecting existing uses. This appears contrary to the approach taken in B (albeit which Sport England does not agree with).

Question 9-4
Policy OS4: Loss of Sport and Recreation Land or Facilities
A. The policy criteria reads as proposals will need to meet them all, which does not appear to be the overarching intention. E.g. if i. is met, then does ii also need to be met?

A.ii. relates only to 'recreation provision' and does not include sports provision. This weakens the protection of playing fields and facilities for formal sport. 'Sport' needs to be included in the wording in isolation

'Replacement sports provision of equivalent or better replacement facilities are proposed in terms of quantity, quality, availability, management and accessibility'

A.iii. this appears to offer the ability of proposals to option of demonstrating that 'either' sport or recreational provision would still be met if a facility were lost. This needs to be tightened to omit this option. It also refers to the potential to demonstrate that a playing field or sports facility could be

lost is recreational standards are met. Recreational standards do not determine the areas need for sports facilities and is not supported by Sport England. The preference would be to separate the requirements for 'sport' and 'recreation' so that clear and relevant criteria is established for both. A.iv. Sport England does not support this policy wording. We will need to see the detail of any site allocation which impacts playing fields and sports facilities and advise as to how such allocations meet the requirements of NPPF paragraph 104 and our own Playing Fields Policy and Guidance. Where allocations include the loss of playing field, the Council should use the local plan review process to allocate sites for their replacement. Sport England will object to loss of playing field required through the needs assessment process that is not replaced appropriately or meets Exception 5 of our Playing Fields Policy criteria.

B. The words 'Wherever practicable' needs to be removed as any proposal relying on replacement provision will need to be provided pre-commencement.

COMMUNITY AND SOCIAL INFRASTRUCTURE

Question 11-1 & 11-2

Policy CT1: Protecting Existing Community and Social Facilities

11.7 It is noted that Education facilities, including schools, youth facilities, colleges and universities are included in this definition and these sites are likely to include playing fields and sports facilities which are dealt with through Policies OS2 and OS3. Sport England would prefer to see this clearly set out to avoid a misinterpretation of this policy and the requirements of OS2 and OS2 as any loss of those facilities is not sequentially or market tested.

Question 11-3

Policy CT2: Loss of Community Facilities

As above.

Question11-4

Policy CT3: New Community and Social Facilities

As above.

BUILT ENVIRONMENT

Question 12-1

Policy BE1: Design

Sport England would welcome the direct inclusion of the Active Design principles within this policy. Active Design promotes activity, health and stronger communities through the way we design and build our towns and cities and encourages the integration of green and blue assets within developments to promote this.
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

Sport England support the general approach proposed to improve design quality across Trafford however would welcome a specific reference to Active Design.
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

Active Design is Sport England's contribution to the wider debate on developing healthy communities. Active Design is rooted in Sport England's aims and objectives to promote the role of sport and physical activity in creating healthy and sustainable communities. Active Design wraps together the planning and considerations that should be made when designing the places and spaces we live in. It is about designing and adapting where we live to encourage activity in our everyday lives, making the active choice the easy choice.

Sport England would encourage good design that should contribute positively to making places better for people, to create environments that make the active choice the easy and attractive choice for people and communities. The creation of healthy places, which promote and enable participation in sport and physical activity, requires the collaborative input of many different partners through many disciplines including planning, design, transport, and health, along with developers working with local communities. Active Design is a key guidance document intended to help unify health, design, and planning by promoting the right conditions and environments for individuals and communities to lead active and healthy lifestyles. The guidance sets out practical case studies and pointers to best practice are set out to inspire and encourage those engaged in shaping our environments to deliver more active and healthier environments where communities can be naturally active as part of their daily lives.

CULTURE, TOURISM AND LEISURE

Question 13-1

Policy CL1: Protecting and Supporting Existing Cultural, Leisure and Tourism Assets

Sport England consider this policy as an ideal opportunity to embed Active Design principles and would welcome the direct inclusion of the Active Design reference within this policy. Active Design promotes activity, health and stronger communities through the way we design and build our towns and cities and encourages the integration of green and blue assets within developments to promote this.
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

Question 13-2

Policy CL2: New Culture, Leisure and Tourism Developments

As with CL1, Sport England consider this policy as an ideal opportunity to embed Active Design principles and would welcome the direct inclusion of the Active Design reference within this policy. Active Design promotes activity, health and stronger communities through the way we design and build our towns and cities and encourages the integration of green and blue assets within developments to promote this.
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design

INFRASTRUCTURE AND PLANNING OBLIGATIONS

Question 14-1

Policy IP1: Infrastructure Delivery and Planning Obligations

This underpins Sport England's objective to Provide – 'To provide new opportunities to meet the needs of current and future generations.' Appropriate new provision that meets needs and encourages people to play sport and be physically active should be provided by adapting existing places and through new development.

https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport

14.11 Sport England supports the inclusion of 'outdoor sports facilities;' 'indoor sports facilities' including swimming pools and gyms; in the 106 requirements. Where contributions towards sports facilities may be required, a reference should be included to signpost the use of Sport England's Playing Pitch Calculator and Sports Facility Calculators available through our Active Places Power, both can be used to help quantify the additional demand for key community sports facilities and playing pitches created by a new population.

It should be noted that Sport England will does not accept a case made on the basis of viability for the loss of playing field and there is no provision in our Playing Fields Policy nor para.104 of the NPPF for such cases to outweigh playing field loss.

Whilst the aim of the policy is supported, it should be noted that Sport England's comments on residential developments over 300 units are made in an advisory capacity, as recommended in the Planning Practice Guidance, and not as part of our statutory remit.

The Council are advised to work with Sport England to devise a process that obtains contributions for outdoor sport based on up to date evidence that can be amended regularly to reflect changes in outdoor sport demand and supply.

TRAFFORD LOCAL PLAN DRAFT SITE SELECTION METHODOLOGY APRIL 2025

Question SS2

- Sport England would expect any sites which include playing fields to fail the Stage 2 test as there would be a policy constraint that would preclude development.
- Sport England would welcome the inclusion of 'non-playing field land' as part of the site criteria for Stage 2 assessment.
- If sites which include playing fields are to be considered, then the Council will need to refer to appropriate up to date evidence base in the form of the Playing Pitch and Outdoor Sports Strategy for justification and allocate land to accommodate their replacement.

[redacted]

From: EVANS, Thomas [redacted]
Sent: 12 June 2025 14:51
To: Local Plan Consultation
Cc: [redacted]
Subject: Trafford Local Plan Regulation 18 Consultation Draft - Cheshire East Council comments

Follow Up Flag: Follow up
Flag Status: Completed

Categories: LP April 2025 comment

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

Dear Local Plans team,

Thank you for consulting Cheshire East Council on the Trafford Local Plan Regulation 18 Consultation Draft.

Having reviewed the draft policies and material, at this stage Cheshire East Council has no comments to make on the draft plan.

Cheshire East Council are currently in the early stages of preparing our own local plan, under the LURA 2023 framework, and look forward to continuing to engage with Trafford Borough Council via the duty to co-operate process.

Despite having no comments to make at this stage, we are keen to understand whether any cross border implications may arise from policy ST3 Southern Growth Areas, in particular and the next stage of your plan making process related to site allocations. We welcome a discussion on these matters at the appropriate time.

Regards,

Tom

Tom Evans | Strategic and Environmental Planning Manager

Cheshire East Council | [redacted]

Cheshire East Council
VibranCE LGBT+ Ally
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****

OFFICIAL

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12th June 2025

Dear Caroline,

Draft Trafford Local Plan (Policies) Reg 18 Consultation

Thank you for your email and the opportunity to comment on the emerging Regulation 18 Draft Trafford Local Plan Policies and supporting evidence base. Having reviewed the Draft Local Plan Policies and supporting evidence base, we make the following comments.

We are supportive of the Plan's commitment to meet the housing and employment land requirements established for Trafford in the Greater Manchester Places for Everyone Plan.

As you are aware from previous discussions, our main area of interest is the New Carrington site, given the scale of development and its proximity in relation to the boundary of the Borough of Warrington. In particular, we are keen to understand the potential impact of development on Warrington's highways network and ensure the delivery of necessary transport infrastructure to mitigate any impacts.

We recognise that the key policy requirements for the New Carrington allocation are set out in the Places for Everyone Plan (Strategic Allocation JPA30) and note that New Carrington is referenced in various Draft Local Plan Policies in the consultation version of the Trafford Local Plan 2025. Following our meeting in October 2024, we are aware however that the key details relating to the delivery and phasing of transport and social infrastructure will be confirmed through the preparation of the masterplan for the allocation.

Given the proximity of New Carrington to Warrington's boundary, and the strategic cross boundary issues it raises, we have requested that we are kept informed and included in further discussions and any workshops that take place on the New

Carrington Masterplan. We note that further evidence base documents have now been published and we will arrange to meet with your separately to discuss these.

We would also like to be provided at the earliest opportunity with a copy of your draft Statement of Common Ground, that identifies the relevant cross boundary strategic issues between our two authorities.

We look forward to continuing our ongoing and constructive engagement with you through the Duty to Cooperate process and we trust this response is helpful as you progress your Local Plan.

If you need any further information and or clarification, please do not hesitate to contact us.

Yours sincerely

[redacted]

Michael Bell
Planning Policy and Programmes Manager

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SE1 8SW

[redacted]

By email: localplan.consultation@trafford.gov.uk

Date: 12/06/2025

Dear Sir/Madam,

New Trafford Local Plan (Regulation 18) Consultation – Response by Network Rail

Background

Trafford Metropolitan Borough Council ("the Council") launched their Regulation 18 consultation to the Trafford Local Plan on 24th April 2025, closing on the 12th June 2025. The period for the new Local Plan will be up to 2042.

This letter sets out Network Rail's response to the Regulation 18 draft Local Plan consultation. For ease of reference, the comments follow the order of the draft Local Plan and specify the relevant Plan sections, Policies, and page numbers.

It is noted that a staged approach is being taken to the preparation of the draft Local Plan. This consultation relates to the first half of the Plan – the Strategy, Vision and Objectives and the thematic policies. It is noted that a further consultation is planned for later in 2025 (September to November 2025) on proposed allocations for housing, employment and other uses. Network Rail will engage in consultation on the second part of the Local Plan as appropriate.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains, and

develops the main rail network. This includes the railway tracks, stations, car parking, signalling systems, bridges, tunnels, level crossings and viaducts.

For background, Network Rail made comments to a separate consultation in November 2024 on the Council's draft planning application validation checklist.

Plan Evidence Base

The draft Trafford Local Plan has been prepared using the significant evidence base that was prepared for the Places for Everyone ("PfE") Plan for the nine Greater Manchester Districts (including Trafford). It is understood that further evidence base studies are due to be undertaken to inform future stages of the Trafford Local Plan, including studies into transport related policies.

The following evidence documents from the PfE Plan have relevance to various aspects of transport:

- Site Selection Background Paper;
- Delivery Topic Paper;
- Greater Manchester Transport Strategy 2040 (updated January 2021);
- Our Five-Year Transport Delivery Plan 2021-2026;
- Existing Land Supply and Transport Technical Note Greater Manchester Spatial Framework 2020;
- Transport Locality Assessments – Trafford – Greater Manchester Spatial Framework 2020;
- Transport Locality Assessments Addendum – Trafford – Places for Everyone – July 2021;
- Transport Topic Paper; and
- Greater Manchester Transport Strategy 2040 (Bee Network).

From a regional and local perspective, Network Rail is a partner in the emerging Bee Network programme, an important initiative to integrate the public transport system, covering 64 stations across Greater Manchester (including Trafford) into a single integrated network. The plan is aimed at not only improving transport but also unlocking major regeneration and housing opportunities on land around the city-region's stations. Network Rail and Transport for Greater Manchester ("TfGM") has entered into a partnership to deliver city-wide transport and regeneration opportunities. This is in addition the delivery of Network Rail's 'Access for All' proposals to improve accessibility at stations within Greater Manchester.

In addition to the evidence base documents listed above, the draft Local Plan should specifically identify the North West and Central Regional Strategic Plan (February 2021). This

Strategic Plan, and associated delivery plans, have been developed by Network Rail to set out a strategic view of how to enhance the Greater Manchester and wider area's rail network up to 2029, including referencing locations such as Trafford Park. A copy of the Strategic Plan is provided with this consultation response. It should also be noted that more localised studies are being undertaken by Network Rail, working with others in the rail industry to develop long term service proposals as well as infrastructure priorities.

Vision and Strategic Objectives (pp 19 – 23)

Supporting text from paragraph 1.50 (p20) of the Plan identifies the vision for Trafford. There are 7no. overarching principles which determine how development will be delivered, Principle no. 3 is concerned with transport, connectivity and accessibility.

Principle 3 is supported by relevant Strategic Objectives set out in the draft Local Plan. Strategic Objective 8 (Sustainable Movement) encompasses transport and connectivity and notes the importance of encouraging sustainable and efficient patterns of movement through active travel and improved public transport provision, as well as improving and enhancing east-west connections across the Trafford area.

Network Rail supports this Principle and Strategic Objective, but requests that specific recognition is also given to the importance of the railway system as part of public transport growth, which also includes freight transport. The railway is an important piece of infrastructure necessary to support the wider development and growth needs of the area. In this regard, Network Rail would also support the identification of emerging key rail projects not currently listed in the Plan or the existing identified evidence base, such as the proposed alternative high-speed rail line between the West Midlands and Manchester/ Northern Powerhouse Rail (the existing PfE evidence base was prepared prior to decisions on the cancellation of HS2 Phase 2b).

Sustainable Development Requirements

Draft Policy ST4 provides the growth strategy and sustainable development ambitions for Trafford, setting out the type, scale and suitability of new development for the Plan Period up to 2042. This sets out the criteria of the location of new development, incorporating enhancing the existing physical environment, providing sufficient infrastructure, and improving the economic, social and environmental conditions of the area. Supporting text notes that development should be near to town centres and/or sustainable public transport hubs.

To fully ensure sustainable patterns of development, in addition to locating development close to sustainable modes of transport, including rail stations, Network Rail would also

highlight that it is necessary that growth is supported by appropriate investment in the area's rail network, including requiring that developments make provision for associated necessary rail and other infrastructure through various appropriate means, including via s106 contributions. Private sector investment is an important part of the future investment needed towards improving the area's rail network (please also see other comments elsewhere in this letter regarding this matter, including responses to draft Policy TM2 below).

Draft Policy TM2 – Public Transport (pp145 – 148)

Draft Policy TM2 notes that the Council will work with TfGM and other partners to deliver a high-quality public transport network across the borough, which offers a choice of accessible, safe and reliable modes of travel to all. To support delivery of public transport projects, all major development proposals will be expected to provide or contribute towards improvements to public transport services, particularly in those areas poorly served by existing services and / or where proposed development would likely generate additional demand which exceeds existing capacity.

Criterion E of the draft Policy states that the Council will promote the improvement and development of the rail network, including:

- Additional rolling stock to alleviate serious overcrowding on many commuting corridors.
- Improvements to capacity, service frequency, journey times and quality on both the Manchester to Liverpool line and the Mid- Cheshire line.
- Improvements to stations and infrastructure.
- Support for proposals for new rail stations which provide enhanced transport connectivity.

Criterion F states that the Council will support the development of the Tram-Train Network to provide improved rapid transit links, in line with the most up-to-date Greater Manchester Transport Strategy Delivery Plan.

Network Rail supports an approach which requires major development proposals to provide or contribute towards improvements to public transport services. As noted previously, private sector investment is an important part of the future investment needed for improving the area's rail network. To this end, Network Rail also supports the framework provided by draft Policy IP1 (Infrastructure Delivery and Planning) to the use of planning obligations and contributions to secure the infrastructure required to make a development acceptable.

With regards to Tram - Train proposals, while there may be opportunities to use capacity of the heavy rail network in this area for Tram -Train (and Network Rail will work with TfGM

examine potential options), long term strategic fit in terms of network usage and performance for such plans must be agreed by Network Rail. Any tram use of the heavy rail network will need to be carefully balanced with heavy rail usage to ensure infrastructure is used in the best possible manner. The realisation of tram - train schemes would need to account for both heavy rail network capacity and future service aspirations, as well as network performance. A robust solution would need to be found to ensure that delays did not transfer between the heavy rail and tram networks.

Draft Policy TM7 – Freight (p160)

Draft Policy TM7 encourages development that promotes the movement of freight by rail and/or water, which contributes towards the improvement and enhancement of a sustainable distribution system and reduces the reliance on goods being transported by road.

Network Rail supports the principle of this draft Policy. In terms of safeguarding land for (future) freight, Network Rail has not identified any specific land safeguarding requirements at present. Initial work undertaken by Freightliner and TfGM hasn't identified the disused line around Carrington for freight use as a viable option that is being explored. However, it is worthy of note that with regards to Trafford Park, options for rerouting/relocating freight services are being looked at between the freight operators and TfGM.

Draft Policy TM9 - Safeguarded Land for Transport Proposals (p162)

Draft Policy TM9 states that the Council will support the provision of a rail route which runs to the west of the M56, connecting the Manchester Airport area to the City Centre, via a tunnel. This includes a new rail station to the west of the M56 / Manchester Airport, of high-quality design and with good quality access by active travel and public transport to surrounding communities. Supporting text to the draft policy notes that notes that in October 2023, the Government outlined significant changes to the High Speed Two (HS2) project, which included the cancellation of Phase 2b. Trafford Phase 2b included the provision of a high-speed rail line to the west of the M56, a new high speed rail station at Manchester Airport and a tunnel portal to provide an underground connection into central Manchester. Notwithstanding cancellation of HS2 Phase 2b, Trafford Council remains supportive of a new rail route in this area providing a link to Manchester via Manchester Airport and associated station located within the Trafford boundary.

Network Rail would support safeguarding of land which was identified for HS2 Phase 2b for future rail use. At this time, we are not aware of any Network Rail initiatives which would require further land safeguarding for rail use.

Draft Policy GI2 - Green Infrastructure Network (p200) and Draft Policy GI8 - Locally Designated Sites and Natural Environmental Assets (p224)

Some of the rail network as shown on the Local Plan Polices Map forms part of the Green Infrastructure ("GI") Network and part of locally designated sites and natural environment assets designations. Draft Policy GI2 states that development proposals will not be permitted which adversely impact upon any of the services and benefits of the GI Network. Similarly, draft Policy GI8 requires that planning applications within these designations must demonstrate how the development proposals protect and enhance the landscape character, biodiversity, geodiversity and conservation value of its natural environment assets, having regard not only to its immediate location but its surroundings and context.

Network Rail supports the general principles and objectives of these draft policies but requests that these policies also recognise the need to balance the protection of existing Green Infrastructure and natural environmental resources with the operational requirements of Network Rail, in line with the current Network Rail's Biodiversity Action Plan which aims to strike a balance between safety, performance, and environmental outcomes. This would be similar in approach to draft Policy GI7 regarding trees, woodlands and hedgerows. The importance of the railway for biodiversity, including in connecting habitats through GI, is fully recognised, and supported by Network Rail. There is however a need to ensure the best balance between biodiversity objectives/GI and the ability to maintain and improve the railway to keep it running safely and smoothly. It is not always safe or practical to avoid all impacts on existing GI features as part of this balance, and in situations where certain on-site impacts are unavoidable, Network Rail will seek to create appropriate habitats and enhance GI elsewhere, (in the local area where possible), to mitigate for and offset any impacts, also having regard to national legislative requirements.

Draft Policy GI7 – Tress, Woodlands and Hedgerows (p221)

Draft Policy GI7 requires that development should seek to protect and enhance existing trees, woodland and hedgerow cover on sites. Criterion Cii of the draft Policy notes however that development proposals will be supported where it can be demonstrated satisfactorily that the need for and benefits of the development clearly outweigh any loss or deterioration of woodlands, hedgerows or trees of high amenity value.

Network Rail supports Policy GI7, notably Criterion C ii which recognises that a need for a development (which could include, for example, operational and rail safety considerations that cannot reasonably be addressed in another way) can outweigh the loss or deterioration of woodlands, hedgerows or trees. For clarity and completeness, it is recommended however that the draft Policy be amended as follows (suggested new text underlined):

Criterion C ii to read: "*It can be demonstrated satisfactorily that the need for and benefits of the development clearly outweigh any loss or deterioration of woodlands, hedgerows or trees, including those of high amenity value*."

Criterion D to read: "*Other than in the circumstances outlined in Criterion C ii, the Council will resist the loss of mature trees, trees of high amenity value (as identified in an Arboricultural Impact Assessment) or a tree, group of trees, area of woodland and/or vegetation of significant ecological, amenity, historic, and/or cultural value on, or adjacent to, a development site*."

Draft Policy BE1 – Design (p287)

Draft Policy BE1 identifies that development must be of a high standard of design and construction and make a positive contribution to the character and distinctiveness of the borough. Criterion BE1 iii of the Policy requires that development must not adversely impact the amenities and / or operations of existing occupiers / land uses by virtue of overbearing, overshadowing, overlooking, visual intrusion, noise and/or disturbance, odour or in any other way.

The inclusion of Criterion BE1 iii is supported by Network Rail. It is requested however that either a further strategic design principle be added or additional supporting text to the Policy provided in relation to the application of Criterion BE1 iii to ensure that new residential (and other) development close to railway infrastructure does not restrict existing or likely future operational rail requirements. This would accord with the 'agent of change' principle established in the National Planning Policy Framework ("NPPF"). This is so that operational requirements for the railway are safeguarded by ensuring that housing development in particular does not impact on the railway or the ability to carry out activities reasonably necessary for its ongoing operation.

Future Housing and Other Development – General Principles

The current Trafford Local Plan consultation does not identify any additional proposed allocations for housing, employment and other uses, other than those identified previously in the PfE Plan. It is understood that a further consultation will be undertaken later in 2025 on any proposed allocations (not already identified in the PfE Plan). The two parts of the draft Trafford Local Plan will then be joined together into one Local Plan at the publication (Regulation 19) stage and published for consultation, in advance of submission to the Secretary of State for Examination.

Network Rail does not object in principle to development, including large allocations, growth zones, and similar allocations, close to the railway. It is important however that such

development does not restrict existing or likely future operational rail requirements in line with the 'agent of change' principle discussed above, and that new development also provides for necessary infrastructure, including rail improvements.

It is therefore requested that any future new development allocations, and general policies concerned with the development of housing (e.g. pursuant to draft Policy R1) include the following provisions:

1. Ensure that any residential development close to the railway does not restrict existing or likely future operational rail requirements in line with the 'agent of change' principle established in Paragraph 193 of the National Planning Policy Framework ("NPPF").
2. Developers to enter into an 'Asset Protection Agreement' to ensure future protection of railway infrastructure; and
3. That relevant policies for growth areas and site-specific allocations etc identify any necessary rail upgrades in consultation with Network Rail.

Summary

I trust that these representations are of assistance and that they will be duly considered as part of the local plan process. If you have any queries or require any further information, please do not hesitate to contact me in the first instance.

Yours faithfully,



Richard Brown
Senior Director, CBRE (acting on behalf of Network Rail)

Enc: Network Rail North West and Central Regional Strategic Plan (February 2021)

Colliers

Accelerating success.

Trafford Local Plan

Regulation 18 Consultation Draft – Policies

Land at Davenport Green, Trafford

Royal London Asset Management Ltd (RLAM)

June 2025

Prepared by: Colliers

Trafford Local Plan (Reg 18) – Land at Davenport Green

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1. Introduction

1.1 Colliers have been instructed to prepare and lodge representation in response to the Trafford Local Plan (Regulation 18 Consultation Draft – Policies) on behalf of Royal London Asset Management Ltd (RLAM). This representation has been lodged in relation to RLAM's landholding at Davenport Green in Trafford, Greater Manchester, which form part of a wider allocated site (Policy JPA3.2) known as Timperley Wedge in the approved Places for Everyone (PfE) 2024, the strategic plan for the Greater Manchester conurbation. Royal London own about 56% of the proposed built development of this allocated site with the balance of the allocation being owned by a number of other landowners. This strategic allocation within the recently approved PfE is one of solely two within the Trafford Council area. It is expected that this allocated site area will see significant development, growth and new infrastructure provision to support the proposed development over the plan period for the next 15+ years.

1.2 It is noted that this stage of the consultation on the Local Plan is focused on the strategy, vision, objectives and policies of the Local Plan. A further consultation will take place on site allocations later in 2025 and the entire Local Plan (policies and allocations) to be submitted to the Planning Inspectorate for Examination at the end of 2026.

1.3 Based on this context, only specifically pertinent (Davenport Green/Timperley Wedge)) policies have been responded to on behalf of RLAM. These include the following that are considered specifically relevant.

- Housing and Affordable Housing
- Green Infrastructure
- Employment land
- Transport and transport links
- Town Centres
- Carbon & Energy

2. Carbon and Energy

2.1 Consultation Question 3-1: Do you support Policy RT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

2.1.1 RLAM broadly support policy RT1: Carbon and Energy and its overall aims to adhere to, Trafford Council's commitment for the borough to be carbon neutral by 2038. Specifically for Southern Trafford, Policy RT1S: Carbon and Energy outlines First step priorities as:

- Solar PV priority area **including Solar Farm, where appropriate**
- EV charging hub and Home EV charging priority area
- Retrofit Priority Area, **where suitable**

And Long-term priority being Flexibility and storage opportunity area.

2.1.2 RLAM agree with the priority of Solar PV, which should also logically support a Solar Farm , where locationally appropriate as well. We also propose a small amendment to the third point as well. RLAM believe the potential for a Solar Farm also supports the longer-term priority for storage opportunities, flexibility is also crucial, and it is welcoming to see this is built into the policy from the outset.

2.2 Consultation Question 3-2: Do you support Policy RT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

2.2.1 RLAM note policy RT2S: Decentralised Energy Generation referring to 'Heat and Energy Network Opportunity Areas'. There should be a reference to recognise 'flexibility' in the manner via which this policy's aims could be achieved, as technology will advance over the plan period and the policy objectives have innumerable means of being secured over a fifteen-year plan period.

3. Housing and Affordable Housing

3.1 Consultation Question 4-2: Do you support Policy R2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

3.1.1 Considering the Davenport Green Masterplan, which is looking to incorporate existing homes where possible, the policy wording should recognise circumstances where a small number of homes may require to be lost in order to deliver strategic sites via PfE, which will deliver many thousands of homes. With regard to the future adoption of the Davenport Green masterplan, as per criteria 1 of policy JPA 3.2 of PfE –

> *"Development of the site will be required to be in accordance with a Masterplan that has been development in consultation with the local community and other stakeholders and approved by the Local Planning Authority."*

3.2 Consultation Question 4-4: Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

3.3 RLAM support the overall aims of policy R3 which is realistically qualified via sub section E with regard to viability, which does require to be taken into account in specific circumstances, which unfortunately are not always limited or exceptional, based on current market evidence, values and increasing constructions costs. This is not unique to Trafford or indeed Greater Manchester but is a nationwide challenge.

3.4 Consultation Question 4-4: Should the Local Plan set an affordable housing requirement, including a tenure mix, for each locality (similar to Core Strategy policy L2) that reflects market conditions?

3.5 It is not considered that a tenure mix is appropriate for each locality, as this requires to be agreed between developers and the Council. To be overly prescriptive form the outset may render certain sites unviable, which is not a productive starting point.

3.6 Consultation Question 4-19: Do you support Policy R11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

3.7 If the Council wish to secure custom/self-build plots, then there requires to be a robust evidence base which quantifies the need for this tenure type. Especially when paragraph points to half of those registered as living outside the borough. The other key question where need requires to be evidenced is how many other Councils those outwith the borough have registered with, as this can distort the actual need.

4. Employment Land

4.1 Consultation Question 5-6: Do you support Policy EJ4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

4.1.1 RLAM supports the policy and welcomes acknowledgement of Davenport Green as 'Key employment area'. Nevertheless, it is required that in order for this policy to supports employment, similarly to policy EJ1: Employment Land Requirements, the employment uses are not limited to specific parts within Class E (Use Classes E(c)(i), E(c)(ii), E(g)(i), E(g)(ii)) but that further parts are included, including Use Class E(c)(iii) and Use Class F1 – Education and that Science/Technology uses are not excluded and neither planning uses that complement either the nearby Airport or Hospital

4.2 Consultation Question 5-8: Do you support Policy EJ6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

4.2.1 RLAM supports Policy EJ6 and encouragement of Modern Economy, however it requires to acknowledge and incorporate proposals for energy storage on sites other than brownfield sites, with newly proposed energy infrastructure.

5. Transport

5.1 Consultation Question 6-2: Do you support Policy TM2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

5.1.1 RLAM supports Policy TM2: Public Transport and agree with the encouragement of the delivery a high-quality public transport network across the borough, including improving bus network, Metrolink extension and tram stops and rail connectivity, at the Davenport Green site with the surrounding areas of Trafford and Greater Manchester.

5.1.2 RLAM wish for this policy to fully emphasise the development around public transport hubs, specifically in relation to future Metrolink stops and to specifically reference Manchester Airport (NPR) rail station (linked to policy TM4: Mobility Hubs) within the 'Rail' section of the Policy TM2 The details outlined In Policy TM9 – Potential Future Rail Route are noted and supported by RLAM for the potential Manchester Airport station and the safeguarded area that remains in place is detailed. However, if this safeguarding area is released this will require to be reflected in the Local Plan.

6. Town Centres & Retailing

6.1 Consultation Question 7-2 Do you agree with all of the proposed boundaries for the Town, Other Designated, Local and Neighbourhood centres as shown on the policies map?

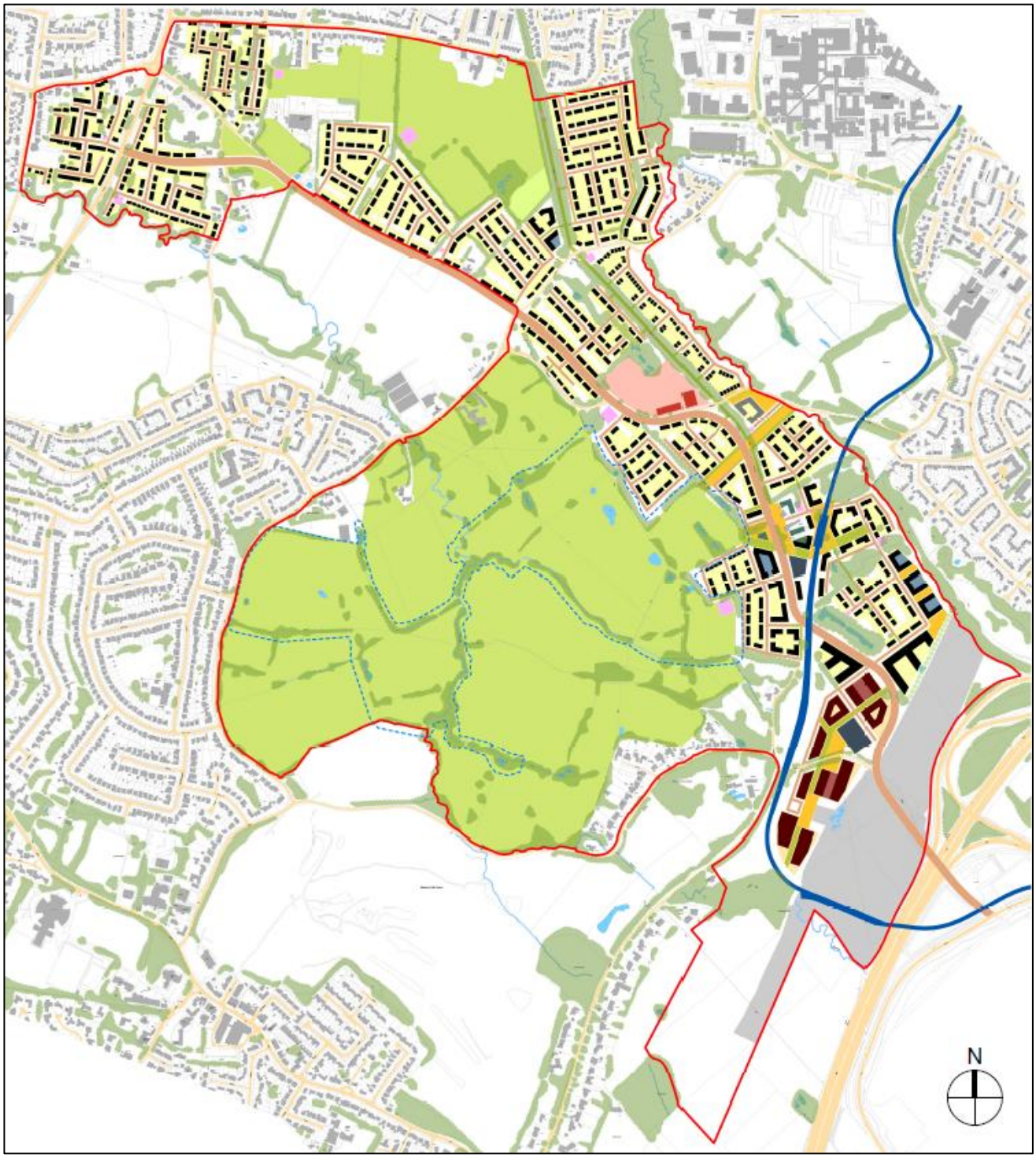
6.2 RLAM support the identification of the new Local Centre at Davenport Green which is consistent with the PfE allocation.

7. Green Infrastructure & Natural Environment

7.1 **Consultation Question 8-5: Do you support Policy GI5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.**

7.1.1 RLAM support the Green Infrastructure Opportunity Areas as outlined in Policy G15 and agrees with the overall principle to maintain, enhance and safeguard networks of multi-functional green and blue spaces with environmental sustainability in mind. The depiction in Figure 8.5 which identify the Rural Park (8), Fairywell Brook Corridor (4) Timperley Brook Corridor (7) is supported, and these are all considered in the masterplan currently being compiled and in the resulting Supplementary Planning Document (SPD) that Trafford Council will produce. Greater levels of detail within the allocation and the relationship that seeks to recognise these GIOA are outlined within the masterplan, putting Policy G15 into practise.

Appendix 1 – Davenport Green Proposed Masterplan



Representations to the Trafford Local Plan: Regulation 18 Consultation Draft – Policies

On behalf of the Tatton Estate

June 2025

Turley
Planning

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Client
Tatton Estate

Our reference
03329

12 June 2025

1. Introduction

1.1 This representation to the Trafford Local Plan: Regulation 18 Consultation Draft – Policies is made on behalf of the Tatton Estate.

1.2 This document provides representations on those elements and policies of the draft Trafford Local Plan – Policies Consultation that are of most relevance to the Tatton Estate. Representations are provided in the following sections of this document, with reference to the most applicable Consultation Question from the Council's survey for ease of reference.

The Tatton Estate

1.3 The Tatton Estate is the largest private landowner within East Cheshire. The Tatton Estate spans 5,500 acres of land and encompasses 400 diverse commercial and residential properties. The Estate is overseen by a professional board of trustees dedicated to its long-term stewardship.

1.4 Whilst the vast majority of the Tatton Estate's land is located within the administrative area of Cheshire East Council, the Estate's ownership does include 7.24 hectares (ha) of land within the Trafford Borough, including a 3.75 ha parcel of land located on the southern edge of Hale / Bowdon. The Estate is promoting the Ashley Mill Lane North site in Hale for residential development; capable of delivering family homes in the short-term. The site is submitted through the Call for Sites exercise being undertaken alongside this consultation (referred to as 'Land at Ashley Mill Lane North').

Overview of Representations

1.5 The Tatton Estate has previously made representations to previous rounds of consultation on the emerging Trafford Local Plan; most notably in March 2021. Progression of the Local Plan follows adoption of the Places for Everyone (PfE) joint development plan document in March 2024, and which establishes the strategic policies for Trafford's Development Plan.

1.6 Whilst the Estate welcomes the progression of the draft Local Plan, these representations raise a number of concerns about the approach currently being proposed by the Council and, as a result, the content of the draft Local Plan policies.

1.7 The Tatton Estate hopes that these representations are helpful and will be taken into account in preparing the next stage of the Trafford Local Plan. The Estate would welcome further dialogue with the Council about the content of the representations in due course.

2. Overall Approach to the Draft Local Plan

Planning Reform

2.1 The Trafford Local Plan is being prepared at an important time. Since its election in July 2024, the Government has made clear that "*sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people"*[1]. It has stated that its "*central mission*" is to "*restore economic growth"* and it also aims to deliver the infrastructure that the country needs, "*including one and a half million homes over the next five years"*[2].

2.2 The Treasury has confirmed that: *'The government's housing targets, coupled with investment in supporting infrastructure, will remove barriers to economic growth.'*[3]

2.3 The revisions to the National Planning Policy Framework (NPPF) in December 2024 provides a policy framework to facilitate the Government's commitments to economic growth and to tackle the housing crisis. Alongside publication of the revised NPPF in December 2024, a revised standard methodology for calculating Local Housing Need (LHN) was introduced to help ensure that the Government's target of delivering 300,000 new homes per year can be achieved. The NPPF now makes clear that Local Plans should accommodate the minimum number of homes needed, as dictated by the LHN using the standard methodology.

2.4 The strategic policies for Trafford's Development Plan are established in PfE and the emerging Trafford Local Plan is, therefore, a 'Part 2' plan which benefits from transitional arrangements in the revised NPPF. Notwithstanding, there is an opportunity for the Trafford Local Plan to reconsider its approach and positively plan to accommodate a higher number of homes than the ***minimum*** requirement set out in PfE.

2.5 This is explored further in the representation on draft Policy R1: Housing Delivery [Consultation Question 4-1] discussed further below.

Devolution and the Interface with Cheshire East

2.6 The new Labour Government has made clear its commitment to planning reform which includes a particular focus on strategic planning across local authority boundaries and further devolution to the regions. The Government has established the clear objective of having universal coverage of strategic plans during this Parliament[4], i.e. within the plan period of the emerging Trafford Local Plan.

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1 Proposed reforms to the National Planning Policy Framework and other changes to the planning system (MHCLG, August 2024)

2 Speeches by the Chancellor, The Rt Hon Rachel Reeves MP, on 5/8 July 2024

3 10 Year Infrastructure Strategy Working Paper – A Cross-Government Plan for Infrastructure, page 1 (HM Treasury, January 2025)

4 English Devolution White Paper: Power and partnership: Foundations for growth (MHCLG, 16 December 2024)

2.7 Cheshire and Warrington are currently undergoing a devolution process, which has been confirmed as part of the Government's devolution priority programme. The three local authorities of Cheshire East, Cheshire West & Chester and Warrington are working together to establish a Mayoral Combined Authority, and a consultation[5] seeking views on the proposal closed on 13 April 2025. The Mayoral Combined Authority for Cheshire and Warrington is expected to be established in time for the first mayoral election to take place in May 2026, subject to the Secretary of State deciding to proceed following review of the consultation responses, the government confirming funding and the necessary legislation being laid in Parliament.

2.8 If established, the Combined Authority would have a duty to produce a Spatial Development Strategy (SDS) for the Cheshire and Warrington area. This would likely overlap and replace (at least in part) any Local Plans which are in preparation or adopted by the three constituent authorities at that time.

2.9 The draft Trafford Local Plan is essentially a 'Part 2' Local Plan following adoption of the Places for Everyone (PfE) joint development plan by nine of the Greater Manchester authorities (including Trafford) in March 2024. Whilst this context and procedural approach is recognised, the Trafford Borough is uniquely positioned within the PfE context given its interface with Cheshire East to the south.

2.10 Whilst the Trafford Borough is administratively part of Greater Manchester and plays an important economic, housing and social role in meeting needs derived within Greater Manchester, the southern part of the Borough in particular also plays an important role as part of the transition between the Greater Manchester conurbation and Cheshire to the south. It will be important to ensure that the emerging Trafford Local Plan recognises this spatial context.

2.11 In this context, it is recommended that Trafford Council seizes the opportunity to work collaboratively with Cheshire East Council and the wider Cheshire and Warrington Mayoral Combined Authority once established, to ensure that opportunities for growth across the wider region are identified and facilitated without being restricted by administrative geographies.

2.12 The potential opportunities that may be realised through effective collaboration, and which could have implications for the strategy and policies of the Trafford Local Plan during the plan period, could include:

- Improvements to public transport routes and connections, particularly those associated with the upgrade of the Mid-Cheshire Line and the expansion of the Metrolink between Hale and Manchester Airport, connecting to Davenport Green (Timperley Wedge) and forming part of the 'Northern Arc'.
- Northern Powerhouse Rail.
- The potential to accommodate an element of housing and employment needs arising in Trafford and the wider southern part of Greater Manchester within sustainable new communities within Cheshire East. In other words, the most

[5] Cheshire and Warrington devolution consultation (MHCLG, February 2025)

sustainable approach to accommodating development needs across the sub-region may be through planned new communities. Such opportunities will require cross-authority collaboration and effective partnership working to explore and realise their potential.

2.13 It is recommended that the draft Trafford Local Plan is amended to include explicit recognition that opportunities to deliver sustainable growth across the wider sub-region will be fully explored with adjacent local authorities and the Cheshire and Warrington Mayoral Combined Authority once established. It should also recognise that the 'wider sub-region' does not just include Greater Manchester, but also includes adjacent parts of Cheshire East.

2.14 For example, paragraphs 1.47 – 1.49 of the draft Local Plan refer to 'Trafford in the Sub-Region' but only make reference to Trafford in relation to Greater Manchester; no recognition is provided of the role that areas within Trafford, particularly those in the southern part of the Borough, make to a wider geography.

Evidence Base

2.15 The evidence of employment and housing needs on which PfE was based in already four years old. By the time that the Trafford Local Plan is adopted, it would be six or seven years old.

2.16 In any case, the evidence used to inform PfE was provided at a strategic level. It did not include detailed evidence in relation to local housing need, for example, and does not provide a city-region or individual authority calculation of the need for different sizes of homes or specific housing needs facing different components of the housing market, or within different geographies within a Borough such as Trafford.

2.17 The Inspectors examining PfE made clear that it would be for individual Local Plans to effectively 'fill the gaps' between the strategic policies within PfE. PfE itself is explicit that:

"The evidence that underpins the Places for Everyone Plan will also inform district level plans but, as a strategic plan, it does not cover everything that a district local plan would. Districts will continue to produce their own Local Plans setting out more detailed policies including both strategic and non-strategic policies, as appropriate, reflecting local circumstances."[6]

2.18 Updated evidence must be prepared now to inform the emerging Trafford Local Plan. This evidence should:

(a) Be specific to the Trafford Borough and include analysis of needs within different localities within the Borough where relevant.

(b) Address the gaps in the strategic evidence base with regards to housing needs

[6] Paragraph 1.57, Places for Everyone Joint Development Plan Document (adopted 21 March 2024)

(c) Ensure that it is up-to-date and reflective of the latest national policy direction and guidance.

2.19 Notwithstanding these 'in principle' concerns with the proposed approach to the draft Local Plan, representations on the draft polices and specific Consultation Questions of relevance to the Estate are provided in the following sections.

3. Strategy (Chapter 2)

Approach

3.1 Chapter 2 of the draft Local Plan seeks to establish 'The Strategy for Trafford'. It confirms that: *"the strategy for planned growth and development in Trafford's Local Plan draws directly down from the PfE Spatial Strategy"*[7].

3.2 It goes on to confirm that, in relation to Green Belt:

"The Trafford Local Plan has been prepared in accordance with the PfE Spatial Strategy and is based on the housing and employment land requirements established in PfE policies JP-H1, JP-J3 and JP-J4. Sufficient land within the urban area and the strategic allocations at Davenport Green (Timperley Wedge) and New Carrington has been identified to meet the requirements.

The Local Plan is therefore not proposing any review of the Green Belt in Trafford, this was undertaken as part of PfE and new Green Belt boundaries have recently been established as part of that Plan."[8]

3.3 The Tatton Estate considers this approach to be fundamentally flawed.

3.4 The two PfE strategic site allocations in Trafford do not secure the full employment and housing land requirements for the Borough, as established in PfE. Further sites will need to be identified through the Trafford Local Plan, with sufficient flexibility and robustness in the forward supply, to ensure the minimum housing requirement in PfE will be achieved over the plan period.

3.5 Whilst PfE introduced revised Green Belt boundaries in a number of locations, this was necessary to accommodate the strategic sites that are allocated in PfE. The Inspectors examining PfE made clear that the Local Plans for the constituent authorities would still have an important role in ensuring that the **minimum** housing and employments needs established in PfE can be delivered, and which may require further amendments to the Green Belt at a local level if there is found to be insufficient capacity within the existing urban area.

3.6 In particular, the Inspectors Report on the Examination of PfE states:

"Each of the nine local planning authorities covered by the Plan… is committed to preparing a new local plan within the context of the strategic policies for the city region set out in the Plan. Those local plans will, amongst other things, ***identify a supply of housing sites (in addition to the allocations in the Plan) to ensure that the minimum***

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7 Paragraph 2.10, Trafford Local Plan: Regulation 18 Consultation Draft – Policies (Trafford Council, April 2025)

8 Paragraphs 2.12 and 2.13, Trafford Local Plan: Regulation 18 Consultation Draft – Policies (Trafford Council, April 2025)

***housing requirement for each district set out in the Plan can be met**, looking ahead a minimum period from their adoption date as required by national policy…*

*In other words, it is not the role of the Plan alone to identify sufficient land to ensure that all objectively assessed needs for housing and other uses can be met, **as much of the supply will be brought forward through local plans**. Nor is it the role of the Plan to address all strategic and other priorities in all districts, as local plans will be able to contain strategic and non-strategic policies, provided that they are consistent with the Plan and with national policy.*

*In the context of the above, **each of the nine authority's local plan will be essential to ensure that sufficient land is identified to allow development needs**, including those set out in the Plan, to be met in a timely and plan-led manner..."* [emphasis added][9]

3.7 It is clear that PfE did not interrogate the urban supply claimed by the districts and that matter was 'left' for the individual Local Plans to consider. In undertaking this exercise the evidence base must consider the extent to which all housing needs will be met through the supply of land, this including a consideration of sizes, types and tenures of housing across the Borough. Such testing must be undertaken as part of the preparation of the Trafford Local Plan in order to demonstrate whether the identified supply of land will in fact meet all of the identified needs and support the Council's overall objectives for the Borough.

3.8 In the context of recent planning reform and an acknowledged housing crisis, the Council should also proactively be looking to increase its identified housing supply beyond the **minimum** required by PfE to ensure that the Local Plan has longevity beyond 2029.

3.9 Once PfE becomes more than five years old in March 2029, the Borough's five-year housing land supply (5YHLS) will fall to be considered against the Local Housing Need (LHN) figure which is currently 1,621 dwellings per annum[10]; 44% higher than the average annual PfE requirement to 2039 of 1,122 dpa. As a result, the Council may be at risk of not being able to demonstrate a 5YHLS during the plan period and which would likely result in speculative applications being progressed, including on grey belt sites, and a more unplanned form of development across the Borough.

3.10 In this context, and the revised NPPF which increases the minimum housing requirement in Trafford, the Council should consider whether further Green Belt release in Trafford is required to ensure that the **minimum** housing and employment requirements set out in PfE are delivered with sufficient flexibility to reflect that some sites may not come forward at all, or as quickly as anticipated. This will require the preparation of detailed evidence on the deliverability (including viability) of the claimed urban supply, as well as the ability or otherwise to accommodate all forms of housing need.

3.11 The Estate recognises the overarching strategy to focus the majority of new development within the existing urban area, including within higher-density

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9 Paragraphs 14-16, Report on the Examination of PfE (14 February 2024)

10 As at 22 May 2025

development which are predominantly located within the North locality. However, it is important to recognise that not all of Trafford's housing needs can be met in such contexts.

3.12 Evidence must also be prepared to demonstrate how the full range of housing needs can be met across the Borough, in order to fulfil the Council's commitment to delivering inclusive growth across Trafford through delivering a range of homes to meet different needs[11].

Comments on Draft Policies – Strategy

3.13 Comments on specific draft policies within the Strategy section (Chapter 2) of the draft Local Plan are provided below.

Policy ST3: Southern Areas (Trafford) [Consultation Question 2-3]

3.14 It is recommended that Policy ST3: Southern Areas (Trafford) and the supporting text is expanded to also recognise that the Southern Areas may benefit from large-scale infrastructure projects, including development in the Southern Areas could, and should, maximise the opportunities to support and benefit from the proposals for improved connectivity and infrastructure provision within the Southern Area, including Northern Powerhouse Rail and enhanced connections to Manchester Airport.

3.15 The policy should also recognise how the Southern parts of the Borough interface with Cheshire East, particularly in terms of recreation and leisure, and service provision.

Policy ST4: Sustainable Development [Consultation Question 2-4]

3.16 The Tatton Estate supports draft Policy ST4: Sustainable Development which reflects the approach to promoting sustainable development embedded in the NPPF and PfE. In particular, the recognition that development that will improve the economic, social and environmental conditions in the area, and that provide sufficient infrastructure to mitigate their impacts, will be secured on sites that can deliver at pace.

[11] Paragraph 2.11(c), Trafford Local Plan: Regulation 18 Consultation Draft – Policies (Trafford Council, April 2025)

4. Residential Development (Chapter 4)

Comments on Draft Policies

4.1 Comments on specific draft policies within the Residential Development section (Chapter 4) of the draft Local Plan are provided below.

Policy R1: Housing Delivery [Consultation Question 4-1]

Housing requirement

4.2 Draft Policy R1 reiterates the housing requirement to 2039 for Trafford as set out at Policy JP-H1 of PfE. An additional requirement for a further 1,122 dwellings per annum (dpa) is then added to cover the period 2039-2042, reflecting the extended plan period for the Trafford Local Plan to 2042. The supporting text (paragraph 4.7) clarifies that the proposed requirement for 2039-2042 has been established by rolling forward the average annual requirement to 2039 set out in PfE for a further three years.

4.3 The Tatton Estate recommends that the Council reconsider its approach to defining minimum housing requirement over the plan period. PfE confirms that, in the event that a Local Plan progressed by one of the constituent authorities extends beyond 2039, the annual average figure for 2022-2039 in Policy JP-H1 should be treated as a **minimum** requirement for each year after 2039[12] (emphasis added). This modification was required by the examining inspectors to ensure the approach is clear and unambiguous[13].

4.4 Since PfE was examined and adopted, the revised National Planning Policy Framework (NPPF, December 2024), and the accompanying revised method for the assessment of Local Housing Need (LHN), establish significantly higher minimum housing needs for most areas; and a renewed emphasis on delivering higher levels of affordable housing. This responds to the Government's stated ambition to create a *"pro-growth National Planning Policy Framework"*[14]. The Government affirms that this is required to support its commitment to rebuild Britain, one of its Missions set out in the Plan for Change[15].

4.5 The new standard method (SM) introduced in December 2024 results in much higher Local Housing Need (LHN) figure than previously. As shown at **Table 4.1**, the new LHN across the PfE plan area is 1,873 dwellings per annum (dpa) higher than the adopted PfE; representing a 18% increase. This would indicate the need to accommodate more than 30,000 additional dwellings over the 17-year plan period to 2039 than PfE

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12 Paragraph 1.57 and footnote 2, Places for Everyone Joint Development Plan Document (adopted 21 March 2024)

13 Paragraph 782, Report on the Examination of PfE (14 February 2024)

14 Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation (MHCLG, February 2025)

15 Plan for Change: Milestones for mission-led government (HM Government, December 2024)

currently plans for. In Trafford, the current LHN figure is 1,621 dwellings; 44% higher than the adopted PfE annual average requirement.

Table 4.1: Comparison of PfE housing requirement with the current Local Housing Need figure

Area	PfE Annual Average Requirement (2022-2039)	Current Local Housing Need figure (as of 22 May 2025)	% Increase
PfE plan area	10,305 dwellings	12,178 dwellings	+ 18%
Trafford	1,122 dwellings	1,621 dwellings	+ 44%

4.6 Whilst PfE is less than five years old, national policy indicates that strategic policies "*are likely to require earlier review if local housing need is expected to change significantly in the near future*"[16].

4.7 In this changing context, it is clear that the Trafford Local Plan must not merely plan for minimum needs outlined in PfE. The Council must apply national policy positively and proactively and update the evidence base of housing needs within Trafford.

4.8 In addition, the Government has made clear its objective of having universal coverage of strategic plans during this Parliament; most notably through the English Devolution White Paper[17] which, amongst other things, proposes mandatory Spatial Development Strategies (SDS). The direction of travel for city regions such as Greater Manchester, where established governance arrangements and a Mayoral Combined Authority are already in place, is clear. They will be expected to achieve early adoption of SDS; strategic approaches to optimising regeneration; higher rates of economic growth; and increased housing delivery.

4.9 In this context, if the Trafford Local Plan was to continue to provide only for PfE's minimum development requirements, it would constrain the potential of Trafford to contribute to national objectives and rapidly become out of date. It would be a more effective use of resources to ensure the Local Plan sets the direction of travel for Trafford in line with the clear direction of travel nationally as expressed through the updated NPPF and new standard method for calculating Local Housing Need.

4.10 It is clear therefore that strategic requirements for Trafford, in the context of much higher requirements across Greater Manchester will be under consideration during the period in which transitional arrangements in NPPF apply. This may be occurring while the Trafford Local Plan proceeds through Regulation 19 and Examination. This reinforces the importance of Trafford taking action now to update evidence of full housing needs in the Borough and robustly testing the identified supply of land to ensure it will meet those needs.

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16 Paragraph 34, NPPF (December 2024)

17 English Devolution White Paper: Power and Partnership: Foundations for Growth (MHCLG, December 2024)

4.11 Faced with analogous circumstances, other PfE authorities (for example Wigan) are commissioning up-to-date assessments of their needs and opportunities to meet them. It is requested that Trafford Council adopts the same approach.

4.12 PfE contains strategic policies with which the Trafford Local Plan must conform. PfE also leaves certain important matters for the individual local plans, including in Trafford, to resolve. In particular, whilst PfE establishes strategic policies on minimum development needs, it has not:

(a) Established the full range of needs, for example by testing the need for different types of homes in Trafford

(b) Demonstrated that the minimum housing needs can be met from the strategic allocations made in PfE and other sources of land, or

(c) Demonstrated how identified needs for affordable housing and the overall aim of delivering 50,000 affordable homes across Greater Manchester will be met.

4.13 As was highlighted during the Examination of PfE, these are among the matters that the individual Local Plans must address in order to be found sound and be in conformity with PfE[18]. The Council should commission updated evidence to address gaps in the strategic evidence base relating to housing needs, as well as to ensure that it reflects latest national policy direction and guidance.

Housing land supply

4.14 In terms of the composition of housing land supply in Trafford, the draft Local Plan confirms (at paragraph 4.9) that the stepped housing requirement in Trafford reflects that a significant proportion of the housing land supply is made up on larger sites, which typically have longer lead-in times and require masterplans and / or infrastructure to be delivered in advance of new housing. As a result, the housing land supply in the earlier years of the plan period includes a greater proportion of smaller sites and sites which are deliverable in the short term, as well as sites which are already well located, close to existing sustainable transport links and services.

4.15 The sources of housing land supply over the PfE plan period (i.e. 2022-2039) identified by the districts is summarised at Table 7.1 of PfE, which forms part of the reasoned justification for Policy JP-H1. Table 7.1 identifies a total supply of 198,888 dwellings for the period 2022-2039, of which 20,122 dwellings are expected to be delivered on sites allocated through PfE.

4.16 Within Trafford, Table 7.1 of PfE identifies a total supply of 23,246 dwellings over the period 2022-2039. The identified supply includes an expectation that 4,917 dwellings will be delivered on the two PfE allocations by 2039. Over two-thirds (77%) of the identified housing land supply in Trafford is on sites identified in the SHLAA (totalling 18,006 dwellings)[19]. Of the 18,006 dwellings identified through the SHLAA, 15,541

[18] See for example PfE Inspectors' Report paragraphs 161-167, 790-793 and 802

[19] A small sites allowance of 323 dwellings is also included

dwellings (86%) are located on brownfield land (or a mix of brownfield and greenfield) and 2,465 dwellings (14%) on greenfield land.

4.17 The Inspectors Report on PfE recognised that *"… the other sources of supply identified in Table 7.1 [i.e. beyond the supply from the PfE allocations]… are not proposals in the Plan but rather existing commitments and potential opportunities that will be considered by individual local planning authorities through local plans"*[20].

4.18 The existing supply of potential housing sites identified by the districts during the PfE process was not interrogated by the examining inspectors. The Inspectors noted that this would be a task for Local Plans to undertake. In undertaking this exercise the evidence base must consider the extent to which all housing needs will be met through the supply of land, this including a consideration of sizes, types and tenures of housing across the Borough.

4.19 In this context it is important to note that PfE (for example at paragraph 11.3), acknowledges that this testing will be part of the local plan process and accordingly establishes an expectation that Local Plans will identify additional sites where these are justified in the light of such testing.

4.20 Such testing must be undertaken as part of the preparation of the Trafford Local Plan in order to demonstrate whether the identified supply of land will in fact meet all of the identified needs and support the Council's overall objectives for the Borough.

4.21 Table 4-2 of the draft Trafford Local Plan indicates a total identified housing land supply of 28,313 dwellings. However, the basis on which this has been calculated is not clear, and it is not clear whether the claimed supply has been interrogated in terms of its delivery and, critically in terms of the urban and brownfield element, its viability.

4.22 In addition, once the strategic policies in PfE become more than five years old in March 2029, the deliverable five-year housing land supply in Trafford will fall to be calculated against the LHN figure in place at that time rather than the adopted PfE requirement[21]. The current LHN figure for Trafford is 1,621 dwellings. This is 44% higher than the average annual requirement in PfE (1,122 dpa) as PfE enables the distribution of some of the needs from the southern authorities to the northern parts of the city-region.

4.23 As a result, the Council may be at risk of not being able to demonstrate a 5YHLS within the next few years, which would leave the Borough at risk to speculative applications, including on grey belt sites, and a more unplanned form of development across the Borough. In this context, it is important that the Council continues to plan for a 5YHLS of housing for the lifetime of the emerging Local Plan. This will require the allocation of further sites and may necessitate a further review of the Green Belt.

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20 Paragraph 790, Report on the Examination of PfE (14 February 2024)

21 In line with paragraph 78 of the NPPF

Policy R3: Affordable and Social Housing [Consultation Questions 4-3 and 4-4]

Affordable requirement

4.24 Draft Policy R3: Affordable and Social Housing proposes to introduce minimum requirements for affordable housing provision as part of all major residential developments; Policies R3N, R3S, R3C and R3W propose a different minimum affordable requirement in each of the four Localities within Trafford. Policy R3S: Affordable and Social Housing within Trafford South proposes a requirement for a minimum 45% affordable housing on qualifying sites within Trafford South.

4.25 The extent to which the draft affordable housing requirement has been assessed in terms of deliverability and viability considerations is not clear. A viability assessment should be made available for consultation to inform the emerging Local Plan policy. The Tatton Estate reserves its position on the suitability or achievability of the proposed affordable housing requirement(s) until this key evidence document has been made available.

Tenure split

4.26 Part A of draft Policy R3 requires affordable housing provided on-site as part of major residential developments to be provided at a tenure mix of 60% rented (40% social rent and 20% affordable rent) and 40% affordable home ownership.

4.27 Whilst it is helpful to provide an indication of the affordable tenure split likely to be sought, it should be recognised that the Council's preferred tenure split may change over the lifetime of the Local Plan. In that context, is recommended that the draft policy is amended to clarify that the tenure split agreed on specific sites will be informed by up-to-date evidence available at the time.

Policy R4: Size and Type of New Homes [Consultation Questions 4-7 and 4-8]

4.28 Part A of draft Policy R4 requires all new residential development to deliver a range of mix of dwelling sizes and types in accordance with the relevant Locality policy.

4.29 Whilst the Tatton Estate supports the overarching ambition to ensure a diverse range of new housing is provided reflective of needs, the policy should acknowledge that not *all* dwelling sizes and types will be capable of being delivered on *all* development sites.

4.30 The appropriateness of applying flexibility in the application of housing mix policy was endorsed by a recent Secretary of State decision in relation to a site in Cheshire East. In that case, the SoS confirmed that: *"it would not be reasonable to expect every development to provide a mix directly in line with the indicative table"*[22]. In some cases, especially residential developments on smaller sites, it is may not feasible or advantageous to expect a broad range of dwelling sizes and types; particularly where the development proposals are responding to a specific identified need.

4.31 Consultation Question 4-8 confirms the Council's intention to set an appropriate house size and type requirement for new development in each Locality, and asks respondents whether they agree with the proposed approach. Whilst it is acknowledged that the needs and demands for different types and sizes of new homes will vary across the

[22] PINS Ref: APP/R0660/W/22/3313892, paragraph IR114

Borough, for the reasons set out above, the Tatton Estate would be concerned if Locality-specific policies set an arbitrary requirement that all new housing development would be required to deliver. Instead, the policies should refer to the current preferred housing mix but acknowledge that any development proposals with an alternative mix should be accompanied by a housing needs assessment, taking into account the most up-to-date information and evidence available.

Policy R5: Housing Density [Consultation Question 4-10]

4.32 Draft Policy R5 is intended to support PfE Policy JP-H4 and propose minimum density requirements across Trafford, with reference to Figure 4-1. The proposed minimum net residential density across the majority of the Borough is 35 dwellings per hectare (dph), increasing to 50, 70 and 120 dph in certain locations at or near public transport facilities.

4.33 The Tatton Estate supports the objective of draft Policy R5 and recognises the importance of maximising the efficient use of land; particularly in the most sustainable locations. However, it is recommended that an additional part is added to draft Policy R5 to introduce an element of flexibility to enable lower-density sites to come forward, where they would meet an evidenced need for a specific type of housing, or where due to site characteristics or the form of development proposed, it would be beneficial to approve the application.

Policy R11: Self-Build and Custom Housing [Consultation Question 4-19]

4.34 Draft Policy R11 seeks to support custom housebuilding to meet local demand for such forms of development. The draft policy intends to achieve this through securing a proportion (5%) of serviced plots for sale to custom builders on all large housing developments (100 dwellings+) and on the PfE strategic allocations at New Carrington and Davenport Green (Timperley Wedge).

4.35 The supporting text confirms that there is evidenced need for self-build dwellings in Trafford, with 294 applicants as of 30 October 2024 on the Trafford Self Build Register[23]. The most popular Locality for applications for the self-build register is the south of the Borough, and over half of applicants would like to build a four-bedroom property[24].

4.36 The draft policy does not, however, include explicit support for the development of self-build and / or custom housing on smaller sites, including schemes which are solely for self-build homes which, due to their nature, is more likely to occur on smaller sites. It is therefore recommended that draft Policy R11 is expanded to include an additional part which confirms that proposals for the provision of self-build and / or custom housing on smaller sites will also be supported where they respond to demonstrated local demand and comply with other relevant policies in the Local Plan.

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[23] Paragraph 4.40, Trafford Local Plan: Regulation 18 Consultation Draft – Policies (Trafford Council, April 2025)

[24] Paragraph 4.42, Trafford Local Plan: Regulation 18 Consultation Draft – Policies (Trafford Council, April 2025)

5. Other Thematic Policies

5.1 Comments on specific draft thematic policies of particular relevance to the Tatton Estate are provided below.

Transport and Movement (Section 6)

Policy TM2: Public Transport [Consultation Question 6-2]

5.2 Draft Policy TM2 confirms that the Council will work with TfGM and partners to deliver a high-quality public transport network across the borough, which offers a choice of accessible, safe and reliable modes of travel. This includes giving priority to the delivery of, and safeguarding the route of, the proposed Metrolink Manchester Airport Western Leg extension (and associated Davenport Green stop).

5.3 The draft policy also confirms that the Council will promote the improvement and development of the rail network including improvements to capacity, service frequency, journey times and quality on the Manchester to Liverpool line and the Mid-Cheshire line and will also support proposals for new rail stations which provide enhanced transport connectivity.

5.4 The Tatton Estate supports this explicit policy support for promoting and delivering improvements to the existing public transport network. However, for the reasons set out at paragraph 2.12 of this document, the Local Plan should go further in recognising the wider opportunities that may arise as a result of significant investment in the public transport network within Trafford and adjacent authorities. In particular, it is recommended that Policy TM2 is expanded to confirm that the Council will work collaboratively with adjoining authorities and other relevant bodies, including the Cheshire and Warrington Mayoral Combined Authority (once established), to realise sustainable growth across the Trafford Borough and wider sub-region, which includes the Greater Manchester city-region as well as the northern part of Cheshire East.

Built Environment (Section 12)

Policy BE1: Design [Consultation Question 12-1]

5.5 The Tatton Estate supports the overarching objective of draft Policy BE1 to ensure that new development within the Borough is of a high standard of design and construction and will make a positive contribution to the character and distinctiveness of the borough.

5.6 It is recommended that the draft policy is expanded to include explicit support for proposals which would secure exceptional design quality, would significantly enhance its immediate setting and be sensitive to the defining characteristics of the local area; consistent with NPPF paragraph 84(c).

6. Draft Site Selection Methodology (April 2025)

6.1 Alongside the current consultation on the draft Policies document, the Council is also inviting comments on the proposed site selection methodology which will be used to identify site allocations and further policy designations which will be subject to consultation at a later date.

6.2 Representations on the Draft Site Selection Methodology (April 2025) on behalf of the Tatton Estate are provided below.

Approach

6.3 The Draft Site Selection Methodology states that:

"As part of the PfE examination it was established that Trafford's housing and employment land requirements can be met on land which is within the two PfE allocations [at Davenport Green (Timperley Wedge) and New Carrington] and on land within the existing urban area. The focus of the Local Plan site selection methodology is therefore, in relation to built development, focused on allocating sites in the existing urban area. The Council does not need to identify any further Green Belt land for development."[25]

6.4 As has been set out clearly within other sections of these representations, PfE did not 'test' the urban supply available within each of the nine authorities claimed during the Examination process. To the contrary, the examining Inspectors made clear that it is for the constituent authorities to undertake this exercise when progressing individual Local Plans. This process must consider the suitability, availability and deliverability of the sites within Trafford's claimed supply, including viability evidence given the extent of supply expected to come forward on brownfield sites within the northern part of the Borough. The extent of such sites to meet **all** housing needs within the Borough also needs consideration.

Proposed Site Selection Methodology [Consultation Question SS1]

6.5 The draft site selection methodology (summarised at Figure SS-1) indicates that sites for consideration will be identified through the following sources: the Strategic Housing Land Availability Assessment (SHLAA); the Employment Land Supply; the Local Plan 2021 proposed site allocations; sites submitted through the Call for Sites exercises; the Brownfield Land Register; and the Grey Belt Assessment.

6.6 The Tatton Estate considers this to be an appropriate range of sources from which to identify potential sites for allocation; however clarity as to how and when the Grey Belt Assessment will be undertaken is requested. All forms of evidence used to inform the site selection process, including the Grey Belt Assessment, must be made available for consultation prior to publication of the proposed Site Allocations.

[25] Paragraph 2.3, Trafford Local Plan Draft Site Selection Methodology (April 2025)

6.7 At this stage, the Council's proposed methodology suggests that sites which are located within the Green Belt (and are not considered to be grey belt) will be automatically excluded from the process at Stage 1 and will not progress to Stage 2. This is a flawed approach given that a key role of the Site Selection process will be to identify the most appropriate and sustainable locations for new development. This should be considered irrespective of the site's current planning policy designation given that the outcome of the allocation process will inform new policy designations.

6.8 For the reasons explained above, the Council should consider whether further Green Belt release in Trafford is required to ensure that the **minimum** housing and employment requirements set out in PfE are delivered with sufficient flexibility to reflect that some sites may not come forward at all, or as quickly as anticipated.

6.9 In the context of recent planning reform and an acknowledged housing crisis, the Council should also proactively be looking to increase its identified housing supply beyond the minimum required by PfE to ensure that the Local Plan has longevity beyond 2029. Once PfE becomes more than five years old in March 2029, the Borough's five-year housing land supply (5YHLS) will fall to be considered against the Local Housing Need (LHN) figure which is currently 1,621 dwellings per annum[26]; 44% higher than the average annual PfE requirement to 2039 of 1,122 dpa. As a result, the Council may be at risk of not being able to demonstrate a 5YHLS during the plan period and which would likely result in speculative applications being progressed, including on grey belt sites, and a more unplanned form of development across the Borough.

6.10 The site selection process should not, therefore, automatically discount sites that are currently within the Green Belt at Stage 1. Instead, they should be considered alongside other sites and progress to Stage 2 where any physical or policy constraint to development would be considered.

6.11 The Tatton Estate reserves the right to provide further comment on the site selection methodology once further information is made available.

[26] As at 22 May 2025

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Local Plan Representations

For Hollins Strategic Land LLP | 20-158

Trafford Local Plan – Draft (Policies) Regulation 18

emery
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Project:	20-158
Site Address:	Draft Local Plan (Policies) Regulation 18
Client:	Hollins Strategic Land LLP
Date:	June 2025
Author:	Stephen Harris

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1. Introduction

1.1 Emery Planning is instructed to submit representations to the Trafford Draft Local Plan (Regulation 18) consultation on behalf of Hollins Strategic Land (hereafter referred to as 'HSL). HSL has a specific interest with their land at Clay Lane, Timperley which was submitted through the Call for Sites in 2021.

2. Plan Period

2.1 Paragraph 20 of the Framework makes clear that strategic policies are those which make provision for housing, employment and other types of growth:

> *"Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*
>
> *a) housing (including affordable housing), employment, retail, leisure and other commercial development;*
>
> *b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
>
> *c) community facilities (such as health, education and cultural infrastructure); and*
>
> *d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."*

2.2 Paragraph 22 of the Framework states:

> *"Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery."*

2.3 Paragraph 22 therefore has two very clear requirements:

- Strategic policies must cover at least a 15-year plan period from adoption.
- In instances where larger scale developments form part of the strategy, policies should be set within a vision that looks further ahead (at least 30 years).

2.4 The PFE at paragraph 1.56 states:

> *"Local plans will be expected to look ahead a minimum period from their adoption, in line with national policy. In the event that a local plan looks beyond 2039, the minimum requirement figures set out in Policies JP-J3, JPJ4 and JP-H1 should be used to inform local plan target(s)[2]."*

2.5 The end date in the Draft Local Plan is 2042, whilst the Local Development Scheme (LDS) February 2025) states that that the Plan will be adopted in 2027/28 following the Examination in Spring 2027. Assuming

that is correct, the plan period would need to be extended to 2043 at minimum in order to provide a full 15 years from adoption.

2.6 Notwithstanding the above, we consider that the plan period will need to be extended further as a minimum, on the basis that it is unlikely that the plan will be adopted before 2027/28 and a full 15-year plan period needs to be provided from adoption. Local Plans can be subject to considerable delays and the Council needs to be realistic about how long an examination may take, considering the almost inevitable need for main modifications and further public consultation, and apply a cautious approach (to avoid the need for further changes during the examination). For example, paragraphs 47 to 49 of the St Helens Inspectors Report, states:

> *"47. The Framework indicates that strategic policies should look ahead over a minimum 15-year period from adoption. The Plan has a stated timeframe of 2020 to 2035. However, the LP has had a long gestation period and, if it is adopted in 2022, it would only have about a 13-year period post adoption.*
>
> *48. Extending the Plan period to 2037 would ensure a 15-year period post adoption so that it can respond to long-term requirements and opportunities, including those arising from improvements to infrastructure. The longer period would increase employment and housing land requirements but the Plan is able to accommodate these changes as demonstrated later in the report. Retail floorspace requirements would not need to change as they would be reviewed well before 2037 when changes in shopping behaviours, including the effects of the pandemic, would be taken into account.*
>
> *49. A Plan period up to 2037 is required so that the Plan is positively prepared, justified, and consistent with national policy. MM001 would secure the relevant changes. There are other consequential changes throughout the Plan which are dealt with below."*

2.7 Therefore, the plan period should be extended to 2043 at the earliest, but we consider 2045 would be appropriate.

3. Policy R1: Housing Delivery

Scale and Phasing

3.1 The policy seeks to meet the PfE housing requirement, including projecting the PE requirement forward beyond 2039. Whilst such an approach is allowed for under the Framework's transitional arrangements, it is nevertheless concerning that the Council and Greater Manchester is yet to turn its attention to addressing local housing need under the new standard method. Local housing need has significantly increased for both Trafford (1,599 dwellings per annum) and Greater Manchester. Trafford and the GMCA ought to be doing everything possible to meet local housing need and contribute to addressing the national housing crisis. This means reviewing the PfE housing requirement now or at least allocating additional land in this Plan. Deferring such a decision to a plan review is contrary to the Framework and Ministerial Statements to improve affordability and build the 1.5 million homes.

Distribution and Supply

3.2 In relation to housing distribution, Paragraph 4.11 states that "*The distribution of development between each Locality is set out in Table 4-2*". However, Table 4-2 only purports to set out the housing land supply (notwithstanding the basis for the figures is unclear).

Table 4-2: Total Identified Housing Land Supply by Locality as at March 2025*

Locality	Net additional homes
North	18,704
South	3,860
Central	677
West	5,072
Total	28,313

* This includes small sites which are identified within the current land supply in lieu of setting a windfall allowance.

3.3 The plan needs to be clear that this is not a proposed distribution of development and, importantly, there needs to be sufficient flexibility to ensure that the housing requirement will be met.

3.4 However, there is no trajectory or supply paper published with this consultation as to when these sites will deliver. Whilst we consider most of the sites in PfE and current supply will deliver going forward, but the key issue is when given the significant housing needs early in the plan period even with the stepped trajectory. The 5 year supply was considered in the appeal at 35 Oakfield, Sale (3325034), where the Inspector stated:

> "*(b) Five Year Housing Land Supply*
>
> *89. The Statement of Common Ground records that the Council can demonstrate only 3.85 years deliverable supply of housing land. Although the Council contends that the supply situation is improving, and the likelihood of a fiveyear supply within the next 12 - 24 months, these claims are contested by the Appellant.*
>
> *90. For my part, I see no merit in detailed analysis. The current shortfall is, in any event, significant and the proposal would make a small net contribution towards addressing the shortfall which I assess as a modest benefit*."

3.5 This is important as the GMCA was very clear at the PFE examination that the PFE does some of the 'heavy lifting' in terms of allocating sites and Green Belt release, but by no means all of the 'heavy lifting'. In particular, the supply of housing land was not assessed through the PFE examination, and the GMCA was clear that it would need to be assessed through the District Local Plans. The GMCA also accepted that if the supply turned out to be insufficient to meet the housing requirements, it may be necessary to release further sites from the Green Belt. To this effect paragraph 11.3 states:

> "*11.3 As appropriate, district Local Plans will allocate sites from this supply reflecting the distribution set out in tables 6.1, 6.2 and 7.2, to ensure that the spatial strategy can be met. In the event that it proves necessary to look to land beyond the existing supply, as updated, national planning policy would apply including in the case of the Green Belt the requirement for exceptional circumstances*."

3.6 If the supply of housing land is not robust and there is a high risk of sites not being delivered as anticipated, which is currently the position, additional sites need to be allocated. Given the absence of non-Green Belt alternatives, as illustrated by the PfE releasing sites from the Green Belt in Trafford, we consider that further Green Belt release is required to meet the housing requirement moving forward. We propose one such site at Clay Lane Timperley.

Safeguarded land

3.7 Safeguarded land was addressed during the examination at the Matter 9 Hearing on 13 December 2022, where the GMCA confirmed that safeguarded land is one of the 'heavy lifting' items for the District Local Plans to consider under the current Framework.

3.8 We consider that safeguarded land must be provided in the Trafford Local Plan to ensure that the plan is consistent with national policy. Paragraph 142 of the Framework identifies that the essential characteristics of Green Belts are their openness and their permanence. Paragraph 145 requires strategic policies to establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Paragraph 148 states that when defining Green Belt boundaries, plans should (amongst other requirements):

> "c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
>
> e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period;"

3.9 Therefore, national policy is clear on the need to ensure that Green Belt boundaries will not need to be altered at the end of the plan period (currently 2042). This is a critical aspect to achieving the intended permanence in the long term. The appropriate mechanism for achieving this is through the provision of safeguarded land for the next plan period, in addition to a plan which provides sufficient land to meet development needs for the current plan period.

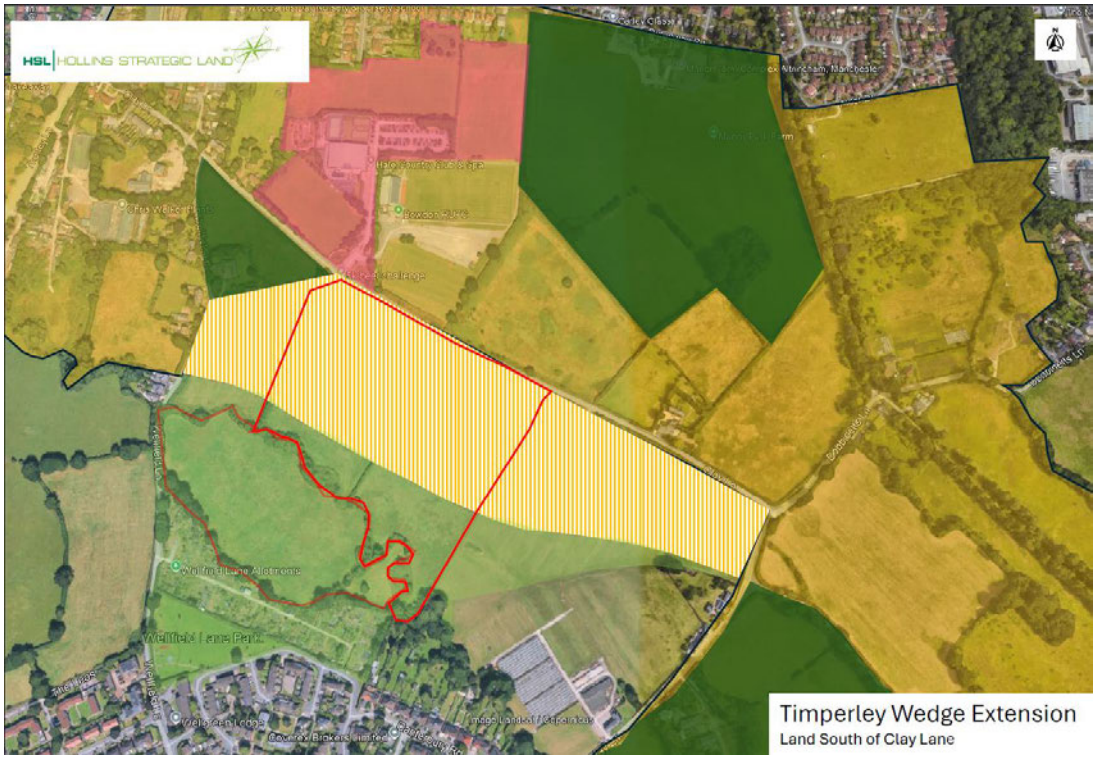
3.10 Furthermore, Trafford is a significant urban district within Greater Manchester and it is inconceivable that development needs will reduce substantially in the future given the recent increase in the standard method. Therefore, the only way of ensuring that the Green Belt boundaries can endure beyond the plan period is to designate safeguarded land. Our client proposes a site which, if not allocated, could be safeguarded to meet future development needs. Further details are set out in Section 4 below.

4. Omission Site – Clay Lane, Timperley - Options to Deliver Housing at Trafford

4.1 The land controlled by HSL can be considered as two distinct land parcels.

Timperley Wedge Extension

4.2 The northern land parcel lies to the south of Clay Lane and immediately adjoins the Timperley Wedge PfE allocation. This land parcel could assist along with adjoining land in facilitating a logical extension to the Timperley Wedge.



4.3 An extension of the Timperley Wedge south of Clay Lane would utilise existing infrastructure and planned new provision while also delivering new homes in an area already identified for significant development. A southern extension would include public open space provision to the south facilitating and safeguarding openness between urban areas.

Timperley Wedge Extension Option – Development Assumptions		
	Approximate Acreage	Approx. Dwelling Yield
Total Indicative Area	40 acres.	
Total Built Development Area	20 acres.	250-300 dwellings.
HSL land control	23 acres.	
HSL Developable Area	10 acres.	140 dwellings.
HSL Open Space Delivery	13 acres	

North Hale Neighbourhood Extension

4.4 The southern land parcel promoted by HSL lies west and east of Wellfield Lane and would form a logical neighbourhood extension to north Hale. The central land parcels would provide public accessible open space in perpetuity and thereby deliver permanent buffers between built areas.



North Hale Neighbourhood Option – Development Assumptions		
	Approximate Acreage	Approx. Dwelling Yield
Total Indicative Area	50 acres.	
Total Built Development Area	25 acres.	350 dwellings.
HSL land control	16 acres.	
HSL Developable Area	5 acres.	70 dwellings.
HSL Open Space Delivery	11 acres	

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12 June 2025

Strategic Planning
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By email

Dear Strategic Planning Team,

Trafford Local Plan Regulation 18 Consultation Draft - Policies

Thank you for consulting Manchester Airport on the policies of the draft Trafford Local Plan. We greatly welcome the opportunity for engagement in the development of your Local Plan.

Manchester Airport is a strategically important component of the UK's infrastructure network and serves as the UK's global gateway in the North. It is the largest airport outside of London and third largest in the UK, handling 30.7 million passengers in 2024 and around 120,000 tonnes of cargo annually. With 50 airlines operating to over 200 destinations, Manchester Airport provides the North of England with valuable international connectivity and crucial links to overseas markets. As such Manchester Airport is a major asset and driver of economic growth, contributing £2.0bn in direct GVA for the North of England in 2024, and supporting approximately 20,000 jobs on site. The Airport is also a major regional transport hub and public transport interchange with rail, bus, coach and Metrolink facilities all located on site. This makes Manchester Airport a strategically significant location in terms of its economic contribution, excellent transport connections and opportunities for growth – all of which will help to meet the future development needs of Greater Manchester.

The close proximity of Trafford to Manchester Airport makes the borough extremely well placed to benefit from the Airport's considerable economic influence and transport connectivity. It is therefore important to ensure that these factors are recognised in your Local Plan. The operational impact of Manchester Airport must also be considered, with policy protection to ensure that the Airport's operational safety and efficiency are not compromised. We will address each of these points against specific policies below.

Strategy

The Places for Everyone Plan recognises Manchester Airport as a key factor in realising the wider growth agenda for the North and unlocking the economic potential of the region, and that to maximise the Airport's contribution to the growth agenda, it must be well-connected to the key towns and cities that it serves. Although we understand that the intention of the Trafford Local Plan is not to repeat or duplicate the strategic objectives and policies contained within Places for Everyone (PfE), it is important to recognise the strategic significance of Manchester Airport to the borough and its role as a major employer and economic and transport hub within your Local Plan.

Davenport Green

Regarding the PfE Davenport Green (Timperley Wedge) allocation, we understand the value that is placed on this in terms of delivering additional homes, employment and transport links to support

economic growth within the Southern Area. Our comments in respect of this site allocation were provided in response to the GMSF (2019) consultation and as part of the preparation of PfE, and we continue to be engaged in the preparation of the Masterplan that is being prepared for the site. Nevertheless, we would like to take this opportunity to highlight the importance of sustainable transport and connectivity to this site and reiterate the points that we have previously made in relation to the timely delivery of new public transport, highway improvements and key transport infrastructure required for this site.

Development at Davenport Green, particularly Metrolink, can add to the opportunities for enhanced connectivity from Trafford to Manchester Airport, the MIX Manchester campus, and more widely across south Manchester. Realising its potential will rely on the delivery of new public transport, highway improvements and key transport infrastructure including the proposed Western extension of Metrolink through to Terminal 2 (which the Davenport Green development will add some demand), the proposed Liverpool - Manchester rail station, new east-west bus connectivity and enhanced walking and cycle routes to the Airport.

Road access arrangements to the Davenport Green site must consider access to Manchester Airport to prevent putting further pressure on an already congested road network and to safeguard the operation and planned growth of the Airport. Manchester Airport expressed concerns about the Locality Assessment that was submitted in support of the GMSF allocation, especially the assumptions contained within it in respect of road access, and traffic generated by the development. These reservations remain and we await the details of the Davenport Green highway modelling to support the detailed Masterplan. Access to the site using the existing Thorley Lane presents the potential for substantial volumes of traffic passing through the Airport site to access the M56. The new spine road running south from MediPark to Thorley Lane should not become a route for through traffic. We also have the concerns about the volumes of Davenport Green traffic passing through the airport or its main access road to reach either the M56 or the A555. As such, the Davenport Green Masterplan requires robust highway modelling and appropriate mitigation to ensure that there is no detrimental effect on traffic accessing the Airport, operating on the roads in the local area, and on the roads within the airport site.

Regarding the scale and type of development that will be acceptable at this location, consideration must be made to Manchester Airport's aerodrome safeguarding requirements. This is to ensure that the safe operation of aircraft and air traffic control procedures is not compromised by development that causes, inter alia: an obstacle, an increased bird strike risk, interference with radar or an ocular hazard through glint and glare or lighting. Careful design of development and any habitat and open water that is to be accommodated on the site should therefore be undertaken from the outset and we would be happy to engage with the design team regarding these matters. Manchester Airport's full aerodrome safeguarding requirements and the associated implications of these for development within Trafford are discussed later in this response.

Renewable Technologies and Methods

We welcome the promotion and implementation of sustainable and renewable energy and fully appreciate the importance of being able to adapt to and mitigate climate change. We are therefore supportive of Policy RT1: Carbon and Energy subject to there being no detrimental impact on aviation safety. Developments such as wind energy schemes, solar photovoltaic panels and energy from waste schemes all have the potential to adversely impact radar and aircraft operations and therefore may not be acceptable in some locations or would require mitigation. Aviation safety must therefore be considered in the determination of planning applications for such schemes and the Aerodrome Safeguarding Authority for Manchester Airport would need to be consulted as statutory consultee in accordance with the legislative provisions set out in Circular 1/2003 – Safeguarding Aerodromes, Technical Sites and Military Explosive Storage Areas.

We therefore recommend that the policy could be improved by stating that proposals for renewable technologies will be supported where the proposal has no adverse impacts on aviation safety. This is of particular relevance to the solar PV priority and opportunity areas that are identified for Locality Policies RT1S and RT1W respectively.

Economy and Jobs

We welcome the range of policies that seek to guide economic regeneration and development across the borough. Within this section, Manchester Airport's role in the local and regional economy and economic contribution to Trafford, including as a major employer, should be recognised.

Land Requirements and Employment Floorspace – Davenport Green

Davenport Green is identified as a key employment area. The area around the economic hub of Manchester Airport, MIX Manchester and the Global Logistics Hub is a prime location for new employment development and we recognise the employment land requirements (Policy EJ1) and office development (Policy EJ4) at Davenport Green, subject to the provision of suitable associated sustainable transport measures and the careful consideration of linkages to the Airport. This is a highly connected economic area close to Manchester Airport and the site has the potential to complement the new business destination being created at MIX Manchester. Proposals for any development at Davenport Green would have to have access to public transport connections, be in line with, and complementary to, proposed highway improvements at M56 Junction 6 and access to the proposed high speed rail station.

Transport and Movement

Good transport links are crucial to supporting sustainable communities and economic growth. It is therefore important to locate development in sustainable locations that are carefully linked to the wider network, and to improve accessibility via sustainable modes of travel across the borough and to key destinations and major economic drivers in the region. We therefore welcome the range of integrated transport measures, active travel networks, public transport initiatives and highway network measures that are identified and would welcome the opportunity to work more closely with Trafford Council to further enhance the sustainable travel links between Trafford and Manchester Airport.

As a key transport hub and international gateway, Manchester Airport plays a major role in boosting the North West's connectivity and meeting the economic and social needs of Trafford's residents. Manchester Airport is also a major employment site, and together with the adjacent MIX Manchester and developments at MediPark and Wythenshawe Hospital offers a highly connected business destination that includes office, advanced manufacturing and logistics facilities, thereby providing further opportunities to stimulate economic growth and employment.

Ensuring that there are effective transport links across the borough and supporting improvements to the public transport and strategic transport network between Trafford and Manchester Airport is therefore important. Supporting such improvements will enable the borough to fully capitalise on the region's international connections and unlock the economic benefits that can help to deliver growth and development across Trafford.

Manchester Airport has a long-standing commitment to improving connectivity and sustainable travel and, through our partnership working, to support the delivery of the region's economic and transport priorities. At the heart of our growth strategy is the need to provide a transport network that is efficient, convenient, reliable and safe. Our policies, targets and objectives are set out in our Economy and Surface Access Plan, which is part of the Manchester Airport Sustainable Development Plan (2016), and

in our Staff Travel Plan (2019). We are therefore keen to work with you in support of the improved linkages between Trafford and the Airport.

Policy TM1 Walking Wheeling and Cycling

There are opportunities to improve active travel routes between Manchester Airport and the borough. We are supportive of the active travel network to the north of Manchester Airport into Trafford as part of our Surface Access Strategy to encourage an increased number of cycle journeys by airport staff. Also, there are connections to Sunbank Lane for recreational walking and cycling routes into the Bollin Valley. Specific improvements that would be welcomed are:

- Enhanced active travel routes into the Airport via Brooklands Road, Hollyhedge Road to Woodhouse Park, and perhaps via the A560.
- Strengthening links to the proposed Bollin Valley Route which passes in the vicinity of Trafford/Dunham Massey.

Policy TM2 Public Transport

Improvements to public transport connectivity through the borough to Manchester Airport should be promoted. Given the proximity of south Trafford to the Airport, accessibility is relatively poor, especially by more sustainable means of transport. We would strongly welcome the following measures:

Bus – Supporting the TfGM network review of services from Trafford to Manchester Airport and advocating for a better service frequency. At present, it can take 1 hour to travel from Trafford to the Airport by bus (248), even though the distance is relatively short. While the new ticket structure that is part of the Bee Network mean that 2 buses can be used within the hour, by paying the £2.00 fare, there is merit in Trafford Council working with us and other partners to strengthen the links to the Airport for residents and visitors travelling for work or leisure.

Metrolink – We welcome the priority afforded to delivery of the Metrolink Manchester Airport line Western Leg extension and associated Davenport Green stop. Metrolink will provide the connection between the high-speed station and the Airport. It will also be a valuable sustainable public transport link for both staff and passengers particularly from Roundthorn, Wythenshawe Hospital, MediPark and Davenport Green to the Airport, and to the wider network of public transport services (rail, coach, and local buses). Connectivity to the Airport via tram can be cost effective when 'tap and go' products are used.

Rail – In terms of rail services, Trafford has mainline stations at Hale and Altringham, where direct services to Chester can be picked up, but none are direct to the Airport and require a change at Piccadilly. Exploring the plans for rail station integration into the Bee Network from these stations would be beneficial in making rail a more attractive option for staff and passengers travelling from Trafford to the Airport.

Manchester Airport has an established Transport Forum and Ground Transport Group, and we would welcome the participation of Trafford Council in these Transport Forum Groups to strengthen collaboration and opportunities to maximise public transport improvements between Trafford and the Airport.

Policy TM5 Local Highway Network

The M56 is a strategically important part of the highway network and is the principal access to Manchester Airport. The Airport has a long-standing local highway improvement obligation to upgrade

the links on Thorley Lane / Runger Lane, M56 Jct 6 and on the M56. These works would include work on Jct 6 and Hale Road that are in Trafford.

Policy TM9 Potential Future Rail Route

We support the provision of the new rail route and development of the Liverpool Manchester railway and the new high-speed station. The station will require appropriate access with connectivity to the M56 at a scale that meets the station's needs whilst also recognising the traffic flows on the local road network, and effects on surrounding businesses and the local community. Access to the station by public transport and active travel modes are important with a need for a Metrolink connection to be in place for the station's opening. The level of car parking provision should be appropriate to the demand and needs of the station to deter kiss & ride journeys (public transport is also important in this regard too).

Policy TM10 Parking Standards

We support the inclusion of requirements for off-airport car parking within policy TM10, in recognition of the off-airport car parking market that is sustained within the borough. Demand for land at the Airport has the potential to displace certain activities that do not have specific locational requirements close to the airfield (such as car parking) to the periphery of the site or to off-site locations. Due to the proximity of Trafford to the Airport it is prudent to anticipate some of this parking demand within the borough and including appropriate policy therefore ensures that any growth of off-airport car parking is effectively controlled and that only appropriate locations are considered for such airport related uses.

To improve the policy, we ask that reference be made to Manchester Airport's Surface Access Strategy. Third party car park operations have the potential to conflict with the aims of the Manchester Airport Sustainable Development Plan and associated Surface Access Plan. This Plan is in place to guide the development and management of surface access to the Airport and sets targets for future surface access capacity to meet projected annual passenger throughputs. Car parking is a key element of our surface access strategy and requires careful management and integration with public transport mode share targets. A further element should therefore be included in policy TM10 and associated supporting text to highlight that when making decisions on applications for the use of land for off-airport car parking, the Council will take into account whether the proposal supports the objectives and delivery of Manchester Airport's Surface Access Strategy.

Green Infrastructure and Natural Environment

We are supportive of your approach to green infrastructure and the natural environment, and the range of policies (GI1-GI10) that seek to improve this network and enhance biodiversity, ecological and landscape value. Notwithstanding this, there is a requirement to safeguard aviation safety when considering any proposal that may attract birds as this could lead to an increase in bird-strike risk. Such proposals include areas of landscaping and the creation or modification of water bodies.

Aviation safety must be addressed in the determination of planning applications for such schemes within 13km of Manchester Airport, and the Aerodrome Safeguarding Authority for Manchester Airport would need to be consulted as statutory consultee in accordance with the legislative provisions set out in Circular 1/2003 – Safeguarding Aerodromes, Technical Sites and Military Explosive Storage Areas. Proposals that adversely impact on aircraft safety should not be supported. This could apply to all policies within this section of the Local Plan, and in particular to policy GI5 Green Infrastructure Opportunity Areas given the opportunity areas in South Trafford that are in close proximity to the Airport (Timperley Brook Corridor, Davenport Green Rural Park and River Bollin Corridor).

Water, Flooding and Drainage

As per our comments on the policies relating to green infrastructure and the natural environment, we welcome policy relating to sustainable drainage but again would like to highlight the importance of considering the potential impact on aviation safety when assessing planning applications relating to SuDS due to the potential for SuDS features to attract birds.

Aviation safety must therefore be addressed in the determination of planning applications for such schemes within 13km of Manchester Airport and the Aerodrome Safeguarding Authority for Manchester Airport would need to be consulted as statutory consultee in accordance with the legislative provisions set out in Circular 1/2003 – Safeguarding Aerodromes, Technical Sites and Military Explosive Storage Areas. Proposals that adversely impact on aircraft safety should not be supported.

Built Environment

Policy BE2 Tall Buildings

Regarding the design requirements for tall buildings that are set out under Policy BE2, we request that attention is drawn to the potential for tall buildings to cause an air navigation obstacle or interference to radar and other navigation aids. Certain tall building proposals, depending on their height and location, will require specialist technical safeguarding assessments to determine whether the proposal would have any impact upon aircraft operations and air traffic control procedures, and in accordance with Circular 1/2003, proposals for tall buildings that exceed the height indicated on the airport's Safeguarding Map must be referred to Manchester Airport as statutory consultee.

It is also pertinent to note that the Civil Aviation Authority (CAA) has a general interest in tall structures as follows:

a) For civil aviation purposes, there is a mandated requirement to promulgate and chart all known structures of a height (i.e. above ground level) of 91.4 m (300 feet) or more.
b) (b) Whilst there is a mandated requirement for structures of a height of 150 m (491 feet) or more to be equipped with aviation warning lighting, structures of lesser height may need to be lit if, by virtue of their location and nature, they are considered a significant navigational hazard.
c) (c) As a minimum it is recommended that all proposed developments over 90 m in height should be notified to the CAA through: e-mail [redacted]

With regard to the lighting of tall buildings, the relevant provisions are set out in the Air Navigation Order: Part 8, Chapter 2, Article 222 "Lighting of en-route obstacles".

Policy BE2 and associated supporting text should therefore acknowledge that the design of tall buildings must consider the potential impact on aviation safety and should demonstrate compliance with any necessary mitigations. We recommend that text is inserted at BE2 subsection C stating that all proposals for tall buildings must clearly demonstrate how they would not adversely impact aviation safety.

BE10 Digital Connectivity

We welcome the reference to aviation safety within Policy BE10 requiring proposals for masts or telecommunications development to demonstrate that (I) "no interference would be caused to air traffic services or electrical equipment." This must be retained.

Other Matters

Manchester Airport must be afforded policy protection to ensure that its operational safety and efficiency are not compromised. This has implications for land and development within the borough and presents specific development issues that cannot be addressed by generic development management policies. It is therefore essential to include an aerodrome safeguarding policy within your Local Plan. This is currently absent, and we request that it be addressed.

We recommended including the following policy and supporting information:

Policy: Aerodrome Safeguarding

Development that would affect the operational integrity or safety of Manchester Airport or Manchester Radar will not be permitted.

Supporting Information

Aerodrome Safeguarding ensures the safety of aircraft manoeuvring on the ground, taking off, landing or flying in the vicinity of the aerodrome. Aerodrome safeguarding is a legal requirement and regulated by ICAO (International Civil Aviation Organisation) and the UK CAA (Civil Aviation Authority). By virtue of its importance to the national air transport system, Manchester Airport is an officially safeguarded aerodrome. The safeguarding zones around Manchester Airport are defined on a safeguarding map lodged with relevant local planning authorities by the airport. The map defines development types that require prior consultation with the Airport Operator and/or National Air Traffic Services Ltd (NATS). Detailed information and guidance on aerodrome safeguarding is published by the Civil Aviation Authority and its implementation in the Planning system can be found in ODPM/DfT Circular 01/2003 'Safeguarding Aerodromes, Technical Sites & Military Explosives Storage Areas Direction' (or any revised versions of this Circular).

The safeguarding zones for Manchester Airport cover the whole of Trafford. The main implications for the types of development that will require consultation are:

- Obstacles – Development over a certain height in different areas of the borough as specified on the safeguarding map. These may cause an obstacle and/or impact on radar.
- CNS – Communication, Navigation and Surveillance systems & navigational aids – any development that might interfere with vital aviation equipment.
- Lighting – Any lighting that could confuse or distract pilots.
- Glint & Glare – To prevent distraction or ocular damage to pilots.
- Wildlife Management – Any proposal likely to attract birds, such as proposals involving mineral extraction or quarrying, waste disposal sites and management facilities, significant areas of landscaping, reservoirs or other significant areas of water, land restoration schemes, sewage works, nature reserves, or bird sanctuaries.
- Renewables – Including wind turbine, solar and biomass energy schemes because all have the potential to interfere with the safe operation of the airport.
- Thermal Plumes – Any scheme that could cause a change to air density e.g. chimneys.
- Wind Shear – Any scheme close to the airport that has the potential to alter wind speed and direction.
- Aviation – Applications connected with an aviation use in any part of the borough including drones, EVTOL (electric vertical take-off and landing) aircraft, UAS (unmanned aircraft system), UAV (unmanned aerial vehicle), vertiports and heliports.

On a precautionary basis, consultations should also be made in relation to telecommunications development within 3km of the Airport perimeter and to significant lighting or advertising schemes on or near the flight approach path that may cause distraction to pilots.

Related documents

ODPM/DfT Circular 01/2003 'Safeguarding Aerodromes, Technical Sites & Military Explosives Storage Areas Direction':Safeguarding aerodromes, technical sites and military explosives storage areas - GOV.UK

It is essential that the above recommended aerodrome safeguarding policy is included within the Local Plan, along with appropriate supporting information.

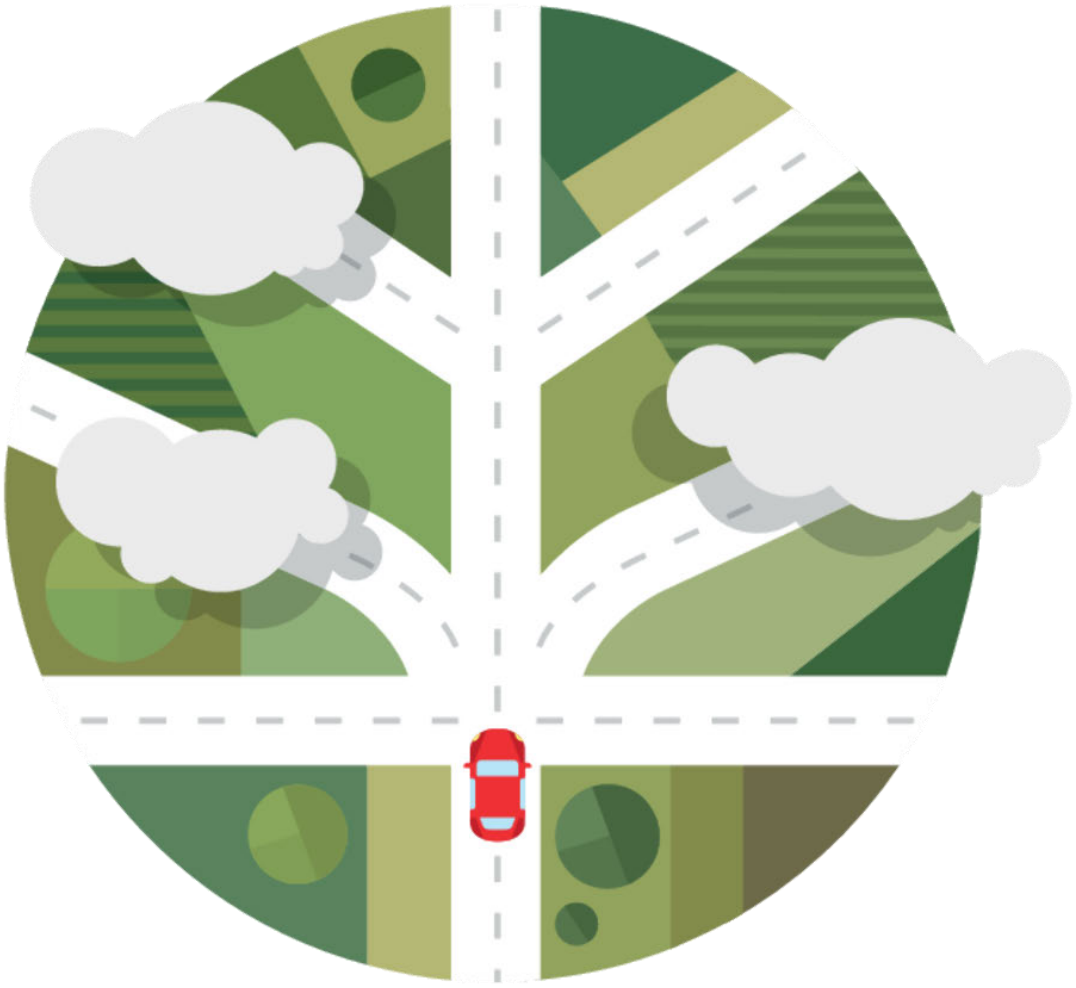
Thank you again for providing us with the opportunity to comment on your draft Local Plan (policies). We trust that our comments have been useful but please don't hesitate to contact us should you wish to discuss any of the matters raised in more detail. Please keep us informed of all future stages of consultation.

Yours sincerely,



Natalie Belford, MRTPI
Senior Planner

Deloitte.



Church Commissioners for England

Trafford Council – Regulation 18 Consultation

June 2025

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1. Introduction

1.1.1. Deloitte LLP is instructed by the Church Commissioners for England ("the Commissioners") to submit representation to the Trafford Council Local Plan – Regulation 18 Consultation ("the Consultation"), which is the subject of public consultation until 12th June 2025.

1.1.2. The Consultation provides background information on a range of planning issues and sets out a series of questions concerning the strategic policies of the draft Trafford Local Plan ("the emerging Local Plan").

1.2. Background and Context of Representation

1.2.1. This representation has been prepared having regard for the Commissioner's land to the south of Bow Green, Bowdon. The land includes two parcels: one to the south of Bow Green Road; and a second to the south of Bow Lane (please see the accompanying site location plan at (**Appendix A**). Collectively these two parcels of land cover an area of 36 hectares and are referred to as the "Site".

1.2.2. In preparing this representation, consideration has been had for the Trafford Local Plan Regulation 18 Consultation Draft Policies (April 2025), Policies Map, Integrated Assessment Report and Policies Assessment, Climate Change Risk Assessment, Habitat Regulations Assessment, and Site Selection Methodology.

1.2.3. The Places for Everyone Joint Development Plan ("PfE") prepared by Greater Manchester Combined Authority and nine of Greater Manchester's Councils (Bolton, Bury, Manchester, Oldham, Rochdale, Tameside, Salford and Wigan) was adopted in March 2024. The PfE sets the strategic framework for development across the region, seeking to deliver sustainable and inclusive growth.

1.2.4. Trafford Council are now bringing forward its own Development Plan, which seeks to implement PfE at a local scale, by providing detailed local policies that align with PfE. The Trafford Local Plan, along with PfE, constitutes the primary land-use planning framework for Trafford within the Development Plan. This plan will inform both daily planning application decisions and strategic planning and development initiatives in Trafford until 2042.

1.2.5. The Commissioners have previously submitted representations promoting the Site for allocation to:

- The Greater Manchester Spatial Framework Vision and Strategic Options Consultation and accompanying "Call for Sites" – January 2016
- The Greater Manchester Spatial Framework Draft 2016 – January 2017
- Trafford Metropolitan Borough Council's public consultation on the "Call for Sites" – September 2018
- The Greater Manchester Spatial Framework Revised Draft 2019 – March 2019
- Trafford Council Preferred Options Local Plan Consultation – March 2021
- Places for Everyone Join Development Plan- Draft Policies Consultation – October 2021

1.2.6. The Commissioners are committed to bringing forward sustainable development at the Site and have included in previous representations a Development Framework document (which is included with these representations at **Appendix B**).

1.2.7. To date, land at Bow Green Farm has not been allocated for release from the Green Belt nor allocated for development in any of the Trafford Local Plan, Greater Manchester Spatial Framework or the PfE.

1.3. The National Planning Policy Framework

1.3.1. This representation has also been framed against the National Planning Policy Framework ("NPPF") with which the Local Plan should be consistent.

1.3.2. The government published amended versions of the NPPF in July 2018, February 2019, July 2021, September 2023, December 2023, and most recently in December 2024.

1.3.3. In the context of the emerging plan, it is important to note that, according to Annex 1, paragraph 234 of the NPPF (2024), the policies in the December 2023 version of the NPPF apply for the purpose of preparing local plans that include policies to deliver the level of housing and other development set out in a preceding adopted joint local plan (such as the PfE) adopted since 12 March 2020. As the emerging Trafford Local Plan seeks to implement the policies of the PfE, adopted on 21 March 2024, at a local scale, the December 2023 NPPF is the relevant version for this plan-making process.

1.3.4. Accordingly, throughout this representation all references to the NPPF relate to the December 2023 version, ensuring consistency and alignment with the relevant national policy framework.

1.4. Structure of Representation

1.4.1. This document replicates and provides a response to the following questions within the Council's online Consultation Questionnaire: 1-9 (personal details); as well as:

- Chapter 1- Question 1-1, Question 1-2, Question 1-3, and.
- Chapter 2- Question 2-1, and Question 2-4.
- Chapter 4- Question 4-1, Question 4-3, Question 4-4, and Question 4-10.
- Chapter 6- Question 6-2.
- Chapter 7- Question 7-1.
- Chapter 8- Question 8-10.
- Chapter 9- Question 9-1.
- Chapter 14- Question 14-1.
- Consultation Question SS1 and SS2.

1.4.2. Concluding comments are provided at the end of the document.

2. Response to Questions 1-9

2.1.1. This section of the representation responds directly to Questions 1-9 of the Council's Consultation Questionnaire which relate to personal details:

2.2. Question 1

2.2.1. Forename: Nolan

2.3. Question 2

2.3.1. Surname: Tucker

2.4. Question 3

2.4.1. Organisation: Deloitte LLP on behalf of the Church Commissioners for England

2.5. Question 4

2.5.1. Position/title: Director

2.6. Question 5

2.6.1. Address: [redacted]

2.7. Question 6

2.7.1. Postcode; [redacted]

2.8. Question 7

2.8.1. Email: [redacted]

2.9. Question 8

2.9.1. Contact Number: [redacted]

2.10. Question 9

2.10.1. Please select 'opt in' if you wish to receive future consultations on planning policy: Opt in

3. Question 1-1

Do you support the draft Policies Map? Are there any changes required which would improve it?

3.1.1. The draft Policies Map establishes a number of boundaries, designations, and allocations for Trafford. This enables stakeholders to understand the planning intentions and restrictions for different locations.

3.1.2. The Commissioners note that the Green Belt boundary in the Policies Map, remains consistent with the Green Belt designation in PfE. The strategy for Trafford's Local Plan expresses that it will not propose "*any review of the Green Belt in Trafford, this was undertaken as part of PfE and new Green Belt boundaries have recently been established as part of that Plan.".*

3.1.3. The PfE sets a minimum number of net additional dwellings that Trafford is expected to identify a sufficient supply of sites for, through its emerging Local Plan. The target that PfE sets out for Trafford is 19,077 between 2022 and 2039. This is an annual average of 1,122 homes per year.

3.1.4. The revised NPPF was published on 12 December 2024. The revisions to the NPPF included the requirement to use the updated standard method for calculating an area's housing need figure, detailed in the National Planning Practice Guidance ("NPPG"). The revised standard method establishes a housing need figure for the delivery 1,599 homes per year in Trafford. Trafford's average delivery over the past three years is 727 homes.

3.1.5. Paragraph 234 of the 2024 NPPF outlines that for the purposes of preparing local plans the policies in this revised version of the Framework do not apply when: "*the plan includes policies to deliver the level of housing and other development set out in a preceding local plan (such as a joint local plan containing strategic policies) adopted since 12 March 2020*". Given that the emerging Local Plan, looks to implement the policies of PfE at a local scale, the revised NPPF does not apply and so the draft Policies in emerging Local Plan will have to align with the relevant NPPF. This means that the housing need figure of 1,599 does not have to be met in the emerging Local Plan.

3.1.6. It is the Commissioners' contention that whilst the emerging Local Plan does not have to provide a suitable supply of sites to deliver 1,599 homes per year, the plan should set ambitious goals for growth in the region. Paragraph 15 of the archived NPPF, December ix, states that "*Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.*". This highlights the expectation for plans to be proactive and ambitious in addressing housing needs, amongst other priorities.

3.1.7. Trafford's average delivery over the past three years, 727, alongside their housing delivery score of 78%, suggests that Trafford is significantly under-delivering on its housing needs. This issue is further reflected in affordable housing delivery, the latest Strategic Housing Market Assessment ("SHMA") (2023) identifies a considerable annual net shortfall of 858 affordable homes. An ambitious Local Plan would not simply maintain the existing Green Belt boundaries inherited from the PfE but would proactively review them to identify opportunities for sustainable development that could contribute to meeting Trafford's housing needs.

3.1.8. While the emerging Local Plan is not bound by the revised NPPF's housing need figure, the principle of ambitious and proactive planning for residential development remains relevant. The updated NPPF further strengthens this argument. Its introduction of "Grey Belt" land within the Green Belt and the "Golden Rules" for Green Belt release demonstrate a clear shift in national policy towards a more pragmatic approach to Green Belt development, particularly for housing. This reinforces the Commissioner's position that Trafford should adopt a more ambitious approach to reviewing its Green Belt Boundaries, seeking opportunities to contribute to housing delivery

whilst safeguarding the fundamental purposes of the Green Belt. The Golden Rules offer a framework for achieving this, ensuring that any Green Belt release is accompanied by significant affordable housing provision, necessary infrastructure contributions, and enhancements to public green spaces.

3.1.9. Furthermore, in line with the relevant NPPF's paragraph 148, consideration should be given to identifying areas of safeguarded land between the urban area and the Green Belt to meet longer-term development need. This approach, as detailed in 148(d), ensures that planning permission for the development of safeguarded land can be granted following an update to a plan which proposes the development.

3.1.10. While the Commissioners support the principle of strategic spatial planning embodied in the draft Policies Map, they cannot endorse a map that fails to update the Green Belt designation, as this demonstrates the Council has not adequately explored all options for meeting Trafford's housing needs and contributing to sustainable development.

4. Question 1-2

Do you agree with the proposed Vision for the Trafford Local Plan?

4.1.1. The Commissioners broadly support the aspirations presented in the Vision for the emerging Local Plan, particularly its focus on achieving carbon neutrality by 2038, enhancing biodiversity, and promoting sustainable transport. The Commissioners also welcome the emphasis on creating thriving communities, meeting housing needs (including affordable housing), supporting economic prosperity, and fostering high-quality design and placemaking.

4.1.2. In order to ensure these aspirations, translate into tangible outcomes, the Vision requires greater specificity and a clearer strategy for delivery. Accordingly, the Trafford vision should articulate specific and ambitious growth targets for housing and employment, demonstrating a proactive approach to meeting local needs and attracting inward investment, aligning with the NPPF's emphasis on positively prepared plans (paragraph 16b).

4.1.3. The Trafford Vision should explicitly link housing and economic development strategies, recognising their interdependence in creating sustainable communities. Considering these elements holistically can strengthen the business case for new infrastructure investment and ensure that new development is supported by necessary services and facilities, as encouraged by the NPPF (paragraph 90f). Recognising this point will also help to achieve the Vision's aim of "*successful and distinct*" town centres, by ensuring that the adequate housing delivery is achieved to support economic growth In Trafford's core communities.

4.1.4. In addition, the Commissioners support the Vision's emphasis on the provision of education, recreation, and leisure facilities. Placing the intention of provisioning facilities and amenities both through and in support of the delivery of new development at the forefront of the emerging Local Plan will also ensure its alignment with national policy. Most specifically paragraph 97(a) of the NPPF which notes that Local Plans should *"plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments"*.

4.1.5. Ultimately, the creation of new sustainable communities across Trafford will ensure the aspirations of the emerging Local Plan, are achieved. New sustainable communities will assist in the development of housing, employment space, new facilities and services, sustainable infrastructure and transport modes, open space, and enhanced local character, to make Trafford a more vibrant and attractive place to live.

5. Question 1-3

Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

5.1.1. The Commissioners support the intent behind the proposed Strategic Objectives, however, consider that greater clarity is required, particularly on their ambition and achievability. The objectives which the Commissioners wish to comment on are outlined below.

5.2. SO1- Deliver the homes that Trafford needs

5.2.1. The Commissioners are supportive of the specific goals articulated within SO1:

"*A. Deliver homes for the residents of Trafford within distinct and attractive neighbourhoods.*

B. Promote a good choice of high quality, accessible, energy efficient housing people can afford in sustainable locations, of a size, mix, density and tenure needed.

C. Address the housing shortage through the provision of affordable and social rented housing in the right mix to support the needs of all, including an ageing population."

5.2.2. These aims align with the NPPF's overarching objective "*the achievement of sustainable development*" (paragraph 7). Furthermore, the focus on affordability and social rented housing directly addresses the NPPF's requirement for plans to "*create great places and ensure good design in development"* (paragraph 34).

5.2.3. To deliver these goals at the scale required the Commissioners recommend that the emerging Local Plan considers the importance of urban extensions. The NPPF recognises that strategic policies should "*plan for and allocate sufficient sites to deliver the strategic priorities of the area*" and allows for this to be achieved "*through other mechanisms*" where appropriate (paragraph 23). When planned strategically, sustainable urban extensions, on land such as the Site at Bow Green, can provide the significant land needed to deliver a substantial quantity of high-quality, affordable, and accessible homes in sustainable locations, contributing significantly to meeting Trafford's housing needs and supporting the creation of distinct and attractive new neighbourhoods. Furthermore, the allocation of urban extensions, would align the emerging local plan with the NPPF paragraphs 22 and 74, which acknowledges the provision of large sites in supporting "*a sustainable community, with sufficient access to services and employment opportunities"* these opportunities could be "*within the development itself*" or "*in larger towns to which there is good access*".

5.2.4. In order to achieve this goal, the Commissioners recommend that a range of viable and readily deliverable sites should be allocated within the emerging local plan. The emerging local plan should ensure alignment with NPPF paragraph 69, which notes that *"planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability*".

5.2.5. In addition to the points made above, on the achievability of this Objective, the Commissioners note that the title of this Objective suggests that Trafford is not only committed to delivering the type of housing needed in Trafford, but also the amount. As previously discussed, the most up to date housing need figure for Trafford is 1,599. However, in its current form, the emerging Local Plan aims to deliver 22,443 homes across the plan period (2022-2042). This is significantly below the current need figure of 1,599 homes per year (31,980 across the plan period). The emerging Local Plan therefore suggests it will only deliver the minimum number of required homes from the PfE, instead of proactively addressing the higher level of housing needed.

5.2.6. The PfE outlines in paragraph 7.4 that if insufficient new homes are provided to meet their minimum requirement, *"then there is a risk that affordability levels will worsen and people will not*

have access to suitable accommodation that meets there need". This demonstrates the risk posed from a lack of housing development in the region. Considering the current low delivery rates of market and affordable housing in Trafford, the Commissioners recommend considering a range of sites for housing development as noted in paragraph 69 of the NPPF and taking into account the pragmatic approach that Labour have taken towards the Green Belt and reviewing this boundary accordingly. Considering that the Government was elected with a mandate to build 1.5 million new homes, an aspirational objective would address the updated housing need figure, as well as support the review of outdated Green Belt boundaries.

5.3. SO4 – Sustain Trafford's economic growth and SO6- Support vibrant town and designated centres

5.3.1. The Commissioners are supportive of Trafford's ambition to attract new investment, fostering a competitive economy, and creating jobs in key centres. Altrincham is identified in Places for Everyone as being Trafford's Main Town Centre and is consequently considered "*the prime location for shops and services, a major source of employment and leisure opportunities*" in the emerging Local Plan.

5.3.2. The Commissioners' land to the south of Altrincham is well-placed to contribute significantly to achieving this objective. Its strategic location, adjacent to a key service centre identified in PfE as Trafford's Main Town Centre, offers a unique opportunity to deliver a mix of uses, including much-needed housing that will directly support Altrincham's continued growth and vitality.

5.3.3. As the NPPF notes, in paragraph 90(f) "*residential development often plays an important role in ensuring the vitality of centres"*. The generation of jobs in Altrincham, as envisioned by SO4, will necessitate a corresponding increase in housing provision, if people are live locally and travel sustainably for work. The Site provides a sustainable solution, creating new homes for the workforce that will drive Altrincham's economic success while also contributing to the creation of a well-designed and thriving community.

5.4. SO7- Protect and improve the natural environment and connect green assets

5.4.1. Regarding SO7, the NPPF emphasises achieving "measurable net gains for biodiversity" (paragraph 185b) and planning for "shared spaces" and "open space" to enhance communities (paragraph 97a). Well, planned urban extensions can incorporate substantial new green infrastructure, exceeding the minimum requirements for biodiversity net gain and creating high quality accessible open spaces and recreational facilities as envisioned by SO7D. Furthermore, through planning obligations, as outlined in the NPPF paragraph 34, developers can contribute to the protection and enhancement of existing designated green and blue spaces and the expansion of Trafford's green infrastructure network.

5.5. SO8- Sustainable movement

5.5.1. The Commissioners recognise the importance of transport issues and support the objective set out in paragraph 108 of the NPPF whereby: "*transport issues should be considered from the earliest stages of plan-making and development proposals*".

5.5.2. Locating new development in sustainable urban extensions that are well-connected to public transport, walking, and cycling routes, the local plan can encourage residents to use these modes of transport instead of private vehicles. Sustainable urban extensions that are in close proximity to existing settlements are more likely to be delivered within walking or cycling distance of local amenities, such as shops, schools, and healthcare facilities, and ensuring that they are well-served by public transport links helping to create complete, compact and connected communities.

5.5.3. The Commissioners always consider the importance of active travel as part of their developments, ensuring that new housing sites are well-designed and integrated with the surrounding transport infrastructure. Consequently, the Commissioners are supportive of policies requiring developers to provide sustainable transport measures as part of their planning applications, the local plan can

ensure that the new housing sites are designed to promote active travel. This can involve requiring developers to provide cycle storage facilities, electric vehicle charging points, and public transport information, as well as contributing to the provision of new or improved public transport services.

5.5.4. The creation of a sustainable community is linked to the delivery of infrastructure, services and facilities that serves it, which can be provisioned as part of residential-led urban extensions, or mixed-use developments. The Commissioners deem it important that the emerging local plan considers the provision of services and facilities that housing allocations could provide. This aligns clearly with SO8 by enabling the creation of integrated, well-connected developments where *"housing, employment, retail, open space, community facilities and transport are well connected*" (SO8).

6. Question 2-1

Do you support Policy ST1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

6.1.1. The Commissioners support the overall direction of Policy ST1: Core Growth Area, particularly the inclusion of Altrincham and the surrounding area. The Commissioners maintain that focusing development around key growth locations and promoting a mix of employment-led development with supporting residentials uses is a sound strategy. This approach aligns with the NPPF's emphasis on sustainable development by concentrating growth in accessible locations, as stated in paragraph 109: "Significant development should be focused on locations which are or can be made sustainable". This strategic plan making will effectively leverage existing infrastructure and promote sustainable travel patterns. To ensure this policy's effectiveness, the Commissioners propose a number of enhancements.

6.1.2. Firstly, ST1 should explicitly prioritise the provision of housing as a fundamental component of the Core Growth Area's mixed-use development strategy. While "supporting residential uses" is mentioned, the policy must give housing a more prominent role, recognising its essential link to employment growth and economic growth. The NPPF states that plans should make "sufficient provision" for housing (paragraph 20a), but Trafford's significant housing shortfall necessitates a more proactive approach. Given the documented lack of available and deliverable housing sites within the existing urban area, it is crucial to consider all opportunities for housing delivery, including the Site at Bow Green.

6.1.3. The Site, as demonstrated in the Site Promotion document in Appendix B, has capacity for a substantial number of new homes, offers a significant contribution to meeting Trafford's housing need and supports the growth of the Core Growth Area. This prioritisation of housing is essential for creating a balanced and sustainable community where people can live and work, thereby reducing reliance on unsustainable transport modes and enabling the efficient use of land within the Core Growth Area.

6.1.4. In addition, the policy should acknowledge the importance of integrating new development within the Core Growth Area with the wider green infrastructure network. The NPPF highlights the importance of green infrastructure in delivering a wider range of benefits, including enhancing biodiversity and mitigating climate change (Paragraph 180). The Site exemplifies this approach with the potential to incorporate substantial green infrastructure into future proposals.

6.1.5. The policy should also prioritise the potential for longer-term, phased development within the Core Growth Area, particularly for larger, strategically significant sites. This aligns with the NPPF's (2023) encouragement of a long-term vision for development, particularly for larger schemes (paragraph 22). The Site, with its potential for phased delivery, can contribute to meeting Trafford's long-term needs.

6.1.6. By incorporating these enhancements, Policy ST1 can provide a more comprehensive and robust framework for guiding sustainable development within Trafford's Core Growth Area, maximising its contribution to the borough's overall vision and objectives.

7. Question 2-4

Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

7.1.1. The Commissioners support the aims of Policy ST3, which seeks to outline the main development considerations for the Southern Areas in Trafford. The Commissioners recognise the importance of promoting sustainable development in these areas, making the most of previously development land, and enhancing the role of Trafford's town centres and other key assets.

7.1.2. The role of Altrincham Town Centre, as Trafford's Main Town Centre is referenced within the policy. The Commissioners support the focus on enhancing its role as a key economic driver and focus for retail, leisure and other town centre uses. Additionally, the Commissioners agree that a healthy vibrant Altrincham is essential for the prosperity of the borough.

7.1.3. The Commissioners also support the consideration of the strategic role of housing allocations, in supporting the Southern Area's growth and vitality. The NPPF emphasises the importance of planning for housing to support economic growth, stating that "*planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt*" (paragraph 85). Furthermore, the NPPF (2023) recognises that "*residential development often plays an important role in ensuring the vitality of centres*" (paragraph 90f).

7.1.4. Allocations such as New Carrington and Davenport Green will undoubtedly contribute to boosting residential delivery in Trafford. However, given the borough is consistently struggling to deliver homes at a scale and pace to meet its needs additional allocations are needed, particularly around key employment hubs and designated centres like Altrincham.

7.1.5. Furthermore, Trafford faces a significant affordability challenge, as demonstrated in the latest SHMA, with average house prices considerably higher than in other Greater Manchester authorities. Average house prices in Trafford are £350k compared to £205k in Greater Manchester. While brownfield sites within town centres can contribute to housing supply, viability constraints often limit the amount of on-site affordable housing that can be provided, leading to reliance on commuted sums or off-site provision. Greenfield sites and larger housing developments, such as the Site, offer a greater opportunity to deliver significant amounts of on-site affordable housing, contributing directly to meeting Trafford's identified needs and creating genuinely mixed and inclusive communities. This approach aligns with the NPPF's emphasis on creating "*mixed and balanced communities*" (paragraph 64) and ensuring that a "*sufficient number and range of homes can be provided to meet the needs of present and future generations"* (paragraph 8b).

7.1.6. By explicitly considering the strategic role of housing allocations in supporting town centres and addressing affordability challenges, the Local Plan can ensure that Altrincham and other designated centres continue to thrive and contribute to the borough's overall prosperity.

8. Question 4-1

Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

8.1.1. The Commissioners propose a number of amendments to Policy R1: Housing Delivery, which seeks to ensure a sufficient supply of housing to meet Trafford's needs. While the policy sets a minimum housing requirement, it should be more ambitious in its target, reflecting the full extent of Trafford's housing need. As mentioned in the response to Question 1-3, the current target is based on the minimum figure required by PfE and falls significantly short of the identified local housing need calculated using the standard method in the 2024 NPPF.

8.1.2. An ambitious target that fully addresses Trafford's housing need would not only provide more homes for local people, but also stimulate economic growth and contribute to the creation of thriving, sustainable communities, whilst addressing affordability and improving choice of housing. The NPPF encourages plans to be "prepared positively, in a way that is aspirational but deliverable" (paragraph 16b). Setting an aspirational housing target would demonstrate this positive approach to planning.

8.1.3. Furthermore, this policy should explicitly recognise the strategic role of sustainable urban extensions in meeting Trafford's housing needs. While the policy prioritises brownfield development, this approach alone will not be sufficient to meet the full extent of future housing need. The NPPF acknowledges the role of larger-scale developments, such as new settlements or urban extensions, in delivering significant numbers of new homes (paragraph 74).

8.1.4. Policy R1 should also include more specific measures to address Trafford's affordability challenges. While the policy mentions affordable housing, it lacks specific targets or mechanisms for ensuring its delivery, particularly on sites where viability constraints may limit on-site provision. The NPPF encourages policies that promote mixed and balanced communities (paragraph 64), and the Local Plan should explore innovative approaches to delivering affordable housing, including on larger sites where greater flexibility may exist. The "Golden Rules" for Green Belt release, as outlined in the NPPF (2024), provide a potential framework for achieving this, ensuring that any Green Belt release for housing is accompanied by a significant affordable housing contribution.

8.1.5. The policy should also provide clearer guidance on assessing the deliverability and viability of proposed housing developments. This is crucial for ensuring that the housing requirement is met and that new homes are built in a timely manner. The NPPF emphasises the importance of ensuring that plans are "deliverable over the plan period" (paragraph 35c) and that policies do not "undermine the deliverability of the plan" (paragraph 34). Clearer guidance on how deliverability and viability will be assessed would provide greater certainty for developers and communities.

8.1.6. The Commissioners' Site offers a unique opportunity to contribute to meeting Trafford's housing needs in a sustainable location. The Site's size and availability make it deliverable within the plan period, and its proximity to Altrincham and existing infrastructure makes it a sustainable location for new housing. By incorporating the suggested enhancements, Policy R1 can provide a more robust and effective framework for delivering the homes Trafford needs, while also addressing the borough's affordability challenges and promoting sustainable development.

9. Question 4-3

Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

9.1.1. The Commissioners agree with the intention of Policy R3: Affordable and Social Housing and recognise the importance of addressing Trafford's acute need to deliver affordable housing. The latest SHMA identifies a considerable annual net shortfall of 858 affordable homes and Policy R3 acknowledges that Trafford is the least affordable local authority area in Greater Manchester. The annual shortfall of 858 affordable homes exceeds Trafford's annual average total housing delivery over the past three years, 727, outlining the importance of affordable housing delivery over the emerging plan period. The NPPF states that "*where a need for affordable housing is identified, planning policies should specify the type of affordable housing required*" (paragraph 64). A clear target ensures clarity for developers and communities.

9.1.2. Table C14 in the SHMA outlines a summary of overall affordable dwelling need by bedroom size and dwelling type, by sub area. The total annual net need for Altrincham is 465 affordable dwellings out of a total 858 annual net need across Trafford. This demonstrates the crucial need for affordable housing in Trafford and specifically in Altrincham. For context the next highest sub-area is Sale, which has a total annual net need of 199. Larger greenfield sites, such as the Site, offer greater flexibility for on-site affordable provision, directly contributing to mixed communities.

9.1.3. Policy R3 should recognise the strategic importance of larger sites, such as urban extensions, in delivering affordable housing. This approach aligns with the NPPF's encouragement of larger-scale development where it can help to meet identified needs in a sustainable way (paragraph 74). Furthermore, the increasing emphasis at the national level on using Green Belt land for housing, as evidenced by the introduction of "grey belt" in the NPPF (2024) and the "Golden Rules," underscores the need for a strategic approach to considering urban extensions on Green Belt land. Such an approach should balance the need for housing with the importance of Green Belt protection, ensuring that any release is justified by exceptional circumstances and delivers significant public benefits, including affordable housing.

10. Question 4-4

Should the Local Plan set an affordable housing requirement, including a tenure mix, for each locality (similar to Core Strategy policy L2) that reflects market conditions?

10.1.1. The Commissioners support the concept of setting locality-specific affordable housing requirements, including a tenure mix, as proposed in the question. This approach can ensure that affordable housing provision is tailored to the specific needs and market conditions of each area, maximising its effectiveness and ensuring viability.

10.1.2. The NPPF encourages local planning authorities to be responsive to local circumstances when planning for housing, stating that policies should reflect "*the character, needs and opportunities of each area*" (paragraph 9). Setting locality-specific affordable housing requirements aligns with this principle by allowing for variations in affordability levels, housing demand, and the capacity of each area to deliver affordable homes.

10.1.3. A locality-based approach, similar to Core Strategy policy L2, can ensure a more nuanced and targeted approach to affordable housing delivery. For example, areas with higher housing costs and greater affordability challenges, such as those around Altrincham, may require a higher proportion of affordable housing than areas with lower housing costs. Similarly, the tenure mix can be tailored to reflect local needs. Areas with a higher proportion of older people, for example, may benefit from a greater emphasis on retirement housing or other specialist accommodation.

10.1.4. Furthermore, a locality-based approach can help to ensure that affordable housing requirements are viable and deliverable. By taking into account local market conditions, the policy can avoid imposing unrealistic burdens on developers, which could hinder housing delivery. This aligns with the NPPF's emphasis on ensuring that plans are "*deliverable over the plan period*" (paragraph 35c) and that policies do not "*undermine the deliverability of the plan*" (paragraph 34).

10.1.5. The Commissioners' Site, located in close proximity to Altrincham, would be subject to the affordable housing requirements for that locality. This Site offers a significant opportunity to deliver a substantial number of affordable homes, contributing to meeting the specific needs of the area. A clear and justified affordable housing requirement for the locality, informed by robust local evidence and viability assessments, will ensure that this potential is realised.

10.1.6. By setting locality-specific affordable housing requirements, the Local Plan can ensure a more effective, targeted, and viable approach to affordable housing delivery, contributing to the creation of mixed and balanced communities across Trafford.

11. Question 4-10

Do you support Policy R5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

11.1.1. The Commissioners support the aims of Policy R5: Housing Density, which seeks to ensure efficient land use and promote sustainable development by setting minimum net residential densities for new housing. The Commissioners recognise the importance of optimising densities in appropriate locations, particularly around town centres and public transport hubs, to reduce reliance on private vehicles and encourage sustainable travel patterns. This approach aligns with the NPPF (2023)'s emphasis on making effective use of land (paragraph 123) and promoting sustainable transport (paragraph 108).

11.1.2. While minimum density standards are useful, Policy R5 should incorporate greater flexibility to account for site-specific circumstances. The NPPF acknowledges that "*local market conditions and viability*" should be considered when determining appropriate densities (paragraph 128b). Factors such as site constraints, topography, and the character of the surrounding area can influence the appropriate density for a particular development. Allowing for flexibility within the policy, while still adhering to the overall aim of promoting higher densities in sustainable locations, would ensure that development proposals are appropriate and deliverable. This is particularly relevant for larger sites, such as urban extensions, where a range of densities may be appropriate across different parts of the site. The Site at Bow Green, for example, envisions a mix of densities reflecting the site's varying character and proximity to existing development.

11.1.3. Policy R5 should explicitly link density considerations with green infrastructure provision. The NPPF highlights the importance of green infrastructure in delivering a wide range of benefits (paragraph 180), and higher density development can create opportunities for integrating green spaces, promoting biodiversity, and enhancing the public realm. The policy should encourage the use of innovative design solutions to maximise green infrastructure within higher density developments, ensuring that these areas are not only efficient in terms of land use but also provide high-quality living environments. The Bow Green development, with its proposed network of green spaces and public realm improvements, demonstrates how higher density housing can be successfully integrated with green infrastructure to create a sustainable and attractive new neighbourhood.

12. Question 6-2

Do you support Policy TM2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

12.1.1. The Commissioners recognise the crucial role of public transport in creating sustainable communities. This aligns with the NPPF emphasis on promoting sustainable transport (paragraph 108) and integrating it with other planning considerations (paragraph 108e). Specifically, the NPPF states that "patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.". Locating new urban extensions in areas that are well-connected to public transport, walking, and cycling routes, the local plan can encourage residents to use these modes of transport instead of private vehicles, helping to achieve Trafford's aspirational objective of net-zero by 2038. By ensuring that the new housing sites are well-designed and integrated with the surrounding transport infrastructure, the local plan can help to enhance the attractiveness and accessibility of sustainable transport modes. Sustainable urban extensions are more likely to be delivered within walking or cycling distance of local amenities, such as shops, schools, and healthcare facilities, and ensuring that they are well-served by public transport links helping to create complete, compact and connected communities.

12.1.2. The Commissioners always consider the importance of active travel as part of their developments, ensuring that new housing sites are well-designed and integrated with the surrounding transport infrastructure. Consequently, the Commissioner are supportive of policies requiring developers to provide sustainable transport measures as part of their planning applications, the local plan can ensure that the new housing sites are designed to promote active travel. This can involve requiring developers to provide cycle storage facilities, electric vehicle charging points, and public transport information, as well as contributing to the provision of new or improved public transport services.

12.1.3. As noted above, the creation of a sustainable community is linked to the delivery of infrastructure, services and facilities that serves it, which can be provisioned as part of small to medium sized residential-led, or mixed-use developments. The Commissioners deem it important that the emerging local plan considers the provision of services and facilities that housing allocations could provide. This aligns clearly with the draft policy which refers to the need for holistic development of housing schemes and associated or supporting infrastructure.

13. Question 7-1

Do you support Policy TC1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

13.1.1. The Commissioners support Policy TC1: Hierarchy of Centres, specifically its recognition of Altrincham as Trafford's Main Town Centre and agree that a thriving town centre is crucial for the borough's economic prosperity. The Commissioners endorse the policy's focus on enhancing Altrincham's role as a key service and employment hub. This aligns with the PfE's designation of Altrincham as a Main Town Centre and the NPPF's emphasis on supporting the vitality and viability of town centres (paragraph 90).

13.1.2. However, as discussed in our responses to Questions 2-1 and 2-3, the Commissioners maintain the policy should explicitly recognise the strategic role of housing in supporting town centre vitality and viability. The NPPF acknowledges that residential development can be a key driver of town centre vitality (paragraph 90f), and the Local Plan should reflect this by considering how housing allocations can contribute to Altrincham's economic success. This is particularly important given Trafford's ongoing housing shortfall and the fact that the Green Belt has not been reviewed during this plan-making period. A proactive approach to identifying suitable housing sites, including those adjacent to designated centres like Altrincham, is essential for ensuring that housing delivery aligns with the economic goals of the area. The Site offers a significant opportunity to provide much-needed housing to support the town centre's growth and contribute to the creation of a thriving local community.

14. Question 8-10

Do you support Policy GI10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

14.1.1. The Commissioners recognise the vital role of development in enhancing biodiversity and are committed to delivering Biodiversity Net Gain (BNG) on all our sites, exceeding the 10% minimum wherever possible. Accordingly, the Commissioners strongly support Policy GI10: Building Biodiversity into New Developments.

14.1.2. To strengthen and enhance the policy, Trafford should recognise the strategic role of sustainable urban extensions in delivering significant on-site BNG. These larger-scale developments offer greater opportunities for habitat creation and enhancement compared to smaller, more constrained sites, directly contributing to an area's biodiversity and creating a more resilient ecological network. This approach aligns with the NPPF's encouragement of larger-scale development where it can help to meet identified needs in a sustainable way (paragraph 74). The Site, for example, demonstrates the potential for urban extensions to deliver substantial BNG through the creation of new habitats, enhancement of existing green infrastructure, and provision of ecological connectivity.

14.1.3. While the NPPF emphasises the use of brownfield land for development (paragraph 123), Policy GI10 should acknowledge the challenges of delivering meaningful BNG on such sites, particularly those affected by contamination or previous industrial uses. The current Defra consultation, launched on 28 May 2025 "*Improving the implementation of Biodiversity Net Gain for minor, medium and brownfield development*" highlights the difficulties of achieving on-site BNG on brownfield sites, particularly due to the presence of Open Mosaic Habitat (OMH), a priority habitat often found on previously developed land. The consultation paper notes that "*delivering BNG for brownfield sites is challenging due to the presence of OMH*" and suggests exploring alternative approaches, such as off-site BNG delivery or habitat creation on other, more suitable sites (page 44).

14.1.4. As such, Policy GI10 and the Trafford Local Plan should reflect these challenges and encourage BNG delivery through strategic greenfield urban extensions, where onsite BNG is more viable. This approach would ensure that the focus remains on achieving a net positive impact on biodiversity, rather than relying on off-site provision or habitat banking that may be the most effective way to achieve BNG on brownfield sites.

15. Question 9-1

Do you support Policy OS1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

15.1.1. The Commissioners believe that creating healthy and safe environments where people want to live, invest, work, visit and play is a crucial aspect of developing a new local plan. The provision of open space within these sites can also ensure developments are safe, accessible and promote social interaction in keeping with paragraph 96 of the NPPF which directly relates to achieving healthy, inclusive, and safe places .By providing open space within the housing sites, local planning authorities can help to create a sense of place and community, which can enhance the quality of life for residents and promote social interaction. This can involve providing parks, playgrounds, sports facilities, allotments, and other green spaces that are accessible to all residents, regardless of age, ability, or income. This can also help to promote physical activity, reduce social isolation, and improve mental health and wellbeing.

15.1.2. Larger scale greenfield developments often offer opportunities to create extensive green infrastructure networks, parks, playing fields, and other recreational facilities that may not be feasible on smaller more constrained sites. This approach aligns with paragraph 74 of the NPPF, which highlights the role of larger scale sites. The Site demonstrates this potential by incorporating a substantial area of new open space, including a network of interconnected green spaces, playing fields, and a local park. This not only benefits new residents but also enhances open space provision for the wider community.

15.1.3. Policy OS1 should clearly articulate the expectation for new developments to contribute financially to the enhancement of open space provision. The NPPF states that plans should set out "the contributions expected from development" for infrastructure, including green infrastructure (paragraph 34). Policy OS1 should specify how these contributions will be secured, whether through planning obligations (Section 106 agreements) or other mechanisms, and how they will be used to fund improvements to existing open spaces, create new parks and gardens, or enhance recreational facilities. Sites allocated in the emerging plan for instance, could contribute to funding improvements to nearby open space networks.

16. Question 14-1

Do you support Policy IP1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

16.1.1. The Commissioners are committed to the principle of sustainable development and recognise the essential role of infrastructure in creating thriving, successful communities. The Commissioners recognise that new development can generate a need for infrastructure, and we are committed to working collaboratively with local planning authorities to ensure that these needs are met in a timely and effective manner, in line with the NPPF's emphasis on the importance of infrastructure for supporting sustainable development (paragraph 20).

16.1.2. The Commissioners maintain that early and proactive engagement with local planning authorities and infrastructure providers is essential for ensuring that the necessary infrastructure is delivered to support new development. This aligns with the NPPF's encouragement of pre-application engagement and front-loading to improve the efficiency and effectiveness of the planning process (paragraph 39).

16.1.3. Infrastructure planning should be comprehensive and integrated, considering the needs of both new development and the wider community. This includes not only physical infrastructure, such as transport, utilities, and drainage, but also social infrastructure, such as schools, health facilities, and open space. Our approach to considering the potential for development at Bow Green development, for example, assesses the provision of a range of on-site facilities, including a local centre, green spaces, and sustainable transport links, to create a well-rounded and sustainable community. This aligns with the NPPF's emphasis on planning for "community facilities" (paragraph 20c) and promoting "healthy and safe communities" (paragraph 96).

16.1.4. The Commissioners are committed to making fair and proportionate contributions, aligning with the NPPF's emphasis on the need for planning obligations to be necessary, directly related to the development and fairly and reasonable related in scale and kind (paragraph 57). The Commissioners recognise that viability is a key consideration when delivering infrastructure and as such support the policies reference to the submission of viability assessments.

17. Question SS1

Do you have any comments on the proposed Site Selection Methodology (Figure SS-1)? Are there any stages / questions / considerations which should be added and/or removed?

17.1.1. The Commissioners welcome the opportunity to comment on the proposed Site Selection Methodology (Figure 1 below). We recognise the importance of a robust and transparent process for identifying and assessing potential development sites, ensuring that allocations are made strategically and in accordance with the NPPF's overarching objective of sustainable development.

Figure SS-1: Trafford Local Plan, Draft Site Selection Methodology

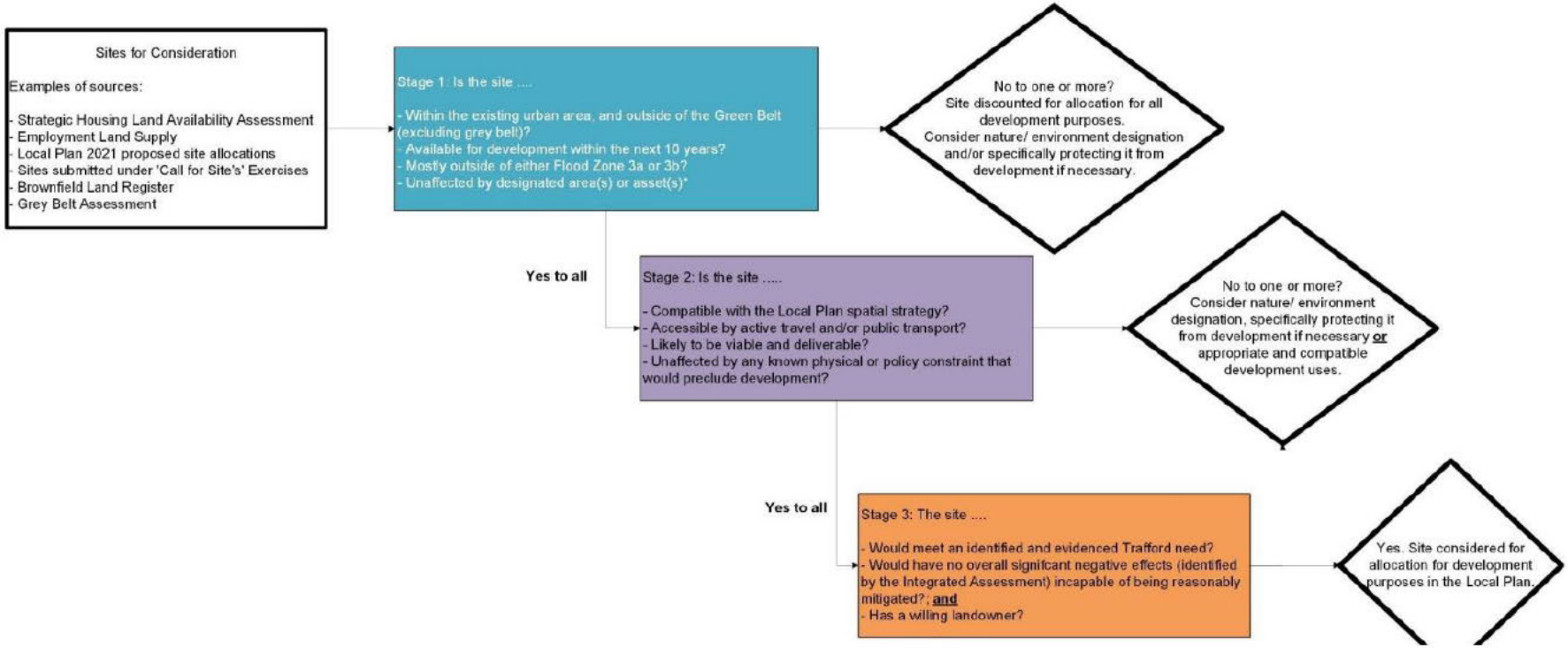


Figure 1: Site Selection Methodology

17.1.2. It is the Commissioner's contention that the methodology could be strengthened through the following changes.

17.2. Prioritising Sites that Contribute to Strategic Objectives

17.2.1. The methodology should explicitly prioritise sites that demonstrably contribute to the achievement of the Local Plan's strategic objectives. While the methodology considers factors such as site constraints and infrastructure capacity, it should give greater weight to sites that directly address strategic priorities such as housing delivery, economic growth, and environmental sustainability.

17.2.2. This change would ensure that allocations are made strategically, maximising their contribution to the borough's overall vision. The Site for example, could directly contribute to a number of strategic objectives including:

- SO1 (housing delivery);
- SO4 (economic growth);
- SO6 (town centre vitality);
- SO7 (environmental protection); and,
- SO8 (sustainable movement).

17.2.3. A methodology that prioritises such contributions would ensure that sites like Bow Green are given due consideration.

17.3. Emphasis on Deliverability and Viability

17.3.1. The methodology should place greater emphasis on assessing the deliverability and viability of potential development sites. While these factors are mentioned, they should be given greater weight in the assessment process. The NPPF emphasises the importance of ensuring that plans are "*deliverable over the plan period*" (paragraph 35c) and that policies do not "*undermine the deliverability of the plan*" (paragraph 34).

17.3.2. A robust assessment of deliverability and viability is essential for ensuring that allocated sites can be brought forward in a timely manner and that the Local Plan's housing and employment targets are met. The Bow Green site, with its single ownership and readily developable nature, demonstrates high deliverability, a factor that should be given significant weight in the site selection process.

17.4. Clearer Green Belt Assessment Criteria

17.4.1. The methodology should include clearer criteria for assessing the suitability of Green Belt sites for development. Whilst the draft Strategy for the emerging local plan outlines that Trafford will not undertake a review of the Green Belt the Site Selection Methodology should also reflect the updated NPPF (2024) and its more nuanced approach to Green Belt development. As previously mentioned, the NPPF (2024) introduces the concept of "grey belt" (paragraph 148) and "limited infilling" (paragraph 154), which could be relevant to assessing potential Green Belt sites. The example sources in Figure 1 references Grey Belt Assessments. Additionally, the "Golden Rules" for Green Belt release in the NPPF (2024) (paragraph 156) should be explicitly incorporated into the methodology, providing a clear framework for assessing the suitability of Green Belt sites for development, particularly concerning their contribution to meeting affordable housing needs. In addition, the relevant NPPF in paragraph 148, outlines that when defining Green Belt boundaries, plans should identify areas of safeguarded land between the urban area and the Green Belt in-order to meet longer-term development needs stretching beyond the plan period. Further clarity on the assessment of safeguarded land should be outlined in the Site Selection Methodology.

17.4.2. This is particularly important given Trafford's limited supply of developable land and the potential need to release Green Belt land to meet housing and employment targets. A more rigorous assessment of Green Belt sites, considering their contribution to meeting strategic objectives, their deliverability, and their potential for providing significant public benefits, would ensure that any release is justified and delivers maximum value. The Bow Green site, while currently in the Green

Belt, offers significant potential for sustainable development, including much-needed housing, affordable homes, and substantial green infrastructure. A clearer Green Belt assessment framework within the Site Selection Methodology, incorporating the updated NPPF (2024) guidance on "grey belt," "limited infilling," and the "Golden Rules," would ensure that such opportunities are fully considered.

18. Question SS2

Specific criteria will need to be identified to assess a sites performance at each stage of the site selection process.

Do you have any comments on what these site criteria should include?

What evidence should inform this assessment?

18.1.1. In addition to the comments on the methodology in answer to Question SS1 the Commissioners propose the following considerations that should form the assessment of sites in Trafford.

18.2. Suitability and Site Constraints

18.2.1. Sites should be assessed based on their suitability for development and any site constraints that may limit their potential. This includes factors such as topography, flood risk, contamination, and access. Evidence to support this assessment should include site investigations, environmental assessments, and technical studies. Sites with minimal constraints and high suitability for development should be prioritised. The Bow Green site, while located within the Green Belt, is relatively unconstrained and offers a suitable location for sustainable development, as demonstrated in the accompanying Site Promotion Document in Appendix B.

18.3. Infrastructure Capacity and Requirements

18.3.1. Sites should be assessed based on the availability and capacity of existing infrastructure, as well as the requirements for new infrastructure to support development. This includes transport, utilities, drainage, and social infrastructure. Evidence to support this assessment should include infrastructure assessments, transport studies, and consultation with infrastructure providers. Sites with good access to existing infrastructure and minimal requirements for new infrastructure should be prioritised. The Bow Green site benefits from its proximity to existing transport links, including the A56 and public transport services, and its development can be supported by planned infrastructure improvements.

18.3.2. By adopting these criteria and supporting evidence, Trafford Council can ensure that the site selection process is transparent, objective, and results in the allocation of sites that contribute meaningfully to the borough's vision and strategic objectives.

19. Conclusion

19.1.1. This representation has been prepared by Deloitte LLP on behalf of the Commissioners in response to the Trafford Council Local Plan- Regulation 18 Consultation.

19.1.2. The Commissioners generally support the overall ambitions of the emerging Local Plan, particularly its focus on achieving carbon neutrality, enhancing biodiversity, and promoting sustainable transport. The Commissioners also welcome the emphasis on creating thriving communities, meeting housing needs (including affordable housing), supporting economic prosperity, and fostering high-quality design and placemaking. However, the Commissioner maintain that the plan should be more ambitious in its approach to housing delivery, affordable housing provision, and Green Belt review, taking into account the updated NPPF (2024) and Trafford's significant housing need.

19.1.3. Against this background, the Commissioners suggest the following be considered and taken forward in the Local Plan process:

- Housing Delivery: The emerging Local Plan should adopt a more ambitious housing target that fully reflects Trafford's identified housing need, going beyond the minimum requirement set by Places for Everyone. The plan should strategically consider sustainable urban extensions, such as the Commissioners site at Bow Green, to contribute significantly to meeting this need. This site offers a unique opportunity to deliver a substantial number of new homes in a sustainable location, supporting the growth of Altrincham and contributing to Trafford's overall housing supply.
- Affordable Housing: The Local Plan should include specific targets and mechanisms for delivering affordable housing, particularly on sites where viability constraints may limit on-site provision. The Commissioners site at Bow Green offers significant potential for delivering a substantial number of affordable homes, contributing directly to meeting Trafford's identified needs. The "Golden Rules" for Green Belt release, as outlined in the NPPF (2024), should be considered in this context.
- Green Belt Review: While acknowledging the draft strategy's intent to maintain existing Green Belt boundaries, the Commissioners encourage a more proactive review of the Green Belt, considering the updated NPPF (2024) and the introduction of "grey belt" and "limited infilling." The Site at Bow Green, while currently within the Green Belt, offers a significant opportunity for sustainable development that could contribute to meeting Trafford's housing needs and other strategic objectives. The "Golden Rules" for Green Belt release should be applied rigorously to ensure any release delivers significant public benefits, including affordable housing and enhanced green infrastructure.
- Site Selection Methodology: The Site Selection Methodology should prioritise sites that demonstrably contribute to the Local Plan's strategic objectives, including housing delivery, economic growth, and environmental sustainability. It should also place greater emphasis on assessing the deliverability and viability of potential sites, and include clearer criteria for assessing Green Belt sites, incorporating the updated NPPF (2024) guidance.

19.1.4. The Commissioners suggest that a number of background papers are drafted to inform policies and allocations within the later iterations of the emerging Local Plan. The following documents are considered by the Commissioners as essential at the early stages of the plan-making process in ensuring policies around housing and economic growth are appropriately drafted and Trafford's overarching strategy is justified:

- Spatial Strategy Approach Background Paper;
- Settlement Hierarchy Assessment Background Paper;
- Housing Background Paper;
- Employment Background Paper;
- Infrastructure Delivery Background Paper;
- Green Belt Review; and,
- Grey Belt Assessment.

19.1.5. The above papers and the emerging Local Plan should be underpinned by a complete and robust evidence base, including a Green Wedge Review, Strategic Housing Land Availability Assessment, Strategic Housing Market Availability Assessment, Employment Needs Assessment, and Housing and Economic Development Needs Assessment, amongst others, to capture the current and future needs of the borough. A robust evidence base is crucial for informing sound planning decisions and ensuring that the Local Plan is justified and deliverable.

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To Whom It May Concern

Trafford Local Plan Regulation 18 Consultation Draft – Representation on behalf of United Utilities Property Services

This letter is prepared on behalf of United Utilities Property Services [UUPS] to provide a response to the Trafford Council's [the Council] Local Plan Regulation 18 Consultation Draft. This response is made in the context of land adjoining the Altrincham Wastewater Treatment Works [WwTW]. UUPS own land adjoining the current WWTW (c. 20.59ha) which is located within the New Carrington strategic allocation within the Places for Everyone Joint Development Plan [PfE]. This land falls within part of New Carrington referred to as 'Sale West'.

Following adoption of the PfE in March 2024, the emerging Trafford Local Plan will provide a more detailed set of locally specific planning policies to guide development within the Borough. We understand that emerging plan seeks to deliver the level of housing and other development set out in PfE, and therefore, in line with the provisions of para. 234(c) of the National Planning Policy Framework (December 2024) [2024 Framework], the Local Plan will be examined under the relevant previous version of the Framework [2023 Framework].

These representations are formed bearing in mind the content of the PfE and the Inspectors' Report associated with the Examination of the PfE (14th February 2024). The Inspector's Report outlines the role of the PfE and its relationship with subsequent individual district local plans. The PfE noted that its key role was to plan to identify housing, office, industrial and warehousing development need and thematic policies to accommodate and inform that development, alongside the allocation of large sites outside the urban area to help meet development needs. Paragraphs 14 – 16 of the Inspectors' Report are of key significance in the consideration of the relationship between PfE and local plans, and state the following ***[Lichfield's emphasis in bold]***:

"14. Each of the nine local planning authorities covered by the Plan has an existing local plan; those were adopted at various times between 1997 and 2023. Each authority is committed to preparing a new local plan within the context of the strategic policies for the city region set out in the Plan. ***Those local plans will, amongst other things, identify a supply of housing sites (in***

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addition to the allocations in the Plan) to ensure that the minimum housing requirement for each district set out in the Plan can be met*, looking ahead a minimum period from their adoption date as required by national policy. Similarly, local plans will, where necessary, allocate sites for industrial, warehouse and office developments in addition to the employment allocations in the Plan.*

15. *In other words, it is not the role of the Plan alone to identify sufficient land to ensure that all objectively assessed needs for housing and other uses can be met, as much of the supply will be brought forward through local plans. Nor is it the role of the Plan to address all strategic and other priorities in all districts, as local plans will be able to contain strategic and non-strategic policies, provided that they are consistent with the Plan and with national policy.*
16. *In the context of the above, each of the nine authority's local plan will be essential to ensure that sufficient land is identified to allow development needs, including those set out in the Plan, to be met in a timely and plan-led manner. However, our role is to determine if the Plan before us is legally compliant and sound, and it is not necessary to recommend a modification to specify when each local plan should be prepared. This is because national policy requires local plans to be reviewed and kept up to date, and the scope and timing of each local plan must be set out in each authority's local development scheme. Furthermore, we are not convinced that setting a timetable for the preparation of local plans would be effective as each authority would still be individually responsible for carrying out the necessary work to prepare its local plan."*

Furthermore, para. 1.56 of the PfE states that:

"The Places for Everyone Plan is the strategic spatial plan for our nine boroughs and as such sets out our planning policy framework. All policies within the plan are "strategic policies". It is being prepared as a Joint Development Plan Document of the nine local planning authorities. Once the Places for Everyone Plan is adopted it will form part of the relevant authority's development plan. As such local plans will need to be consistent with it and neighbourhood plans will need to be in general conformity with the strategic policies. Local plans will be expected to look ahead a minimum period from their adoption, in line with national policy. In the event that a local plan looks beyond 2039, the minimum requirement figures set out in Policies JP-J3, JPJ4 and JP-H1 should be used to inform local plan target(s)."

Footnote 2 states that in the event that a local plan looks ahead beyond 2039, the annual average figure 2022-2039 in policy JP-H1 Table 7.2 should be treated as a minimum requirement for each year after 2039.

Plan Period

Paragraph 1.13 sets a plan period of up to 2042. Paragraph 22 of the National Planning Policy Framework [Framework] states that strategic policies should look ahead over a minimum 15-year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery. The Council's Local Development Scheme envisaged adoption in 2027 /

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2028. Therefore, UUPS considers that the Local Plan should, instead, look ahead to least 2048 to accord with the Framework.

Policy R1: Housing Delivery

PfE Policy JP-H1 (Scale, Distribution and Phasing of New Housing Development) sets out that a minimum of 175,185 net additional dwellings will be delivered over the period 2022-2039, or an annual average of around 10,305. The total requirement for Trafford for the period 2022-2039 is 19,077 dwellings, an annual average of 1,122 dpa.

Whilst the approach of Policy R1: Housing Delivery Residential Development taken to utilise the average figure for Trafford's housing requirement within PfE is consistent with the Inspectors' recommendation from the examination, this also should be considered in the context of Trafford's recently increased Local Housing Need [LHN] calculated using the Government's Standard Method (SM3). Based on affordability ratios published in March 2025 and the updated Housing Stock figures published in May 2025, Trafford's SM3 figure is now 1,599 dpa, 477 dwellings above the adopted annual average requirement of 1,122. From 22nd March 2029 onwards (when the PfE will be five years from adoption and therefore out of date), the LHN will apply and the housing requirement for Trafford will increase significantly.

Over the five year period from 2029-2034, Trafford's housing requirement will be 8,395 (based on current SM3 figure plus a 5% buffer in accordance with NPPF para. 78). The Council are required to apply a 20% buffer after the 1st July 2026 (and if the Housing Delivery Test indicates that delivery was below 85% of the housing requirement). In such circumstances Trafford's housing requirement will be 9,594 over the five year period. It will be highly likely at this stage that the Council will struggle to identify a sufficient supply of land and will be unable to demonstrate a Five-Year Housing Land Supply from 2029 onwards. As such, Trafford must take positive steps now towards meeting the needs identified in PfE and the significantly increased housing requirement from March 2029 onwards.

It is therefore imperative that the Council put steps in place now to ensure plan led development rather than being subjected to speculative applications in 2029 when the higher housing requirement becomes mandatory. Waiting until 2029 to proactively identify land to meet this higher housing requirement will be too late, and the Council should plan through the emerging Trafford Local Plan to address this. On this basis, it would be more appropriate for Trafford to plan for their actual housing need rather than for the minimum amount of growth in the short term, and the Council should therefore review its housing land supply in this context.

Furthermore, it is highly unlikely that Trafford would be able to redistribute any of its housing requirement across other Greater Manchester Borough's through a potential review of the PfE in 2029, as the LHN for all other Borough's has significantly increased based on SM3. It is therefore highly likely that Trafford will be required to meet its LHN in full, placing further pressure on the requirement to identify additional housing land. Furthermore, in drafting this Local Plan the Council should be looking ahead beyond 2029 and seeking to maximise the use of land released by PfE from the Green Belt. In this respect they should seek to ensure that the maximum possible quantity of development can be delivered on such land (having regard to matters such as peat and other constraints) ensuring that provision of soft uses (such as open space) is located in the Green Belt where possible, or on peat and other areas

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which are not developable. Failure to do this simply creates a problem for the Council in a few years time which may result in the need for more difficult decisions rather than planning for it now.

Paragraph 2.13 states that the Local Plan is not proposing any review of the Green Belt. It states that this was undertaken as part of PfE and new Green Belt boundaries have recently been established as part of that Plan. However, the evidence of the constituent authorities and the GMCA was that further Green Belt review may be necessary and was an option open to each authority in considering subsequent development plan documents. It is incorrect to suggest that a review now is not possible because that was not the evidence presented to the examination.

At the outset, it is important to reiterate that the PfE Inspectors did not review or endorse the claimed supply positions for each LPA. With this in mind, as per the Inspectors' Report on the examination of PfE, it is the role of the Local Plan to identify a supply of housing sites (para. 14), and the Local Plan will be essential to ensure that sufficient land is identified to allow development needs, including those set out in the Plan, to be met in a timely and plan-led manner (para. 17).

It is also noted that the PfE Inspectors required the insertion of the following text into PfE Policy JP-H1: Scale, Distribution and Phasing of New Housing Development:

"where national policy requires a local planning authority to identify and update annually a supply of specific deliverable sites in their district, this will be assessed against the minimum delivery rates for the district set out in Table 7.2, ***irrespective of any shortfalls or surpluses in other districts and in the Plan area overall (unless national policy requires a different figure to be used****)."*

In terms of supply, PfE Table 7.1 summarises the sources of housing land supply up to 2039 for each GM Borough. The position for Trafford is set out below in Table 1.

Table 1

District	SHLAA – Brownfield Land	SHLAA – Greenfield Land	SHLAA - Mix	Allowances	PfE Allocations	2022-2039 Land Supply
Trafford	14,716	2,465	825	323	4,917	23,246

Source: PfE

Paragraph 69 of the 2023 Framework (unchanged in paragraph 72 in the 2024 Framework) requires strategic policy making authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. This requires planning policies to identify a supply of specific, deliverable sites for five years following the intended date of adoption and specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.

Trafford Council have not published a Strategic Housing Land Availability Assessment to support evidence for the housing land supply set out in Table 1 or set out the Council's supply of land for housing. As set out above, individual sites included in Table 7.1 of the PfE was not assessed by the Inspector during examination of the PfE, and the supply in Trafford was therefore not endorsed by the

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Inspector. UUPS has significant concerns that a large proportion of the claimed developable supply set out in Table 1 may not be developable and has not been independently scrutinised.

The Council has presented no evidence that the Council can demonstrate a supply of specific deliverable sites within the borough (without relying on surpluses in other districts as per PfE Policy JP-H1) in accordance with the Framework.

UUPS considers additional land is required to be released from the GB to boost housing supply in accordance with the Framework. There is further capacity at the New Carrington strategic allocation on land adjoining the WWTW (currently located in the Green Belt) to accommodate further housing. UU's land is relatively unconstrained benefiting from an existing access and can come forward in the short term. The wider allocation is heavily constrained by restorable deep peat which will reduce the developable area and the number of capacity of dwellings to be delivered across New Carrington. In the context of the desire to avoid developing on restorable deep peat, the land adjoining the Altrincham WWTW is not within the core area where peat is likely. Even if there were, due to the historic fill material imported on the site, there is no prospect of restoration in any event. As such, UUPS considers that Trafford Council should undertake a full Green Belt review as part of their emerging Local Plan ensure that sufficient supply is identified through the emerging plan.

It is considered that the Council should also be seeking to maximise the developable area of the Site not located within the Green Belt. This will ensure the Site can maximise its contribution to the Council's identified housing needs, particularly given the proposed housing requirement in Policy R1 falls significantly short of the Council's LHN figure identified in SM3. By making best use of the Site for the delivery of housing through the draft Local Plan, this will help to reduce the extent of Green Belt release required when the strategic policies (including around housing requirement) will need to be reviewed. A review of PfE will be required by March 2029. This will avoid a situation where the Council's draft Local Plan will only have real weight for approximately two years between its adoption and March 2029. The Council should therefore look ahead and take a more proactive approach to meeting needs now.

Policy R3: Affordable and Social Housing

This policy states that all major residential developments will be required to provide on-site affordable housing, with a tenure mix of 60% rented (40% social rent and 20% affordable rent) and 40% affordable home ownership. Policy R3W: affordable and Social Housing within Trafford West requires a minimum of 40% affordable housing. The policy goes on to state that a minimum of 10% of affordable homes must be Totally Affordable Net Zero [TANZ] homes. This policy does not have regard to PfE Policy JP Allocation 30: New Carrington which requires a minimum of 15% affordable housing across the allocation to be provided. Fundamentally the viability of these policy requirements has not been properly tested having regard to site specific viability evidence. Furthermore, the policy seeks to introduce new requirements that have not been tested from a deliverability / viability perspective. This includes the deliverability of social rented affordable housing, and TANZ. Cross reference should be made to specific affordable housing requirements for allocation policies and should have regard to viability in accordance with paragraph 34 of the 2023 Framework (or 35 of the 2024 Framework).

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Policy R7: Adaptable and Accessible Housing

This policy states that in accordance with PfE policy JP-H3 all new dwellings must be built to the accessible and adaptable standard in Part M4(2) unless specific site conditions make this impracticable. It also states that proposals of 50 or more homes will be required to provide at least 4% of new homes to be built to Part M4(3) wheelchair accessible and adaptable standard. The Council encourages and supports the use of 'Lifetime Homes' design standard. UUPS considers that further evidence is required to justify a requirement which goes above and beyond optional standards in accordance with the Planning Practice Guidance.

Policy R11: Self-Build and Custom Housing

This policy states that on sites of more than 100 houses at least 5% of dwellings will be made available as serviced plots for sale to custom builders. It goes on to state that each custom build plot must be marketed for at least 24 month period, and suggests that where plots remain unsold after the marketing period they will either be further marketed or will be transferred to a Registered Provider for the provision of affordable housing. However, the viability of providing this quantity of housing has not properly been tested and nor has its effect on deliverability. The basis of the threshold is unclear and the practical consequences on sites such as Carrington where the Council accept it is not viable to provide a full range of affordable housing and other planning obligations because of challenging market conditions. Again, UUPS considers that further evidence is required to justify this requirement both in terms of need and the impact of the policy on viability and deliverability.

Policy GI2: Green Infrastructure Network

The draft policies map designates areas of the borough as Green Infrastructure Network. However, from a review of Policy GI2: Green Infrastructure Network, this does not provide any justification for the designation on UU's land interests. Nor does it set out any clear intentions for the areas subject to these designations. Further clarification is required.

In the context of the strategic allocation area for New Carrington, the inclusion of Green Infrastructure Network on the Altrincham WWTW and land adjoining the Altrincham WWTW is considered to be disproportionate and unjustified. It is assumed that these have been adapted and expanded from the strategic green spaces shown indicatively on PfE Picture 11.46 New Carrington Indicative Allocation Plan. However, no evidence was presented by the Greater Manchester Combined Authority [GMCA] as to why these areas were identified on this plan within PfE, nor is there any part of the allocation policy explicitly requiring any green space to be delivered in strict accordance with the areas indicated. This therefore does not support the identification of land as part of a Green Infrastructure Network.

Any requirement to do so would impact on viability and other matters, and there is no evidence that such a facility is capable of being provided in this location, or that such a use is appropriate and efficient and effective use of land having regard to constraints within the allocation, particularly in regard to restorable deep peat which will ultimately have a substantial influence on developable areas. In the context of the desire to avoid developing on restorable deep peat, the land adjoining the Altrincham WWTW is not within the core area where peat is likely. Even if there were, due to the historic fill material imported on the site, there is no prospect of restoration in any event. UUPS therefore considers

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that either within the Green Belt or elsewhere within the allocation which is constrained by restorable deep peat may be better suited to providing this strategic function.

It is noted that criterion 1 of PfE Policy JP Allocation 30: New Carrington requires the development to be in accordance with a masterplan to be developed in consultation with the local community and approved by the local planning authority. It goes on to state that central to the masterplan shall be the consideration of opportunities to restore habitats, strengthen ecological networks, and manage the carbon and hydrological implications of development, having regard to the presence of peat on parts of the site. This masterplan is currently being progressed. It is UUPS view that the location of any strategic green network should rightfully and properly be made through the masterplanning exercise having regard to technical constraints on developable areas. As such, UUPS consider that the Green Infrastructure Network shown on the draft polices map should be deleted where it intersects with the Carrington allocation boundary.

It is noted that the Green Infrastructure Network above and beyond the strategic green spaces shown indicatively on PfE Picture 11.46 New Carrington Indicative Allocation Plan (i.e. the WwTW and surrounding area), UUPS strongly objects to this as this area is part of the operational WwTW. Future investment into this infrastructure may be required to serve the strategic allocation. As such, this area is not available for development as a Green Infrastructure Network.

Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets

The draft policies map designates various areas around the operational WwTW as locally designated sites and natural environmental assets. Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets requires development proposals to make a clear commitment to the protection and enhancement of Trafford's locally designated sites and natural environment assets, as defined on the policies map. It is not clear what has driven these areas to be included within the designation. It appears that these areas follow the boundaries of old lagoons associated with the operational WwTW which do not hold any ecological value. UUPS strongly object to any areas within the operational WwTW to be included in such designation.

Summary

UUPS welcomes the emerging Local Plan being prepared by Trafford, however there are clear concerns regarding the Council's approach to delivering their adopted housing supply, and the relationship with PfE. In line with the Inspectors' Report on the examination of PfE, it is explicitly stated that it is the role of subsequent local plans to identify a supply of housing sites (para. 14) and ensure that sufficient land is identified to allow development needs to be met in a timely and plan-led manner (para. 18). In its current form, there are significant questions as to whether the draft Local Plan would facilitate the necessary development in Trafford without the release of Green Belt land. It is considered that the Local Plan should seek to maximise the delivery of housing on land released from the Green Belt to meet needs identified in PfE as well as to acknowledge the higher requirement set out in SM3 which the Council will be obliged to plan for in a short period of time. Failure to have regard to the requirements of SM3 would represent short termism at an extreme, and would not represent proper planning.

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The viability implications of the policies within the draft Local Plan must be tested to ensure that the policies are realistic and will not undermine the delivery of new development within the Borough.

Lastly, UUPS have significant concerns with the Green Infrastructure Network and Locally Designated Sites and Natural Environment Assets designated on the draft policies map which require urgent review.

We urge the Council to progress with the masterplanning of the Carrington site to allow the delivery of sites in the short term. Current progress has been slow and the Council recently communicated that a plan was not expected to be in place until summer 2026. This will be over two years after the adoption of PfE (ignoring the significant risk of further delay) which is delaying the delivery of much needed housing in the Borough and contributing to the absence of a 5 year housing land supply.

We trust that the representations will be fully considered in the formulation of the emerging Local Plan and would be grateful if you could keep us informed as to the details of the next stage of consultation.

Yours faithfully

[redacted]

Imogen Zulver
Senior Planner
MTCP (Hons) MRTPI

Representations to the Draft Trafford Local Plan

Regulation 18 Consultation (April 2025)

Submitted on behalf of the BlackRock UK Property Fund

June 2025

MICHAEL SPARKS ASSOCIATES

1. Introduction & Context

1.1 This document includes representations to the Trafford Local Plan Regulation 18 Consultation Draft ("the Draft Plan") that was published for consultation on 24 April 2025.

1.2 These representations have been prepared on behalf of the BlackRock UK Property Fund ("referred to hereafter as BlackRock"). These representations are not made on behalf of any other part of BlackRock and any comments should only be attributed to the BlackRock UK Property Fund and references to BlackRock in this document should be regarded as such.

1.3 BlackRock are the owners of the Voltage Park site in New Carrington that is allocated for employment use and benefits from planning permission to provide 5 new employment units at the site, alongside supporting infrastructure. This site has further development potential and it is considered that it will make a significant contribution to the supply of land to meet future the employment needs of Trafford over the next plan period.

1.4 This document provides comments on several of the draft policies included in the Draft Plan with particular regard to their likely impact on bringing forward employment development within the Borough over the next plan period.

1.5 Both the National Planning Policy Framework ("NPPF") and the Places for Everyone Plan ("PfE Plan") provide significant support to development that supports economic growth, so it is therefore important to ensure that constraints on such development are identified to ensure that sufficient employment premises are available to meet the future needs of occupiers.

1.6 BlackRock are one of the largest investment managers operating in the UK market, with Real Estate forming a key component of their investment activities.

1.7 BlackRock welcome the opportunity to comment on the Draft Plan and support the overall ambitions and general direction of the plan making process. However, there are matters that they wish to comment on to ensure that the policies are both Sound and effective.

1.8 It is in this context that these representations to the Draft Trafford Local Plan are made.

2. Comments on Draft Policies

2.1 This section details the policies that BlackRock wishes to make representations on alongside confirmation on whether they wish to support or object to it.

Draft Policy RT1: Carbon and Energy

2.2 Whilst the general objective of this draft policy is supported, in its current form the policy wording does not offer sufficient clarity and it is considered that it can be refined and simplified to make its objectives clearer so that it is easier to understand n practice.

2.3 Part B of the policy refers to the relevant policies of PfE, which is part of the Development Plan. Referring to the need to comply with other aspects of the adopted Development plan is not necessary as this is a requirement of development and Part B offers nothing new from a policy perspective.

2.4 Part C of the policy refers to later parts of the proposed Policy Framework and again is unnecessary duplication as it doesn't offer anything apart from requiring compliance with other parts of the proposed Plan.

2.5 This approach makes it unnecessarily convoluted. It notes that all development proposals need to consider the aspects of the aspects set out in RT1N, RT1S, RT1C and RT1W. As set out below, not all of these objectives and requirements will be relevant to every development proposal and this blanket approach is not targeted enough.

2.6 The requirements for this policy should be simplified and clarified to identify what are requirements for all proposals, and which ones may only be relevant to development of a particular type or scale.

Suggested Changes:

1. Remove Part B as it just references a policy of the existing adopted Development Plan and is unnecessary duplication.
2. Remove Part C as additional context can be added to the component parts of the policy to clarify how those requirements are to be addressed.

Draft Policies RT1N, RT1S, RT1C and RT1W: Carbon and Energy

2.7 Part Ai of Policy RT1N refers to public EV charging hubs as a first step priority. In the absence of any caveats to the policy wording, the policy wording is actively encouraging all sites, irrespective of use, to provide this infrastructure. Encouraging public EV charging to be installed on employment site presents many potential issues, principally related to public health and safety connected to members of the public on employment and industrial sites. It would also elevate operational and security concerns for uses on employment sites, many of which cannot allow members of the public on site and require site access to be strictly controlled.

2.8 Finally, such infrastructure risks sites failing to optimise the use of land for its allocated use as accommodating EV charging stations will impact on site utilisation and the objective of making best use of land to meet specific needs.

2.9 The wording should also recognise that it is not appropriate for all development to provide public EV charging hubs and that certain uses, including most employment and industrial land uses, would not be expected to adopt this “First Step Priority”.

2.10 Part Bi. of Policy RT1N requires a blanket approach to district heat networks for industrial sites in Trafford. This is considered unnecessary. Employment operations do not generally require heat, especially where proposed buildings have high thermal efficiency that minimise their heat requirements. Heat may potentially be required by some operations, but these are generally limited to larger scale B2 operations and very much depends on the activities of each particular site and does not apply to all industrial/employment development.

2.11 The only locations where heat networks are generally viable is where there is co-location of uses (residential, office, municipal etc) that can use surplus heat and where there is a co-ordinated approach to providing a locally based heat/power plant that occupiers have the ability to connect to. Placing the requirement for a heat network on individual development is not considered a reasonable approach.

2.12 Part B of Policy RT1WB.iii. refers to a “Non-domestic opportunity area”. No other reference is made to a non-domestic opportunity area within the draft document, so it is unclear what this is.

Suggested Changes:

1. It is suggested that these subsidiary policies should be stand-alone and revised so that they clearly identify their requirements identify how this relates to different development types.
2. Commentary should be added to identify that development proposals will not need to address the requirements where they are not relevant or feasible.
3. Additional clarification should be added in the policy wording so that its requirements are clear and concise.

Policy RT2: Decentralised Energy Generation

2.13 As noted above, locations where heat/power networks are generally viable is where there is co-location of uses (residential, office, municipal etc) that can use surplus heat and where there is a co-ordinated approach to providing a locally based heat/power plant that occupiers have the ability to connect to. Placing the requirement for a heat network on individual development proposals is not considered a reasonable approach.

2.14 Furthermore, employment operations do not generally require heat, especially where proposed buildings have high thermal efficiency that minimise their heat requirements. Heat may potentially be required by some operations, but these are generally limited to larger scale B2 operations and very much depends on the activities of each particular site and does not apply to all industrial/employment development.

2.15 Placing a requirement on development proposals that do not connect to a network to make a financial contribution to decentralised initiatives is not considered reasonable where it can be demonstrated that there it is not feasible to connect or where there is no need to connect. Financial contributions need to meet the tests set out in the CIL Regulations and NPPF and it is considered that such a requirement will not meet these tests.

Suggested Changes

1. Acknowledge in the policy that not all development is suitable to connect to such networks.
2. Remove the requirement to make a financial contribution for development that does not connect.

Draft Policy RT3: Overheating and the Urban Heat Island

2.16 Part E of draft Policy RT3 (Integration of Green Infrastructure) requires developments to accommodate Green Roofs (where feasible). The current wording of the policy is supported as it is not feasible in all cases for development proposals to accommodate such roofing systems.

2.17 Employment buildings are designed to have lightweight roof systems that accommodate roof lights (for natural light and to minimise need for electrical lighting) and solar pv (to reduce carbon emissions. These cover large volumes of internal space that are designed to be robust building forms with flexibility to accommodate different operations with as few columns as possible.

2.18 Adding Green roofs to such roof spans is not feasible or appropriate for the following reasons

- Green Roof systems add additional loads to the roof requiring significant additions to the building structure in respect of concrete foundations and steelwork. This increases the embodied carbon need during constriction
- Green Roof systems are hard to integrate with rooflight and pv systems and add areas that can store water which can void product warranties and complicate maintenance
- The addition of green roofs can have implications for fire ratings for materials which can impact on the ability to secure insurance for new employment premises

Suggested Changes

2.19 No changes to the policy wording are suggested, however it should be made clear in the supporting text that green roof systems will not be appropriate for all building typologies.

Draft Policy RT4: Sustainable Retrofitting

2.20 Part B of Policy RT4 states that all proposals for *"significant demolition and reconstruction must be fully justified, ensuring the efficient use of resources and energy compared to the existing structure".* The definition of "significant" is not defined and so it is unclear when the policy requirement to fully justify is triggered.

2.21 Part B goes on to states that "*when demolition is unavoidable, developments must divert at least 85% of waste from landfills and either reuse materials on-site or salvage appropriate materials for reuse off-site*". The wording is not precise. It is unclear as to whether this is related to the demolition phase of works or construction phase too, or both.

2.22 Furthermore, different building typologies, particularly older buildings, may be constructed using particular materials that need to be disposed of in landfill and so cannot be diverted to meet the 85% requirement. Likewise, other sustainability measures may be achievable that are equally valid when retrofitting an existing building.

2.23 As such a blanket 85% minimum figure is not considered appropriate.

2.24 Notwithstanding, any specific detail connected to reuse and recycling should be contained within Policy RT5.

2.25 Part D of the policy refers to local historical assets, it is unclear what is meant by this. Does this cover designated and non-designated heritage assets? Or is this a further categorisation?

Suggested Changes:

1. Define in the policy or supporting text what TMBC would define as "significant demolition".
2. Change the reference to "…at least 85%...." to a target so that it is clear what should be achieved but adding flexibility to take account of those instances where this is not feasible.
3. Clarify Part D of Policy RT4, which refers to a "local historical asset".

Draft Policy EJ2: Trafford Park

2.26 Part B of Policy EJ2 states that, "*the Council will permit sustainable development for business, industry, storage and distribution (Use Class B2 and B8) in accordance with Policies EJ3"*. This wording is not consistent with draft Policy EJ3 that also allows Class E(g) (ii) & (iii).

2.27 Occupiers often want flexibility to accommodate a variety of uses within their premises and employment areas such as Trafford park are considered suitable to accommodate uses across classes E(g)(ii) & (iii). Such an approach would provide a flexible and responsive planning system and make best us of land to meet needs.

2.28 Part C of Policy EJ2 states that "*The Council will resist the loss of employment space within the Trafford Park boundary, in line with Policy EJ4*." Many employment sites do not provide the facilities needed by modern occupiers and contain insufficient yard dimensions to accommodate operational requirements. It is therefore often necessary to reduce the overall floorspace on site to accommodate a higher quality provision.

2.29 This should be clarified so that the definition of 'employment space' can be understood. Older employment properties can often have higher site density than new developments as they can have smaller yard areas that are no longer suitable to meet modern requirements. Where development of such older sites is proposed, the amount of floorspace can reduce, although the new units will be of a higher standard and better meet modern demands of occupiers.

2.30 Furthermore, newer employment premises typically have larger internal volumes so the new space can be used more productively. A reduction in floorspace may therefore be required as part of redevelopment, but the resulting development can improve flexibility and productivity as it provides new efficient units that meet demands of the market, catering for a wider range of needs. This is therefore a benefit and should therefore not constrain redevelopment opportunities.

2.31 Part C of Policy EJ2 goes on to state that "*Proposals for uses not listed in Policy EJ2B will not be permitted in Trafford Park*." This wording is considered too restrictive. Other complementary uses can co-exist with B2 and B8 and flexibility is often required by occupiers to ensure that development can be responsive to changing economic conditions.

Suggested Changes

1. Part B: Add Class Eg (ii) & (iii) to ensure consistency with policy EJ3.
2. Part C: Clarify definition of employment space.
3. Part C:Ensure consistent with draft Policy EJ3.

Draft Policy EJ3: Industrial & Warehousing Uses

2.32 Part B of Policy EJ3 states that "*All industrial and warehousing employment areas must comply with the agent of change principle and be designed to ensure that established commercial uses remain viable and can continue or grow without additional restrictions being placed upon them*." The Agent of Change principle should not apply to existing employment areas where employment use is proposed as part of development, but to alternatives uses that may be proposed on or adjacent to these sites where they could restrict existing or future employment provision at allocated or established employment sites.

Suggested Changes

1. Part B should be deleted as this does not reflect the Agent of Change principle.

Draft Policy EJ5: Safeguarding Trafford's Employment Land

2.33 Policy Concern: The Agent of Change principle should be referred to specifically within Part iv. to make this more robust. This is where the Agent of Change principle is relevant.

Suggested Changes

1. Refer to the Agent of Change principle in part iv.

Draft Policy EJ6: Data and Energy Storage

2.34 Part A of Policy EJ6 states that "*Applications for data or energy storage facilities will be expected to utilise low profile, former industrial brownfield sites that have existing infrastructure*." This wording is unclear and ambiguous. It is unclear what a "low profile" site is. It is also not appropriate to expect all sites for data or energy storage to have existing infrastructure.

2.35 Part E of Policy EJ6 states that "*Applications for data or energy storage should make use of existing power infrastructure. Due to the low direct economic benefits of data or energy storage use, proposals will be expected to make Section 106 contributions towards academia and skills organisations*."

2.36 Proposals for such development will be meeting an identified need, and they will make a contribution to the economy in a multitude of ways. The blanket statement that such developments have "low direct economic benefits" is overly generalised and does not take into account the contribution that such development can make to greater energy security and the wider economy.

2.37 It is also not clear why Section 106 contributions should be required to academia and skills organisations. Any requirement for planning obligations needs to meet the tests set out in the CIL Regulations and the NPPF and it is considered unlikely that this requirement will meet those tests.

Suggested Changes

1. It is suggested that Part A of the policy is rewritten to confirm the LPA's expectation that applications for data or energy storage facilities can come forward on formerly developed brownfield sites only as there may be exceptions to this.
2. Suggest removing reference to "low profile" and the need for "existing infrastructure".
3. Part E should be deleted. Data and energy storage facilities can make significant economic contributions and support greater resilience to infrastructure in the UK.
4. Deletion of paragraph 5.40 in the supporting test as this can be tested at application stage. It is common sense that the development cannot come forward without a necessary power supply.

Figure 8-1

2.38 Figure 8-1 appears to identify part of the Voltage Park site in New Carrington as an area of mossland. The Voltage Park site is previously developed and comprises hardstanding and cleared land that is ready for development. The categorisation of this as part of an area of mossland should therefore be clarified and corrected.

Suggested Changes

1. Review and revise Figure 8-1 in respect of the Voltage Park site.

Draft Policy GI6: Green Infrastructure in New Developments

2.39 Part A of Policy GI6 confirms that *"all development proposals must demonstrate how they will contribute to the protection, enhancement (including quality and/or the multi functionality), and expansion of the Green Infrastructure network*." Part C of Policy GI6 requires all non-residential development to achieve an Urban Greening Factor score of 0.3 as a minimum.

2.40 The wording of Part A is unclear and ambiguous. Part C risks not being consistent with wider objectives of the Plan of securing growth. Many existing employment sites comprise previously developed land that is laid over entirely with hardstanding, is fully covered by buildings and often have significant utilities running underneath the land. Moreover, to ensure effective operation, new employment uses typically require large areas of yard and hardstanding to accommodate servicing needs. To apply a blanket approach will have unintended consequences of reducing site capacity to accommodate new employment floorspace against the strategic objectives of national and local policy.

2.41 As noted above green roofs are not considered suitable for larger employment buildings and so it is unlikely that development of this nature will meet this target. Reference should be had to the preparation of the London plan 2021, where following examination and consideration of evidence provided from developers across the employment sector, an exemption to Urban Green Factor targets was removed for development of B2 and B8 development.

Suggested Change:

1. Part A should be reworded to ensure it is clear what is being required. As currently drafted, the wording isn't clear as not all sites will be able to contribute to expansion of the Green Infrastructure network as this will vary on a site by site basis.
2. Part C should include an exception for B2/B8 development either in the policy wording or supporting text that omits employment uses from this policy expectation. This would be consistent with approach taken as part of the adopted London Plan which specifically omits Use Class B2 and Use Class B8 uses from the target score of 0.3 to avoid unintended consequences that would affect other strategic objectives within the Plan.

Draft Policy GI7: Trees, Woodland and Hedgerows

2.42 Part B.i. of Policy GI7 requires the following for all major development: "*where there is no existing tree canopy cover, provide a minimum of 20% tree canopy (upon maturity) across the whole site area*". Many existing employment sites comprise previously developed land that is laid over entirely with hardstanding, is fully covered by buildings and often have significant utilities running underneath the land. Moreover, to ensure effective operation, new employment uses typically require large areas of yard and hardstanding to accommodate servicing needs.

2.43 It is considered that employment development won't be able to achieve the 20% requirement without fundamentally compromising the design and functionality of these uses and the associated infrastructure below ground. Whilst the policy allows for justification to be provided as to why this threshold cannot be achieved and a new percentage to be agreed with the LPA, it is extremely unlikely that a percentage close to this minimum standard will be achieved for employment uses.

2.44 The policy as currently worded does not provide sufficient flexibility and does not allow for recognition that other strategies can be adopted to meet the policy objective which is to support biodiversity net gain and build resilience to climate change.

Suggested Change:

1. Provide exceptions within the policy wording that recognises employment uses are not expected to achieve this minimum target.

Draft Policy GI10: Building Biodiversity into New Developments

2.45 Whilst the overall objective of this policy is supported, and it is now a requirement for development to secure a 10% net gain in biodiversity, some of the measures identified in Part B are not feasible for certain development sectors. This is particularly the case for Green Roofs for employment buildings and the policy wording should ensure that there is flexibility for different development typologies.

Draft Policies OS1: Open Space, OS2: Outdoor Space & Recreation and OS3:Indoor Sports and Recreation,

2.46 These policies are considered most relevant to residential development, however their current proposed wording often applies to all Major development, which we believe is unintended and should be corrected. Part D of Policy OS1 requires "All major developments must ensure their occupants..." Part E requires "Major developments that are not able to ensure..." Similarly, Policies OS2 and OS3 interchange between the policy requirements applying to all "major residential development" to "major developments". This wording is ambiguous and unclear. It is assumed that the policy requirements contained within Policies OS1, OS2 and OS3 apply to major residential development only.

Suggested Changes

1. Clarify in Policies OS1, OS2 and OS3 that the policy requirements refer to major residential development only and amend wording accordingly.

Draft Policy WA4

2.47 Part A of Policy WA4 requires that "All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates." As a minimum, residential development must meet the mandatory water efficiency standard od 125 litres/person/day as set out in Building Regulations. PfE Policy JP-S4 (7) requires that "*District local plans may and should consider setting a tighter water efficiency standard of 110 litres/person/day where there is a clear local need with reference to national guidance on housing optional technical standards."* No evidence is provided to support the justification that there is a clear local need for all new development to achieve the higher standard.

Suggested Change

1. The wording should be updated to require the specific efficiency standard of 125 litres/person/day to be achieved as a "Minimum" with the "Optional" standard of 110 litres/person/day to be aspirational or a target.

Draft Policy IP1:

2.48 Part C of Policy IP2 states that "*all monitoring fees are required to be paid at completion of the relevant legal deed*." This can be a sizeable amount and is not considered reasonable for payment upfront when the triggers of the various obligations are some way from being activated. The monitoring fees should be proportionate to the issues being monitored and this will only generally happen when the development is or is about to be implemented, not at completion of the deed.

2.49 As noted in the GPDO, Section 106 Agreements should be advertised prior to the grant of planning permission. This approach therefore gives the possibility that sizeable monitoring fees are paid at completion of the legal deed in advance of planning permission being granted. Should the permission for some reason not be granted, then there is nothing to monitor and this policy does not take this into account. Therefore this is unreasonable and the proposed policy wording is Not Sound.

Suggested Change

1. The wording should be updated to link the payment of the monitoring fees to the respective trigger points being reached when monitoring by the LPA is required.

3. Summary

3.1 The overall objectives of the Trafford Local Plan are supported, however there are some areas that need to be refined to ensure that the proposed policies are clear and concise and which will support development.

3.2 Policy provisions that will realise unintended consequences to the strategic objectives also need to be clarified and remedied so that the ambitions to support growth in housing numbers an employment floorsapce can be realised and so that the Plan can be considered to be Sound.

Draft Trafford Local Plan

Regulation 18 Consultation Draft

On behalf of **Peel NRE Limited**

Project Ref: 333101927 | Rev: 01 | Date: June 2025

Document Control Sheet

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For and on behalf of Stantec UK Limited				

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1.0 Introduction

1.1 These Representations are submitted to Trafford Council (the "Council") on behalf of our Client, Peel NRE Limited, in response to the Council's Regulation 18 Consultation on the Draft Local Plan - Policies, which was published for consultation in April 2025.

1.2 Our Client welcomes the progress that has been made on the Trafford Local Plan and supports the Council's intention to prepare a new Local Plan. However, our Client has a number of concerns with the Draft Local Plan as published which should be taken into consideration by the Council as it takes forward its Local Plan.

1.3 These representatives are written specially in relation to the land interests at 'Land West of Manchester Road, Carrington' (known locally as the Peaks Nook Site), which was subject to an outline planning application (ref. 107456/OUT/22) for 15,500sqm of Use Class B2 and B8 floorspace in 2022. This was refused in 2024, and an appeal was subsequently submitted with the Public Inquiry taking place in May 2025.

1.4 The land is also identified in Places for Everyone (PfE) adopted in March 2024 which identifies the site for mixed residential and employment uses as part of the New Carrington allocation (JPA30). Our Client's land interests are identified on the Indicative Allocations Plan at Picture 11.46 of as being suitable for mixed residential and employment development. PfE policy JPA30 is part of the Trafford statutory development plan. Part 1 of JPA30 states that development within the New Carrington area should be in accordance with a Masterplan that will be developed in consultation with the local community and approved by the LPA. The Masterplan is to set out how infrastructure will be funded and delivered as part of the strategic allocation. However, it is yet to be prepared or indeed adopted by the Council and it is not clear how the draft Local Plan relates to the Masterplan and the delivery of the development and required infrastructure.

Structure of Representations

1.5 These Representations highlight our Clients' support for the Council in progressing its new Local Plan and will outline areas of concern that we feel the Council should address now to ensure that a Sound Local plan can be progressed. As such, these Representations has been prepared to align with the structure of the draft Local Plan.

1.6 Furthermore, these Representations seek to ensure that the emerging Local Plan for Trafford aligns with PfE and ensure that its policies are not at odds with the requirements of JPA30.

1.7 In preparing these representations, we have had regard to paragraph 35 of the National Planning

Policy Framework (NPPF) (2023), which sets out the requirement for the Council's New Local Plan to be examined in order to assess whether the Plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound. For ease of reference, the tests of 'soundness' for a Local Plan, as prescribed by the NPPF, are that it be:

a) ***Positively Prepared*** *– providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

b) ***Justified*** *– an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

c) ***Effective*** *– deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

d) ***Consistent with national policy*** *– enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

1.8 Clearly, the above tests are to be applied in the examination of the Local Plan, which is some way off. The purpose of these representations are, therefore, not to test for, or object to the Local Plan on the grounds of soundness, but to provide a constructive commentary in response to the Regulation 18 Consultation Draft document (and supporting evidence), with the purpose of aiding the ongoing production of a Local Plan so that it may be improved and, ultimately found sound. The Representations made reflect the views of our Clients, and our knowledge and experience of the Site, the Borough, national planning policy requirements and local planning issues.

2.0 Context of the New Local Plan

2.1 Whilst Peel supports each component of the Vision and the Strategic Objectives SO1 to SO10, it is concerned that these do not reflect or convey the strategic role that Trafford will play in realising the sustainable and inclusive growth of Greater Manchester which is presented as the central theme of PfE.

2.2 The Local Plan is an important vehicle for realising this and ensuring the environmental, social and economic benefits of this are optimised for Greater Manchester and Trafford.

2.3 This context is however not conveyed in the Vision and Strategic Objectives, which present a misleading picture as to the scale of growth in Trafford and the role it plays in the context of a wider strategic ambition for Greater Manchester as presented in PfE.

2.4 The Vision makes no reference to Trafford's role in this regard, with the aims and aspirations being firmly grounded in delivering the development which Trafford 'needs' rather than that which will deliver a step change in the Borough, and Greater Manchester's, economic future and which reflects PfE as the strategic spatial plan to the Trafford Local Plan. There is a tension between the Vision and PfE in this regard.

2.5 This can be readily corrected via the introduction of additional wording into the Vision, as follows:

Trafford will play a leading role in delivering the sustainable and inclusive growth of Greater Manchester, reflective of the aspirations set out in Places for Everyone

2.6 This better reflects the subsequent Plan Strategy (Chapter 2) which defines and supports the delivery of key strategic development proposals, including those identified above, and which encapsulates the focus and role of the Core Growth Area. This is reflected in the opening line of para 2.1 which notes that the Plan Strategy is the direct descendent of PfE. This principle applies equally to the Vision which should be modified to reflect this.

2.7 This tension should also be addressed through a corresponding Strategic Objective (in addition to SO1 to SO10) which follow the Vision. This may be worded as follows:

SO11: Contribute to the sustainable economic growth of Greater Manchester
A. Support investment in and delivery of key development locations within the Core Growth Area

2.8 Further to the above, the Draft Local Plan identifies four Locality Areas (North, South, Central and West) which seeks to group together the 21 electoral wards of the Borough. The Draft Local Plan seeks to apply thematic policies to specific Locality Areas, in addition to borough-wide policies.

2.9 It should be noted that New Carrington straddles two Localities (West and South). Therefore, these

Locality Areas have the potential to introduce contrasting policy requirements with PfE. If this is to be pursued by the Council in the forthcoming Local Plan, it must ensure that the Localities (and the respective policy requirements) do not conflict with adopted PfE policies (including but not limited to JPA30).

2.10 As presently drafted, Peel is concerned the the draft Local Plan and Policies Map do not fully reflect the policies and land uses identified for New Carrington in PfE. This point is addressed more specifically in the following sections of this representation.

3.0 Vision, Strategic Objectives and Strategy

3.1 The tension between PfE and the Draft Local Plan's Vision and Strategic Objectives does not generally present itself in respect of the Plan Strategy.

3.2 However, Peel suggests the following changes to improve the Local Plan's clarity, useability and accuracy.

Balancing potentially competing objectives

3.3 The Local Plan is an important vehicle for both delivering the growth and investment needed to realise the strategic ambitions of PfE and ensuring this happens in a way that optimises positive social, economic and environmental outcomes.

3.4 It is right that it contains policies and seeks to set standards which will enable this. However, there is a critical balance to be struck in the context of potentially competing objectives.

3.5 First and foremost, PfE and the Local Plan are about facilitating positive change via investment. They rely on investment being deployed into new development to realise its principal aspired outcomes. It is therefore more than a regulatory tool rather is a facilitator of investment, regeneration and positive social, economic and environmental change.

3.6 Set against this backdrop, Peel is concerned that the combined effect of policy expectations set out, many of which mark a step change from standards and requirements that have been applied in the past, has not been fully considered in terms of their practical achievement in the context of the scale of development which Trafford needs to deliver and in respect of commercial viability. These are two separate but related issues.

3.7 This representation considers these on an individual basis through comments on Chapters 3 to 14.

Impact on commercial viability

3.8 Development, and the positive outcomes which come from this, will only be realised if this is commercially viable. Peel would note that the Council has not yet produced any viability evidence base for the Local Plan which logically would need to be informed by a consideration of the policy standards and expectations which the Local Plan is seeking to impose.

3.9 Again Peel would note the step-change in such standards compared to existing policy which will inevitably put pressure on development viability.

3.10 Indeed there is already clear evidence of significant development viability constraints affecting the delivery of development within Trafford even before consideration of the additional requirements

of the Local Plan (and indeed the recently adopted Trafford Design Code) noting the very low recent residential starts in the Borough based on the latest data and notwithstanding a reasonably healthy hypothetical pipeline supply by reference to planning permission data (see Section 1).

3.11 Peel is also aware of the ongoing preparation of the New Carrington Masterplan as required by criterion 1 of PfE Policy JPA30. The Council's lack of progress with the Masterplan has led to uncertainty and delay in the progress of planning applications for employment generating development in delivering the allocated land uses set out in PfE policy JPA30).

3.12 Set against this context and to ensure that a robust approach to viability is applied, it is requested that Trafford Council needs to join the preparation of the evidence that is being prepared for both the New Carrington Masterplan and the emerging Local Plan.

Practical effects on scheme design and compatibility

3.13 Separate but related to development viability, it is important to consider the practicality of achieving the prescriptive policy standards and expectations set out whilst achieving the level and density of development sought and which is appropriate in the context of the strategic drivers of the Local Plan.

3.14 A number of these policy expectations have a spatial impact on sites, with land or space within buildings having to be set aside to accommodate such requirements – e.g. the Urban Greening Factor requirements in Policy GI6. This poses the question of whether sites will be able to accommodate both the scale of development needed to meet the stated (significant) development needs of the Borough and the Plan and these wider infrastructure requirements at the same time.

3.15 Such requirements are not without merit and Peel supports their intent but a real-world assessment of the practical achievement of these requirements, alongside the scale of development which the Plan seeks, is needed. This is presently absent.

3.16 It is fundamental cornerstone of any sound Local Plan that the Plan is proven to be 'Effective' and deliverable. At this stage, Peel is concerned about the potential internal incompatibility of the Draft Plan in this regard and that the imposition of the additional standards and expectations, as noted above, could constrain the delivery of the Plan and ultimately Trafford's ability to play its part in the delivery of PfE and the strategic outcomes it seeks.

Suggested key amendment

3.17 This issue and potential tension could be readily addressed by a general provision within the Local Plan which notes that the practicality of achieving the aspired policy standards will be considered on a case-by-case basis. This would acknowledge that there will be need to balance the desire to achieve these standards against the need to optimise the development yield from sites and ensure that development is viable, such that there may be site specific reasons why the standards are not fully enforced in the prescriptive manner presented.

3.18 This does not dilute the effectiveness of the policies in each case and the default would remain

that the standards are met. However, such a provision recognises that there needs to be scope to apply judgement as to achievement of these standards and reflects the spirit of the 'planning balance' being embedded into policy.

3.19 It is noted that the recently adopted Trafford Design Code incorporates a 'comply or justify' provision which reflects the above suggested approach. Peel considers that an equivalent provision in the Local Plan is important for the stated reasons. A general provision to this effect should be included in Part E of Policy ST4 as follows:

> *Planning applications that accord with the policies in this Local Plan (and, where relevant, with polices in Places for Everyone, adopted Neighbourhood Plans and Supplementary Planning Documents) when taken as a whole, will be granted permission unless material considerations indicate otherwise. The Council will use the policies in the Local Plan positively to facilitate sustainable development and will consider compliance with the standards set out in this Local Plan in the round, reflecting the application of the 'planning balance' in the context of a need for development to contribute positively to a range of social, environmental and economic objectives.*

3.20 Without prejudice to the above point, a number of policies should be amended to reflect the requirement for flexible application of the standards and expectations set out consistent with the above principle. Such instances are outlined in comments on relevant chapters in the sections that follow.

4.0 Economy and Jobs

Policy EJ3: Industry and Warehousing

4.1 Policy EJ3 relates to Industry and Warehousing Key Employment Areas as defined on the Policies Map, and refers to New Carrington (part ii).

4.2 Peel's land interest at 'Land West of Manchester Road' in New Carrington is clearly identified as a 'Mixed Residential and Employment Use' in PfE by policy JPA30, as illustrated in Picture 11.46. The Council has also accepted the principle of employment use as part of a recent planning application (ref: 107456/OUT/22) for 15,500sqm of Class B2/B8 employment floorspace.

4.3 For clarity and consistency with PfE the draft Local Plan should identify the 'Mixed Residential and Employment Use' area. Furthermore, to complete with the test of soundness Policy EJ3 and the Policies Map should be updated to recognise the role that the 'Mixed Residential and Employment Use' area at New Carrington can play in meeting the housing and economic ambitions for the area. Such an approach will be consistently with Picture 11.46 and Policy JPA30 of PfE.

Policy EJ5: Safeguarding Trafford's Employment Land

4.4 Policy EJ5 sets out the Council's proposed approach to protecting employment land in defined locations, including detailing the criteria which are to be satisfied in respect of proposals for the development or use of land in these locations for non-employment uses.

4.5 The defined locations include existing operational employment areas, such as New Carrington (Policy EJ3).

4.6 New Carrington is identified by PfE as strategic location that is to deliver a transformational mixed-use development. Whilst New Carrington will have a clear economic function, Policy EJ3 and EJ5 need to ensure that the 'Mixed Residential and Employment Use' areas identified by PfE can deliver development as identified and intended.

4.7 As set out above, it is expected that a site-specific allocation policy will be put in place for New Carrington which will require, amongst other things, development to come forward in accordance with the corresponding masterplan as well as relevant PfE policies.

5.0 Transport and Movement

Policy TM1N: Walking, Wheeling and Cycling Improvements in Trafford North

5.1 Peel supports the aspirations of Policy TM1N but would note that, consistent with other points made in this representation, the ability of development to fund active travel infrastructure will need to be considered in the context of the viability of individual developments – see general points made in Section 2 of this representation on this theme.

Policy TM1N: Walking, Wheeling and Cycling Improvements in Trafford West

5.2 Policy TM1W seeks to enable the provision of integrated active travel infrastructure as part of the Carrington Relief Route. However, no further commentary is provided. It is repeated that the phase of active travel be justified (including where recently referenced to the New Carrington Masterplan)

5.3 It is, therefore, requested by Peel that this policy (and / or the supporting text) draws reference to the New Carrington Masterplan and the supporting evidence being prepared to demonstrate the work that is being undertaken to the phasing, delivery and contributions towards new infrastructure.

5.4 It should also be noted that Peel committed to active travel upgrades (notably improvements to PROW routes no. 5 and no. 7) as part of the outline planning application / appeal at Land to the West of Manchester Road in New Carrington (via agreed planning conditions / Unilateral Undertaking).

Policy TM2: Public Transport

5.5 Peel would highlight the same point as that made above in relation to the ability of individual developments to fund public transport improvements.

5.6 As currently drafted, the policy applies to all major developments and does not take into consideration the Masterplan for New Carrington which will identify infrastructure improvements, such as public transport, and a mechanism for development proposals within JPA30 to contribute towards those enhancements. The policy is also ambiguous as to whether “contribute” refers to a financial contribution, or on-site improvements. This is a matter which refers clarification and justification to local plan policy TM2.

6.0 Green Infrastructure and natural environment

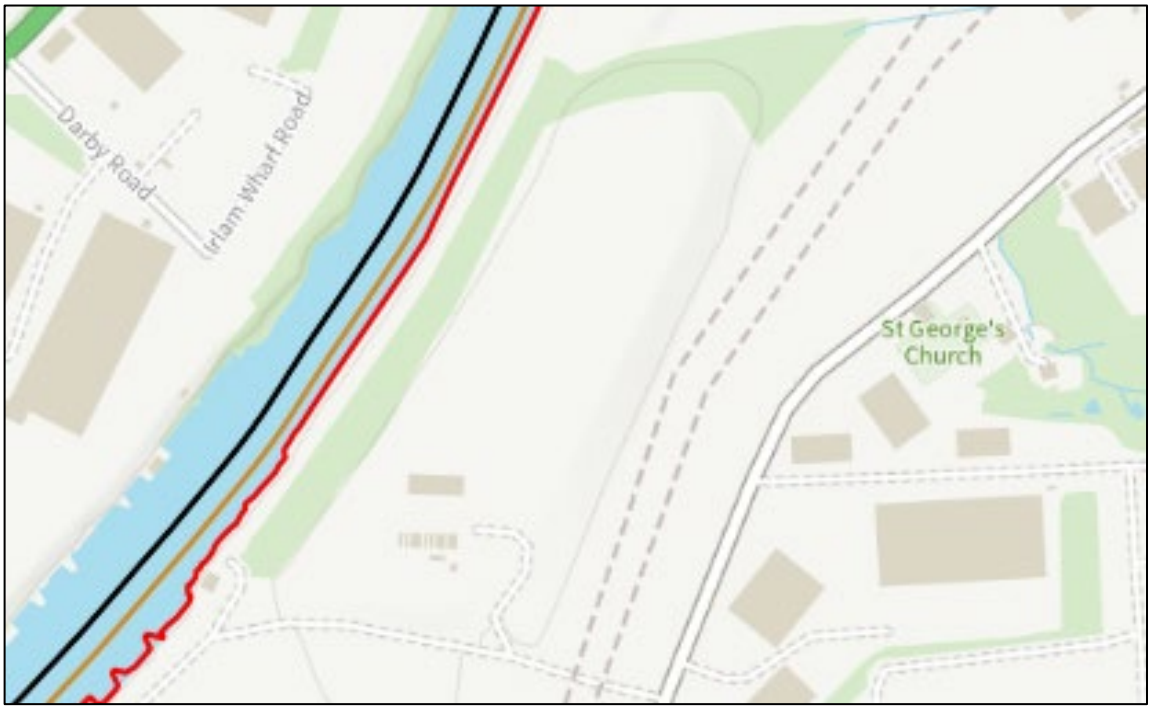
Policy G12: Green Infrastructure Network

6.1 The main policy thrust of Policy GI2 is supported by Peel. However, we raise significant concerns regarding the extent of the Green Infrastructure Network as defined on the Policies Map.

6.2 The entirety of Peel's land interest in New Carrington is identified within the Green Infrastructure Network which the Council will seek to protect, enhance and manage under the provisions of Policy GI2. However, the identification of Land West of Manchester Road as Green Infrastructure is inaccurate and conflicts with PfE Allocation JPA30 which identifies the land for mixed residential and employment use.

6.3 Furthermore, as shown in the extract below, the Council's own interactive Policies Map shows existing development (comprising of the energy generation plant and reserve facility) on this site. The land is also inaccessible to the public.

Figure 1: Interactive Policies Map Extract



6.4 For the policy to be consistent and robust it must be consistent with PfE policy JPA30 and the land west of Manchester Road omitted from the Green Infrastructure Network and the Polices Map is amended to align with the New Carrington Allocation.

6.5 Furthermore, we include at **Appendix 1** an extract of the Parameter Plan which was accepted by the Council as part of Peel's outline planning application (ref: 107456/OUT/22) at this site which shows a central development area, with a retained green buffer.

Policy G16: Green Infrastructure in New Developments

6.6 The principle and purpose of GI6 is supported by Peel.

6.7 However, in the context of comments above, Peel is concerned that where prescriptively expressed, and with particular reference to the Urban Greening Factor requirements, the standards and

expectations of the policy may not be practically achievable whilst delivering the wider development ambitions of the Local Plan in the context of some sites and when considered on a case-by-case basis.

6.8 This is not to suggest such standards should not referenced in the Local Plan but simply that an appropriate level of flexibility as to their application needs to be included to ensure development can come forward and thus the Local Plan delivered.

6.9 This speaks to the need for judgements on policy compliance to be made in the round in the context of potentially competing objectives (see section 2 of this representation). Where requirements are imposed with no flexibility, there is a risk of policy conflict arising to an extent and level which cannot be reconciled in the planning balance, stifling the Local Authority's ability to progress schemes favorably through the planning development and ultimately the delivery of the Plan.

6.10 Peel does not believe this to be the intention but would highlight that this is a real risk, and one which the Local Authority may struggle to mitigate, without appropriate level of flexibility being incorporated into the plan.

6.11 Peel does not wish to water down the ambition of the Plan in respect of such areas or to reduce the effectiveness and enforcement of such policies. There should be a default position that such standards are met, where they are themselves reasonable and justified, but for the reasons pointed out, these need to be flexibly applied.

6.12 To that end, and to complement the suggested amendments to Policy ST4 outlined above, Peel would suggest the Policy GI6 is amended as follows:

6.13 **Part C:**

All proposals for major development must be supported by a dedicated green infrastructure plan, which may be included within a site wide landscape strategy, and will be required to:

I. Include an Urban Greening Factor (UGF) calculation, in accordance with Natural England's latest guidance, demonstrating how the development will meet a UGF score of:

- *0.4 as a minimum for residential development on brownfield development sites*
- *0.5 as a minimum for residential development on greenfield development sites*
- *0.3 as a minimum for non-residential development*

Where this is not feasible in the context of the development, and having regard to the requirements and ambitions of other policies within the Local Plan, this will need to be expressly justified.

6.14 **Part D:**

Where it is considered that the development will have a detrimental effect on the quantity, quality or function of existing green infrastructure, then the development will not be supported unless it can be demonstrated that an assessment has been made and suitable mitigation measures proposed. Any mitigation measures should be of equal or greater value than that which is to be compromised or lost through development or where the detrimental effect is justified having regard to wider material considerations, including the requirements of policies of the Local Plan

Policy GI7: Trees, Woodland and Hedgerows

6.15 An equivalent point is raised in respect of the aspirations of GI7 relating to tree canopy cover. To that end, Part Bi should be amended as follows:

> *A Tree Canopy Cover Assessment must be provided that demonstrates how the development will incorporate trees on-site, and:*
>
> - *where there is no existing tree canopy cover, provide a minimum of 20% tree canopy cover (upon maturity) across the whole site area; or*
> - *where there is existing tree canopy cover, provide a minimum increase of 10% tree canopy cover (upon maturity over the existing onsite tree canopy cover); or*
> - *where there are existing ecological, historical, landscape, operational or design-led reasons that justify not meeting the canopy requirements (as applicable), provide evidence to support this and agree an alternative percentage of canopy cover with the Council;*

7.0 Infrastructure and Planning Obligations

Policy IP1: Infrastructure Delivery and Planning Obligations

7.1 Part F of Policy IP1 states that any financial contribution in-lieu of on-site provision must be of sufficient value to enable the Council to provide a bespoke and standalone project, covering costs such as land acquisition, build, procurement, planning and legal costs etc.

7.2 However, such an approach does not meet the tests of soundness as these variables are unlikely to be known at the plan making or indeed the planning application stage. If, for example, affordable housing cannot be achieved on-site, the financial contribution in-lieu of on-site provision must take into consideration different land values etc. Whilst Peel understands the spirit of which Part F has been drafted, there is a lack of evidence to back up this requirement.

7.3 Part G of Policy IP1 is ambiguous as it is unclear whether it is relevant to Part F above or relevant to schemes where the applicant considers financial contributions are not viable. Peel questions the requirement of a publicly available open book financial viability appraisal "where relevant" and requests that it be made clear under what circumstances this would be required.

Policy IP2: Managing and Monitoring Planning Obligations

7.4 Peel does not object to the expectation of applicants making contributions towards the funding of managing and monitoring planning obligations, but the requirement for major developments to pay 5% of the value of the planning obligation is excessive.

7.5 In the context of a relatively modest planning obligation valued at say £2m, this would represent a £100,000 additional fee for a relatively limited process. This is likely to be significantly more than the value of the planning application fee for such a scheme, which funds a more intense and involved stage of work undertaken by the Local Authority than merely the managing and monitoring of a planning obligation.

7.6 This requirement is not justified and should be adjusted to 1% of the value of the planning obligation or otherwise be calculated as a percentage of the planning application fee paid for the scheme in question – say 10%.

8.0 Summary/ Conclusion

8.1 These Representations are submitted to Trafford Council on behalf of our Client, Peel NRE Limited, in response to the Council's Regulation 18 Consultation on the Draft Local Plan, which was published for consultation in April 2025

8.2 Our Client welcomes the progress made by the Council in getting to this stage of the new Local Plan, and its intention to meeting the development needs of the Borough. Notwithstanding this however, our Client have a number of concerns with the document as well as some of the policies within it, as well as the lack of evidence base which underpins the draft Plan.

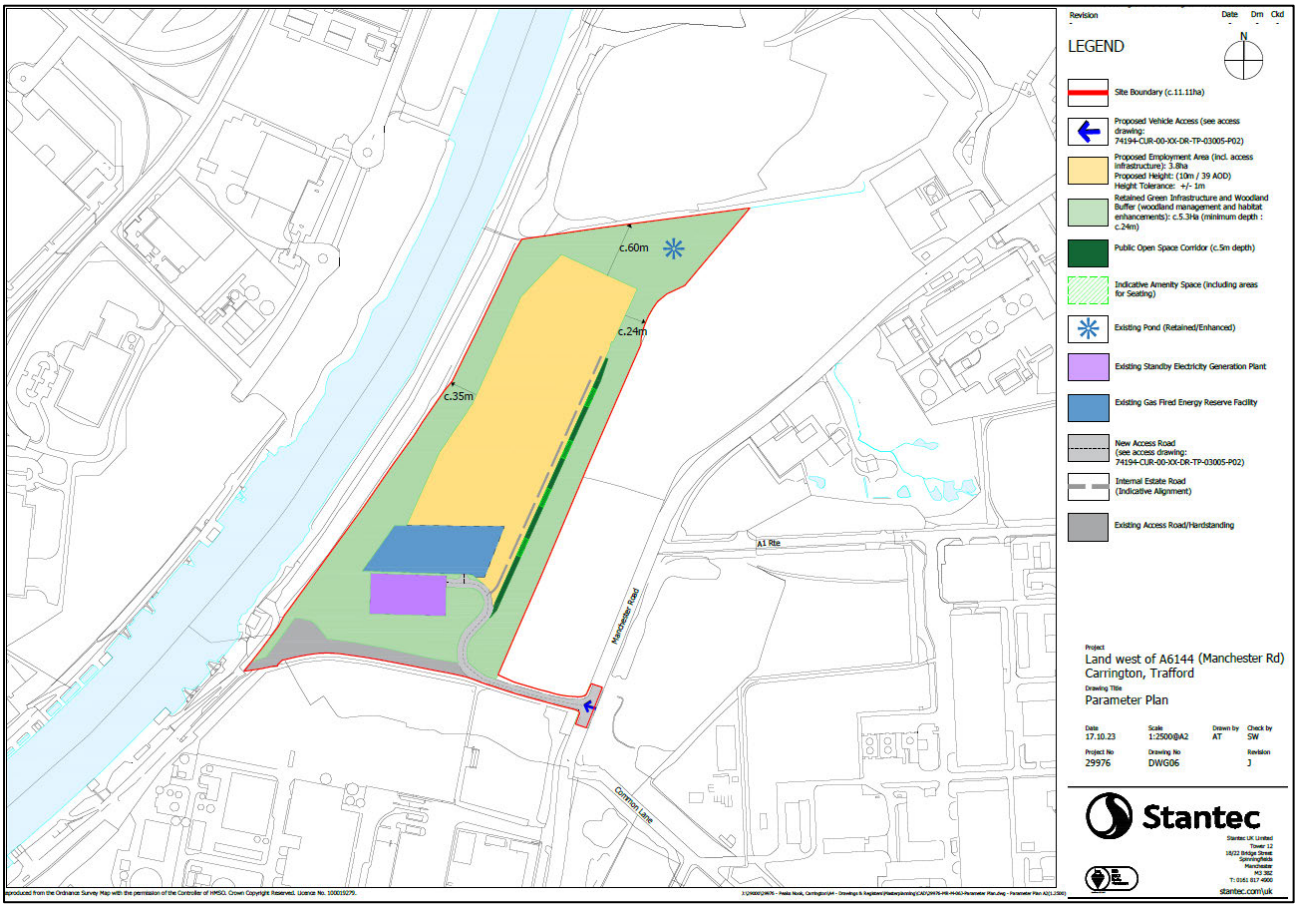
8.3 In summary, our Client's position is that the Local Plan must align with PfE, including JPA30, and must be supported by sufficient evidence to ensure that the requirements set out in these policies are reasonable and viable. The Local Plan should not place onerous requirements on applicants which would preclude development from coming forward when the Council should be supporting sustainable development to meet the Government's aim of significantly boosting the supply of homes.

8.4 The Local Plan must align with PfE, including JPA30, and must be supported by sufficient evidence to ensure that the requirements set out in these policies are reasonable and viable. The Local Plan should not place onerous requirements on applicants which would preclude development from coming forward when the Council should be supporting sustainable development to meet the development needs of the borough over the next plan period.

8.5 We trust that these Representations will be afforded full consideration by the Council and would welcome the opportunity to meet with the Council to discuss further.

APPENDIX 1:

PARAMETER PLAN AGREED UNDER OUTLINE PLANNING APPLICATION REF. 107456/OUT/22



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Fisher German LLP
The Estates Office
Norman Court
Ashby de la Zouch
LE65 2UZ

t. 01530 412821
fishergerman.co.uk

Our Ref: 105181-024

12 June 2025

Trafford Borough Council
localplan.consultation@trafford.gov.uk
via email only

Dear Sir /Madam,

Draft Trafford Local Plan (Policies) Regulation 18 Consultation – April - June 2025
Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Please also consult with NESO separately from NGET.

NGET assets within the Plan area

Following a review of the above Development Plan Document, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.

Asset Description
ZO ROUTE TWR (011R - 197): 400Kv Overhead Transmission Line route: DAINES - DEESIDE 1 and DAINES - DEESIDE 2
ZO ROUTE TWR (010A - 011R): 400Kv Overhead Transmission Line route: DAINES - DEESIDE 2
ZO ROUTE TWR (010B - 011R): 400Kv Overhead Transmission Line route: DAINES - DEESIDE 1
ZE ROUTE TWR (465R - 507A): 400Kv Overhead Transmission Line route: CELLARHEAD – DAINES and DAINES – MACCLESFIELD

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ZZN ROUTE TWR (023 - 023A - 023B - 023C): 400Kv Overhead Transmission Line route: CARRINGTON - DAINES 3 and CARRINGTON - SOUTH MANCHESTER 2 ZZN ROUTE TWR (001 - 023): 400Kv Overhead Transmission Line route: CARRINGTON - SOUTH MANCHESTER 1 and CARRINGTON - SOUTH MANCHESTER 2 ZZN ROUTE TWR (023 - 029): 400Kv Overhead Transmission Line route: CARRINGTON - SOUTH MANCHESTER 1 and CARRINGTON - DAINES 3 ZQ ROUTE TWR (001 - 008): 400Kv Overhead Transmission Line route: CARRINGTON - DAINES 1 and CARRINGTON - DAINES – PENWORTHAM ZO ROUTE TWR (003 - 009R): 400Kv Overhead Transmission Line route: CARRINGTON - DAINES 2 and CARRINGTON - SOUTH MANCHESTER 2 ZO ROUTE TWR (002 - 003): 400Kv Overhead Transmission Line route: CARRINGTON - SOUTH MANCHESTER 2 ZO ROUTE TWR (001 - 003): 400Kv Overhead Transmission Line route: CARRINGTON - DAINES 2 ZQ ROUTE TWR (008 - 008A): 400Kv Overhead Transmission Line route: CARRINGTON - DAINES 1 ZQ ROUTE TWR (008 - 009): 400Kv Overhead Transmission Line route: CARRINGTON - DAINES – PENWORTHAM ZQ ROUTE TWR (009 - 010 - 010A): 400Kv Overhead Transmission Line route: CARRINGTON - DAINES 3 and CARRINGTON - DAINES – PENWORTHAM DO ROUTE: 132Kv Overhead Transmission Line route: CARRINGTON 275KV SGT1A and CARRINGTON 275KV SGT1B EA ROUTE: 132Kv Overhead Transmission Line route: CARRINGTON 275KV SGT2A and CARRINGTON 275KV SGT2B ZQ ROUTE TWR (011 - 050): 400Kv Overhead Transmission Line route: CARRINGTON – KEARSLEY and CARRINGTON - DAINES – PENWORTHAM YO ROUTE: 275Kv Overhead Transmission Line route: BREDBURY - SOUTH MANCHESTER and DISC BREDBURY - SOUTH MANCHESTER
Cable: SGT1A 132KV CABLE Cable: SOUTH MANCHESTER 1 275KV CABLE Cable: DAINES ZO009R - ZZN023D CABLE SECT 01
Electrical Substation: CARRINGTON 132KV S/S Electrical Substation: CARRINGTON 400KV S/S Electrical Substation: CARRINGTON 275KV S/S Electrical Substation: DAINES 400KV S/S Electrical Substation: SOUTH MANCHESTER 275KV S/S Electrical Substation: SOUTH MANCHESTER 132KV S/S

A plan showing details of the site locations and details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.
https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps

NGET Electricity Network Infrastructure

The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken

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into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

Policy Commentary

Having reviewed the consultation document NGET wishes to comment on the following policies.

General points and New Carrington Strategic Allocation

We note that two further consultations on the draft Trafford Local Plan – one focussed on allocations and designations later in 2025 and another considering the plan in its entirety in 2026 – are scheduled. We will also review these consultations and provide further comments as appropriate in response to these.

We also note that New Carrington – a strategic allocation within the already adopted Greater Manchester Places for Everyone plan – interacts directly with a number of NGET assets. Whilst it is understood that it is not for this consultation to receive comment on an already adopted allocation, we do note from the indicative masterplan that whilst the majority of interaction occurs within the Green Belt, there is a small area of interaction between NGET assets and the mixed residential and employment areas to the north of the site. As development of the detailed masterplan progresses, the council should be cognisant of this and avoid interaction that would prejudice NGET's ability to maintain and expand the electricity transmission network.

Consultation Question 1-3: Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

SO3 – Strategic Objective 3: Ensure Trafford's resilience and carbon neutrality

A focus for NGET is the adaptation and expansion of the electricity transmission network to accommodate the Government's push to net zero and decarbonisation of the network. In Trafford specifically, the planned expansion of both the Carrington and Daines substations is in response to this drive (detailed further under 'new infrastructure' below). These works will directly contribute to ensuring Trafford's resilience and carbon neutrality and as such the role of the NGET network and the need to accommodate its adaptation should be reflected within this strategic objective through appropriate additional wording. As part of this it should recognise the important role of adaptation and expansion of NGET's network in delivering carbon neutral and broad economic development.

SO7 – Strategic Objective 7: Protect and improve the natural environment and green assets

Part of NGET's network crosses a range of green assets within the Borough. Additional wording should be included to recognise that these areas interact with essential electricity transmission infrastructure and that improvement of the natural environment should not prejudice NGET's ability to maintain, adapt and expand its assets particularly to accommodate the push for net zero and decarbonisation of the network.

Consultation Question 3-1: Do you support Policy RT1? Are there any changes required which would improve the policy?

Policy RT1: Carbon and Energy

We support the principle of the policy but, as with SO3, an opportunity to strengthen the policy (a key aim of which is to reach carbon neutrality within Trafford by 2038) exists by including wording which recognises the role of the adaptation and expansion of the electricity transmission network in achieving net zero, low carbon development and economic growth. To this end the policy should include wording which makes clear development within the vicinity of electricity transmission infrastructure should not prejudice NGET's ability to achieve decarbonisation of the network and that development of the network to achieve the above aims will be supported in principle.

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Consultation Question 8-2: Do you support Policy GI2? Are there any changes required which would improve the policy?

Policy GI2: Green Infrastructure Network

Part of NGET's network crosses a range of green infrastructure assets within the Borough. Additional wording should be included to recognise that these areas interact with essential electricity transmission infrastructure and that improvement or adaptation of such assets – including changes to designations - should not prejudice NGET's ability to maintain, adapt and expand its assets particularly to accommodate the UK Government's drive for net zero and decarbonisation of the network. It is well proven that the electricity transmission network and green infrastructure assets can function well together and this policy provides an opportunity to clarify this.

Consultation Question 8-5: Do you support Policy GI5? Are there any changes required which would improve the policy?

Policy GI5: Green Infrastructure Opportunity Areas

Proposed Green Infrastructure Opportunity Areas cover large areas of land within the Borough and as such GNET's network interacts with them. As essential infrastructure, requirements under part B of the policy are onerous, in particular B(iii) which requires any development proposals to improve public accessibility. It would not normally be within the reasonable scope of proposals to improve the electricity transmission network to actively *improve* public access to related land. The policy should therefore be adapted to recognise this should be achieved 'where appropriate', or B(iii) should not be applicable to proposals relating to essential infrastructure.

Consultation Question 12-1: Do you support Policy BE1? Are there any changes required which would improve the policy?

Policy BE1: Design

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Therefore, to ensure that Policy BE1: Design is consistent with national policy we would request the inclusion of a policy strand such as:

"*take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.*"

New Infrastructure

Demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.

The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim.

NGET's infrastructure projects in England and Wales will support the country's energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain.

The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new

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renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.

Within Trafford Borough Council area specifically, current plans are to expand both the Carrington and Daines electrical substations listed above. Neither substation currently falls within any designation aside from Daines which falls within the Green Belt, however the council should be cognisant of these plans for expansion in the onward development of the Draft Trafford Local Plan.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

Angela Brooks MRTPI, Partner

[redacted]

Tiffany Bates, Development Liaison Officer

[redacted]

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[redacted]

Angela Brooks MRTPI
Partner

For and on behalf of Fisher German LLP

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Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgrid.com/document/345326/download

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: https://www.nationalgrid.com/document/349291/download

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/

For local planning policy queries, please contact: [redacted]

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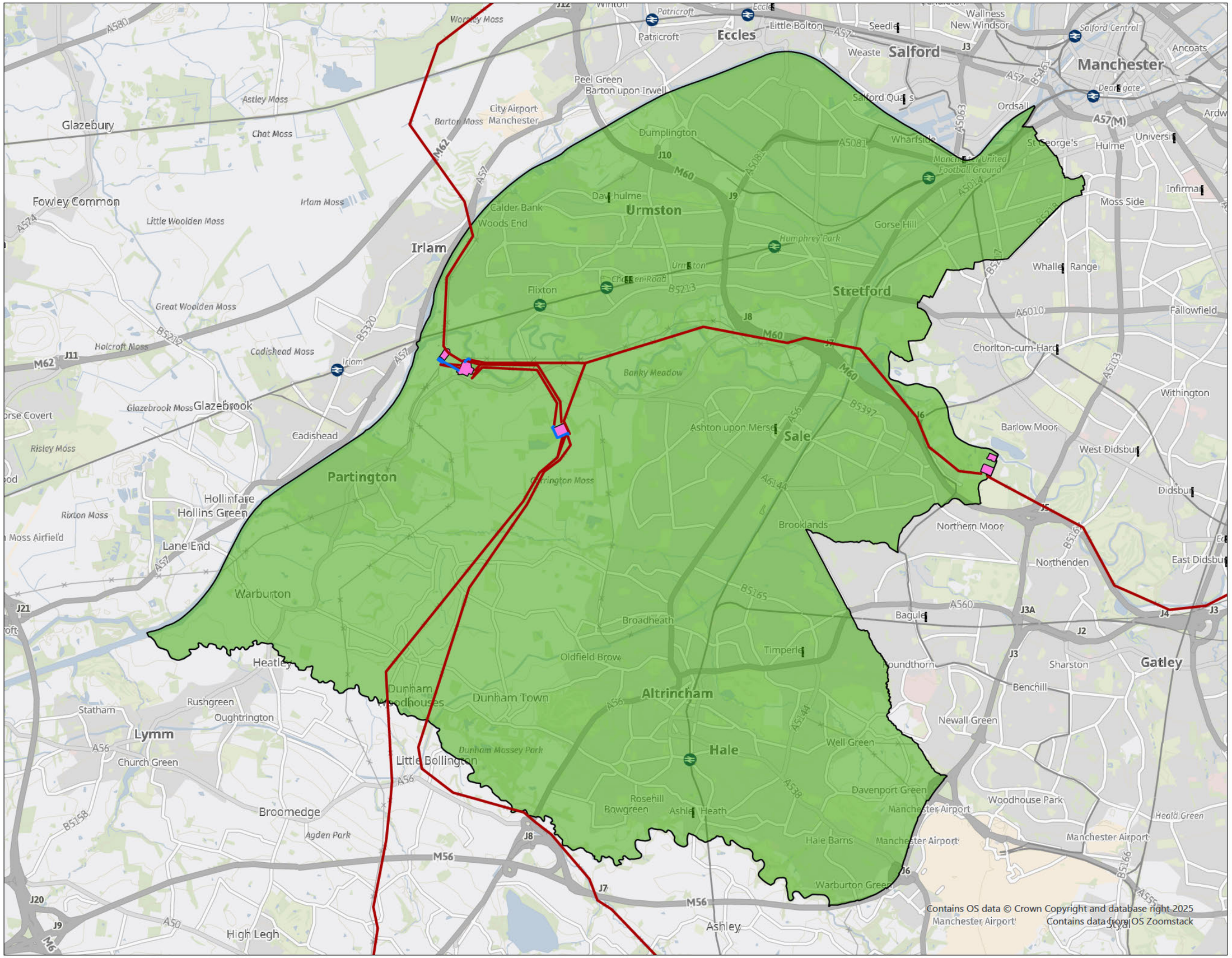
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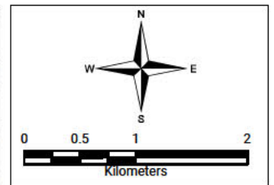
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OVERVIEW WINDOW

LEGEND:
- Cable
- OHL
- Substation
- LPA Area

REVISION: A

CLIENT: nationalgrid

SCHEME: PLANNING INTERACTION

TITLE: LPA ASSET INTERACTION

FP: 105181-024

SCALE: 1:55,000 @ A3
DATE: 20/05/2025

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Trafford Local Plan - Policies

Regulation 18 Consultation Draft

On behalf of **Redrow Homes (North West) Limited**

Project Ref: 333102333 | Rev: 01 | Date: June 2025

Document Control Sheet

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For and on behalf of Stantec UK Limited				

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1	30/05/25	Draft	[redacted]	[redacted]	-
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1.0 Introduction

1.1 These Representations are submitted to Trafford Council (the "Council") on behalf of our Client Redrow Homes (North West) Limited, in response to the Council's Regulation 18 Consultation on the Draft Local Plan - Policies, which was published for consultation in April 2025.

1.2 Our Client welcomes the progress that has been made on the Trafford Local Plan and supports the Council's intention to prepare a new Local Plan. However, our Client has a number of concerns with the Draft Local Plan as published which should be taken into consideration by the Council as it takes forward its Local Plan.

1.3 Our Client has land interests at Warburton Lane, Warburton ('the Site'), which comprises part of the strategic 'New Carrington' allocation identified in the Places for Everyone (PfE) Joint Development Plan Document under Policy JP Allocation 30 (JPA30). The majority of the Site falls within the area of JPA30 designated as 'Warburton Lane' with a small proportion of the Site located within 'Partington East'.

1.4 Our Client submitted two planning applications in relation to the Site on 10th December 2024 which are pending determination. Those planning applications are:

- 115155/HYB/24: 'Land East Of Warburton Lane'. Hybrid application comprising: A) application for full planning permission for 103 homes together with access, open space, landscaping, highways and drainage infrastructure and other associated works; and B): application for outline planning permission for up to 300 homes together with access, open space, landscaping, highways and drainage infrastructure and other associated works (appearance reserved on the outline element); and
- 115154/FUL/24: 'Land West Of Warburton Lane'. Full planning application for the erection of a residential development (155no units) together with access, open space, landscaping, highways and drainage infrastructure, and other associated works.

1.5 JPA30 is expected to deliver around 5,000 new homes and 350,000sqm of employment floorspace with 4,300 of these homes expected to be delivered over the next fifteen years. Our Client's land interests are identified on the Indicative Allocations Plan at Picture 11.46 of as being suitable for residential development.

1.6 Together, the two planning applications have the capacity to deliver up to 558no. high quality family homes in New Carrington. The developments would make an important contribution towards Trafford's local housing needs as well as deliver a range of other benefits including improving accessibility, new recreational facilities, biodiversity enhancement and economic

advantages through increased local spend and employment opportunities during the construction phase.

Structure of Representations

1.7 These Representations highlight our Clients' support for the Council in progressing its new Local Plan and will outline areas of concern that we feel the Council should address now to ensure that a Sound Local plan can be progressed. As such, these Representations will be structured as follows:

- Section 2 will provide commentary on the consultation itself, as well as headline concerns around the Site Selection Methodology, forthcoming plan period and alignment with the PfE Plan.
- Section 3 will set out our commentary in relation to the Vision, Strategy and Objectives set out in the Draft Local Plan and highlight our concerns surrounding the approach towards the four Locality Areas.
- Section 4 will then provide a more detailed analysis of the draft Local Plan's policy-specific considerations and will also consider the supporting evidence which underpins the emerging Local Plan;
- Section 6 will provide concluding comments taking the commentary within the above sections in the round and will make recommendations as appropriate.

1.8 These Representations will demonstrate that, in the context of a national housing crisis and the introduction of the Government's mandatory housing targets based on the Standard Method calculation for each local authority, there is a pressing need for housing which the Council should seek to maximise.

1.9 Furthermore, these Representations seek to ensure that the emerging Local Plan for Trafford aligns with PfE and ensure that its policies are not at odds with the requirements of JPA30.

1.0 In preparing these representations, we have had regard to paragraph 35 of the National Planning Policy Framework (NPPF) (2023), which sets out the requirement for the Council's New Local Plan to be examined in order to assess whether the Plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound. For ease of reference, the tests of 'soundness' for a Local Plan, as prescribed by the NPPF, are that it be:

a) ***Positively Prepared*** *– providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do*

so and is consistent with achieving sustainable development;

b) ***Justified*** *– an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

c) ***Effective*** *– deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

d) ***Consistent with national policy*** *– enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

1.1 Clearly, the above tests are to be applied in the examination of the Local Plan, which is some way off. The purpose of these representations are, therefore, not to test for, or object to the Local Plan on the grounds of soundness, but to provide a constructive commentary in response to the Regulation 18 Consultation Draft document (and supporting evidence), with the purpose of aiding the ongoing production of a Local Plan so that it may be improved and, ultimately found sound. The Representations made reflect the views of our Clients, and our knowledge and experience of the Site, the Borough, national planning policy requirements and local planning issues.

2.0 Context of the New Local Plan

2.1 This Section of the Representations provides our Clients commentary on the consultation itself, as well as headline concerns around the Site Selection Methodology, forthcoming plan period and alignment with the PfE Plan.

2.2 As stated at Paragraph 1.1 of the draft Local Plan, the consultation relates only to policies. Any site allocations and designations will be the subject of a separate full consultation later in 2025.

2.3 The draft Local Plan is, therefore, being consulted on in two parts, the first consultation (April 2025) on the Strategy, Vision, Strategic Objectives and Thematic policies of the plan, alongside a draft policies plan. The second consultation will be on the site allocations and further policy designations setting out how the plan will come forward.

2.4 The Draft Site Selection Methodology (SSM) (April 2025) which has been published as part of the Local Plan consultation in advance of identifying draft allocations sets out how appropriate sites to support the delivery of the Local Plan will be identified, and the proposed methodology for assessing them and determining which are most suitable for allocation.

2.5 As noted in Section 1 of these Representations, our Client's Site is allocated for development as part of the PfE New Carrington Policy JPA30. Paragraph 2.3 of the SSM claims that as part of the PfE examination, it was established that Trafford's housing and employment land requirements can be met on land which is within the two PfE allocations and on land within the existing urban area. For this reason, the focus of the SSM is on allocating sites in the existing urban area.

2.6 Whilst our Client welcomes the fact that PfE allocations, which include our Client's Site, are identified as helping to meet housing and employment requirements for Trafford, they query the focus of the SSM being reliant on the remainder of the Council's housing requirement being met on land within the existing urban area.

2.7 As we address later in these Representations, the mandatory housing requirement for both Trafford and the wider Greater Manchester area has increased significantly compared to the PfE requirement which was adopted prior to the 2024 NPPF and planning reforms.

2.8 We acknowledge that the Local Plan is to examined under the NPPF 2023 under the transitional arrangements set out at paragraph 234(c) of the NPPF 2024[1] and we consider that the starting point for the Local Plan (at this time) is to deliver the strategic policies of the PfE.

[1] Whish provides provisions for plans which include policies to deliver the level of housing and other development set out in a preceding local plan (such as a joint local plan containing strategic policies) adopted since 12 March 2020.

2.9 Accordingly, the Local Plan confirms that the emerging plan period will be to 2022-2042, which represents a 20-year plan period. The 2022 start date is backdated to align with PfE which, as above, we agree is the correct application of national policy.

2.10 However, as set out in the Council's latest Local Development Scheme (LDS) (February 2025), the anticipated adoption date for the new Local Plan is 2027/2028.

2.11 Paragraph 34 of the NPPF 2024 sets out that:

"*Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary*[2]*. Reviews* ***should be completed no later than five years from the adoption date of a plan****, and* ***should take into account changing circumstances affecting the area, or any relevant changes in national policy****. Relevant strategic policies will need updating* ***at least*** *once every five years* ***if their applicable local housing need figure has changed significantly****; and they are likely to require earlier review if local housing need is expected to change significantly in the near future."* (our emphasis)

2.12 The PfE was adopted in March 2024. With regard to the above, it is clear that there is a legal requirement for the PfE to be updated, and for that update to be competed no later than March 2029; circa 12 months behind the expected adoption of the Local Plan. Notwithstanding that legal deadline, it is our view that there have been significant changes in both the overall housing requirement for the combined authorities that adopted the PfE (an increase of circa 15%) but also a significant change for individual authorities (including a 42% increase in Trafford) which would warrant the early review of the PfE.

2.13 In either case, it is clear that the adoption of the Local Plan and the required adoption of a reviewed PfE are likely to be closely aligned. Indeed, the preparation of evidence base for the review of the PfE, which will inevitably involve the identification and selection of sites at a local level, will necessarily overlap with the Local Plan process.

2.14 As such, we consider that it would be short sighted for the Council to rely on the assumption that it will deliver the entirety of its development needs on PfE allocations and sites within the urban area alone when it is likely that it will need to identify additional sites across the Borough to ensure it has sufficient housing land supply and a balanced approach to housing delivery across

[2] Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012)

the plan period. It should certainly not limit its own ability to identify and assess such land now.

2.15 Figure SS-1 contained in the SSM which outlines the proposed stages of the SSM is a very high level document and our Client reserves the right to comment further when the Council consults on the second part of the Local plan in relation to allocations and further detailed evidence is made available. Notwithstanding this, the SSM should take into consideration the uplifted housing requirement for Trafford and the likely implications for future plan making.

2.16 In addition to the above, paragraph 22 of the NPPF states:

"***Strategic policies should look ahead over a minimum 15 year period from adoption****, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.* ***Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery"***

2.17 As above, the proposed plan period for the Local Plan is to 2042 which, taking into account the emerging LDS timescales, would be sufficient. However, in line with our comments on the need to review the PfE we consider that it would be a reasonable to go beyond the minimum requirement of the NPPF and seek to align with the likely plan period for the a PfE review (which would be at least to 2043 if adopted in 2029). Moreover, given the reliance of Trafford on the delivery of New Carrington (a large scale development and extension to an existing village / town that has a delivery timescale which is likely to extend beyond the plan period) we consider it would be appropriate for the Local Plan to look further still to account for those timescales. It would be beneficial for the Council to update its envisaged timescales for the completion of New Carrington within the Local Plan itself.

2.18 By planning beyond the NPPF required minimum of 15 years (from adoption), the Council provides itself with the opportunity to look at a timescale which aligns with those strategic allocations identified in PfE and provides an opportunity to identify and maintain an appropriate quantum and mix of sites (giving choice in terms of size and location) to provide a pipeline of sites capable of meeting a consistent trajectory in the short, medium and long term, which is capable of meeting the increased housing requirement for Trafford under the Standard Method (and inevitable uplift that will arise through a review of the PfE in the face of an overall uplift for the 9 GMCA authorities). Given the housing crisis which the Country currently faces, the need for a robust, deliverable supply of housing sites, is paramount.

2.19 Notwithstanding the above, we acknowledge that the PfE Plan (as it is currently adopted) is a crucial consideration for the Council which must inform the emerging Local Plan and its overall

strategy and well as its local policies; this forms a key basis of our Representations. Indeed, it is vital that the Trafford Local Plan and its policies align with the PfE plan and the policies and site allocations contained therein.

2.20 Paragraph 1.22 confirms that the Trafford Local Plan has undergone assessments to consider its potential social, economic and environmental effects. The Integrated Assessment in the evidence base identifies the type, nature and extent of these potential effects and how the Trafford Local Plan can address them.

2.21 We have undertaken a review of the Integrated Assessment, and as we discuss within these Representations, the Council considers there to be no reasonable alternatives to the policies set out in the Local Plan. Clearly, with regard to our comments in relation to the need to look beyond the current requirements of the PfE, our Client disagrees with that approach and has proposed an alternative for consideration.

2.22 Paragraph 1.27 of the Local Plan states that a significant evidence base was prepared for the PfE Plan and much of the evidence is also relevant to the Trafford Local Plan. Whilst that is true, the Trafford Local Plan must be informed by robust and up-to-date evidence and should not solely rely on PfE evidence which, in turn, will need to be reviewed as part of the process for reviewing the PfE.

3.0 Vision, Strategic Objectives and Strategy

3.1 This Section focusses on the Vision for Trafford and the supporting Strategic Objectives as set out in the Draft Local Plan. We then provide comments in relation to the proposed four Localities, the Local Plan Strategy and its alignment with PfE.

Vision and Strategic Objectives

3.2 As set out in Section 2, our Client considers that the plan period may not comply with the provisions at NPPF Paragraph 22. We, therefore, consider the Vision should be extended beyond 2042 in the next iteration of the Draft Plan.

3.3 Our Client is broadly supportive of the overall Vision. However, in relation to the fourth paragraph, our Client considers that the wording can be more aspirational and include reference to not only affordable homes but also market and family homes to align with the Government's target to deliver 1.5 million new homes over the parliamentary period (and the significantly increased standard method housing need for Trafford published in December 2024).

3.4 We raise no objection to the Strategic Objectives, however as per our comments above, the Council focuses on the delivery of affordable homes rather than a complimentary mix of aspirational housing delivery as a whole to ensure sustainable development and the delivery of a balanced mix of homes in the most appropriate locations.

3.5 SO1 (Delivering the homes that Trafford needs) states at Part C, "*Address the housing shortage through the provision of affordable and social rented housing in the right mix to support the needs of all, including an ageing population.*" However, the provision of affordable and social rented housing cannot address the housing shortage or address the needs of all. In order to meet the Government's objective to significantly boost the supply of homes and to achieve its mandatory housing requirements, Trafford must recognise within the Vision and Strategic Objectives that the delivery of both market and affordable homes in the right places will help to address the growth needs of the Borough over the next plan period. Indeed, we note that the successful delivery of housing and regeneration (particularly in New Carrington) is dependent on a significant uplift to the market conditions within regeneration areas which can only be achieved by an uplift in the market's (homebuyers) aspiration to live in those regeneration areas.

3.6 SO3 (Ensure Trafford's resilience and carbon neutrality) requires all new development to be carbon neutral by 2028. Our Client assumes that this has been drafted in error on the basis that the PfE requirement is to be carbon neutral by 2038. To clarify, PfE seeks a net zero carbon

approach to operational emissions up until 2028, thereafter emissions in construction should be considered. This should be reflected in the Trafford Local Plan.

3.7 It is worth noting that the PfE itself proposed a very ambitious target for carbon neutrality in excess of national Building Regulation led commitments which, in themselves are challenging. Indeed, national targets for carbon neutrality are underpinned by assumptions relating to the de-carbonising of the grid (i.e. development will fundamentally switch towards energy which is in turn sustainably generated at source). For the PfE to meet its targets, it requires housing development to run ahead of that de-carbonsing of the grid and achieve locally generated carbon free energy, principally through district heat networks (the feasibility of which was not tested in viability terms at the PfE). If Trafford Council is seeking to push beyond even the PfE's ambitious and untested measures, it would need to consider the implications of those targets in terms of viability and feasibility.

3.8 SO3 also seeks to "Prioritise brownfield development'. Whilst our client is supportive of the re-use of previously developed land and the alignment with PfE, we highlight that sustainable development should come forward in the right locations to support the future needs of the borough. Our Clients is concerned that reliance on brownfield land will be insufficient to meet the housing needs of the Borough (particularly in relation to affordable housing) and a brownfield first approach should not act as a barrier to sustainable greenfield or Grey Belt development.

Trafford Localities

3.9 We object to the use of figure 1-2 which identifies four Locality Areas (North, South, Central and West) which have been described as the "heart" of the Local Plan and seeks to group together the 21 electoral wards of the Borough. These Localities are not identified in the current adopted Core Strategy or the adopted PfE Plan. However, the Draft Local Plan seeks to apply some thematic policies to specific Locality Areas, in addition to borough-wide policies.

3.10 We provide our commentary to those policies in further detail in Section 4 of these Representations. However, at the outset our Client raises significant concerns with this approach as JPA30 straddles two Localities (West and South) each with contrasting policy requirements. Our Client's Site lies predominantly within the proposed South Locality whereas the rest of the New Carrington Allocation is within the West Locality. This is at odds with JPA30 which sets out specific requirements for the allocation in terms of affordable housing, density and other matters as whole.

3.11 Therefore, the Council cannot take an alternative policy approach towards different parts of the

Allocation whilst relying on the assumptions and evidence which underpins PfE Policy JPA30. It is essential that the emerging policy requirements of the Local Plan are properly tested in terms of their viability and feasibility. The proposed zoning of affordable housing delivery within the borough and proposed levels of affordable housing within across the localities are applied cumulatively to JPA30 policies and are entirely untested in terms of viability.

3.12 Furthermore, we would argue that the characteristics of the New Carrington allocation require a bespoke approach to viability and feasibility. The Council identifies different character areas within the allocation which collectively need to deliver proportionate contributions and specific infrastructure to support the wider allocation (with the Council expecting that each area is likely to make different contributions). In addition, the Council expects the allocation area to experience significant changes to the market conditions within the allocation which are likely to be unique to the allocation itself (and effect different character areas differently to each other and to areas outside the allocation). Accordingly, we consider it is not a justified or sensible approach to consider the characteristics of different parts of the allocation as defined by existing Ward boundaries.

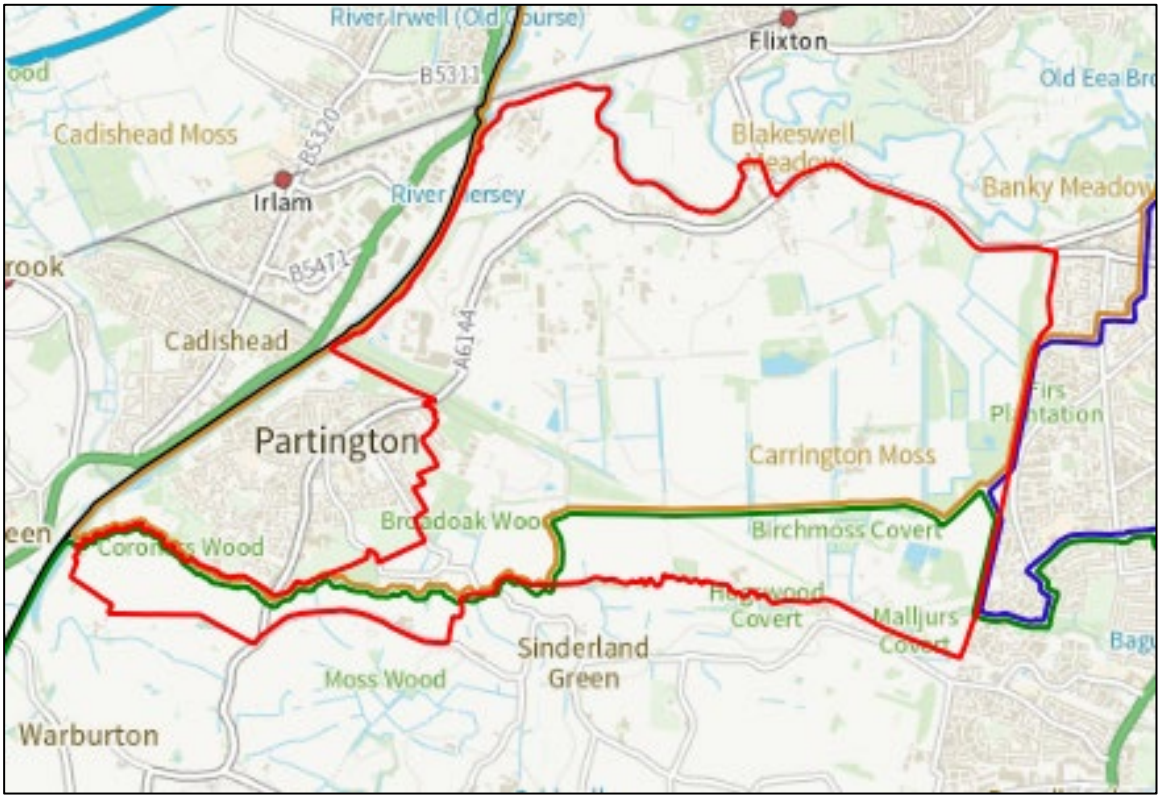
3.13 Taking our Client's interests are Warburton Lane as an example. Development land within the Allocation JPA30 clearly benefits from the uplift in value associated with being identified as suitable for residential development. However, with that allocation comes significant costs which are associated with paying for its proportion of the wider infrastructure needs of the allocation (including the need to deliver significant infrastructure on the Site itself); the cost of which was acknowledged within the examination of the PfE as making development unviable in current market conditions. That situation would be entirely at odds with a development site which might be identified, for example, within the village of Warburton itself which would not be required to contribute towards infrastructure for the New Carrington Allocation. Notwithstanding that disparity, the Local Plan Localities as drafted would seek to consider the characteristics of those two sites in the same way; including to identify the proportion of affordable housing which would be considered deliverable (as we come on to address later in these representations).

3.14 We note that the Council is currently preparing a New Carrington Masterplan (NCM) which seeks to identify how infrastructure will be delivered across allocation JPA30 and how those costs will be met proportionally across the allocation; we understand that Masterplan will be adopted as an SPD. Our client maintains, as it stated within the PfE EIP, that any alteration in policy requirements (such as a change in affordable housing requirement for parts of an Allocation) should only be secured by an updating the Development Plan (in this case, through the emerging Local Plan) which is properly tested through examination. However, it is essential that any such examination (and viability testing which supports it) is based on realistic assumptions and impacts of policy proposals.

3.15 Accordingly, it seems illogical for the Council to seek to introduce untested policy requirements through a Local Plan on top of already onerous requirements of JPA30 which, in turn, are subject to a Masterplan document which has not yet completed the feasibility testing of the infrastructure it is seeking to deliver. The introduction of such requirements seems, at the very least, premature.

3.16 An extract of the draft Policies Map is included in Figure 1 below which illustrates how JPA30 is straddled by two Locality Areas.

Figure 1: Policy Map Extract



Local Plan Strategy

3.17 Section 2 of the Local Plan sets out the Local Plan Strategy which is based on the overarching PfE Strategy. This is welcomed by our Client and will ensure a coherent development plan.

3.18 Paragraph 2.1 confirms that PfE provides the strategic policies for Trafford and the Local Plan provides the detailed, locally specific policies. This is correct, as cited in the PfE Plan and is supported by our Client. However, as articulated above, the introduction of the Trafford Localities as part of the strategy and individual policy requirements is considered to be at odds with the strategic policies of the PfE Plan.

3.19 Whilst the Local Plan explains that various spatial options were identified as part of the PfE preparation, it must be noted there have been significant planning reforms including the introduction of mandatory housing targets since the adoption of PfE. This will inevitably have consequences on the spatial strategy for Greater Manchester as a whole but also each borough to ensure the plan area can deliver its minimum housing needs.

3.20 Paragraph 2.9 states that the chosen spatial option for PfE as a starting point uses the existing urban land supply helping to promote sustainable patterns of development and the efficient use of land to minimise the amount of Green Belt land required to support housing and employment.

3.21 The Draft Local Plan draws reference to the broad Strategic Areas identified in the PfE Spatial Strategy which includes the Core Growth Area, Inner Regeneration Area, Sustain Southern Competitiveness, and Boost Northern Competitiveness. Our client supports the Local Plan's alignment with PfE in this regard, and Sustain Southern Competitiveness which is relevant for the majority of Trafford..

3.22 Paragraph 2.12 of the Local Plan states that the draft Trafford Local Plan is based on the housing and employment land requirements established in PfE Policies JP-H1, JP-J3 and JP-J4.

3.23 Whilst the above Strategy is clearly replicated in the draft Local Plan, we do not consider there to be sufficient up-to-date evidence to confirm that Trafford has sufficient land to achieve its housing requirements in the context of the mandatory housing targets (whether these are taken on a GM wider basis of a local one) which have been re-introduced based on the Standard Method Calculation.

3.24 Accordingly, even if the spatial strategy element of the PfE is replicated in terms of overarching principles (and, at the time of writing, we cannot see why it would not be) the newly published housing requirements will inevitable require an uplift to housing delivery across Greater Manchester. If the individual LHN figure for each borough is taken into account (which identifies a housing need in Trafford some 42% above its current PfE housing requirement), a GM wide plan is very unlikely to define a lesser role, proportionally, for Trafford in meeting its spatial strategy in the future.

3.25 Accordingly, whilst our Client is generally supportive of the general thrust of the Council's emerging policies, it is evident that that room will need to be made in those policies for the Plan to do more.

4.0 Thematic Policies

4.1 This Section of the Representations provides our Client's commentary on the specific policies within the Plan, as currently drafted, insofar as they are relevant to our Clients land interests and the soundness of the Plan. These considerations are set out on a theme-by-theme basis, as they are set out within the draft Local Plan but should also be read in the context of the wider considerations, as set out within Sections 2 and 3 of these Representations.

Residential Development

4.2 Our client welcomes the statement at paragraph 4.1 of the draft Local Plan which says meeting the housing needs of Trafford's growing population is essential to ensuring the future prosperity of Trafford. However, for the reasons set out throughout these representations (and below in response to Policy R1), we do not consider the housing requirement is sufficient set within the context of the NPPF and re-introduction of mandatory housing targets.

Policy R1 (Housing Delivery)

4.3 As articulated earlier in these Representations, we consider the plan period (2022 to 2042) as stated at Part C of Policy R1 should be extended to align with paragraph 22 of the NPPF to plan for a period that would align with a review of PfE as well as a period which aligns with the likely delivery of its strategic allocations. We seek the Council's update as to what those timescales are considered likely to be.

4.4 Policy R1C goes on to say that a minimum of 22,443 net additional dwellings will be delivered in Trafford over the plan period to reflect the PfE requirement set out at Policy JP-H1. Policy JP-H1 seeks to provide 19,077 new additional dwellings in Trafford over the plan period 2022-2039, equating to an annual average of circa. 1,122dpa in Trafford (with that average being projected on beyond the PfE plan period).

4.5 As such, the Council have taken a simple approach to apply the PfE housing requirement over a 20-year plan period for Trafford. Our Client objects to this methodology.

4.6 Clearly it is not known exactly how a review of the PfE will approach the housing requirement in Trafford. However, at the very least the Council should assume that a 15% uplift will be applied to the remaining PfE plan period to reflect the overall increase in LHN for the 9 GM authorities; for the years of the Plan period beyond 2039, the LHN for Trafford of 1,599dpa should be used (in the absence of a PfE requirement for this period).

4.7 Notwithstanding the above, we would suggest that an entirely more robust (and positively prepared) strategy would be to rely on Trafford's LHN as its housing requirement beyond 2029 (i.e. when Policy JP-H1 will be five years old and considered out of date) and should be reflected in the stepped approach at Table 4-1.

4.8 As set out in the latest PfE Annual Monitoring Report, net completions in Trafford for 2023/24 were 741dpa; a shortfall of -76 against the PfE requirement (which is stepped down at the start of the plan period for Trafford). In the context of Trafford's housing requirement increasing to 1,122dpa from 2025 (as per the stepped approach) and the 1,599dpa figure based on the Standard Method, this is a significant shortfall which indicates Trafford should be much more aspirational to ensure its housing needs are met.

4.9 This is reflected at paragraph 4.13 of the draft Local Plan which states "since the introduction of the Housing Delivery Test in 2018, Trafford has been required to produce four Housing Delivery Test Action Plans, with the last being in 2022 with the adoption of PfE. Prior to this, Trafford had not delivered enough net homes to meet its annual requirement."

4.10 As such, as the Council has historically underdelivered against it's housing requirement, it should be much more aspirational in the forthcoming Local Plan to ensure the development needs of the Borough can be met.

Policy R3 (Affordable and Social Housing)

4.11 Our Client objects to Part A of Policy R3 which requires all major residential developments to provide on-site affordable housing in accordance with the Locality Policies. We provide our comments to the specific Locality Policies in relation to affordable housing in more detail below.

4.12 Regarding the required tenure mix of 60% rented (40% social rent and 20% affordable rent) and 40% affordable home ownership tenure split, it is unclear what evidence this is based on, and this is not a requirement in the PfE Plan. As such, our Client objects to this requirement unless the Council can justify through appropriate evidence what this is based on.

4.13 Part B of Policy R3 requires affordable housing to be evenly distributed, with no more than six affordable housing units located adjacent to each other, or clustered together when delivered as part of a wider scheme. It is not considered that this aligns with the PfE Plan or national policy. There is no evidence to suggest what harm providing more than six affordable homes does within a cluster.

4.14 Whilst 'pepper potting' affordable housing is a welcomed approach by our Client, restricting affordable housing to no more than 6 in a row is overly restrictive. The layout of affordable units will vary on a site-by-site basis and may depend on how Registered Providers manage their stock. It also will depend on the split between market and affordable homes. For example, if a

scheme proposed to deliver 45% affordable homes then it may be required for more than 6 affordable units to be located adjacent to each other for the layout to be successful.

4.15 As currently drafted we consider that this part of Policy R3 is onerous and should be amended to support the pepper potting of affordable units as opposed to no more than 6 units.

4.16 Part C of Policy R3 requires a minimum of 10% of affordable homes to be Totally Affordable Net Zero (TANZ) homes.

4.17 Whilst it is our understanding that the Major of Greater Manchester made a manifesto to deliver 30,000 net zero social rented homes across the city region by 2038, this is not a requirement within the PfE Plan. The delivery of affordable homes is challenging due to viability issues and our Client has concerns that this requirement risks the delivery of affordable housing which is a key objective of the Local Plan.

4.18 There is no viability evidence to suggest that this requirement is feasible, nor where the Council has justified a requirement of 10%. We, therefore, suggest that this is removed from Policy R3.

4.19 Policy R3S (Affordable and Social Housing within Trafford South) requires proposals within the Trafford South Locality, such as our Client's Site, to provide a minimum of 45% affordable housing.

4.20 Policy R3W (Affordable and Social Housing within Trafford West) requires proposals within the Trafford West Locality, which includes the remainder of the New Carrington Allocation, to provide a minimum of 30% affordable Housing.

4.21 Our Client objects to the above, which is at odds with Allocation JPA30 in the PfE Plan as well as the evidence which underpins it. Criteria 5 of JPA30 states that a minimum of 15% affordable housing will be provided across the allocation "*to be provided in accordance with local policy requirements in relation to type and tenure*".

4.22 The latter part of this policy is clarified at paragraph 650 of the Inspector's Report for PfE which states:

"The modified policy refers to the affordable housing being "provided in accordance with local policy requirements". It should be clear therefore that this relates to how the affordable housing will be delivered in terms of type and tenure, rather than application of policies which may derive a different overall requirement figure. To ensure there is no ambiguity, we have amended the modifications to policy and reasoned justification to clarify that this refers to housing type and tenure."

4.23 Further to this, the Inspector's Report for PfE states at paragraph 647 that following sensitivity

testing, the Whole Plan Viability Assessment concluded that 15% delivery would be achievable across the allocation as a whole. Whilst the Greater Manchester Combined Authority (GMCA) suggested a modification during the examination to remove this figure and instead rely on their local plan to determine the requirement on a site-by-site basis, the Inspector concluded that, based on the findings of the viability assessment, there is nothing inherently unsound about using the 15% figure as a guide for the whole allocation and thus no need to amend the policy in this regard.

4.24 As above, it is clear that the viability position at New Carrington (in the face of a 15% affordable housing requirement) was finely balanced; at the time of examination of the PfE, it was balanced to show that New Carrington was not viable (without a change in market conditions). Indeed, since then, the Council has demonstrated (through its interim approach to determining financial contributions for New Carrington) that the costs of delivery have risen significantly. Conversely, there is no evidence to support rising sales revenues to absorb these costs.

4.25 Notwithstanding the above, and without any financial and viability evidence / justification for doing so, Policy R3 proposes a requirement which is some 300% (R3S) of the PfE requirement at Warburton Lane and 200% (R3W) of the PfE across the remainder of the allocation.

4.26 On the basis of the above, Policies R3S and R3W do not align with criteria 5 of JPA30. In fact, we consider that such a policy approach would completely undermine the delivery of JPA30 and would fail all of the tests of soundness within the NPPF.

4.27 Whilst most of our Client's Site has been identified within the Trafford South Locality, the Council has not provided any evidence which tests our Client's Site, which we know has very different conditions to other areas within the Trafford South Locality in light of infrastructure contributions which will be required as part of the New Carrington Masterplan process.

4.28 Therefore, the Council cannot expect a significantly higher proportion of affordable housing at our Client's Site or the rest of New Carrington when the Masterplan is still in preparation.

4.29 As an overarching point, we object to the general layering on of additional planning obligations and costs to the Council's strategic allocations which have already been through an examination process through the PfE. To enable the delivery of sites, it is essential that land can be obtained (and landowners expectations) can be established on the allocation of a Site. Nevertheless, in the absence of any evidence which supports a change of approach at the Council's PfE Allocations we suggest that the Council's emerging policies should not apply to those allocations and that should be made clear within the emerging plan. At the very least, the Council should conclude it's master planning process for the PfE Allocations such that costs associated with the Sites are known and fixed before any consideration of additional costs are explored.

4.30 Paragraph 4.17 of the Local Plan states that new studies will be commissioned to better understand the affordable housing requirements and plan viability which will help determine the requirement. As such, it is clear that no such viability testing has been undertaken. We reserve further comments until such studies are published for consultation. However, we object to approach to the affordable housing policy in the absence of a Masterplan and the Trafford Local Plan should not have conflicting policies on an allocated site.

4.31 The IA confirms at paragraph 5.33 that there are no reasonable alternatives to this policy and it responds to available evidence. Our Client disagrees for the reasons set out above.

Policy R4 (Size and Type of New Homes)

4.32 Our Client has concerns with Part B of Policy R4 which requires applications to be accompanied by a housing need statement which outlines how the scheme would contribute to the creation of mixed and sustainable communities.

4.33 Whilst our Client is supportive of the creation of mixed and sustainable communities, it is for the Council to determine the mix for housing development based on up-to-date evidence. Applications should then broadly accord with this, which may be based on locational evidence.

4.34 Part C states the Council will not support applications for major development which would result in an over concentration of a particular dwelling size or type where they do not meet an identified local need.

4.35 However, the supporting text at Paragraph 4.22 confirms that the latest Housing Needs Assessment shows there is a need for all sizes and types of housing across Trafford. As such, we do not consider there to be any evidence to indicate why Policy R4 would resist planning applications which result in an overconcentration of a particular dwelling size or type if there is a unmet need for all housetypes. Trafford should be taking a pro-growth strategy and not resisting sustainable development which addresses an unmet need.

4.36 The IA confirms at 5.35 that there are no reasonable alternatives to this policy. Again, our Client disagrees with this for the reasons set out above and the Council must consider alternatives to this policy which take a more flexible approach towards housing delivery.

Policy R5 (Housing Density)

4.37 Whilst our Client does not disagree that Policy R5 aligns with Policy JP-H4 of the PfE Plan, Part C states the minimum density requirements across Trafford are shown in Figure 4-1 which is 35dph across most of the Borough.

4.38 However, Policy JPA30 of the PfE Plan sets out at criteria 4 the average densities which are to be achieved for the New Carrington Allocation. In relation to our Client's Site at Warburton Lane, the average density which is sought is 25dph.

4.39 Therefore, as currently drafted, Policy R5 is at odds with JPA30 and the draft Local Plan should be updated to reflect the housing densities required as part of the strategic allocations included in PfE.

4.40 As such, our Client suggests that the Policy approach is amended to exclude the PfE Allocations from the requirements of Policy R5. Failing that, Policy R5 should either lower the minimum requirements, or to state that the figures are a target, as opposed to a minimum. This would allow sufficient flexibility to account for site-specific considerations, whilst also placing an impetus on providing increased density, wherever possible.

4.41 The IA confirms at 5.37 that this policy applies a PfE policy on a local level and so there are no reasonable alternatives. We disagree for the reasons set out above.

Policy R7 (Adaptable and Accessible Housing)

4.42 Policy R7 sets a requirement at Part A that all new homes will be built to comply with Part M4(2) (Accessible and Adaptable Dwellings) of the Building Regulations as well as stating at Part B that development proposals of 50+ dwellings there will be a requirement to provide at least 4%, to be compliant to Part M4(3) (Wheelchair User Dwellings).

4.43 Our Client has no objection to this in itself, but would highlight that such requirements may conflict with other aspirations of the Plan. As such, it is important that there is a degree of flexibility in the Plan to ensure that any such conflicts can be addressed through appropriate negotiation, and not be subject to lengthy delays.

Transport and Movement

Policy TM2 (Public Transport)

4.44 Our Client is concerned with the wording of Policy TM2 which states at Part B that "all" major development proposals will be expected to contribute towards improvements to public transport services.

4.45 As currently drafted, the policy applies to all major developments and does not seem to take into consideration sites which may already be well-served by public transport and where no additional demand is anticipated.

4.46 Furthermore, the Masterplan for New Carrington will include infrastructure improvements, such

as public transport, and a mechanism for development proposals within JPA30 to contribute towards those infrastructure enhancements. As such, Policy TM2 should take this into consideration.

4.47 The policy is also ambiguous as to whether "contribute" refers to a financial contribution, or on-site improvements to public transport services. This should be clarified by the Council.

Policy TM6S (The A56 in Trafford South)

4.48 Policy TM6S states the Council will work with stakeholders and partners to investigate and support the future delivery of the following interventions in Trafford South:

i. New and improved crossing points at all junction arms and protected cycling infrastructure on priority A56 junctions, including but not limited to: Sinderland Road, George Richards Way, Navigation Road, Barrington Road, Woodlands Road and Charcoal Road.
ii. Provision of wider pavements and more pedestrian crossings on the Dunham Road section of the A56

4.49 It is not clear how the Council intends to secure these improvements. As stated within these Representations, our Client's Site is part of JPA30 which is subject of its own transport improvement initiatives. A Masterplan is currently being drafted for New Carrington which will establish infrastructure requirements and viability evidence to ensure the delivery of the New Carrington allocation alongside the necessary infrastructure improvements.

4.50 As such, our Client's site cannot be expected to contribute towards additional infrastructure improvements schemes as part of the Trafford Local Plan such as those outlined in Policy TM6S.

Green Infrastructure and Natural Environment

Policy GI6 (Green Infrastructure in New Developments)

4.51 Our client broadly supports the provisions of Policy GI6 which seeks to protect and enhance the Green Infrastructure Network.

4.52 However, Part C of the policy requires all proposals for major development to be supported by a dedicated green infrastructure plan which is required to include an Urban Greening Factor (UGF) calculation in accordance with Natural England's latest guidance.

4.53 Our Client is concerned with the policy wording and requests that the word “requires” is removed as the UGF calculation is a planning tool and not a statutory requirement. Therefore, we suggest that Policy GI6 provides support for submission of a UGF calculation, but the requirement for all major developments to include this should be omitted from Policy GI6.

Policy GI7 (Trees, Woodland and Hedgerows)

4.54 Policy GI7 states that a Tree Canopy Cover Assessment must be provided which demonstrates how the development will incorporate existing trees and:

- where there is no existing tree canopy cover, provide a minimum of 20% tree canopy cover (upon maturity) across the whole site area; or
- where there is existing tree canopy cover, provide a minimum increase of 10% tree canopy cover (upon maturity over the existing onsite tree canopy cover); or
- where there are existing ecological, historical, landscape or operational reasons that justify not meeting the canopy requirements (as applicable), provide evidence to support this and agree an alternative percentage of canopy cover with the Council; and
- Where new streets form part of the proposal, tree lined streets must be integrated into the design, considering key constraints such as highway safety, street furniture, lighting and underground services. Planning applications will need to provide clear, justifiable and compelling reasons where this cannot be achieved.

4.55 Our Client objects to the inclusion of the first three bullet points above. It is unclear what these requirements have been based on, and we raise concerns that the quantum of tree canopy cover across sites will have implications against other policy requirements of the draft Local Plan, such as housing density and meeting housing requirements.

4.56 Furthermore, Policy JP-G7 of the PfE Plan seeks to protect trees and woodland and requires developments which result in the loss of existing trees to provide replacement trees on the basis of two new trees for each tree lost, or other measures that would also result in a net enhancement in the character and quality of the treescape and biodiversity value in the local area, with a preference for on-site provision.

4.57 Trafford’s adopted Supplementary Planning Document 1 (SPD1) ‘Planning Obligations’ also requires additional on-site tree planting. For residential dwellings (Use Class C3) the requirement is 3 trees per unit.

4.58 In the context of PfE and SPD1, it is unclear what the requirements of Policy GI7 are based on, and we request evidence is provided by the Council to justify this requirement.

4.59 Applicants are required to accord with PfE in addition to the mandatory 10% biodiversity net

gain. Our Client, therefore, has significant concerns on the viability and feasibility of achieving the requirements of Policy GI7 which we consider to be overly onerous and could have substantial implications in terms of meeting the strategic objectives of the Local Plan and of PfE.

Water, Flooding and Drainage

Policy WA2 (Sustainable Drainage – Surface and Foul Water)

4.60 Our Client has no objection to the overall provisions of Policy WA2 which broadly align with PfE Policy JP-S4. However, we raise concerns with Part F of the Policy which states for any development proposal which is part of a wider development or allocation, a site-specific drainage strategy or statement must be part of a holistic site-wide drainage strategy.

4.61 We disagree with this approach, and as currently drafted the policy is ambiguous as it is not clear what "wider development" would relate to.

4.62 Our Client considers that there is a risk this policy could prevent development from coming forward for sites which are available. If an applicant is ready to submit a planning application for a parcel of land which is part of a wider site, but adjacent developers or landowners are not in a position to progress a site wide drainage strategy then this could preclude development from coming forward.

4.63 Whilst a holistic approach towards a wider development or allocation is supported, development of individual parcels should not be held up if a sustainable drainage strategy which can accommodate the proposed development can be achieved sustainably.

4.64 In the case for JPA30, an allocation-wide flood risk, foul and surface water management strategy will be developed as part of the required Masterplan/delivery strategy. As such, we consider a Masterplan which sets out a drainage strategy may be applicable to strategic allocations, but should not be required for proposals part of a "wider development".

4.65 Our Client also raises issues with Part I of Policy WA2 which states Applicants for major developments "must" engage with United Utilities or relevant water authorities early in the planning process to assess the need for infrastructure upgrades or improvements.

4.66 This requirement should be removed from the Policy. Whilst early engagement is encouraged, there is no statutory requirement to engage with United Utilities, and it is the Council's responsibility to consult with relevant bodies as part of the planning application consultation process. United Utilities are not a statutory consultee in the planning process and we consider that requiring applicants for all major developments to engage with United Utilities or other relevant water authority early in the planning process is onerous and may place a burden on the water authority and cause unnecessary delays.

Infrastructure and Planning Obligations

Policy IP1 (Infrastructure Delivery and Planning Obligations

4.67 Our Client supports the general thrust of Policy IP1. However, it is unclear what evidence has informed Policy IP1N (Trafford North Infrastructure Contributions).

4.68 This policy requires developments in Trafford North to make financial contributions towards the provision of infrastructure in accordance with the following rates:

i. Residential (Class C3 and C4): £150 per sqm
ii. All other development £70 per sqm

4.69 The Council has not provided any supporting evidence to justify the above requirements for developments in the Trafford North Locality which appears to be in addition to requirements established in the Council's adopted Community Infrastructure Levy (CIL) Charging Schedule (adopted 2014) and SPD1.

4.70 Paragraph 14.13 of the Local Plan states that "a large amount" of development is anticipated in the Trafford North Locality which is expected to be high density and higher rise flats which is excluded from CIL. However, many housing developments in the Trafford North Locality over the next plan period will not be excluded from CIL and so we raise concerns over this blanket approach towards infrastructure contributions for the whole of the Locality.

4.71 Paragraph 14.15 states the amount per sqm is based on the Civic Quarter Area Action Plan. However, this does not correspond with the whole North Trafford Locality. Notwithstanding this, the cost per sqm is higher in Policy IP1N than Policy CQ11 of the Civic Quarter Area Action Plan and the Council has not justified why a higher figure has been apportioned to the Trafford North Locality. As such we disagree that these figures are "reasonable and justified" as described at paragraph 14.15 of the Local Plan.

4.72 Furthermore, there seems to be no viability evidence prepared by the Council to support this requirement. By the Council's own admission, the Trafford North Locality includes more brownfield land which historically has viability issues. As such, the Council must provide sufficient evidence which demonstrates that these additional infrastructure requirements will not render schemes unviable, particularly alongside other requirements such as affordable housing provision.

4.73 Whilst our Client's Site is not located in the Trafford North Locality, their concerns are pertinent to ensure the Trafford Local Plan is based on robust evidence to ensure sustainable development is not prevented due to viability issues.

5.0 Conclusions

5.1 These Representations are submitted to Trafford Council on behalf of our Client, Redrow Homes (North West) Limited, in response to the Council's Regulation 18 Consultation on the Draft Local Plan, which was published for consultation in April 2025

5.2 Our Client welcomes the progress made by the Council in getting to this stage of the new Local Plan, and its intention to meeting the development needs of the Borough. Notwithstanding this however, our Clients have a number of concerns with the document as well as some of the policies within it, as well as the lack of evidence base which underpins the draft Plan.

5.3 Within these Representations, our Client has provided a commentary regarding the alignment of the Trafford Local Plan with PfE, and the onerous policy requirements which do not align with PfE and do not seem to be supported by sufficient evidence. The key points raised are as follows:

- **Plan Period**: As set out in the Council's latest LDS, the anticipated adoption date for the new Local Plan is 2027/2028. Our Client has raised concerns that the plan period to 2042 may not be consistent with paragraph 22 of the NPPF.
- **Trafford Localities**: We have raised significant concerns with the approach to dividing the Borough into four Localities which each have several locality-specific policy requirements. These Representations have highlighted conflict with PfE, particularly in relation to JPA30 which straddles two Localities (West and South) each with contrasting policy requirements (such as affordable housing, density and other matters). Therefore, it is unclear how the Council expects to provide a different policy approach towards our Client's Site which falls under the policy considerations for JPA30.
- **Housing Requirement:** Whilst the Trafford Local Plan should align with the strategic policies contained in PfE, the Government's introduction of mandatory housing targets came into force in December 2024. As such, the PfE housing requirement should not be implemented over the entirety of the next plan period for Trafford. The mandatory housing requirement for Trafford, based on the latest Standard Method, is 1,599dpa which represents a 42% increase from the 1,122dpa housing requirement established under Policy HP-H1 of the PfE Plan and should be reflected in the forthcoming Local Plan.
- **Affordable Housing:** These Representations have outlined that the proposed tenure mix does not align with PFE. We have also raised concerns regarding policy requirements which restrict the concentration of affordable housing to no more than six adjacent units. We have also highlighted that certain policy requirements such a minimum of 10% of affordable homes to be TANZ homes is not supported by sufficient evidence and will have viability implications for affordable schemes. Notably, our Client objects to the affordable housing requirements set out in Policy R3S (45%) and R3W (30%) which is at odds with

Allocation JPA30 in the PfE Plan which states that a minimum of 15% affordable housing will be provided across the allocation.

- **Exempt PFE allocations from additional policy burdens:** As set out above the Local Plan must avoid policy conflict between the PfE Policies (particularly strategic allocations) and the Local Plan. Where such policy conflicts are likely to arise, the PfE allcotions should be exempt from the emerging requirements of the Local Plan (for example where there is a conflict in density requirements). Furthermore, the Local Plan should avoid the introduction of further untested policy requirements in addition to those imposed on the PfE Strategic Allocations; particularly in advance of confirmation of the scope and feasibility of those allocations to deliver the requirements set out within the PfE itself; in the case of New Carrington, to be established through an SPD.

5.4 Further to the key considerations above, our Client has also identified a number of additional concerns in relation to draft policies on the size and type of new homes, housing density, adaptable and accessible housing, public transport and highways contributions, green infrastructure, drainage and planning obligations.

5.5 In summary, the Local Plan must align with PfE, including JPA30, and must be supported by sufficient evidence to ensure that the requirements set out in these policies are reasonable and viable. The Local Plan should not place onerous requirements on applicants which would preclude development from coming forward when the Council should be supporting sustainable development to meet the Government's aim of significantly boosting the supply of homes.

5.6 Overall, our Client seeks to ensure that the Local Plan supports our Client's land interests at Warburton Lane which comprises JPA30 in the PfE Plan. The Trafford Local Plan should not conflict with this allocation or set additional requirements which could render future development unviable.

5.7 We trust that these Representations will be afforded full consideration by the Council and would welcome the opportunity to meet with the Council to discuss further.

Strategic Planning,
Trafford Council,
Trafford Town Hall,
Talbot Road,
Stretford,
M32 0TH

Our Ref: UK0040010.4128

12 June 2025

Dear Sir/Madam,

Trafford Local Plan (April 2025) Regulation 18 Consultation Draft - Policies
Representation on behalf of Trafford Palazzo Ltd

We write on behalf of Trafford Palazzo Ltd in response to Trafford Council's Regulation 18 Public Consultation on the Strategy, Vision and Objectives and the thematic policies of Trafford's emerging draft Local Plan.

WSP are acting for Trafford Palazzo Ltd part of the Peel Group, an investment and development company that prides itself on delivering well-designed development and infrastructure projects across Trafford, Greater Manchester and the UK.

This representation provides comments solely in the context of the land interests of Trafford Palazzo. Other Peel Group businesses, notably Peel Land and Peel Waters, have submitted wider representations to the Local Plan consultation in relation to the land and development interests of these businesses. These should be considered and reported independently of Trafford Palazzo's representation.

Trafford Palazzo Ltd have owned and operated Trafford Palazzo as a retail and leisure destination, for the last four years. In the intervening period they have invested heavily in its revitalisation through the proactive diversification of its offering, ensuring it responds to the ever-evolving needs and demands of local and regional consumers thereby contributing to the ongoing regeneration of Trafford Park.

Trafford Palazzo Ltd have identified an opportunity associated with the surface car park located to the rear of Trafford Palazzo and adjacent to the Bridgewater Canal, that would see the redevelopment of the brownfield site for a variety of uses to enhance and complement the Vision for the wider area. While only at feasibility stage the most viable mix of uses at this stage includes residential, a hotel and multi-storey car park. The ethos of the project is to make more efficient use of the brownfield site, in a highly sustainable and accessible location. A site location plan is enclosed within Appendix 1. Representations are therefore enclosed relating to this proposition.

The following representations also relate to Trafford Palazzo's retail and leisure offering and the contribution it can make to the draft Local Plan aspirations relating to the 'Trafford Centre Rectangle'. Including the emergence of the area as a world class leisure and tourism destination, established in a sustainable manner whilst also meeting the needs of local residents.

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These representations propose amendments to the emerging policies with the aim of:

- Promoting an additional housing allocation on a sustainable and deliverable brownfield site;
- Reinforcing the emphasis on mixed-used development within the 'Trafford Centre Rectangle';
- Ensuring appropriate flexibility within housing policies to meet site specific needs; and
- Ensure policies promote the continued diversification and re-vitalisation of the Trafford Palazzo shopping centre.

Allocations

The draft Allocations Map indicates that two Policies will be specifically relevant to the Trafford Palazzo site, including:

- Policy ST1: Core Growth Area (Trafford)
- Policy CL2N: Trafford Centre Rectangle.

POLICY ST1: CORE GROWTH AREA (TRAFFORD)

This Policy, in conjunction with the Places for Everyone Spatial Strategy allocates The Trafford Centre (and surrounding area) as a 'Core Growth Area' where development opportunities should be focussed. It states the following:

> *"B Development opportunities in the Core Growth Area:*
> *i. Will be focussed around key growth locations including at Trafford Park, The Trafford Centre, Stadium District and Wharfside, and Pomona.*
> ii. *Will collectively deliver mixed employment led development with supporting residential and ancillary uses"*

In principle Trafford Palazzo Ltd is supportive of Policy ST1 and particularly statement B ii, but suggest support for mixed use development could be bolstered further by the following amendment to the text:

> *B ii Will collectively deliver mixed employment led development with supporting residential uses and ancillary uses <u>across all key growth locations</u>"*

Trafford Park provides a sustainable and suitable location for residential development that could contribute to a more efficient use of land and overall housing target. The suggested wording adds additional support for residential development in all key growth locations identified within the policy, to encourage growth and investment into the areas from a variety of complimentary sectors to enhance the overall offerings of the Trafford Core Growth Area.

POLICY CL2N: TRAFFORD CENTRE RECTANGLE

Policy CL2N provides criteria for new cultural, leisure and/or tourism development within the Trafford Centre Rectangle (which includes Trafford Palazzo). The general support for these uses within this area is welcomed, as is the policy's support for new Use Class E(d–f) facilities.

However, we request greater clarity regarding the implementation of the requirements outlined part A(v) which currently states the following:

> *"[Proposals for new cultural, leisure and/or tourism development within the Trafford Centre Rectangle, as defined on the policies map, must]: 'Be accompanied by an assessment of air quality and pollution in the area and how this will be impacted and/or mitigated by any scheme"*

Trafford Palazzo continues to attract new leisure operators through the repurposing of existing floorspace. Many of these operators do not require new construction or external alterations and therefore have minimal, if any, impact on local air quality or pollution. As currently worded, part A(v) could be interpreted to require air quality assessments for all proposals, regardless of scale or environmental impact.

To ensure proportionality and clarity, we suggest the following revision to part A(v):

> *"v. <u>All applications proposing new buildings and/or floorspace shall</u> be accompanied by an assessment of air quality and pollution in the area and how this will be impacted and/or mitigated by any scheme."*

This adjustment would ensure the policy remains robust without placing unnecessary burdens on minor or internal development proposals that do not affect environmental quality.

INTERACTION WITH THE CANAL

Paragraph A(iv) of policy CL2 states the development must: *"(iv) Where appropriate, create and/or enable the creation of active frontages onto the Manchester Ship Canal and the Bridgewater Canal, by preserving and enhancing the existing canal side walkways and improving their accessibility."*

Supporting this Policy CL1 'Protecting and Supporting Existing Cultural, Leisure and Tourism Assets' states that *"The Council will protect, support, and enhance Trafford's existing cultural, leisure and tourism assets, including through the provision of appropriate ancillary development, particularly in the following locations:[…] Trafford's waterways including the Mersey Valley, Manchester Ship Canal and the Bridgewater Canal".*

We agree with the thrust of these policies to protect and enhance the canals in Trafford and ensure new development does not turn its back on the canal. However we think there should be a stronger incentive for developers to provide active frontages onto the Canal, and improve public access and integration of development with the Canal. As such we suggest that a new subparagraph is added to Policy CL2 A which states the following:

> *"Development will be supported where it introduces new active uses alongside the Trafford's waterways; providing it includes active frontages and enhanced public access"*

This policy wording is more compelling and offers stronger support to development which will enhances public interaction with Trafford's waterways.

Residential Delivery

A key focus for Trafford's emerging Local Plan is to ensure the steady delivery of sustainable residential development in line with the policies and allocations established within the Places for Everyone Joint Development Plan.

POLICY R1: HOUSING DELIVERY

We broadly support the direction of Policy R1, particularly its continued commitment to delivering new housing in line with the Places for Everyone (PfE) Joint Development Plan. However, in our view parts of the policy could be strengthened further to ensure the Local Plan remains robust and responsive to future housing needs over the full plan period to 2042.

Future-Proofing Housing Delivery Targets

Policy R1 rightly maintains the PfE housing requirement for Trafford, equating to the delivery of 1,122 dwellings per annum up to 2042. However, the most recent application of the Government's standard method indicates a higher housing need for Trafford of 1,599 dwellings per annum. While Trafford is currently not required to meet this higher figure due to the recent adoption of PfE, this position could change by 2029 if the PfE Plan is not updated and found sound at that time.

This is supported by Annex 1 Paragraph 232 of the National Planning Policy Framework:

> *"However, existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given). Where a local planning authority can demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78 and where the Housing Delivery Test indicates that the delivery of housing is more than 75% of the housing requirement over the previous three years, policies should not be regarded as out-of-date on the basis that the most up to date local housing need figure (calculated using the standard method set out in planning practice guidance) is greater than the housing requirement set out in adopted strategic policies, for a period of five years from the date of the plan's adoption."*

The above demonstrates that if by 2029 Trafford's housing targets are not considered sound through a review of the Plan by an Inspector, then the standard method for calculating local housing need comes into force in accordance with the NPPF (2024). Up to 2029 if Trafford cannot demonstrate a five-year housing land supply or their housing delivery test result falls under 75%, then the housing policies in PfE will be considered out of date and the standard method will apply.

Given that this draft Local Plan will extend to 2042, we strongly recommend that the Council begin considering additional sites for residential allocation to meet the higher housing targets established by the standard method. This proactive approach would help ensure housing land supply can be maintained to meet the Government's ambition of constructing 1.5 million homes.

Support for Urban and Brownfield-Focused Growth

Paragraph E of Policy R1 states the following:

> *'The Council will support the provision of new housing that makes as much use as possible of previously developed land within the existing urban area. This will be achieved through new build and conversion'*

We are supportive of the policy's clear commitment to maximising the use of previously developed land within the existing urban area. Paragraph E appropriately emphasises the use of both new build and conversion opportunities, aligning with national objectives for urban regeneration and

sustainable development. The site identified within Appendix 1 directly supports this approach, making a valuable contribution to housing supply while promoting the reuse of brownfield land.

Efficient Use of Land and High-Density Development in Sustainable Locations

Paragraph F of Policy R1 states the following:

> *'The Council will seek to ensure the efficient use of land, concentrating higher density development in the most sustainable locations, at the lowest risk of flooding, close to services and facilities as well as public and active transport links; where it can be demonstrated that it is consistent with other policies in the Development Plan'*

We also strongly support the intention in Paragraph F to concentrate higher density housing in the most sustainable locations i.e. those with low flood risk and strong access to services and public/active transport. The site to the rear of Trafford Palazzo meets these criteria, offering excellent connectivity to local services, facilities, and established public transport infrastructure. Its development would support the efficient use of land while being consistent with broader sustainability and accessibility goals set out in the Development Plan.

In conclusion, while we support the overall thrust of Policy R1 and its alignment with the PfE strategy, we encourage the Council to take a more future-oriented approach. The potential requirement to meet a higher housing figure from 2029 should prompt consideration of reserve sites or a review mechanism to ensure that Trafford can respond swiftly and effectively to changing circumstances. Additionally, the policy's support for brownfield development and sustainable urban intensification is welcomed and should be retained.

POLICY R5: HOUSING DENSITY

We support the overarching objectives of Policy R5, which builds upon PfE Policy JP-H4 and reinforces the importance of appropriate housing densities in sustainable locations. The application of minimum net residential densities is a vital component in ensuring land is used efficiently, particularly in areas with strong access to services and transport infrastructure. The map establishes a minimum net density of 70 dwellings per hectare within the Trafford Park area. A minimum net density of 120 dwellings per hectare is established at Altrincham town centre.

Support for Higher Density in Well-Connected Areas

We welcome the identification of higher minimum net residential densities for locations that are well served by infrastructure. The Trafford Park area in particular along Barton Dock Road (such as the site shown at Appendix 1) is highly accessible, with a number of tram stops in close vicinity, and great access to shops and services.

Encouragement of Densities Above the Minimum Where Justified

While minimum densities are necessary to ensure a base level of efficiency in land use, in accordance with NPPF paragraph 130.a, we consider that Policy R5 should go further by actively encouraging higher densities in suitable locations. To this end, we recommend the inclusion of additional policy wording as Policy R5.D. to provide greater clarity and ambition. For example:

> *"D. Higher densities will be welcomed where appropriate access to services, facilities, and public and active travel links exist, in accordance with the wider objectives of sustainable development."*

Such an addition would help provide policy support for developments that exceed the minimum density standards, where justified, and would assist in delivering the quantum of new homes required over the plan period in a sustainable manner.
This approach aligns with national and regional policy objectives to focus growth at sustainable urban locations, reduce pressure on greenfield land, and support viable communities.

Open Space, Sport and Recreation

Policy OS1: Open Space at Part F sets out standards for the quantum of on-site open space provision in respect of residential developments. We are concerned that these standards will stifle much needed high-density residential developments on sustainable brownfield sites where capacity is limited. High density in the Growth Area is supported by the emerging Local Plan, therefore flexibility is required for key growth areas where high density development is appropriate, and where there is already great access to facilities. To make the most efficient and effective use of land in accordance with the NPPF, it is imperative that open space requirements should include a level of flexibility to account for each site's context. A one-size fits all approach is not appropriate in this case. As such the following amended wording for Policy OS1 Part F is proposed:

> *"Residential developments over 50 homes will be required to provide a minimum of 3ha of new accessible public open space per 1,000 population (i – iii) and other open space (iv – v) on-site including:*
>
> *i. Minimum 1ha of parks, gardens and recreation grounds per 1,000 population*
>
> *ii. Minimum 1ha of natural and semi-natural greenspace per 1,000 population*
>
> *iii. Amenity greenspace*
>
> *iv. At least 0.25ha provision for children and teenagers per 1,000 population*
>
> *v. At least 0.25ha of allotments per 1,000 population*
>
> *In respect of high density, apartment-led developments, where these are appropriate, the level and form of accessible public open space to be provided on site will be determined on a case-by-case basis. This will be considered by reference to the site's context and having regard to the need to balance the requirement for new homes and the need to make efficient and effective use of land by delivering development at the appropriate density with the need to ensure an attractive and liveable environment where residents can access external space for active use"*

To ensure consistency with the above point, we would also suggest the following amendments:

For Part D of Policy OS2 (And Part C of Policy OS3 which is a repeated policy):

> *"All major residential developments should seek to ~~must~~ ensure their occupants are able to access at least one type of indoor sports and recreation provision within a repeating radius of 1.2km, starting at the site's centre point, as listed under criterion B where this is viable and deliverable."*

Green Infrastructure and Natural Environment

Policy GI6 seeks to ensure that an appropriate level of green infrastructure in included within new development. Part C relates to major development and is prescriptive in requiring delivery of green infrastructure against Natural England's Urban Greening Factor (UGF) calculation.

Whilst Trafford Palazzo Ltd support the principle of Policy GI6 there are concerns that the explicit requirements in the policy may not be practically achievable whilst delivering the wider development ambitions of the Local Plan particular in key growth areas where higher density development is the most appropriate.

Where requirements are imposed with no flexibility, there is a risk of policy conflict arising to an extent which cannot be reconciled in the planning balance, stifling the Local Authority's ability to progress schemes favourably through the planning development and ultimately the delivery of the Plan.

To that end, and to complement the suggested amendments to Policy OS1 outlined above, we would suggest the Policy GI6 is amended as follows:

> *"All proposals for major development must be supported by a dedicated green infrastructure plan, which may be included within a site wide landscape strategy, and will be required to:*
>
> > *i. Include an Urban Greening Factor (UGF) calculation, in accordance with Natural England's latest guidance, demonstrating how the development will meet a UGF score of:*
> >
> > > ▪ *0.4 as a minimum for residential development on brownfield development sites*
> >
> > > ▪ *0.5 as a minimum for residential development on greenfield development sites*
> >
> > > ▪ *0.3 as a minimum for non-residential development*
>
> *Where this is not viable and deliverable in the context of the development, and having regard to the requirements and ambitions of other policies within the Local Plan, this will need to be expressly justified."*

Sustainable Transport

POLICY TM1: WALKING, WHEELING AND CYCLING

Trafford Palazzo Ltd supports the overall objectives of Policy TM1, which appropriately seeks to make walking, wheeling and cycling as the natural choices for everyday trips. We welcome the Council's commitment to achieving a meaningful modal shift away from private car use through investment in active travel infrastructure and the integration of sustainable transport requirements in new development proposals.

The site to the rear of Trafford Palazzo is particularly well-suited to delivering on the aims of this policy. It benefits from excellent access to a range of multimodal transport options, including:

- Existing Metrolink and high-frequency bus services;
- Established pedestrian routes along the Bridgewater Way and Barton Dock Road; and

- Planned public realm improvements aligned with the Greening Trafford Park Masterplan.

Furthermore, development of the site would present a valuable opportunity to enhance interconnectivity between the Trafford Centre area to the south and the canal-side walking and cycling routes to the north and east. This would actively support and advance the Council's wider active travel and placemaking objectives.

While we fully support the intent of TM1, we consider that its effectiveness could be improved by more explicitly recognising and encouraging development proposals that leverage existing active travel infrastructure and promote new multi-modal transport options. To this end, we propose the inclusion of an additional supporting clause under Section D or as a new paragraph, for example:

> *"D(viii). Proposed development will be supported where it contributes to the enhancement of existing sustainable transport infrastructure and/or introduces new multimodal travel options in areas with high public transport accessibility."*

This addition would strengthen the policy by acknowledging the value of well-connected sites, such as land to the rear of Trafford Palazzo, in delivering the Council's sustainable transport strategy, while also providing greater clarity for applicants and decision-makers.

Call for Sites

This section has been written to support the submission of the site adjacent to the Bridgewater Canal and to the rear of Trafford Palazzo, in response to the Call for Sites. Trafford Palazzo Ltd have ambitions to make more efficient use of this previously developed land to provide residential dwellings, a hotel and a multi-storey car park capable of accommodating the parking needs of the existing and proposed uses.

QUANTUM OF DEVELOPMENT

The emerging Trafford Local Plan currently proposes a minimum residential density of 70 dwellings per hectare for the Trafford Palazzo site, as outlined in Policy R5: Housing Density. While this reflects the site's excellent level of accessibility and proximity to services, Trafford Palazzo Ltd considers this minimum density underrepresents the full development potential of this sustainably located, previously developed urban site.

The site identified within **Appendix 1** comprises approximately 2.8 hectares of previously developed land which lies within a highly accessible urban location, benefiting from:

- Proximity to high-frequency Metrolink and bus services;
- Direct connections to Bridgewater Way and Barton Dock Road pedestrian and cycling corridors;
- Established public infrastructure and utilities; and
- Existing cultural, leisure, and retail uses which support a mixed-use community.

Following a detailed internal assessment of site constraints and opportunities, Trafford Palazzo Ltd has identified capacity for up to:

- 448 Use Class C3 dwellings, and
- 186 Use Class C1 hotel rooms

The above can be accommodated within the site boundary, representing a significant and deliverable uplift on the proposed minimum density in the draft Local Plan. **Appendices 2, 3 and 4**

provide floor plans, an accommodation schedule and artist's impressions demonstrating how this can be achieved on this site and how it could look.

This higher quantum of development is consistent with the locational characteristics of the site and aligns with national planning policy, including NPPF paragraph 130, which states that:

> *"plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate"*

The draft Local Plan must respond positively to these national objectives by facilitating the delivery of higher-density development in the most sustainable locations. Allocation of the site in question and delivery of housing of the quantum proposed by Trafford Palazzo Ltd would help to:

- Provide much needed homes;
- Make a meaningful contribution to Trafford's housing requirement;
- Support tourism and visitor numbers to the Trafford Park area to support existing and emerging developments;
- Optimise the efficient use of brownfield land;
- Support a vibrant, mixed-use development node in the heart of the Trafford Centre Rectangle;
- Enhance accessibility, connection, and interaction between Trafford Park and the Bridgewater Canal
- Maximise the benefits of existing infrastructure and reduce car dependency through transit-oriented development.

Trafford Palazzo Ltd therefore requests that the Local Plan include a site-specific allocation for the land identified within Appendix 1, recognising the capacity of the site to accommodate:

- Approximately 448 C3 dwellings, and
- 186 C1 hotel rooms

DELIVERABILITY

In accordance with Annex 2 ('Glossary') of the NPPF, for a site to be considered 'deliverable', it should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing can be delivered on the site within five years.

This section of the representation demonstrates that the site illustrated within Appendix 1 is deliverable:

AVAILABLE

The site is fully under the control of Trafford Palazzo Ltd and is available for development immediately. It is currently underutilised previously developed land, hosting a surface car park. There are no known external factors that would render the site unavailable. There are no land ownership issues that would prevent the site from being brought forward for development and the site has no legal constraints. Further Trafford Palazzo Ltd are preparing a pre-application enquiry to discuss the detail of the proposals with a view to submitting a planning application in late 2025 / early 2026.

SUITABLE

The previously developed site is located in a highly accessible and urbanised setting, located adjacent to established leisure and retail uses at Trafford Palazzo and the Trafford Centre. The site benefits from excellent access to sustainable transport infrastructure, including the Metrolink, frequent bus services, and existing pedestrian and cycling networks along Barton Dock Road and the Bridgewater Way. It is also served by a wide variety of local services and employment opportunities, supporting the potential for a sustainable residential community.

As confirmed in Policy R5: Housing Density, this location is identified by Trafford Council as being suitable for higher minimum residential densities due to its infrastructure capacity and urban character. The principle of delivering residential development within the wider Trafford Centre Rectangle is further reinforced by the promotion of the Trafford Waters development in the draft Local Plan and associated Place Profile, which identifies the potential for high-density mixed-use growth in this area.

Given the site's under-utilised nature, strategic location, and supporting policy framework, it is clearly suitable for residential-led mixed use development. Allocation of the site represents an opportunity to deliver a complimentary range of uses to those already within the Trafford Centre Rectangle. Promoting further development here will contribute meaningfully to housing delivery and align with the Council's aspirations for regeneration, tourism, transport integration, and compact urban growth.

Conclusion

This submission seeks to positively inform the emerging Local Plan by supporting its aims to optimise land use, unlock under-utilised urban land, deliver much-needed housing and tourism accommodation, and continue to promote Trafford Palazzo and the wider Trafford Centre Rectangle as a world-class leisure, retail and tourism destination.

The site identified in **Appendix 1** is previously developed and presents no physical constraints that would preclude its suitability for residential and tourism development. Given its strategic location, high level of accessibility, we consider that the site should be formally allocated for mixed use development within the Local Plan, alongside the adjacent Trafford Waters allocation. **Appendices 2, 3 and 4** demonstrate how this could be achieved.

We look forward to engaging further as the Plan progresses. In the meantime, we trust that this submission is in good order, and we would be pleased to provide any further information or clarification as required.

Yours faithfully

[redacted]

Julie White
Technical Director – Planning Consultancy
BSc(Hons), MATRP, MRTPI

Encl.
Appendix 1 – Site location plan
Appendix 2 – Masterplan Option 1 Traf Palazzo-JMA-MP-XX-XP-A-Masterplan
Appendix 3 – Area Schedule 1 276_0.03_009
Appendix 4 – Artist's Impression

RAPLEYS

Strategic Planning
Trafford Council
Trafford Town Hall
Talbot Road
Stretford
M32 0TH

Email: localplan.consultation@trafford.gov.uk

Date: 10 June 2025

Dear Sir/Madam,

Re: Draft Trafford Local Plan Consultation

We write on behalf of Lidl Great Britain Limited ('Lidl'), in response to the Regulation 18 consultation on the Draft Trafford Local Plan.

Lidl is a substantial and growing presence in the UK convenience retail market, with over 980 stores currently trading and more than 35,000 employees. The business is investing significantly in the UK, including 500 million pounds this financial year as part of its ongoing expansion programme. Lidl is actively delivering new stores nationwide to meet its objective of operating 1,000 stores across the UK in the near future.

Lidl's stores bring a wide range of benefits to the communities they serve. These include:

- Providing high quality products at the lowest possible prices;
- Delivering a modern and convenient shopping experience for local residents;
- Improving customer choice in the areas where they trade;
- Constructing buildings of sustainable, high-quality design with well-integrated landscaping; and
- Creating around 40 new jobs per store, aligned with the Living Wage Foundation rate for all eligible employees, and without the use of zero-hour contracts.

Lidl has a significant interest in bringing forward new stores within Trafford and wishes to ensure that the emerging Local Plan facilitates sustainable retail investment and aligns with national planning policy.

Lidl welcomes the preparation of the emerging Local Plan and supports the Council's intention to provide a sound and effective planning framework. However, they wish to make representations on several key policy matters, which it is considered require further refinement to ensure the plan is positively prepared, justified, effective, and consistent with national policy as set out in the National Planning Policy Framework (NPPF, 2024).

Lidl wish to make a representation in relation to the following consultation questions set out within the Draft Local Plan consultation:

- Consultation Question 7-4; and
- Consultation Question 5-7.

Lidl would also like to put forward 2no. sites for allocations through the Local Plan process.

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Registered Office: Unit 3a The Incubator The Boulevard, Enterprise Campus, Alconbury Weald, Huntingdon. PE28 4XA Regulated by RICS

Consultation Question 7-4: Do you support Policy TC3 (Out of Centre Retail and Leisure)? Are there any changes required which would improve the policy?

In response to the above question, Lidl are generally supportive of the policy but disagree with the retail impact thresholds set out and consider that a change to the retail impact threshold would improve the policy.

As currently drafted, the policy states:

> *"B. An Impact Assessment will be required for retail and leisure development proposed outside of identified town centres where:*
>
> > *vi. It would provide a gross floorspace in excess of 500 sqm; or*
> >
> > *vii. The proposal is located within 800 metres of the boundary of a district or local centre and would provide a gross floorspace in excess of 200 sqm.*
>
> *C. The above thresholds apply to new floorspace (including mezzanine floorspace), extensions to existing floorspace, changes of use and applications seeking the variation of restrictive conditions."*

The drafted policy proposes a retail impact threshold based upon the nature of specific centres. This approach is considered to be overly restrictive and inconsistent with Paragraph 94 of the National Planning Policy Framework (NPPF), which establishes a default threshold of 2,500 square metres.

The thresholds identified in the draft policy appear to apply uniformly across all types of retail development, including convenience retail, comparison retail, food retail and non-food retail. However, the impacts associated with different forms of retail are not equal. It is therefore considered appropriate for the policy to distinguish between food and non-food retail, rather than applying a single blanket threshold across the board.

It is Lidl's view that the national threshold of 2,500 square metres should be adopted for food retail development in any location across Trafford Council.

Over the past 10 to 20 years, the food retail sector has undergone a significant shift. The majority of food shopping is now undertaken in mid to large format foodstores, many of which are located outside of town centres. These formats are often unsuited to central locations due to their size, parking requirements, and catchment-driven footfall patterns. As a result, the primary impact of new foodstore development tends to fall on existing edge or out-of-centre facilities, rather than on retailers trading within defined town centres.

Given this context, the risk of significant adverse impacts arising from a new foodstore of less than 2,500 square metres in an edge or out-of-centre location is generally considered to be low. The adoption of the 2,500 square metre threshold would still provide an appropriate safeguard against larger format schemes that may have a greater potential to harm town centre vitality, while ensuring that smaller, well-located proposals are not subject to disproportionate policy hurdles.

The practice of adopting differentiated thresholds for food and non-food retail is well established across the country. It is common for local authorities to adopt the national default threshold set out in the NPPF, particularly in the context of food retail. On this basis, Lidl considers the current draft of Policy TC3 to be overly cautious and misaligned with both market realities and national guidance.

It is noted that Trafford Retail and Leisure Study, which represents the most recently prepared evidence with respect to retail and leisure was prepared in August 2019. This document is almost 6 years old.

In addition, the household survey which underpins the document was undertaken in October 2018. This is evidence is now almost 7 years old.

Therefore, this should be revisited so that the Council have an up-to-date evidence base to inform their new Local Plan.

Evidence supporting a Local Plan should be up to date and is crucial in creating a sound Plan. It is recognised by the Planning Advisory Service that evidence base documents that are 2 or more years old are potentially at risk of having been overtaken by events, particularly as they may rely on data that is even older.

Therefore, as a minimum, a new evidence base is required before any retail impact thresholds are set.

Notwithstanding this position. Lidl requests that the policy be amended to introduce a specific threshold for food retail development, set at 2,500 square metres, in line with the NPPF. This would ensure the policy is both proportionate and effective, supporting sustainable growth while continuing to protect the function and viability of defined centres. This should be the default position if the evidence base is not updated.

Supplementary to Question 7-4 - Planning for Retail Needs

Paragraph 124 of the NPPF requires that:

> *"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions."*

This includes meeting the need for additional retail development in areas where there is currently a deficiency.

It is noted that at present, the Trafford and Leisure Retail Study, which forms the evidence base to the emerging local plan, was prepared by Nexus Planning in 2019. This document is now 6 years old and is considered to be out of date, given that the retail market has moved on significantly since it was prepared.

As noted above, the evidence supporting a Local Plan should be up to date and is crucial in creating a sound Plan.

Before any new Development Plan is adopted, a new Retail Study should be prepared. Once this document is prepared, it is necessary to consider whether additional retail sites need to be allocated to meet any additional retail need that is identified.

This must be approached in the same way as new housing of new employment space would be planned for through the Plan process.

Unless this is done, the Plan cannot be considered sound.

Consultation Question 5-7: Do you support Policy EJ5 (Safeguarding Trafford's Employment Land)? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Lidl are generally supportive of the draft policy. However, Lidl consider that the following elements of the policy should be changed to reflect common practices regarding marketing evidence and the Government's position with respect to Use Class E.

The Local Plan proposes that developments which seek to bring forward non-traditional employment uses on designated employment land will need to be supported by a marketing exercise.

The area of this policy Lidl wish to comment on is set out below:

> *"B. Non-employment development (uses other than those specified in all EJ3 and EJ4 policies), other than for operational development required to support existing employment uses, will be resisted within these Employment Areas unless it is demonstrated to the Council's satisfaction that:*
>
> > *i. The site or building(s) is no longer suitable for employment use;*
> >
> > *ii. The possibility of retaining, reusing or redeveloping the site or building(s) for similar or alternative employment use has been fully explored;*
> >
> > *iii. There is a clear demonstrable need for the proposed non employment use;*
> >
> > *iv. The proposed redevelopment would not compromise the primary employment function of the locality or the operations or amenity of neighbouring users.*
>
> *C. Within the employment areas designated as Key Employment Areas by policies EJ3 and EJ4, in addition to part B, applicants must also demonstrate to the Council's satisfaction that:*
>
> > *v. There are no suitable alternative sites within Trafford to meet the need for the proposed development; and*
> >
> > *vi. That the premises or land has been actively marketed for employment use for a minimum of 36 months, which must be evidenced*
>
> *D. Within the employment areas designated by locality policies EJ3N, EJ3S, EJ3C, EJ4N, EJ4S and EJ4C, in addition to part B, applicants must also demonstrate to the Council's satisfaction that:*
>
> > *vii. There are no suitable alternative sites within the locality to meet the need for the proposed development;*
> >
> > *viii. The premises have been actively marketed for employment use for a minimum of 24 months"*

For the purposes of this policy, it is outlined within policies EJ3 and EJ4 that "employment uses" are considered to be the following:

> *"Egi (Office),*
> *Egii (Research and Development,*
> *Egiii (Light Industrial),*

B2 (General Industrial),
B8 (Storage or distribution)"

In terms of the use classes set out within the policy justification, the approach adopted must be consistent with the Government's intention to allow greater flexibility in land use planning, following the introduction of Class E to the Use Class Order.

Further to Use Class E (Commercial, Business and Service) being introduced in September 2020, it is clear that the Government regards Class E uses as employment generating economic uses. In many cases, Class E uses have the propensity to create more jobs and bring greater economic benefits than a Class B use of comparable size. There is therefore sense and logic in grouping Class E uses with Class B uses.

As set out above earlier, Lidl creates around 40 new jobs per store, aligned with the Living Wage Foundation rate for all eligible employees, and without the use of zero-hour contracts. Henceforth, it is evident Lidl stores can create a significant contribution to job creation across Trafford borough.

On this basis, Lidl suggests that all Class E uses should be explicitly supported within Strategic Employment Areas and on employment sites, alongside the existing E use classes supported, B2 and B8 uses, as they are widely acknowledged to be employment-generating.

Lidl also deem the minimum requirement for a 36 months / 24 months active marketing excessive in comparison to the minimum requirements of other Councils across England.

Lidl suggests that the policy be amended to allow for a minimum marketing exercise of 6 months. This would ensure the policy is proportionate whilst also protecting the function and viability of employment land. A shorter timeframe ensures that sites do not sit stagnant and economically inactive for substantial periods of time.

The requirement for marketing evidence in itself, is also considered to be overly onerous and unnecessary. It is Lidl's view that the requirement for marketing evidence should be removed, or as a minimum reduced to a 6 month period, and that a better and more effective approach would be to require viability evidence to be submitted.

It is Lidl's view that the policy should be amended on this basis.

It is also considered that any requirement for marketing evidence should be removed where the proposed use contributes positively to economic development.

Site Allocations

The NPPF requires that Councils plan appropriately to meet the needs of all land uses. As such, Lidl wish to promote two sites to be allocated for retail use.

These sites have also been submitted the Council's Call for Sites exercise.

Former Dobbies Garden Centre, Green Lane, Timperley

The site at Green Lane, Timperley, Altrincham WA15 8QP, is a former garden centre which closed on December 17th 2024. The site primarily contained retail areas, along with an ancillary café for shoppers. As this site has established retail use, and is located between Timperley and Hale Barns, it is suggested a retail allocation on this site would benefit a forthcoming application for the vacant site.

This site will provide additional and enhanced shopping provision for the wider surrounding area, which will see significant growth as the Timperley Wedge / Davenport Green Allocations starts to come forward.

A redline plan of the site has been included at Appendix 1 reference.

Circle Court, Barton Road, Stretford

Circle Court, Barton Rd, Stretford, Manchester M32 9GJ is a current block of flats. Lidl intend to develop the disused area of land to the north of the existing apartment building.

The site is located within a dense residential cluster with limited food retail provision in the locality.

As such, a retail allocation on site would be of benefit to the nearby community, whilst making use of brownfield land.

A redline plan of the site has been included at Appendix 2 reference.

Summary

Lidl very much support the progression of the draft Local Plan for Trafford Council. However, it is important to ensure that the Plan adopts a pro-active approach to development, acts as an enabler to development and does not overly burden developers. The policies within the draft Local Plan must also be considered 'sound' so that it can pass through the Plan examination process.

The comments set out within this letter of representation have been framed in this context. Lidl hope that these comments can be considered on an appropriate basis and are useful to the Council in progressing its new Plan.

Please could written receipt of these representations be provided. In addition, our client would like to be kept informed and notified about the on-going plan process.

Yours sincerely,

Rapleys LLP

emery
PLANNING



Representations

For Wain Estates (Carrington) Ltd | 20-501

Consultation: Draft Local Plan (Policies) Regulation 18

emery
PLANNING

Project:	20-501
Consultation:	Draft Local Plan (Policies) Regulation 18
Client:	Wain Estates (Carrington) Ltd
Date:	12 June 2025

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1. Introduction

1.1 Emery Planning is instructed to submit representations to the Trafford Draft Local Plan (Policies) Regulation 18 consultation on behalf of Wain Estates (Carrington) Limited (hereafter referred to as 'Wain Estates').

1.2 Wain Estates is the principal landowner at New Carrington, which is allocated for 5,000 new homes and 350,000m2 of B2 and B8 floorspace in the Greater Manchester Places for Everyone (PfE). The delivery of the site is of strategic importance for Trafford and Greater Manchester, and it is critical that it is developed in a timely fashion to ensure that the Council meets its housing and employment land requirements, and also to ensure that the regeneration of the site and the area is achieved as soon as possible.

1.3 We set out our responses to the policies of the plan below, under the heading of each relevant chapter.

2. Response to the policies

Plan Period

2.1 Paragraph 22 of the Framework states that strategic policies should look ahead over a minimum 15-year period from adoption.

2.2 The proposed Plan Period for the Local Plan is 2022 to 2042. The base date for the housing and employment policies is 1 April 2022. Therefore, to provide a 15-year plan period from adoption, the plan must be adopted by 1 April 2027. However, the Council is only at Regulation 18 stage now, and the Local Development Scheme (LDS) states that examination will not commence until Spring 2027, with adoption scheduled for '2027 / 2028'. Therefore, the proposed plan period will not provide a 15-year plan period from adoption.

2.3 We consider that the plan period should be extended to 2045, to provide sufficient flexibility for slippage in the programme prior to adoption. Based on the Council's timetable in the LDS, the absolute minimum end date should be 2044.

Policy ST5: Climate Change

2.4 Part b of the policy states that new development 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. The policy would need to be robustly evidenced in terms of the proposed requirement and consistency with national policy (including the Written Ministerial Statement of December 2023) and viability.

Policy RT1: Carbon and Energy

2.5 The proposed policy is not justified and is not consistent with national policy.

2.6 Paragraph 164(b) of the Framework states that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. Paragraph 56-002 of the PPG states that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Notably there is no reference to setting higher standards than Building Regulations in relation to carbon emissions and renewable energy.

2.7 The Written Ministerial Statement (WMS) of 13 December 2023 also has the effect of national policy and is a significant material consideration. This states:

> "the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale."

2.8 Whilst the WMS statement continues to identify that local policies can set additional standards subject to certain criteria being met, the clear emphasis of the WMS is to avoid a proliferation of standards such as this. It can be noted that the preparation of Policy JP-S2 of the PfE pre-dated the WMS, and the PfE Inspector's report explicitly recognises at paragraph 722 that the WMS was not taken into account in the examination of the policy.

2.9 Furthermore, the Trafford Local Plan has not been subject to a whole plan viability assessment to demonstrate that any additional requirements, over and above Building Regulations, would be viable. This conflicts with paragraph 10-001 of the PPG and paragraph 32 of the Framework, which respectively set out that policy requirements should be informed by a proportionate assessment of viability, and should take into account relevant market signals.

Policy RT2: Decentralised Energy Generation

2.10 The policy unnecessarily replicates parts of PfE Policy JP-S3. Such replication is unnecessary, and there is potential for inconsistencies between the policies. Such a policy should not be included in the Trafford Local Plan.

2.11 Furthermore, the policy is not supported by any evidence in relation to deliverability, including viability and grid capacity. Therefore, the policy is not justified, and it is not consistent with national policy.

Policy RT3: Overheating and the Urban Heat Island

2.12 This policy concerns energy efficiency, carbon emissions and climate change. As discussed in our response to Policy RT1, such standards should be addressed through Building Regulations, not a proliferation of varying local requirements.

2.13 Notwithstanding the above, the specific requirement for development to include green roofs, vertical gardens, and strategic tree planting to provide cooling is overly prescriptive, and is not justified by evidence in relation to a) what it will achieve, b) whether it is viable and c) whether it will impact upon the achievement of the overall housing and employment land requirements.

Policy RT4: Sustainable Retrofitting

2.14 Part b of the policy states that all proposals for significant demolition and reconstruction must be 'fully justified', ensuring the efficient use of resources and energy compared to the existing structure. The policy fails to set out what is required for development to be acceptable, and in any event national policy provides no support for the issue of embodied carbon standards. Furthermore, the draft policy is not supported by robust evidence in relation to the potential implications for the achievement of the Council's housing and employment land requirements, given the significant reliance upon previously developed land.

2.15 Part b continues to state that when demolition is 'unavoidable', developments must divert at least 85% of waste from landfills and either reuse materials on-site or salvage appropriate materials for reuse off-site. There is no requirement in national policy to demonstrate that demolition is 'unavoidable', and therefore the starting point of the policy is both unclear and inconsistent with national policy. It is also unclear on what basis the 85% figure is derived. In many cases the re-use of materials will not be feasible or appropriate.

2.16 Part c of the policy is inconsistent with national policy in relation to development proposals affecting heritage assets. The policy as drafted states that there should be no harm. National policy allows for harm where the relevant tests are met.

2.17 In relation to part d, it is not clear why an energy efficiency audit is required for local historical assets. The policy is not justified or consistent with national policy.

Policy RT5: Circular Economy

2.18 The Council has not adduced any evidence to demonstrate that there is a significant local issue which requires a specific local approach (resulting in a proliferation of local requirements, which the Government has made clear that it wishes to avoid). Furthermore, the draft policy is not supported by robust evidence in relation to the potential implications for the achievement of the Council's housing and employment land requirements, given the significant reliance upon previously developed land.

Policy R1: Housing Delivery

Scale and Phasing

2.19 The policy seeks to meet the PfE housing requirement, including projecting the PE requirement forward beyond 2039. Whilst such an approach is allowed for under the Framework's transitional arrangements, it is nevertheless concerning that the Council and Greater Manchester is yet to turn its attention to addressing local housing need under the new standard method. Local housing need has significantly

increased for both Trafford and Greater Manchester. Trafford and the GMCA ought to be doing everything possible to meet local housing need and contribute to addressing the national housing crisis. This means reviewing the PfE housing requirement now.

Delivery of New Carrington

2.20 In terms of delivery to meet the housing requirement, the delivery of the New Carrington allocation is critical to Trafford being able to maintain its housing trajectory and achieve a five-year housing land supply.

- The PfE anticipates 4,300 homes at New Carrington during the plan period (2022 – 2039)
- 945 units were committed at 1st April 2022 - 597 units at Carrington Village and 348 units at Heath Farm Lane. Delivery of Carrington Village has been held up for a number of reasons, in particular issues experienced in agreeing the remediation strategy and the relocation of the rugby pitch.
- The GMCA's Hearing Statement to Matter 8 (housing supply) of the PfE examination advised the first completions of the remainder of the New Carrington allocation would be achieved in 2024/25.
- The GMCA's Matter 23 Hearing Statement of the PfE examination referred to the New Carrington Masterplan (2020) and the New Carrington Topic Paper (2021) for its evidence on delivery. The trajectory in the New Carrington Masterplan has Sale West coming forward for significant development from 2024/25. This includes commencement of delivery on SR2A which is the main development area within Sale West and is controlled by Wain Estates.

2.21 Early phases of New Carington are therefore critical to the housing trajectory being maintained. The masterplanning and application processes must be expedited to ensure that the site can be delivered in accordance with the Council's trajectories which underpin Policy R1. At this point Wain Estates have significant concerns in respect of ongoing delays to the masterplanning process and the Carrington Relief Road.

Distribution and Supply

2.22 In relation to housing distribution, Paragraph 4.11 states that "*The distribution of development between each Locality is set out in Table 4-2*". However, Table 4-2 only purports to set out the housing land supply (notwithstanding the basis for the figures is unclear).

Table 4-2: Total Identified Housing Land Supply by Locality as at March 2025*

Locality	Net additional homes
North	18,704
South	3,860
Central	677
West	5,072
Total	28,313

* This includes small sites which are identified within the current land supply in lieu of setting a windfall allowance.

2.23 The plan needs to be clear that this is not a proposed distribution of development and, importantly, there needs to be sufficient flexibility to ensure that the housing requirement will be met.

2.24 However, there is no trajectory or supply paper published with this consultation as to when these sites will deliver. Whilst we consider most of the sites in PfE and current supply will deliver going forward, but the key issue is when given the significant housing needs early in the plan period even with the stepped trajectory. The 5 year supply was considered in the appeal at 35 Oakfield, Sale (3325034), where the Inspector stated:

> *"(b) Five Year Housing Land Supply*
>
> *89. The Statement of Common Ground records that the Council can demonstrate only 3.85 years deliverable supply of housing land. Although the Council contends that the supply situation is improving, and the likelihood of a fiveyear supply within the next 12 - 24 months, these claims are contested by the Appellant.*
>
> *90. For my part, I see no merit in detailed analysis. The current shortfall is, in any event, significant and the proposal would make a small net contribution towards addressing the shortfall which I assess as a modest benefit."*

2.25 This is important as the GMCA was very clear at the PFE examination that the PFE does some of the 'heavy lifting' in terms of allocating sites and Green Belt release, but by no means all of the 'heavy lifting'. In particular, the supply of housing land was not assessed through the PFE examination, and the GMCA was clear that it would need to be assessed through the District Local Plans. The GMCA also accepted that if the supply turned out to be insufficient to meet the housing requirements, it may be necessary to release further sites from the Green Belt. To this effect paragraph 11.3 states:

> *"11.3 As appropriate, district Local Plans will allocate sites from this supply reflecting the distribution set out in tables 6.1, 6.2 and 7.2, to ensure that the spatial strategy can be met. In the event that it proves necessary to look to land beyond the existing supply, as updated, national planning policy would apply including in the case of the Green Belt the requirement for exceptional circumstances."*

2.26 If the supply of housing land is not robust and there is a high risk of sites not being delivered as anticipated, which is currently the position, additional sites need to be allocated. Given the absence of non-Green Belt alternatives, as illustrated by the PfE releasing sites from the Green Belt in Trafford, we consider that further Green Belt release is required to meet the housing requirement moving forward.

2.27 Wain Estates continues to promote additional land at New Carrington which would be suitable for housing development, including parcels CE3B and the proposed extension to SR2A. Call for sites submissions are made under separate cover.

Safeguarded land

2.28 Safeguarded land was addressed during the examination at the Matter 9 Hearing on 13 December 2022, where the GMCA confirmed that safeguarded land is one of the 'heavy lifting' items for the District Local Plans to consider under the current Framework.

2.29 We consider that safeguarded land must be provided in the Trafford Local Plan to ensure that the plan is consistent with national policy. Paragraph 142 of the Framework identifies that the essential characteristics of Green Belts are their openness and their permanence. Paragraph 145 requires strategic policies to establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Paragraph 148 states that when defining Green Belt boundaries, plans should (amongst other requirements):

> "c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
>
> e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period;"

2.30 Therefore, national policy is clear on the need to ensure that Green Belt boundaries will not need to be altered at the end of the plan period (currently 2042). This is a critical aspect to achieving the intended permanence in the long term. The appropriate mechanism for achieving this is through the provision of safeguarded land for the next plan period, in addition to a plan which provides sufficient land to meet development needs for the current plan period.

2.31 Furthermore, Trafford is a significant urban district within Greater Manchester and it is inconceivable that development needs will reduce substantially in the future given the recent increase in the standard method. Therefore, the only way of ensuring that the Green Belt boundaries can endure beyond the plan period is to designate safeguarded land.

2.32 Wain Estates continues to promote additional land at New Carrington which would be suitable for designation as safeguarded land, including parcels CE3B and the proposed extension to SR2A. Call for sites submissions are made under separate cover.

Policy R3: Affordable and Social Housing

2.33 PfE Policy JPA30: New Carrington is clear that the requirement for affordable housing at New Carrington is 15%. However, this is not made clear in Policy R3 which proposes alternative affordable housing requirements, without any reference to New Carrington. The policy must be amended to clarify that the affordable housing requirement for New Carrington is set under PfE Policy JP Allocation 30, and Policy R3 is not applicable.

2.34 In relation to the requirement for 10% of affordable homes to be provided as Totally Affordable Net Zero (TANZ) homes, it is also assumed that this is not intended to apply to New Carrington given that it is not a requirement of PfE Policy JPA30, and no allowance for such housing was accounted for in the viability evidence which supported the PfE. Again, this needs to be clarified in Policy R3.

Policy R4: Size and Type of New Homes

2.35 The policy sets a requirement for applications to be accompanied by a housing need statement, and states that the Council will not support applications for major development which would result in an over-concentration of a particular dwelling size or type (based solely on bedroom numbers), where they do not meet an identified local need.

2.36 We support the specific reference to the need for family housing, which is particularly acute in the borough given that recent delivery has been dominated by apartment schemes.

2.37 We note the findings of the Trafford Housing Need Study 2023, but the data from this assessment for market housing is based on demographic projections. There is insufficient consideration of householder aspirations, demand and other factors affecting the demand for dwelling sizes such as homeworking and spare bedroom requirements for family flexibility. Other factors that need to be taken into account include local character and viability. This should be reflected within the policy, which should make clear that housing mix should be applied flexibly, having regard to these factors.

Policy R5: Housing Density

2.38 The policy unnecessarily duplicates PfE Policy JP-H4, which sets out density provisions, and it also conflicts with Policy JPA30, which sets out proposed average densities for the New Carrington allocation. The policy should therefore be deleted.

Policy R6: Older Persons Accommodation

2.39 Part b of the policy states that the Council will seek to meet the needs of older persons through the provision of approximately 4,500 homes of the overall housing land target to be developed as new housing for older persons households, including approximately 2,500 C3 homes, 1,000 C2 extra care homes and 600 C2 residential bed spaces.

2.40 Wain Estates considers that there is a need for such accommodation and is supportive of the provision of specialist housing to meet the needs of older persons. However, the Council needs to provide up-to-date evidence on the need to demonstrate that the policy, and the figures set out within it, is justified. Guidance is provided in the PPG as to how the need for such accommodation should be calculated. Furthermore, having identified a need and a requirement, the Council needs to demonstrate how the proposed requirements will be met. We consider that the Council should work with providers to identify and allocate suitable and deliverable sites to meet the need.

2.41 Part c of the policy states that major development of 10 or more dwellings (or equivalent C2 care bed spaces) will need to be in accordance with the affordable housing requirements set out in Policy R3. The C2 use class covers a wide range of accommodation including extra care (which may comprise dwellings) and a care home which provides bedspaces. It is not appropriate to group such accommodation with the general requirements set out in Policy R3. Any requirement for affordable housing for these types of accommodation needs to be subject to viability testing, and evidence to demonstrate that such units can practically be delivered.

Policy R7: Adaptable and Accessible Housing

2.42 The policy replicates PfE Policy JP-H3 in relation to the requirement for M4(2) dwellings. Such replication is unnecessary and may result in conflicting policy requirements. This aspect of the policy should be deleted.

2.43 Part b of the policy states that proposals of 50 or more homes will be required to provide at least 4% of new homes to be built to Part M4(3) wheelchair accessible and adaptable standard. However, the Council has not presented any evidence in relation to need and viability (see paragraph 63-015 of the PPG). Furthermore, additional policy burdens must not be added to the PfE allocations (including New Carrington) which were subject to viability testing through the PfE process.

2.44 Part c of the policy refers to Lifetime Homes standards. However, Lifetime Homes have been superseded by the optional Building Regulations accessibility standards. The reference should be deleted.

Policy R11: Self-Build and Custom Housing

2.45 The Council has not adduced evidence to demonstrate that a requirement for 5% of dwellings on schemes of more than 100 dwellings to comprise self-build and custom housing is justified. Further analysis is required, having regard to the guidance in the PPG, to demonstrate the need (beyond the limited information provided in the supporting text), together with how the much supply would be created through the proposed policy. The Council also needs to evidence that it has considered alternative methods for meeting needs, including allocating specific sites or a specific exception policy.

2.46 Part d of the policy states that each plot must be marketed for at least 24 months and where plots remain unsold after the marketing period they will either be further marketed for a period as agreed by the LPA or will be transferred to a Registered Provider for the provision of affordable housing at affordable housing land values. There is no justification for such an approach. Such plots should be available for delivery as general market housing if there is no demand for them as market self-build plots.

Policy EJ1: Employment Land Requirements

2.47 The plan seeks to establish an employment land requirement based on rolling forward Trafford's proportion of the employment land supply identified in Table 6.1 of the PfE. Such an approach was debated during the PfE examination, albeit it was not taken forward as the Inspector's considered that the requirement did not need to be disaggregated in the PfE. However, formulating the proposed requirement in such a simplistic way means that there is no in-depth analysis of the types and quantum of employment floorspace that will be required, or the locational requirements, to fulfil the economic potential of Trafford. Sectors such as logistics and distribution are seeing unprecedented levels of demand, with an inadequate supply to meet this need.

2.48 Paragraph 87 of the Framework states:

> "Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations." (our emphasis)

2.49 The requirement to make provision for storage and distribution operations at a variety of scales is also reflected in PfE Policies JP2 and JP4.

2.50 Policy JP-J4 sets a requirement of 3,300,000 sqm (35,520,904 sqft) industrial and warehousing floorspace across the plan area. This is based upon the need figure identified within the Updated Note on Employment Land Needs for Greater Manchester (2021) by Nicols Economics. This report is the key

evidence base document for the employment land requirement in the PfE, with the methodology principally based on historic past take-up rates.

2.51 Against the requirement of 3,300,000 sqm (35,520,904 sqft) industrial and warehousing floorspace in Policy JP-J4, the PfE allocates sites which would bring the total supply to 4,060,000 sqm (43,701,476 sqft) industrial and warehousing floorspace. This is approximately 700,000 sqm (7,534,737 sqft) (21%) greater than the requirement and need figure identified by Nicols Economics. The purpose of allocating this additional land is to ensure that the supply addresses the qualitative supply issues that are not factored into the requirement figure which is based on past trends. Fundamental to these qualitative factors is the need for large-scale industrial, logistics and warehousing, which is not properly captured in the past take-up rates (and therefore the future need). This is due to changes in demand for large-scale logistics and warehousing driven by internet retailing and a need for greater reliance in supply chains. Furthermore, the lack of previously available supply to accommodate large-scale industrial, logistics and warehousing means that the need is not captured in past take-up rates.

2.52 Paragraph 6.31 of the PfE states:

> "There is evidence that past industrial and warehousing completions have been constrained by a lack of suitable sites within Greater Manchester, resulting in the city-region being unable to compete for some major occupiers. When combined with the need to secure a significant increase in the quality of accommodation available to respond to evolving business requirements and increasing global competition, this means that a considerable uplift on past development rates is needed."

2.53 The PfE also highlights the critical importance of providing a range of sites to meet all needs, including the critical need for large-scale logistics. Paragraph 6.30 of the PfE states:

> "There is already a varied range of industrial and warehousing locations, ranging from major areas with strong brand recognition such as Trafford Park to numerous smaller employment areas that are an important source of local employment and business opportunities. However, our long-term economic success will partly depend on the ability to continually renew and enhance the supply of accessible industrial and warehousing premises, responding to changing business practices and demands. Rising levels of automation and digitisation, increased customisation, greater integration of product services, and demands for more functionally and energy efficient premises are all leading to the need to increase the supply of new high quality floorspace, often with larger floorplates. At the same time, there will continue to be a demand for smaller and/or cheaper accommodation to support local businesses and start-ups that may often be working on narrow margins but make an important contribution to our economy. All of this points to the need for a diverse portfolio of sites and premises, both retaining existing premises and providing new ones of varying size and location." (our emphasis)

2.54 As the Council is aware, Wain Estates is progressing a planning application for up to 95,000m2 of B2/B8 floorspace at Carrington Junction (LPA ref: 109755/OUT/22). As part of the application, JLL has prepared an updated review of the industrial and logistics market for Trafford and the wider region. The key findings of the report are as follows:

- There is strong occupier demand for Grade A industrial/ logistics units over 250,000 sq ft in Trafford and core North West locations with limited choice for occupiers.
- Trafford does not have an adequate employment land supply. The Borough relies on the redevelopment of older employment sites or occupiers utilising poorer quality buildings.
- Trafford does not have the ability to offer a wide range of sites on either a qualitative or quantitative basis to attract large occupiers.
- Trafford has only two sites potentially capable of delivering a building in excess of 250,000 sq ft and both sites are in Carrington. These are Carrington Junction and Voltage Park (Phases 1&2). Voltage Park (Phase 1) alone is insufficient to satisfy the scale of demand for larger requirements, with consent for only one unit of 285,000 sq ft and with the other consented units being significantly smaller. A detailed planning application for a unit of 383,000 sq ft at Voltage Park (Phase 2) has been submitted but this cannot be delivered prior to the Carrington Bypass/Relief Road being completed, which The Junction is not restricted by. Also, we understand there are issues with Voltage Park, which are currently impacting the deliverability of these units.
- From an analysis of the current Grade A availability there are only ten existing/under construction buildings of 250,000 sq ft or more in the North West, with only three units on the market in Greater Manchester and only one of which is in Trafford, being K333 on Trafford Park.
- The list of requirements (250,000 sq ft+) so far this year show the following:
  - there are 19 requirements that would consider Trafford as a location. This translates to floor space requirements of between 6 to 9.3 million sq ft.
  - Of these 19 requirements, 13 are focussed on the North West with the remaining six considering the North West alongside other regions.
  - Six of these requirements require a minimum building of 400,000 sq ft.
  - The average size of the current requirements identified is 404,473 sq ft. An analysis of requirements for units of 250,000 sq ft or larger during 2023 in the North West shows 25 requirements with an average size of 311,200 sq ft. This shows an increase in average requirement size year on year.
- The average transaction sizes in the North West for each year between 2020 – 2023 is as follows:-
  - 2023 - 305,776 sq ft
  - 2022 - 361,855 sq ft

  - 2021 - 249,067 sq ft
  - 2020 - 215,733 sq ft
- A particular increasing occupier trend in the wider market is the need for a high-power connection which can be extremely slow and costly to upgrade. Carrington Junction has access to a substantial power supply, which could be a significant factor in retaining an existing occupier or attracting a new occupier into the Trafford borough.
- Carrington Junction would be able to deliver two units of circa 400,000 sq ft and 500,000 sq ft, which currently cannot be accommodated elsewhere in Trafford. This will diversify and improve Trafford's industrial employment land portfolio, which is lacking in consented sites of this scale.
- Carrington Junction could provide Trafford with an attractive industrial/logistics opportunity that is deliverable, helping meet the strong occupier demand for large-scale units over 250,000 sq ft. This will result in significant new jobs and substantial business rates revenue for Trafford Council.

2.55 JLL therefore consider that there is a clear need for large scale B2 / B8 units in Trafford. The findings of the JLL report have been largely accepted by the Council's own consultants. The Local Plan provides a clear opportunity to address this need.

2.56 Notwithstanding the above, it is not clear how the employment land requirement within the plan (as currently drafted) would be met. The proposed supply needs to be set out, together with evidence to demonstrate that the sites within the supply are deliverable.

2.57 In addition to Carrington Junction, which involves the partial loss of one of the SBIs, Wain Estates is also promoting further land at New Carrington which would be suitable for employment use (the land known as CE3B). A call for sites submission is made under separate cover.

Safeguarded land

2.58 We have addressed the need to identify safeguarded land in our response to Policy R1. The same principles apply for both housing and employment development, and therefore the comments are equally applicable in response to Policy EJ1.

2.59 Wain Estates continues to promote additional land at New Carrington which would be suitable for designation as safeguarded land, including parcel CE3B which proposed for housing and/or employment use. Call for sites submissions are made under separate cover.

Policy EJ3: Industry and Warehousing

2.60 We generally support the identification of New Carrington for industry and warehousing. However, it is not clear why this is necessary in the context of the PfE allocation. Furthermore, a degree of flexibility may be required in relation to New Carrington, given the existing COMAH restrictions, and New Carrington' potential to accomodate significant infrastructure which falls outside of B2 and B8 use (for example, small modular reactors, energy infrastructure including battery storage and AI growth related infrastructure including data centres). We therefore do not support the policy as proposed.

Policy EJ5: Safeguarding Trafford's Employment Land

2.61 The policy seeks to resist the loss of employment land within areas. However, New Carrington is identified for a mixed-use development under Policy JPA30. We do not consider it is necessary to have additional policy requirements in addition to Policy JPA30. Furthermore, as we have set out in our response to Policy EJ3, a degree of flexibility may be required in relation to New Carrington, given the existing COMAH restrictions, and New Carrington' potential to accommodate significant infrastructure which falls outside of B2 and B8 use. We therefore do not consider that the policy as drafted is appropriate for New Carrington.

2.62 Furthermore, the proposed requirement to market sites for 36 months is also not justified or proportionate. If there is a need for an alternative form of development, such as energy or data related development at New Carrington, then there should be no need to market the site at all.

Policy EJ6: Data and Energy Storage

2.63 Part a of the policy states that applications for data or energy storage facilities will be expected to utilise 'low profile', former industrial brownfield sites that have existing infrastructure. Firstly, it is not clear what is meant by 'low profile'. Secondly, it is not realistic to limit such development to brownfield sites, when the need has not been addressed through the plan, but is considered to be significant and exponentially rising. In reality, Green Belt sites are likely to be required to meet the needs. This is a matter that the Council should consider further ahead of the next version of the plan.

2.64 Part d of the policy states that proposals for Data and Energy storage must not constrain the early development of key strategic employment and housing sites. Again, clarity is required as to what this means. There may be significant opportunity for data and energy storage at New Carrington given the unique nature of the location and the availability of power.

2.65 Part e of the policy states that due to the low direct economic benefits of data or energy storage use, proposals will be expected to make Section 106 contributions towards academia and skills organisations.

As the Council is aware, Wain Estates has offered to make significant investment in skills and education as part of its Carrington Junction proposal. However, for data and energy storage proposals, it is not clear how such contributions would directly relate to a proposed development, or how a development would be otherwise unacceptable without such contributions.

Policy TM10: Parking Standards

2.66 Electric vehicle charging provision is now covered by building regulations. Planning policy should not duplicate or seek to vary requirements set by other legislation.

Policy GI1: Landscape Character Areas

2.67 The landscape character types set out within the policy and Figure 8-1 comprise a mix of types taken from different assessments, which overlap in some areas, and in other areas the boundaries conflict. Furthermore, the Trafford Landscape Strategy is the only borough specific evidence relied upon, but this is more than 20 years old. The policy needs to set out clear requirements for specific areas, based on up-to-date evidence.

2.68 In addition, the wording of the policy is inconsistent with the Framework and is not justified. Paragraph 187(a) of the Framework refers to protecting and enhancing valued landscapes, whilst paragraph 187(b) refers to recognising the intrinsic character and beauty of the countryside. The policy seeks to apply a level of restriction akin to valued landscapes across the entirety of the borough. The policy should require development to have regard to the qualities, features and characteristics of the landscape character areas.

Policy GI2: Green Infrastructure Network

2.69 The policy states that the Council will seek to protect, enhance, and manage Trafford's Green Infrastructure (GI) as an accessible network of connected. varied, multi-functional green and blue spaces, which respond to local character. However, green infrastructure is not fully defined and is not identified on the proposals map. The policy could be interpreted to effectively apply to all greenfield sites, noting that paragraph 8.10 even refers to countryside areas. Such an approach is not appropriate or justified given that there is a need to development greenfield sites to meet development needs. A proportionate approach must be taken which accords with national policy as set out in Section 15 of the Framework, and in particular paragraph 188.

Policy GI5: Green Infrastructure Opportunity Areas & Policy GI5W: Green Infrastructure Opportunity Areas in West Trafford

2.70 The policy identifies New Carrington as one of 13 'Green Infrastructure Opportunity Areas'. It is not clear why these areas have been selected and there is seemingly no evidence underpinning the proposed designations, both in terms of the existing baseline, the intended outcomes, and how this will impact development proposals in terms of viability and deliverability.

2.71 The policy also states that within such areas, development proposals must demonstrate how they will safeguard and enhance existing areas of valued habitats and sites of biological importance. Such an approach of blanket protection is inconsistent with the Framework, which states at paragraph 187(a) that planning policies should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils in a manner commensurate with their statutory status or identified quality in the development plan.

Policy GI6: Green Infrastructure in New Developments

2.72 This policy states that all development proposals must demonstrate how they will contribute to the protection, enhancement (including quality and/or the multi functionality), and expansion of the Green Infrastructure network. As set out above in our responses to Policies GI2 and GI5:

- Green infrastructure is not fully defined and is not identified on the proposals map. The policy could be interpreted to effectively apply to all greenfield sites, noting that paragraph 8.10 even refers to countryside areas. This is not appropriate given that there is a need to development greenfield sites to meet development needs. A proportionate approach must be taken which accords with national policy as set out in Section 15 of the Framework, and in particular paragraph 188.
- An approach of blanket protection, regardless of environmental quality, is inconsistent with the Framework, which states at paragraph 187(a) that planning policies should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils in a manner commensurate with their statutory status or identified quality in the development plan.

2.73 The policy continues to stimulate the achievement of an Urban Greening Factor (UGF) score of between 0.3 and 0.5, depending upon the type of development. However, the Council has not provided evidence to justify the proposed UGF requirement in terms of why 0.4 or 0.5 is necessary, and also that the proposed requirement is viable and will not impact upon the deliverability of sites. A further issue with UGF is that it does not stipulate what is the right type of "greening" for a location in terms of character and amenity. Therefore, even if a policy can be demonstrated to be viable and not impact upon the achievement of

development requirements (including site capacities), the policy should make clear that it needs to be applied flexibly.

Policy GI7: Trees, Woodland and Hedgerows

2.74 The policy states that trees, woodlands and hedgerows will be protected and enhanced. Again, such an approach of blanket protection is unnecessary and inconsistent with the Framework. Where there is the loss of trees, woodlands and hedgerows, a balanced judgement is required considering the quality of what is lost versus proposed mitigation measures, also taking into account the wider benefits of a proposed development. This should be reflected within the policy.

2.75 The draft policy also states that for major development a Tree Canopy Cover Assessment must be provided that demonstrates how the development will incorporate trees on site, and:

- where there is no existing tree canopy cover, provide a minimum of 20% tree canopy cover (upon maturity) across the whole site area; or
- where there is existing tree canopy cover, provide a minimum increase of 10% tree canopy cover (upon maturity over the existing onsite tree canopy cover);

2.76 The proposed approach is not justified. For example, we would query why 20% is required on a site which may currently contain no trees at all. Furthermore, such an approach could have a very significant impact upon development viability, and also the quantum of development that can be achieved on sites of all scales. The Council needs to provide robust evidence that such an approach would not impact upon development viability, deliverability or the overall quantum of development across the entirety of the Council's housing and employment land supply.

Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets

2.77 Part a of the policy states that development proposals must demonstrate a clear commitment to the protection and enhancement of Trafford's locally designated sites and natural environment assets, as defined on the policies map. As stated above, an approach of blanket protection is inconsistent with the Framework, which states at paragraph 187(a) that planning policies should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils in a manner commensurate with their statutory status or identified quality in the development plan. The policy therefore needs to differentiate between designations and the quality of sites. As drafted the policy fails to do this.

2.78 The policy should also recognise that where there is harm to a locally designated site, a balanced judgement is required considering the status of the site, the impacts of the proposed development on the designated site, the proposed mitigation measures, and the need for and/or benefits of a proposed development.

Policy GI10: Building Biodiversity into New Developments

2.79 This policy states that all development proposals should seek to enhance biodiversity beyond the minimum mitigation requirements, where appropriate and practical. The requirement for a 10% net gain in biodiversity is out in legislation. There is no evidence or justification for the proposed approach of exceeding the national requirement. The proposed policy is therefore contrary to paragraph 74-006 of PPG.

Policy CT5: Social Value in New Developments

2.80 Wain Estates has demonstrated a willingness to enter into a comprehensive local labour and training agreement in respect of the proposed Carrington Junction development, to maximise the local benefits of the proposed development in the overall planning balance, for a large-scale employment development that would deliver a significant number of local jobs. However, such agreements are not necessary or appropriate for all forms of major development. The Council will therefore need to evidence what the implications of the policy would be in terms of viability and deliverability (including timescales for delivery).

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12th June 2025

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To whom it may concern,

TRAFFORD LOCAL PLAN REGULATION 18 CONSULTATION DRAFT - POLICIES - SITES KNOWN AS PLOTS 10C & 11, TRAFFORD WHARF ROAD & SOUTH OF WATERSIDE

CBRE Limited has been instructed on behalf of Electricity Supply Nominees (Scotland) Limited (ESN) c/o CBRE Investment Management (CBRE IM) to submit representations to Trafford Council's Local Plan Regulation 18 Consultation Draft document and the accompanying Call for Sites exercise in respect of its landholdings to the south of Trafford Wharf Road (known as Plot 10c) and to the south of Waterside (known as Plot 11), Trafford Park ('the Site'). The location of the sites are shown edged in red on the aerial plan below.

This representation builds on previous comments made to Trafford Council in relation to the site for the 2024 Trafford Wharfside Development Framework and Masterplan consultation. The representations supported the regeneration of this area of Trafford and the allocation of the site for high quality residential-led development.



Figure 1: Indicative Site Boundary

This representation is set out as follows:

- Site Context;
- Planning Policy Context;
- Response to the Regulation 18 Local Plan Draft Consultation;
- Call for Sites; and
- Summary and Conclusion.

Site Context

The Site and its Surroundings

Plot 10c and Plot 11 is situated within the Gorse Hill and Cornbrook Ward of Trafford North and within Trafford Park, a predominantly industrial area in south Manchester (c.3 miles south west of Manchester City Centre), and adjacent to the more commercial and residential area of Old Trafford. Trafford Park has developed into a major industrial estate. Trafford North is located opposite Old Trafford, Salford Quays and MediaCityUK, as well as various tourist attractions such as the Imperial War Museum and Old Trafford football stadium. It is characterised by low density industrial and manufacturing buildings.

This growth is in part attributed to its excellent transport links, including proximity to the M60 motorway, providing quick access to the North-West motorway network. Trafford itself is evolving as various new residential schemes come forward, contributing to the southward expansion of Manchester City Centre.

Land to the south of Trafford Wharf Road (Plot 10c) is rectangular in shape and covers approximately 0.86 hectares. The site is currently used for employment purposes and is occupied by two units in office, industrial, and warehousing uses, along with associated surface car parking and yards. There are green spaces in the north and south.

Land to the south of Waterside (Plot 11) is a long rectangular shape and covers approximately 1.57 hectares. It is used for employment purposes, and contains five units in office, industrial, and warehousing uses. With associated surface car parking and service yards. A green strip runs along the southern edge of the site.

The freehold interest in the Site is owned by ESN c/o CBRE IM, the relevant leasehold interests have been set out below for context:

Plot 10c. Electricity Supply Nominees Ltd

- Leasehold to LDEX Group Ltd (Lease expiry 05/03/2035)

Plot 11. Electricity Supply Nominees Ltd

- Leasehold to Hilti (Gt. Britian) Ltd (5 yrs) (Lease expiry 15/07/2025)
- Leasehold to Hilti (Gt. Britian) Ltd (10 yrs) (Lease expiry 30/08/2028)
- Leasehold to Strawberry Catering Ltd (10 yrs) (Lease expiry 06/02/2034)
- Leasehold to Wilman Universal Industries Ltd (10 yrs) (Lease expiry 16/10/2029)
- Leasehold to Rubix U.K. Ltd (6 yrs) (Lease expiry 26/11/2026)

Planning Policy Context

As the Council are familiar with the planning policy context for the sites and the surrounding area, we do not provide a detailed summary within this section of the representation. However, we would like to highlight the following allocations and policies.

Adopted Trafford Core Strategy (2012)

The following adopted development plan polices are of relevance:

- *UDP Saved Policy E7* – allocates the sites as a Main Industrial Area.
- *Core Strategy Appendix 1* – notes that the sites sit within the Regional Centre.
- *Core Strategy Policy SL2* – notes that the sites form part of the wider Trafford Wharfside area under which is recognised for its significant potential for new economic and residential development, as part of MediaCityUK, alongside Manchester United Football Club. Policy SL2 has been partially replaced by Places for Everyone (PfE) Policy JP-Strat1 and JP-Strat-3 (please refer to sub-section below); however, the following sub-sections remain relevant.
  - *In the Mediacity:uk area: high quality mixed-use development for employment activity (10 hectares of mainly B1 office and light industrial uses), leisure (including hotels) residential development (900 units) and an appropriate scale of supporting retail and community uses;*
  - *A high quality, high density, multi-storey mixed-use redevelopment of Victoria Warehouses which is a prominent long-standing, under-used, 1.4 hectare site located at the Trafford Wharfside eastern gateway. The mixed-use redevelopment to comprise: residential apartments; commercial office accommodation; hotel accommodation; and ancillary leisure and retail accommodation; and*
  - *In the Manchester United stadium area: development that supports the existing football stadium and associated hospitality, conference, retail and visitor facilities.*
- *Core Strategy Policy L1* – contains an annual housing target of 694 units per annum up to 2018 and 578 per annum between 2019 and 2026; however, as this plan is deemed "out of date" in terms of its housing targets by the NPPF.

Places for Everyone (2024)

The following adopted Places for Everyone polices are of relevance:

- *Policy JP-Strat1: 'Core Growth Area'* - protects and enhances the economic role of the Core Growth Area through sustainable development as well as significant increase in the number and range of homes. It notes that improvements in connectivity between areas such as The Quays will mean that these areas can become increasingly suitable for high density and will support growth across the City Centre.
- *Policy JP-Strat3: 'The Quays'* - notes that the area is expected to continue evolving as an economic hub of national importance, with significant growth anticipated across business, residential, leisure, and tourism sectors. Future development is expected to be of high density. The high environmental quality of the Quays (including its public realm, green infrastructure, wildlife sites and heritage assets) will be safeguarded and improved as these elements are key to its unique character, high quality, distinctive design will continue to be a priority. The policy also highlights that major improvements in sustainable and active travel will be sought, including stronger connections to key rail stations and enhanced connectivity with the City Centre.
- *Policy JP-S1: 'Sustainable Development'*- sets out PfE's focus on prioritising brownfield development. It states that in preparing plans, suitable brownfield land and vacant buildlings will be preferred as much as possible to meet development needs. This will provide investment into existing urban areas and address dereliction, supporting regeneration and enhancement of urban locations.

- *Policy JP-H1: 'Scale, Distribution and Phasing of New Housing Development'* - sets out the minimum number of net additional dwellings each authority is expected to identify. For Trafford, an annual average of 1,122 new dwellings per annum is required up to 2039 to meet housing demand in the area.

Housing Need

PfE sets out the housing requirement for each of the nine Greater Manchester authorities. For Trafford an annual average of 1,122 new dwellings per annum is required up to 2039 to meet housing demand in the area. The new Local Plan is based on this housing requirement, with 1,122 expected to be delivered annually from 2025, culminating in 19,077 homes delivered between 2022-2039.

NPPF (2024) – Standard Method

The NPPF expects strategic policy-making authorities to follow the standard method for assessing local housing need to identify the minimum annual housing need figure for each LPA. Trafford's housing targets have being significantly increased from 1,122 to 1,607 dwellings per annum (a 43% increase) as a result of the updated to the standard method included within the NPPF (December 2024) and the Government's ambition to deliver 1.5 million homes within the next 5 years.

Housing Delivery Test

The Ministry for Housing, Communities and Local Government (MHCLG) introduced the 'housing delivery test' in 2018 to measure net additional dwellings built in a local authority's area against the homes required. HDT results are published annually by DLUHC with measures set out for local planning authorities that do not fully meet their delivery rate targets.

Trafford scored 78% in the latest housing delivery test for 2023 (published 2024), meaning that a buffer of 20% is added to the local housing need figure until housing delivery goes above 85%. Trafford has historically not been able to deliver housing in line with need, in part, due to the slow delivery of Trafford's larger, strategic locations including Trafford Wharfside.

Response to the Regulation 18 Local Plan Draft Consultation

Comments are provided below to the relevant questions posed by the Council as part of the Regulation 18 consultation, in respect of our client's landholdings. ESN c/o CBRE IM reserves the right to submit further representations as the Local Plan process evolves and additional evidence is published.

The Site is located within a 'Core Growth Area' under draft policy ST1 of the draft New Local Plan. The Trafford North Localities – Place Profile consultation document highlights that the Trafford Wharfside area is earmarked for transformation stemming from the redevelopment of Old Trafford and the area surrounding the stadium.

Strategy

The New Local Plan strategy has been drafted based on the overarching PfE Spatial Strategy which provides the strategic policies for Greater Manchester (excluding Stockport). It is understood that various spatial options have been considered throughout the preparation of the New Local Plan consultation which included focusing development and growth in the north/south, increasing densities and Green Belt release. The proposed strategy is a hybrid option which seeks to:

- *"Optimise the baseline housing land supply, ensuring all opportunities to increase densities and to identify additional sites were explored;*
- *Concentrate development near to town centres and/or sustainable public transport hubs;*
- *Take advantage of existing and planned global assets; and*

- *Deliver inclusive growth across Greater Manchester, seeking opportunities to boost the competitiveness of north Greater Manchester whilst sustaining the competitiveness of south Greater Manchester."*

ESN c/o CBRE IM are supportive of the overall spatial strategy set out within the Draft New Local Plan consultation and recognise that the regeneration of key areas of Trafford such as Trafford Wharfside will help to deliver inclusive growth and promote high quality mixed use development. Responses to the relevant consultation questions within the Strategy section of the draft New Local Plan are set out below:

Consultation Question 2-1 Do you support Policy ST1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

ESN c/o CBRE IM is supportive of the location and vision for the Core Growth area, which focuses "*development opportunities*" around "*key growth locations*" including Wharfside where the site is located. The Wharfside area presents a significant opportunity for mixed use residential development, given its highly sustainable location with direct links to work and leisure uses within Manchester City Centre and Salford City Centre.

Trafford is the second largest contributor to Greater Manchester's economy and Trafford Park plays an important part in this as a major industrial location both regionally and nationally with over 1300 business and 41,000 employees. Whilst it should be protected for employment uses there is a wider long terms vision to transition the Wharfside area to create destination location within Greater Manchester and a sustainable vibrant local community, the draft policy sub-text rightly identifies that as Trafford evolves and market drivers shift demand, there is an opportunity to deliver new residential mixed-use areas in highly sustainable locations which meet Trafford's housing need.

Manchester United released a vision for the new Old Trafford Stadium District in March 2025 including the new landmark stadium and mixed-use development. The allocation of this site and the redevelopment of the wider Wharfside area will support the redevelopment given its neighbouring location, capitalising on its sustainable location and close connection Manchester City Centre.

Consultation Question 2-4 Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

ESN c/o CBRE IM supports the principles set out in Policy ST4, particularly the positive approach taken when considering development proposals reflecting the presumption in favour of sustainable development set out in the NPPF. This is particularly important in addressing the need for new housing in a context of delivery challenges as seen in the results of the housing delivery test, whilst managing growth responsibly.

ESN c/o CBRE IM welcomes the policy's commitment to collaborative working between the Council and applicants, which is important for unlocking the potential of development sites and ensuring that planning processes are efficient and solutions-focused. It is important that there is clarity and certainty on the expectations for development coming forward through plan-led decision making to allow opportunities to be developed and come forward without delay and with confidence.

Culture, Leisure and Tourism

The draft New Local Plan acknowledges that Trafford is strongly positioned within Greater Manchester and offers a diverse range of cultural/ leisure assets and visitor attractions which contribute to it's rich and varied culture. Responses to the following relevant consultation questions within the Culture, Leisure and Tourism section of the draft New Local Plan have been set out below:

Do you support Policy CL1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

ESN c/o CBRE IM is broadly supportive of Trafford Council's vision of a new world-class stadium and stadium district which seeks to create a new, inclusive, diverse, resilient and vibrant mixed-use neighbourhood that maximises opportunities in the Trafford Wharfside area.

The Wharfside area presents a significant opportunity to provide a new residential-led neighbourhood, centered around the key tourism and leisure uses around Old Trafford football stadium, in a highly sustainable location with direct links to work and leisure uses within Manchester City Centre and Salford City Centre.

the potential redevelopment of Old Trafford football stadium and stadium district further adds to the changing character of this area to a key strategic location for redevelopment in proximity to Trafford, Manchester City Centre and Salford City Centre.

ESN c/o CBRE IM is supportive of the proposed land uses noted within the draft policy. Given that the Gorse Hill and Cornbrook Ward is one of the most deprived areas in terms of housing in Trafford, residential development should play an integral part in the transformation of this area to ensure inclusive growth and to meet the needs of local people.

Residential Development

The draft New Local Plan consultation acknowledges that the future growth and prosperity of Trafford is contingent on meeting the housing needs of current and future populations. There is a need for housing across Trafford to support local communities by providing a variety of tenures, sizes, types and levels of affordability. Responses to the following relevant consultation questions within the Residential Development section of the draft New Local Plan have been set out below:

Consultation Question 4-1 Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

ESN c/o CBRE IM supports the prioritisation of brownfield land within the existing urban area. Brownfield development has a number of significant benefits including; protection of green space, making use of existing infrastructure, greater opportunities for taking advantage of and improving existing sustainable travel modes, and therefore aligning with Trafford's sustainability goals. A 'brownfield-first' approach also aligns with national policy and has been given a stronger emphasis by the Labour government through the recent updates to the NPPF, funding opportunities, and proposals for a brownfield passport.

By locating a large amount of residential development in North Trafford on brownfield land, future development is able to take advantage of the existing transport network including trains, trams and buses, as well as proximity to Manchester City Centre and employment opportunities in the city centre and Trafford Park.

ESN c/o CBRE IM supports the promotion of high density development in the most sustainable locations, providing an opportunity to maximise density and respond to the urgent need to deliver a significant volume of new housing in response to the substantial need that has been identified in PfE . It also aligns with the Council's aim to delivery the majority of housing in North Trafford.

Consultation Question 4-3 Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Consultation Question 4-5 Should 10% of all affordable and social housing be delivered as Truly Affordable Net Zero Homes (TANZ)?

ESN c/o CBRE IM is supportive of the delivery of affordable housing within major residential development. It is considered that the wording of this draft policy should allow for a viability exemption to balance the market conditions which impact delivery with the technicalities of redeveloping brownfield sites. A greater consideration of viability challenges, supported by market evidence, is needed throughout the draft policy in

order to ensure that housing can be deliverable to meet the ambitious housing requirements as stated in PfE. The draft policy seeks to limit flexibility in the application of affordable housing policy with specific reference to "limited" and "exceptional" circumstances, which are also subject to viability assessment. It is considered that these references are inconsistent with national policy and guidance as there is no national policy justification (or expectation set in PPG) for a viability case to be made only in "limited" or "exceptional circumstances".

Consultation Question 4-7 Do you support Policy R4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Consultation Question 4-8 The intention is to set an appropriate house size and type requirements for new development in each Locality to meet housing needs across the borough. Do you agree with this approach?

ESN c/o CBRE IM is supportive of the need to deliver a mix of housing to meet identified needs in the Borough and would propose reference to the allocation of suitable sites which are critical to the delivery of the Trafford's housing requirement, including any suitable brownfield sites and small sites. The Site is a suitably located brownfield site, which has the capability of producing a high-density development through efficient use of available land and ultimately reducing the amount of land required to meet housing need.

ESN c/o CBRE IM is supportive of primarily apartment led schemes being delivered within the ward of Gorse Hill and Cornbrook. However, it is considered that the policy wording should allow for an approach to deliver 100% apartment led development where it can be justified that there is an identifiable local housing need or market evidence can be provided for an alternative proportion.

The Site is suitable, deliverable and achievable to be allocated within the emerging Local Plan as a housing -led mixed use development allocation.

Consultation Question 4-10 Do you support Policy R5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

ESN c/o CBRE IM is supportive of increasing the density of development within the Trafford Wharfside area acknowledging that the Site is a suitably located brownfield site, which has the capability of producing a high-density development through efficient use of available land and ultimately reducing the amount of land required to meet housing need.

Call for Sites

A Call for Sites exercise is running concurrently with the Regulation 18 consultation considering sites for development, protection or other purpose within Trafford. ESN c/o CBRE IM have completed the accompanying Call for Sites form setting out the details of the site and the proposed allocation.

The Site lies in an a highly sustainable strategic location, well connected to the local and regional transport network, and ongoing improvements to public transport facilities which will further enhance its accessibility. The Site is well situated for residential uses; it is less than 10-minute walk from Media City, The Lowry Theatre and Outlet Mall, The Imperial War Museum, and Old Trafford Football Stadium, an international brand, has a prominent frontage onto Wharfside Way (Plot 11), and benefits from proximity to Old Trafford football ground and MediaCityUK.

The Site is a suitably located brownfield site, which has the capability of producing a high-density development through efficient use of available land and ultimately reducing the amount of land required to meet housing need. ESN c/o CBRE IM is supportive of the need to deliver a mix of housing to meet identified needs in the Borough. The identification of the Site for residential uses would be critical to the delivery of the Housing Strategy, including any suitable brownfield sites and would aid in the wider placemaking of the Wharfside area.

There are opportunities to provide ancillary uses at ground floor level across residential developments to provide an active frontage and the potential for a live-work aspect.

The Site could deliver a minimum of 300 residential units (based on an indicative assumption of a minimum of 120 dwellings per hectare) with the potential for other complementary uses such as commercial, retail and ancillary uses to activate the ground floor spaces.

Wider connectivity through the Wharfside area to Salford Quays, towards Old Trafford football stadium and other key developable sites could be achieved through key routes with landscaped areas provided to break up the density.

The allocation of both plots for a residential-led mixed use development will secure substantial economic, social and environmental benefits in the local area which will contribute to meeting identified development needs in Trafford.

Summary and Conclusion

We trust that the representations are in order and their contents will be given due consideration. ESN c/o CBRE IM would welcome the opportunity to discuss the proposals further with the Council and explore their landholdings in further detail.

Yours sincerely,

Laura Pennington
Senior Planner
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12th June 2025

By email: localplan.consultation@trafford.gov.uk

To whom it may concern,

TRAFFORD LOCAL PLAN REGULATION 18 CONSULTATION DRAFT POLICIES – LAND AT THE JUNCTION OF JOHN GILBERT WAY AND WHARFSIDE WAY, TRAFFORD PARK

CBRE Limited has been instructed on behalf of Indurent Management Ltd (hereafter referred to as 'Indurent') to submit representations to Trafford Council's Local Plan Regulation 18 Consultation Draft document and the accompanying Call for Sites exercise in respect of its landholdings ('the Site'). The location of the Site is shown edged in red on the aerial plan below.

This representation builds on previous comments made on behalf of St Modwen to Trafford Council in relation to the 2024 Trafford Wharfside Development Framework and Masterplan consultation, as well as previous comments made on behalf of Harbert (previous landowner) to the 2018 Local Plan Consultation and 'Call For Sites'. The previous representations supported the regeneration of this area of Trafford and the allocation of the site for high quality residential-led development.

Figure 1: Indicative Site Boundary



This representation is set out as follows:

- Site Context;
- Planning Policy Context;
- Response to the Regulation 18 Local Plan Draft Consultation;
- Call for Sites; and
- Summary and Conclusion.

Site Context

The Site and its Surroundings

The land at Wharfside Way is located within Trafford Park, a predominantly industrial area of south Manchester, which is adjacent to Old Trafford, a more commercial and residential area. The Site is triangular in shape and has a prominent position at the entrance to Trafford Park. The Site is located 3 miles south west of Manchester City Centre within Trafford Park which has evolved as a significant industrial estate. This is due in part to its proximity to excellent road networks, close to the M60, which provides quick access to the wider North-West motorway network. Trafford itself is also evolving, as a southerly expansion of Manchester City Centre is leading to the creation of a number of new residential schemes towards Trafford Park.

The Site is approximately 27 acres (circa 10.8 ha) and is generally level. It is occupied by a number of operational warehouses; although the eastern parcel comprises vacant land currently used as a depot and for parking purposes. The Site is currently in use for industrial and leisure purposes with associated surface car park.

Land Ownership

The freehold interest in the Site is owned by Indurent, a developer and operator of industrial and logistics space formed by Blackstone in 2024, which combined the development capability of St. Modwen Logistics and operating expertise of Industrials REIT.

It is Indurent's aspiration to protect the Site and meet the needs of the existing occupiers within the short to medium term due to a number of existing leaseholders being operational for the next five to seven years. However, in the longer term, Indurent have aspirations to redevelop the Site for high-quality residential-led mixed use development.

Planning Policy Context

As the Council are familiar with the planning policy context for the site and the surrounding area, we do not provide a detailed summary within this section of the representation. However, we would like to highlight the following allocations and policies.

Adopted Trafford Core Strategy (2012)

The following adopted development plan polices are of relevance:

- ***Policy SL2 'Trafford Wharfside'*** states that a major mixed-use area of regional and international significance will be created at Trafford Wharfside. The focus of this area will be on opportunities for new economic (digital and media industries), leisure (hotels and visitor attractions) and residential development. Policy SL2 considered that the area could deliver 10ha of mainly (former) Use Class B1 office (now Use Class E(g)) and light industrial uses, leisure (including hotels), 900 new homes and ancillary/ supporting retail and community uses. Alongside development at MediaCity, Victoria Mill and Pomona Island, it is expected that residential development can be accommodated at Trafford Wharfside and will comprise mostly of apartments, appropriate to its Regional Centre location.

- ***Policy W1 'Economy'*** notes that that Council will focus employment uses including former Use Class B1 business/office (now Use Class E(g)), B2 general industry and B8 storage or distribution and similar appropriate uses with one of the key focus areas being Trafford Wharfside.

Places for Everyone (2024)

The following adopted Places for Everyone polices are of relevance:

- ***Policy JP-Strat1: 'Core Growth Area'*** notes that improvements in connectivity between areas such as The Quays will mean that these areas can become increasingly suitable for high density and will support growth across the City Centre.
- ***Policy JP-Strat3: 'The Quays'*** notes that the area will continue to develop as an "economic location of national significance" with business, housing, leisure and tourism roles significantly expanded and new development will generally be of high density.
- ***Policy JP-S1: 'Sustainable Development'***- sets out PfE's focus on prioritising brownfield development. It states that in preparing plans, suitable brownfield land and vacant buildlings will be preferred as much as possible to meet development needs. This will provide investment into existing urban areas and address dereliction, supporting regeneration and enhancement of urban locations.
- ***Policy JP-H1: 'Scale, Distribution and Phasing of New Housing Development'*** - sets out the minimum number of net additional dwellings each authority is expected to identify. For Trafford, an annual average of 1,122 new dwellings per annum is required up to 2039 to meet housing demand in the area.

Housing Need

PfE sets out the housing requirement for each of the nine Greater Manchester authorities. For Trafford an annual average of 1,122 new dwellings per annum is required up to 2039 to meet housing demand in the area. The new Local Plan is based on this housing requirement, with 1,122 expected to be delivered annually from 2025, culminating in 19,077 homes delivered between 2022-2039.

NPPF (2024) – Standard Method

The NPPF expects strategic policy-making authorities to follow the standard method for assessing local housing need to identify the minimum annual housing need figure for each LPA. Trafford's housing targets have being significantly increased from 1,122 to 1,607 dwellings per annum (a 43% increase) as a result of the updated to the standard method included within the NPPF (December 2024) and the Government's ambition to deliver 1.5 million homes within the next 5 years.

Housing Delivery Test

The Ministry for Housing, Communities and Local Government (MHCLG) introduced the 'housing delivery test' in 2018 to measure net additional dwellings built in a local authority's area against the homes required. HDT results are published annually by DLUHC with measures set out for local planning authorities that do not fully meet their delivery rate targets.

Trafford scored 78% in the latest housing delivery test for 2023 (published 2024), meaning that a buffer of 20% is added to the local housing need figure until housing delivery goes above 85%. Trafford has historically not been able to deliver housing in line with need, in part, due to the slow delivery of Trafford's larger, strategic locations including Trafford Wharfside.

Response to the Regulation 18 Local Plan Draft Consultation

Comments are provided below to the relevant questions posed by the Council as part of the Regulation 18 consultation, in respect of our client's landholdings. Indurent reserves the right to submit further representations as the Local Plan process evolves and additional evidence is published.

Strategy

The New Local Plan strategy has been drafted based on the overarching PfE Spatial Strategy which provides the strategic policies for Greater Manchester (excluding Stockport). It is understood that various spatial options have been considered throughout the preparation of the New Local Plan consultation which included focusing development and growth in the north/south; increasing densities; and Green Belt release. The proposed strategy is a hybrid option which seeks to:

- *"Optimise the baseline housing land supply, ensuring all opportunities to increase densities and to identify additional sites were explored;*
- *Concentrate development near to town centres and/or sustainable public transport hubs;*
- *Take advantage of existing and planned global assets; and*
- *Deliver inclusive growth across Greater Manchester, seeking opportunities to boost the competitiveness of north Greater Manchester whilst sustaining the competitiveness of south Greater Manchester."*

The Site is located within a 'Core Growth Area' under draft policy ST1 of the draft New Local Plan. The Trafford North Localities – Place Profile consultation document highlights that the Trafford Wharfside area is earmarked for transformation stemming from the redevelopment of Old Trafford and the area surrounding the stadium.

Indurent is supportive of the overall spatial strategy set out within the Draft New Local Plan consultation and recognise that the regeneration of key areas of Trafford such as Trafford Wharfside will help to deliver inclusive growth and promote high quality mixed use development.

Responses to the relevant consultation questions within the Strategy section of the draft New Local Plan are set out below:

Consultation Question 2-1 Do you support Policy ST1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Indurent is supportive of the location and vision for the Core Growth area, which focuses "development opportunities" around "key growth locations" including Wharfside where the site is located. The Wharfside area presents a significant opportunity for mixed use residential development, given its highly sustainable location with direct links to work and leisure uses within Manchester City Centre and Salford City Centre.

Trafford is the second largest contributor to Greater Manchester's economy and Trafford Park plays an important part in this as a major industrial location both regionally and nationally with over 1300 business and 41,000 employees. Whilst it should be protected for employment uses there is a wider long terms vision to transition the Wharfside area to create a destination location within Greater Manchester and a sustainable vibrant local community, the draft policy sub-text rightly identifies that as Trafford evolves and market drivers shift demand, there is an opportunity to deliver new residential mixed-use areas in highly sustainable locations which meet Trafford's housing need.

Indurent acknowledge that the Wharfside area poses an opportunity to provide a new residential-led neighbourhood, centered around the key tourism and leisure use of Old Trafford football stadium and in a highly sustainable location with direct links to work and leisure uses within Manchester City Centre and Salford City Centre. Planning policy in this area historically focused on industrial uses across Trafford Park, setting it as

a key employment location. However, the Wharfside area, as well as the wider area in Trafford, is evolving and the Draft Local Plan must appropriately respond to these changes as well as other market drivers.

Manchester United released a vision for the new Old Trafford Stadium District in March 2025 including the new landmark stadium and mixed-use development which creates an ambitious regeneration narrative for the surrounding area and places the Site and the Wharfside area in a unique position to transition to land uses that would be more complimentary to this vision. The allocation of this Site and the redevelopment of the wider Wharfside area will support the redevelopment given its adjacency, capitalising on its sustainable location and close connection Manchester City Centre and Salford City Centre.

Consultation Question 2-4 Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Indurent supports the principles set out in Policy ST4, particularly the positive approach taken when considering development proposals reflecting the presumption in favour of sustainable development set out in the NPPF. This is particularly important in addressing the need for new housing across Trafford and Greater Manchester in a context of delivery and viability challenges evidenced by the previous results of the Housing Delivery Test, whilst managing growth proactively across sustainably located, previously developed sites.

Indurent welcomes the draft policy's commitment to collaborative working between the Council and applicants, which is important for unlocking the potential of development sites and ensuring that planning processes are efficient and solution-focused. It is important that there is clarity and certainty on the expectations for development coming forward through plan-led decision making to allow opportunities to be developed and come forward without delay and with confidence.

As referenced within the previous representation to the Trafford Wharfside Development Framework and Masterplan consultation, Indurent were disappointed by the lack of consultation with relevant landowners within the Wharfside area and limited exploration into alternative land uses for the Site given the previous representations to the Trafford Local Plan consultation (on behalf of the previous landowner Harbert). Indurent consider that Trafford Wharfside poses an opportunity for meaningful placemaking, creating a shift change from the historic industrial uses and creating a vibrant residential-led, mixed use area centered around the Old Trafford football stadium and associated developments. We would welcome discussions with Trafford Council and look forward to work collaboratively to create a deliverable regenerative vision for the Wharfside area.

Culture, Leisure and Tourism

The draft New Local Plan acknowledges that Trafford is strongly positioned within Greater Manchester and offers a diverse range of cultural/ leisure assets and visitor attractions which contribute to its rich and varied culture. Responses to the following relevant consultation questions within the Culture, Leisure and Tourism section of the draft New Local Plan have been set out below:

Do you support Policy CL1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Indurent is broadly supportive of Trafford Council's vision of a new world-class stadium and stadium district which seeks to create a new, inclusive, diverse, resilient and vibrant mixed-use neighbourhood that maximises opportunities in the Trafford Wharfside area.

The Wharfside area presents a significant opportunity to provide a new residential-led neighbourhood, centered around the key tourism and leisure uses around Old Trafford football stadium, in a highly sustainable location with direct links to work and leisure uses within Manchester City Centre and Salford City Centre.

Indurent is supportive of the proposed land uses noted within the draft policy CL1. Given that the Gorse Hill and Cornbrook Ward is one of the most deprived areas in terms of housing in Trafford, the scale of investment available within this area of Trafford has the ability to further support and grow the local economy.

The potential redevelopment of Old Trafford football stadium and stadium district further adds to the changing character of this area to a key strategic location for redevelopment in proximity to Trafford, Manchester City Centre and Salford City Centre. The Trafford Wharfside area offers a clear opportunity to provide residential led, mixed used developments and create a gateway location to Old Trafford stadium, MediaCity, Salford City Centre and Manchester City Centre. However, a collaborative approach is required to ensure that planning policy for the area is fully aligned with the future redevelopment of Old Trafford and the Stadium District. Given the uncertainty around the redevelopment of Old Trafford stadium and potential for a new stadium to be repositioned to the east of Old Trafford's current location, there need to provide more flexibility to the identified land uses across the area and a reassessment of key routes throughout the Wharfside area.

Residential Development

The draft New Local Plan consultation acknowledges that the future growth and prosperity of Trafford is contingent on meeting the housing needs of current and future populations. There is a need for housing across Trafford to support local communities by providing a variety of tenures, sizes, types and levels of affordability. Responses to the following relevant consultation questions within the Residential Development section of the draft New Local Plan have been set out below:

Consultation Question 4-1 Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Indurent supports the prioritisation of brownfield land within the existing urban area for residential-led development. A 'brownfield-first' approach aligns with the wider Trafford's wider sustainability goals and has been given a stronger emphasis by the Labour government through the recent updates to the NPPF, funding opportunities, and proposals for a brownfield passport.

Indurent supports the promotion of high density development in the most sustainable locations, providing an opportunity to maximise density and respond to the urgent need to deliver a significant volume of new housing in response to the substantial need that has been identified in PfE. The allocation of the Site for residential development would provide a substantial contribution to the 18,704 net additional homes required within Trafford North and identified within the supporting text of draft policy R1. By locating a large amount of residential development in North Trafford on brownfied land, future development is able to take advantage of the existing transport network including trams and buses, proximity to Manchester City Centre and Salford City Centre as well as employment opportunities in the City Centre and Trafford Park.

A greater consideration of viability challenges, supported by market evidence, is required to support the redevelopment of brownfield land in order to ensure that housing can be deliverable to meet the ambitious housing requirements stated in PfE and draft policy R1. The redevelopment of brownfield land faces numerous viability challenges, therefore significant weight should be applied to the benefits of delivering as many homes as possible in order to improve the viability of brownfield development.

Consultation Question 4-3 Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Indurent is supportive of the delivery of affordable housing within major residential development and acknowledge the locally identified need for affordable housing within Trafford. A greater consideration of viability challenges, supported by market evidence and consideration of site specific factors, is needed throughout the draft policy in order to ensure that housing can be deliverable to meet the ambitious housing requirements stated in PfE and the draft Local Plan.

The draft policy seeks to limit flexibility in the application of affordable housing policy with specific reference to "limited" and "exceptional" circumstances, which are also subject to viability assessment. It is considered that these references are inconsistent with national policy and guidance as there is no national policy justification (or expectation set in PPG) for a viability case to be made only in "limited" or "exceptional circumstances".

Consultation Question 4-7 Do you support Policy R4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Consultation Question 4-8 The intention is to set an appropriate house size and type requirements for new development in each Locality to meet housing needs across the borough. Do you agree with this approach?

Indurent is supportive of the need to deliver a mix of housing to meet identified needs in Trafford specifically for the delivery of new homes with Trafford North. The Site is a suitably located brownfield site, which has the capability of producing a high-density development with an estimated capacity of 2,000 residential units through the efficient use of available land and ultimately reducing the overall amount of land required to meet housing need across Trafford.

Indurent is supportive of primarily apartment led schemes being delivered within the ward of Gorse Hill and Cornbrook and consider that this area of Trafford is attractive for residential to rent developments which would make the most effective use of the local amenities, population demographics and proximity to Manchester City Centre and Salford City Centre. However, it is considered that the policy wording should allow for an approach to deliver 100% apartment led development where it can be justified that there is an identifiable local housing need or market evidence can be provided for an alternative proportion.

The Site is suitable, deliverable and achievable to be allocated within the emerging Local Plan as a residential-led mixed use development allocation.

Consultation Question 4-10 Do you support Policy R5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

The Trafford Wharfside area is sustainably located with existing transport links to Manchester City Centre and Salford City Centre via various active travel links including bus and tram and is within walking distance of MediaCityUK and Salford Quays. Indurent is supportive of increasing the density of development within the Trafford Wharfside area acknowledging that the Site is a suitably located brownfield site, which has the capability of producing a high-density development through efficient use of available land and ultimately reducing the amount of land required to meet housing need.

Tall Buildings

Draft policy BE2 acknowledges that proposals for well-designed tall buildings (with high architectural standards and materials) within appropriate locations will be considered by the Council, with tall buildings defined as being six storeys or more or 30 metres or more in height.

Consultation Question 12-2 Do you support Policy BE2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Indurent is supportive of the broad locations suitable for tall buildings covering strategic masterplan areas in Trafford North. Strategic Development Areas within Trafford North which have a strategic masterplan, such as the Civic Quarter, Pomona and Stadium District and Wharfside are acknowledged as being the most suitable areas to accommodate tall buildings within Trafford. It is considered that densities and massing could be increased within the Trafford Wharfside area to make the most efficient use of the land for mixed use residential-led developments and to draw on the wider transformation of the Stadium District which is understood to include tall buildings.

Call for Sites

A Call for Sites exercise is running concurrently with the Regulation 18 consultation considering sites for development, protection or other purpose within Trafford. Indurent have completed the accompanying Call for Sites form setting out the details of the site and the proposed allocation.

The Site lies in an a highly sustainable strategic location, well connected to the local and regional transport network, and ongoing improvements to public transport facilities which will further enhance its accessibility. The Site is well situated for residential and leisure uses; it is less than 10-minute walk from MediaCityUK, The Lowry Theatre and Outlet Mall, The Imperial War Museum, and Old Trafford Football Stadium, an international brand. Additionally, the Site has the following characteristics, which are considered suitable for a residential-led mixed use development:

- Prominent frontage onto Wharfside Way;
- Proximity to Old Trafford football ground and MediaCity; and
- Significant scale of the Site allows for phasing.

At this stage, it is considered that there are no technical or environmental constraints that would restrict the allocation of this site for residential uses. The capacity study, shown in Figure 2, sets out an illustrative quantum and scale of development that we consider achievable and deliverable on the Site, prepared by Sheppard Robson. Land South of John Gilbert Way does not form part of Indurent's land ownership and has been shown as part of the capacity study for contextual purposes only.

Figure 2: Illustrative Capacity Study



The Site has the potential to deliver circa 2,000 residential units (Use Class C3) with the potential for other uses such as commercial, retail and ancillary uses to activate the ground floors of each building.

The illustrative sketch assumes building heights of ground plus six storeys to ground plus nine storeys with the taller massing set at key focal points within the Site, These indicative heights are based on the indicative densities set out within the Trafford Wharfside Development Framework and Masterplan, however Indurent consider there are opportunities to increase scale and density across this Site. Wider connectivity through the Wharfside area to Salford Quays, towards Old Trafford football stadium and other key developable sites could be achieved through key routes to the centre and eastern parts of the Site, with landscaped areas provided to break up the density.

The allocation of the Site for a residential-led mixed use development will secure substantial economic, social and environmental benefits in the local area which will contribute to meeting identified development needs in Trafford.

Summary and Conclusion

We trust that the representations are in order and their contents will be given due consideration. Indurent would welcome the opportunity to discuss the proposals further with the Council and explore their landholdings in further detail.

Yours sincerely,

Laura Pennington
Senior Planner
CBRE Limited - Planning & Development

12 June 2025

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THE TRAFFORD CENTRE – REPRESENTATIONS TO TRAFFORD LOCAL PLAN CONSULTATION

Introduction and Strategy

I write on behalf of The Trafford Centre Ltd who are the owners of The Trafford Centre. The centre extends to over 50 hectares within the Trafford North locality and currently supports over 10,000 jobs[1] which is around 6% of the total workforce within Trafford and around a third of the total provided within Trafford Park. The centre attracts over 24,000,000 visitors per year which is around ten times the number of visitors to Old Trafford football ground. These visitors are drawn from across the north of England and North Wales attracted by the wide range and high quality of shops at the centre along with the significant leisure attractions present in the centre and the surrounding Trafford Centre Rectangle.

It is therefore considered crucial that the Trafford Local Plan positively plans for the future success and improvement of The Trafford Centre and wider Trafford Centre rectangle. These representations to the Trafford Local Plan ('the Plan') are made in this context. The representations are supported by the following appendices:

- Appendix 1 – Consultation Question Schedule
- Appendix 2 – Call for Sites Form

The overall vision of the Plan is supported. This includes the aspiration to concentrate growth close to sustainable transport hubs and to utilise existing urban land to accommodate development needs in the first instance. It is agreed that this is the most sustainable approach to accommodating the required residential and economic growth within the Borough over the period of the Plan. Aligned to this, there is a strong opportunity to build on the existing success and importance of The Trafford Centre to the local economy through appropriate development proposals over the course of the Plan period to maintain and enhance the economic role it plays in the Borough and wider city region.

Whilst the overall vision and objectives of the Plan are supported, there are a number of comments in respect of specific policies that are made below that if incorporated into the next iteration of the Plan, are considered to improve its ability to deliver the sustainable growth desired in Trafford over the coming years. Where a policy is not referred to, there are no specific comments made in respect of the particular policy and to avoid unnecessarily lengthy representations, the contents of the policies being commented upon are not reiterated within this letter. The table appended to this letter also sets out each of the questions within the Local Plan consultation document and provides The Trafford Centre Ltd's response to each of the questions.

[1] The number of jobs supported and number of visitors per year figures do not include those provided at Trafford Palazzo or within the wider Trafford Centre Rectangle.

Comments on Specific Policies

Policy ST1

Policy ST1 is supported in promoting development opportunities within the Core Growth Area in line with the Places for Everyone plan for Greater Manchester ('PfE') which includes The Trafford Centre and adjacent Trafford Park. The supporting text to the policy is also strongly supported, in particular its recognition that The Trafford Centre and surrounding area is home to a number of large scale leisure and out of town retail uses that play a vital role in the economic success of Trafford and being one of the most popular visitor attractions in the North West. It is recognised that The Trafford Centre is not a designated centre and it fulfils a different role to the designated centres in the Borough, it is an asset to Trafford in terms of the jobs it provides, the economic role it performs and the services available to residents. The recognition of this unique role within the Local Plan is therefore strongly supported.

Policy ST4

Overall Policy ST4 of the Local Plan is supported in building upon relevant policies within PfE document and in seeking to address the climate crisis. It is considered however that the supporting text to the policy should recognise that the policy does not require that existing buildings achieve carbon neutrality by 2028. Furthermore, it is considered that the supporting text should also note that a limited degree of flexibility may be applied to the achievement of carbon neutrality in new developments where these achieve the wider aspirations of the Local Plan, where achieving carbon neutrality would result in development that is otherwise acceptable being made unviable and when all reasonable steps have been taken to reduce carbon emissions from the development. This will allow a degree of pragmatism and ensure that new development is as sustainable as possible whilst allowing positive development that delivers the overall regeneration aspirations of Trafford to be realised.

Policy R4

The desire to maximise residential densities in the north of the Borough as promoted through Policy R4 is supported. There are large areas of previously developed land in the north of the Borough with good access to public transport and with strong potential for active travel use. Directing the Borough's residential needs to the north of Trafford is considered to positively support the regeneration of the northern part of the Borough and is considered to be the most sustainable way of meeting the overall Borough's development needs.

Policy EJ1

The associated text to Policy EJ1 recognises the important role The Trafford Centre provides in supporting employment and job opportunities. The supporting text as it is presently worded would benefit from adjustment to also briefly recognise the accessibility of The Trafford Centre and the surrounding area by a variety of modes of transport in this part of the Plan.

This will appropriately recognise that whilst the provision of jobs is important in itself, it is key that these are accessible to as many of the Borough's residents as possible to maximise regeneration potential and socio-economic benefits.

Policy TM2

The overall aspirations and approach of Policy TM2 in seeking to support the extension and improvement of the public transport network in Trafford are strongly supported. However, the potential for the extension of the Trafford Centre Metrolink line to Port Salford should be specifically included in the policy, not just the supporting text to ensure it is given due prominence and its prospects of delivery are maximised to help support growth and improve the accessibility of the whole of The Trafford Centre rectangle and Trafford Park by a variety of means of transport. The Trafford Centre Metrolink line can play a key role in serving the large scale development and regeneration plans at Wharfside and the potential for this will be significantly increased if the line is extended.

Policy TM5

The recognition of the importance of the delivery of the Western Gateway Infrastructure Scheme within the policy is supported. However, it should also be specifically recognised within the policy or supporting text that the transport improvements associated with the scheme are required for the Trafford Waters development to be delivered in full to ensure the highway network is able to operate effectively in the area and that the operation of existing uses in The Trafford Centre Rectangle is not compromised.

Policy TM10

Ensuring that new developments have the appropriate amount of car parking to ensure they are adequately served whilst promoting public and active travel modes is an important consideration. The policy's recognition that there is a need for flexibility and consideration of local factors in determining the appropriate level of vehicle parking provision is therefore strongly supported to ensure that new developments are accessible by a variety of means of transport. The aspiration is for The Trafford Centre's modal shift to continue to evolve towards public and active travel over time which has the potential to reduce parking demand in the long term. It is important however that adequate parking is maintained over the short to medium term to ensure that the centre is able to trade successfully without impacting the operation of the surrounding highways network. The pragmatic and flexible approach proposed through Policy TM10 is considered to support this and is therefore welcomed.

Policy TC3

Overall Policy TC3 is supported and considered to be in accordance with relevant national planning policy. It is considered that the supporting text to the policy that specifically covers The Trafford Centre could be improved, however, through recognising the large number of jobs provided at the centre and its importance to the local economy. This can be achieved through adding the following text to the end of paragraph 7.41: "…*which support a large number of jobs in and around The Trafford Centre and help to underpin its important role in the local economy.*"

Policy GI6

Whilst the aspirations to improve landscaping and greenery in the Borough can be supported it is considered that adjustment is necessary to two of the provisions within Policy GI6. Firstly, the requirement to achieve an urban greening factor of 0.3 for major development sites should only be sought where this is feasible as for Brownfield sites, this could conflict with the need to make the most effective use of land which in turn could put more pressure on the development of Greenfield and Green Belt sites. Although this obviously should not prevent an aspiration to achieve the greening of the Borough overall and of specific Brownfield sites where feasible, it is considered that this pragmatism should be reflected in the policy.

Furthermore, the policy should make clear that the requirement to ensure green features remain effective for up to 30 years applies only to such features that contribute to biodiversity net gain calculations with other soft landscaping or existing green features not covered by this requirement.

Policy GI7

It is considered that the requirement for up to 20% increase in tree canopy cover on development sites is unnecessary and is best served through the biodiversity net gain legislation as detailed below.

Overall Green Infrastructure Policies

Overall, in respect of the Green Infrastructure Policies, it is not considered necessary and it is considered onerous and inconsistent for the combined requirements for:

- 10% biodiversity net gain as required by national legislation;
- An urban greening factor of 0.3 to be achieved on major non-residential development; and,
- Up to 20% canopy cover of trees in new developments.

Whilst there is overlap between these proposed policies, combined they mean that a substantial proportion of a development site, regardless of whether it is Greenfield or Brownfield, and regardless of the sustainability of its location, need to be given over to landscaping. This has the potential to make Brownfield developments that make effective use of land in sustainable locations unviable putting pressure on the development of less sustainable Greenfield and Green Belt sites. It is considered that the requirement to achieve a 10% biodiversity net gain on sites would be sufficient to strike a balance between improving biodiversity, urban greening and helping to mitigate the effects of climate change. This effectively requires a site to be greened and integrating urban trees into a Brownfield development is one of the most effective ways of achieving a biodiversity net gain. As a result, canopy cover will naturally be increased through the existence of the biodiversity net gain requirements. Requiring these additional assessments places additional burdens on planning applications threatening their viability for limited overall gain. It is therefore considered that the requirements for urban greening and tree canopy cover increases are unnecessary and onerous and should be removed from the Plan.

Policy OS1

It is recommended that Policy OS1 be clarified to ensure that the access to open space requirements relate only to residential development as it is not considered appropriate for example to require that there is an allotment within 1.2km of major commercial developments within Trafford Park for example.

Policy CT4

It is considered that Policy CT4 is unduly onerous in seeking to restrict fast food uses and hot food takeaways from within a 2-mile walk of schools. This distance effectively means that virtually the whole Borough is covered by this policy. A 2-mile distance equates to around a 45-minute walk which is a return distance that cannot be covered by school children leaving school premises at lunchtime and is extremely unlikely to be undertaken after school to visit a hot food takeaway, particularly when in the vast majority of instances closer hot food takeaways will be accessible within designated retail centres which is allowed by Policy CT4.

It is therefore recommended that a more realistic walking distance of around 0.5/0.6 miles or 1km is used or alternatively that The Trafford Centre is omitted from this policy recognising that although it is not a designated retail centre, hot food takeaway uses would be expected to be found in a regional shopping centre and therefore are not inappropriate in this location. This is not considered to result in any increased potential for consumption of fast food for residents of the Borough given the existing facilities at The Trafford Centre and its distance from the closest schools.

Policy CL1

The recognition of The Trafford Centre and the surrounding area as one of the Borough's key cultural and tourist attractions is strongly supported. The centre draws in a large number of visitors each year from across the region to the benefit of the Borough and its residents. The redevelopment and improvement of Old Trafford stadium as part of the wider Wharfside regeneration proposals is also supported as are the package of transport measures that are envisaged to be required to support this scheme. The Trafford Centre look forward to

engaging and providing further comments on the detail of the accessibility plans for this development in due course to ensure that a sustainable transport solution can be delivered for the new stadium and associated development that enables the continued successful operation of The Trafford Centre as a visitor destination of importance in the Borough on event days. The centre can play a role in facilitating sustainable access to the new stadium but it is crucial that this is carefully co-ordinated and planned.

Policy CL2

Policies CL2 and CL2N are strongly supported as it is considered that the policies provide appropriate support for the leisure and cultural facilities within The Trafford Centre Rectangle and recognises the importance of such uses to the area's attractiveness as a regional destination and source of jobs and economic vibrancy for Trafford Borough.

Policy IP1

The aspiration to improve infrastructure provision within Trafford North is supported. However, there does not appear to be any supporting evidence available with the Local Plan that justifies either the principle of an infrastructure payment for all development in Trafford North or that assesses the viability of the specific figure proposed to be levied. It is considered therefore the policy as currently proposed is not adequately evidenced and justified.

There are wide differences in the infrastructure requirements of different forms of development and across the different parts of Trafford North. As a result of this, Policy IP1 is objected to until it has been possible to assess the Council's evidence and detailed justification for the policy. In this context, it is considered that a blanket policy seeking to introduce an infrastructure levy to a particular part of the Borough should be undertaken as an update to the Council's infrastructure charging schedule rather than through the Local Plan.

Notwithstanding this, it is considered that infrastructure requirements associated with new development should be assessed on a case by case basis to ensure that all requirements are proportionate and viable.

Call for Sites

In addition to supporting a large number of existing jobs and bringing over 24,000,000 visitors to Trafford each year, it is considered that The Trafford Centre can provide a further contribution towards Trafford's development needs and to support delivery of draft policies within the Local Plan. It is considered that there are two sites within the centre that can contribute to these development needs as follows:

- Regent 3 Car Park – commercial use; and
- Peel 7 Overflow Car Park – proposed employment use.

An aerial image with these sites indicated in yellow is provided below and the sites can also be viewed on the map at the following link:

https://www.google.com/maps/d/u/0/edit?mid=1FrLHhBwTO-ZTxspl_VFTpPSX6aG1Sjs&usp=sharing



It is considered that The Trafford Centre Regent Car Park 3 would be a suitable location for development being highly accessible adjacent to the Trafford Centre bus station and the Metrolink stop but a currently under-utilised car park.

The Peel 7 overflow car park is also under-utilised and is the least used of those at the centre only being used at the busiest periods of the year. Over recent years through improvements to public transport such as the introduction of the Bee Network buses and delivery of the Trafford Centre Metrolink line, there has been a gradual modal shift at the centre towards greater use of public transport.

The combined proposal for the allocation of the Peel 7 overflow car park for employment purposes and the Regent 3 car park for suitable commercial uses allows a consolidation of parking spaces at the centre as is promoted by the Local Plan. The proposals will therefore make more effective overall use of previously developed land to meet the Borough's development needs whilst facilitating a continued modal shift towards sustainable modes of transport and creating new jobs for residents of the Borough. Any proposals on the Peel 7 car park and land to the south (previously the subject of a planning permission for a hotel, would need to take into account the wildlife corridor that covers part of the site and how this would be integrated into the development proposals.

It is therefore requested that the Regent 3 and Peel 7 car parks are allocated for appropriate development in the emerging Local Plan. Further information on the future development potential of these sites can be provided if required.

Summary and Conclusions

Overall the Trafford Local Plan is considered to include a positive overall strategy and vision for the development of the Borough over the coming years. Notwithstanding this, these representations set out a number of comments in respect of specific policies that, if incorporated into the next iteration of the Plan, are considered to improve its ability to deliver the sustainable growth desired in Trafford over the Local Plan period.

I trust the above comments will be taken into account in the future progression and formulation of The Trafford Local Plan. If you have any questions or wish to discuss further, please feel free to contact me on the details at the head of this letter.

Yours faithfully



Steve Renshaw

Director

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JUNE 2025

APPENDIX 1 – CONSULTATION QUESTION TABLE

Ref	Consultation Question	Proposed Response
1-1	Do you support the draft Policies Map? Are there any changes required which would improve it?	No comments on the Policies Map other than those relevant to specific policies represented on the map as commented on below.
1-2	Do you agree with the proposed Vision for the Trafford Local Plan?	The overall vision of the plan is supported including the aspiration to concentrate growth close to sustainable transport hubs and using existing urban land to accommodate development needs in the first instance. This is considered to be the most sustainable approach to accommodating the required residential and economic growth within the Borough and there is an opportunity to evolve the role of The Trafford Centre through appropriate development proposals over the course of the Plan period to maintain the economic role it plays in the Borough and wider city region.
1-3	Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?	The Strategic Objectives of the Plan are supported and considered to be appropriate in delivering the vision of the plan.
2-1	Do you support Policy ST1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	Policy ST1 is supported. The supporting text to the policy is also strongly supported, in particular its recognition that The Trafford Centre and surrounding area is home to a number of large scale leisure and retail uses that play a vital role in the economic success of Trafford being one of the most popular visitor destinations in the North West.
2-2	Do you support Policy ST2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
2-3	Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
2-4	Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
2-5	Do you support Policy ST5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	Policy ST4 of the Local Plan is supported in building upon the relevant policy within the Greater Manchester Places for Everyone document and seeking to address the climate crisis. It is considered however that the supporting text to the policy should recognise that the policy does not require that existing buildings achieve carbon neutrality by 2028. Furthermore, it is considered that the supporting text should also note that a limited degree of flexibility may be applied to the achievement of carbon neutrality in new developments where these achieve the wider aspirations of the Local Plan, where achieving carbon neutrality would result in the otherwise

Ref	Consultation Question	Proposed Response
		acceptable development being unviable and where all reasonable steps have been taken to reduce carbon emissions from the development. This will allow a degree of pragmatism and ensure that new development is as sustainable as possible whilst allowing positive development that delivers the overall regeneration aspirations of Trafford to be realised.
2-6	The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?	No specific comments.
3-1	Do you support Policy RT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
3-2	Do you support Policy RT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
3-3	Do you support Policy RT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
3-4	Do you support Policy RT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
3-5	Do you support Policy RT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
3-6	The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?	No specific comments.
4-1	Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
4-2	Do you support Policy R2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
4-3	Do you support Policy R3? Are there any changes required which would improve the	No specific comments.

Ref	Consultation Question	Proposed Response
	policy? Please provide any supporting evidence which you think is relevant.	
4-4	Should the Local Plan set an affordable housing requirement, including a tenure mix, for each locality (similar to Core Strategy policy L2) that reflects market conditions?	No specific comments.
4-5	Should 10% of all affordable and social housing be delivered as Truly Affordable Net Zero Homes (TANZ)?	No specific comments.
4-6	Should any other policy approaches to affordable and social housing be explored?	No specific comments.
4-7	Do you support Policy R4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	The desire to maximise residential densities in the north of the Borough is supported. There are large areas of previously developed land in the north of the Borough with good access to public transport and potential for active travel. Directing the Borough's residential needs to the north of Trafford is considered to positively support the regeneration of the northern part of the Borough and is the most sustainable way of meeting the Borough's development needs.
4-8	The intention is to set an appropriate house size and type requirements for new development in each Locality to meet housing needs across the borough. Do you agree with this approach?	No specific comments.
4-9	Do you think specific size and type requirements should be set for major residential development sites in the borough, like Pomona and Wharfside, to align with a Locality approach?	No specific comments.
4-10	Do you support Policy R5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
4-11	Do you support Policy R6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
4-12	Should the Local Plan set a definition for what constitutes a Care Home, Extra Care and Assisted Living? If so, what should they be defined as?	No further comments.
4-13	Do you support Policy R7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
4-14	Do you support Policy R8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
4-15	Do you support Policy R9? Are there any changes required which would improve the	No specific comments.

Ref	Consultation Question	Proposed Response
	policy? Please provide any supporting evidence which you think is relevant.	
4-16	Should the affordable housing requirement apply to student accommodation to enable a proportion of student accommodation schemes to be affordable to students from low-income backgrounds?	No specific comments.
4-17	Should nomination agreements be used to ensure that accommodation is reserved for students enrolled at a named institution?	No specific comments.
4-18	Do you support Policy R10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
4-19	Do you support Policy R11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
4-20	The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?	No specific comments.
5-1	Do you support Policy EJ1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	The associated text to Policy EJ1 that recognises the important role The Trafford Centre provides in underpinning employment in the area is strongly supported. It would also be of benefit to adjust this text to also recognise the accessibility of The Trafford Centre and the surrounding area by a variety of modes of transport in this part of the Plan.
5-2	Do you support Policy EJ2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
5-3	Do you support Policy EJ3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
5-4	Do you agree with the proposed boundary shown on the policies map for Trafford Park?	No specific comments.
5-5	Do you agree with the proposed boundary shown on the policies map for Broadheath Employment Area?	No specific comments.
5-6	Do you support Policy EJ4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
5-7	Do you support Policy EJ5? Are there any changes required which would improve the	No specific comments.

Ref	Consultation Question	Proposed Response
	policy? Please provide any supporting evidence which you think is relevant.	
5-8	Do you support Policy EJ6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
5-9	Do you support Policy EJ7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
5-10	The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?	No further comments to add to those made in respect of question 5-1.
6-1	Do you support Policy TM1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
6-2	Do you support Policy TM2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	The overall aspirations and approach of Policy TM2 in seeking to support the extension and improvement of the public transport network in Trafford are strongly supported. However, the potential for the extension of the Trafford Centre Metrolink line to Port Salford should be specifically referred to in the policy, not just the supporting text to ensure this aspiration is given due prominence and its prospects of delivery are maximised to help support growth and improve the accessibility of the whole of The Trafford Centre rectangle and Trafford Park by a variety of means of transport.
6-3	Do you support Policy TM3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
6-4	Do you support Policy TM4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
6-5	Do you support Policy TM5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	The recognition of the importance of the delivery of the Western Gateway Infrastructure Scheme within the policy is supported. However, it should also be specifically recognised within the policy or supporting text that the transport improvements associated with the scheme are required for the Trafford Waters development to be delivered in full to ensure the highway network is able to operate effectively in the area and that the operation of existing uses in The Trafford Centre Rectangle is not compromised.
6-6	Do you support Policy TM6? Are there any changes required which would improve the	No specific comments.

Ref	Consultation Question	Proposed Response
	policy? Please provide any supporting evidence which you think is relevant.	
6-7	Do you support Policy TM7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
6-8	Do you support Policy TM8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant	No specific comments.
6-9	Do you support Policy TM9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
6-10	Do you support Policy TM10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	Ensuring that new developments have the appropriate amount of car parking to ensure they are adequately served whilst promoting public and active travel modes is an important consideration. The policy's recognition that there is a need for flexibility and consideration of local factors in determining the appropriate level of vehicle parking provision is therefore strongly supported to ensure that new developments are accessible by a variety of means of transport.
6-11	Do you support Policy TM11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
6-12	Do you support Policy TM12? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	Policy TM12 is supported. The current approach of the policy would support the provision of Park and Ride facilities at The Trafford Centre to take advantage of the public transport accessibility of the centre to remove road traffic from the highway network. Such facilities would have the potential to form part of the future suite of transport measures needed to serve the Old Trafford stadium redevelopment and adjacent Wharfside regeneration.
6-13	Do you support Policy TM13? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
6-14	The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?	No further comments.
7-1	Do you support Policy TC1? Are there any changes required which would improve the	No specific comments.

Ref	Consultation Question	Proposed Response
	policy? Please provide any supporting evidence which you think is relevant	
7-2	Do you agree with all of the proposed boundaries for the Town, Other Designated, Local and Neighbourhood centres as shown on the policies map?	No specific comments.
7-3	Do you support Policy TC2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant	No specific comments.
7-4	Do you support Policy TC3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	Overall Policy TC3 is supported and considered to be in accordance with relevant national planning policy in respect of retail and town centres. It is considered that the supporting text to the policy could be improved, however, through recognising the large number of jobs provided at The Trafford Centre and its importance to the local economy. This can be achieved through adding the following text to the end of paragraph 7.41: "…*which support a large number of jobs in and around The Trafford Centre and help to underpin its important role in the local economy.*"
7-5	The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?	No further comments.
8-1	Do you support Policy GI1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
8-2	Do you support Policy GI2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
8-3	Do you support Policy GI3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
8-4	Do you support Policy GI4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
8-5	Do you support Policy GI5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
8-6	Do you support Policy GI6? Are there any changes required which would improve the	Whilst the aspirations to improve landscaping and greenery in the Borough can be

Ref	Consultation Question	Proposed Response
	policy? Please provide any supporting evidence which you think is relevant.	supported, it is considered that adjustment is necessary to two of the provisions within the policy. Firstly, the requirement to achieve an urban greening factor of 0.3 for major development sits should only be sought where this is feasible as for Brownfield sites, this could conflict with the need to make the most effective use of land which in turn could put more pressure on the development of Greenfield and Green Belt sites. Although this obviously should not prevent an aspiration to achieve the greening of the Borough and of Brownfield sites where feasible, it is considered that this pragmatism should be reflected in the policy. Furthermore, the policy should make clear that the requirement to ensure green features remain effective for up to 30 years applies only to such features that contribute to biodiversity net gain calculations with other soft landscaping or existing green features not covered by this requirement.
8-7	Do you support Policy GI7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	It is considered that the requirement for up to 20% increase in tree canopy cover on development sites is unnecessary and is best served through the biodiversity net gain legislation.
8-8	Do you support Policy GI8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
8-9	Do you support Policy GI9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
8-10	Do you support Policy GI10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
8-11	The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?	Overall, in respect of the Green Infrastructure Policies, it is not considered necessary and it is considered onerous and inconsistent to have separate requirements for: - 10% biodiversity net gain as required by national legislation; - An urban greening factor of 0.3 to be achieved on major non-residential development; and, - Up to 20% canopy cover of trees in new developments. Whilst there is overlap between these proposed policies, combined they mean that a substantial proportion of a development site, regardless of whether it is Greenfield or Brownfield, and regardless of the sustainability of its location, need to be given over to landscaping. This has the potential to make

Ref	Consultation Question	Proposed Response
		Brownfield developments that make effective use of land in sustainable locations unviable putting pressure on the development of less sustainable Greenfield and Green Belt sites. It is considered that the requirement to achieve a 10% biodiversity net gain on sites would be sufficient to strike a balance between improving biodiversity, urban greening and helping to mitigate the effects of climate change. This effectively requires a site to be greened and integrating urban trees into a Brownfield development is one of the most effective ways of achieving a biodiversity net gain therefore canopy cover will naturally be increased through the existence of the biodiversity net gain requirements. Requiring these further assessments places additional burdens on planning applications threatening their viability for limited overall gain. It is therefore considered that the requirements for urban greening and tree canopy cover increases are unnecessary and onerous and should be removed from the Plan.
9-1	Do you support Policy OS1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	It is recommended that Policy OS1 be clarified to ensure that the access to open space requirements relate only to residential development as it is not considered appropriate for example to require that there is an allotment within 1.2km of major commercial developments within Trafford Park for example.
9-2	Do you support Policy OS2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
9-3	Do you support Policy OS3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
9-4	Do you support Policy OS4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
9-5	Do you support Policy OS5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
9-6	Do you support Policy OS6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
9-7	The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider	No further comments.

Ref	Consultation Question	Proposed Response
	are missing and which should be included in the Local Plan?	
10-1	Do you support Policy WA1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
10-2	Do you support Policy WA2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
10-3	Do you support Policy WA3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
10-4	Do you support Policy WA4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
10-5	The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?	No further comments.
11-1	Do you support Policy CT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
11-2	Do you think the Council should protect the loss of community facilities and local services through a sequential test (as set out in Policy CT1 above), or by requiring a statement setting out evidence as to why a particular facility is not needed?	No specific comments.
11-3	Do you support Policy CT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant	No specific comments.
11-4	Do you support Policy CT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
11-5	Do you support Policy CT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	It is considered that Policy CT4 is unduly onerous in seeking to restrict fast food uses and hot food takeaways from within a 2-mile walk of schools. This distance effectively means that virtually the whole Borough is covered by this policy. A 2-mile distance equates to around a 45-minute walk which is a return distance that cannot be covered by school children leaving the premises at lunchtime and is extremely unlikely to be undertaken outside of school hours to visit a hot food takeaway, particularly when in the

Ref	Consultation Question	Proposed Response
		vast majority of instances closer hot food takeaways will be accessible within designated retail centres. It is therefore recommended that a more realistic walking distance of around 0.5/0.6 miles or 1km is used or alternatively that The Trafford Centre is omitted from this policy recognising that although it is not a designated retail centre, hot food takeaway uses would be expected to be found in a regional shopping centre and therefore are not inappropriate in this location.
11-6	Do you support Policy CT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
11-7	The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?	No further comments.
12-1	Do you support Policy BE1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
12-2	Do you support Policy BE2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
12-3	Do you support Policy BE3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
12-4	Do you support Policy BE4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
12-5	Do you support Policy BE5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
12-6	Do you support Policy BE6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
12-7	Do you support Policy BE7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
12-8	Do you support Policy BE8? Are there any changes required which would improve the	No specific comments.

Ref	Consultation Question	Proposed Response
	policy? Please provide any supporting evidence which you think is relevant.	
12-9	Do you support Policy BE9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
12-10	Do you support Policy BE10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
12-11	The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?	No further comments.
13-1	Do you support Policy CL1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	The recognition of The Trafford Centre and the surrounding area as one of the Borough's key cultural and tourist attractions is strongly supported. The centre draws in a large number of visitors each year from across the region to the benefit of the Borough and its residents. The redevelopment and improvement of Old Trafford stadium as part of the wider Wharfside regeneration proposals is also supported as are the package of transport measures that are envisaged to be required to support this scheme. The Trafford Centre look forward to engaging and providing further comments on the detail of the accessibility plans for this development in due course to ensure that a sustainable transport solution can be delivered for the new stadium and associated development that enables the continued successful operation of The Trafford Centre as a visitor destination of importance in the Borough on event days. The centre can play a role in facilitating sustainable access to the new stadium but it is crucial that this is carefully co-ordinated and planned.
13-2	Do you support Policy CL2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	Policies CL2 and CL2N are strongly supported as it is considered that the policies provide appropriate support for the leisure and cultural facilities within The Trafford Centre Rectangle and their importance as a regional destination and source of jobs and economic vibrancy for Trafford Borough.
13-3	The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?	No further comments.

Ref	Consultation Question	Proposed Response
14-1	Do you support Policy IP1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	There does not appear to be any supporting evidence available with the plan that justifies either the principle of an infrastructure payment for all development in Trafford North or assessing the viability of the specific figure. It is considered therefore the policy as currently proposed is not adequately evidenced and justified. There are wide differences in the infrastructure requirements of different forms of development and across the different parts of Trafford North. As a result of this, Policy IP1 is objected to until it has been possible to assess the Council's evidence and detailed justification for the policy. It is considered that infrastructure requirements associated with new development should be assessed on a case by case basis to ensure that all requirements are proportionate and viable.
14-2	Do you support Policy IP2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.	No specific comments.
14-3	Do you agree that the Council should require a fee to monitor and report on all planning obligations?	No specific comments.
14-4	Do you agree or have any observations or suggestions on the proposed planning obligation monitoring fees for either minor and/or major developments?	No specific comments.
14-5	The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?	No further comments.

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Trafford Metropolitan Borough Council
Trafford Town Hall
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M32 0TH

12 June 2025

Dear Sir/Madam,

Trafford Metropolitan Borough Council – Local Plan Regulation 18 Consultation

CBRE Limited, under instruction of Manchester United Football Club Limited (MUFC; 'the Club'), hereby submit the following representation for consideration as part of Trafford Metropolitan Borough Council (TMBC) consultation on the Draft Trafford Local Plan (April 2025).

We have reviewed the documents published as part of the consultation, and this response is set out accordingly with respect to the proposed relocation and development of the Old Trafford football stadium, as well as opportunities for redeveloping the existing site and other landholdings owned by MUFC. The development of a new 100,000 capacity stadium will capitalise on the strength of MUFC's reputation and importance within Greater Manchester and Trafford, as well as act as a catalyst by significantly contributing to placemaking and growth of the local economy. Leading economic advisory firm, Oxford Economics, have estimated that the proposals for a new stadium, together with mixed-use developments in the surrounding area (including Trafford Wharfside), have the potential to deliver an additional £7.3 billion GVA per year to the UK economy and the creation of 92,000 new jobs, of which £4.2 billion and 48,000 relate to Trafford, The proposals also include the construction of at least 17,000 new homes.

The plans for the area around the stadium have been designed to tackle the Government's priority issues head-on, delivering mixed-use housing, new jobs, and will support the social and economic growth of the UK. They will also unlock huge potential through new and modern transport solutions for the benefit of the community, employees, visitors, and local businesses.

We truly believe this can be one of the largest and most successful sports-led regeneration projects ever undertaken in the world.

BACKGROUND

Old Trafford has been the home of Manchester United Football Club since 1910, and has undergone several redevelopments and expansions throughout its 115-year history. As of 2025, the ground has a current operating capacity of 74,231, making it the UK's third largest sporting venue, second-largest football stadium overall, and the largest club football stadium.

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However, the site has not seen significant expansion since 2006, when an increase of approximately 8,000 seats was made with the addition of second tiers to both the north-west and north-east quadrants of the stadium. The Club has considered major redevelopment of the current stadium since then, but there are a number of challenges associated with this, including the constrained nature of the site owing to the Bridgewater Canal to the north and railway lines to the south, the disruption and complexity associated with operating a stadium (including match days) in a construction site for several years, and the lack of a neutral ground to be used during construction works all being contributing factors. Furthermore, a new stadium offers more scope for capacity increase, improved fan and visitor experience, job creation (during construction and operation), as well as having a greater catalytic impact on the aspirations for wider regeneration over and above any redevelopment of the existing stadium. Therefore, the Club has announced its intention to build a new 100,000 capacity stadium on land adjacent to the current stadium, plus new ancillary facilities across the site. This response to the consultation considers the Club's current aspirations for a new stadium, as well as possible future use of surrounding land (including the area occupied by the existing stadium).

MUFC is a significant local employer, providing a range of work pathways and training for young people. The Manchester United Foundation (MUF), the associated charity of the Club, has partnerships with 36 high schools and eight SEND schools with whom MUF staff work to provide mentoring, leadership, volunteering, qualifications, and work experience opportunities. 1,800 qualifications were achieved across the 2024/25 season. MUF's 'Next Move' programme provides career insight and opportunities for participants to engage with key local organisations, including the NHS, Greater Manchester Police, and Manchester Metropolitan University (MMU). MUF also has a partnership with Eccles Sixth Form College to deliver a BTEC Sport programme, offering unique opportunities to engage with the Club, with work experiences available across retail, hospitality, sports coaching, and customer service. There is also a partnership with MMU to deliver a Sport and Youth Leadership Degree, again offering students work experience opportunities across MUF projects. The social value of MUF in the 2023/24 season was over £50 million. The Club is committed to continuing and building upon these initiatives.

DRAFT LOCAL PLAN POLICIES & STRATEGIC OBJECTIVES

Strategic Objective 3 – Ensure Trafford's Resilience and Carbon Neutrality

MUFC supports the Council's vision to prioritise the sustainable development of brownfield, derelict, and previously developed land, as well as understanding the importance of ensuring their contribution to the climate resilience in the borough. However, considering the implied intent of this strategic objective, it would be expected to determine a carbon baseline using an established measurement and reporting process – requiring scoping definition clarification by the strategic objective or referenced sources of the same – and then follow an energy/carbon hierarchy approach to determine the project's viable pathway towards net zero. The functional and operational specifics of the new stadium are unlikely to make net zero achievable within a scope 1 and 2 boundary. Once active onsite measures have been fully implemented, clarification would be sought for how residual carbon is required to be addressed.

It is acknowledged that the Greater Manchester Combined Authority (GMCA) has recently published supplementary guidance for Places for Everyone (PfE) Policy JP-S2 (Carbon and Energy).

Policy ST1 – Core Growth Area

The Club strongly supports the Council's aspirations to designate the Stadium District as a 'Core Growth Area' and focus development and growth within this location. MUFC recognise that a new stadium will serve as the key facilitator to promoting the Stadium District as a Core Growth Area and encouraging the development of other uses.

Policy RT2 – Decentralised Energy Heating

It is understood by the Club, through discussions with the Council, that there would not be sufficient capacity in the existing heat networks to serve the new stadium development. Whilst the Club accepts the Council's aims to expand and add to the network, it is considered that RT2 should allow for viability assessments to evidence where contributions to decentralised

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energy initiatives – or establishing a new heat and energy network within major developments – would not be fair, proportionate, or achievable.

Policy RT3 – Overheating

MUFC supports the proposed cooling hierarchy and accepts the requirement to demonstrate the exhaustion of all other cooling methods before active cooling may be considered and implemented to control heat.

Policy RT4 – Sustainable Retrofitting

It is expected that the existing Old Trafford stadium will remain fully operational while the new stadium is being constructed. Its use after that point is still to be determined, but one possibility is for it to be demolished to make way for a processional route coupled with new developments in the wider masterplan. Under this scenario, whilst the Club is understanding of the Council's aspirations to minimise waste from demolished buildings and structures, and would work to make the demolition of the existing stadium a sustainable process, the requirement to *"divert at least 85% of waste from landfills and either reuse materials on-site or salvage appropriate materials for reuse off-site"* is considered unfeasible and should instead be a target as opposed to a minimum requirement. MUFC would also ensure that items of significant history and club heritage are preserved and can be repurposed within the new stadium and/or wider Stadium District.

Policy R3 – Affordable and Social Housing

The National Planning Policy Framework (NPPF) confirms that plans should set out the contributions expected from development, including the levels and types of affordable housing provision required, along with other infrastructure. In addition, the NPPF requires that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused on supporting and justifying the policies concerned, and consider relevant market signals. Whilst the Club is supportive of delivering mixed tenure communities, policies should not undermine the deliverability of the Local Plan. In addition, as the masterplan develops, the location and proximity to the new stadium to all new homes should be reviewed. As with all residential development, this should take into account stadium operations and crowd movement, as well as the associated impact on local residents.

The Club has not yet seen any published financial viability evidence to underpin the draft policies, and the total costs of all relevant policies are not of a scale that will make the plan undeliverable. An up-to-date area-wide viability assessment should be prepared, in accordance with relevant national policy and guidance, to robustly test the deliverability of draft plan policies, especially as proposals for Trafford Wharfside and the Stadium District further evolve. Should adjustment be required, this should be reflected in revised draft policies within the forthcoming Regulation 19 draft of the local plan. The evidence base should be transparently published, in full, for stakeholder review and comment.

Policy R3(E) seeks to limit flexibility in the application of affordable housing policy, as set out under points (E i-iv), by reference to *"limited"* and *"exceptional"* circumstances, which are also subject to viability assessment. Firstly, there is no national policy justification (or expectation set in PPG) for a viability case to be made only in *"limited"* or *"exceptional circumstances".* Secondly, these circumstances are not defined, resulting in a lack of clarity in the policy wording. These references are therefore inconsistent with national policy and guidance and should be removed.

Policy R3N – Affordable and Social Housing within Trafford

See the Club's response to Policy R3.

Policy TM1N – Walking, Wheeling, and Cycling Improvements in Trafford North

The Club is supportive of the aspiration to create a high-quality processional route to the football stadium. It should be noted that while the existing stadium is still in use, a temporary processional route would need to be used – starting from Sir Matt Busby Way towards Wharfside Way and entering the new stadium through John Gilbert Way. Additional access ways over the Bridgewater Canal are also expected to be required. Under the scenario in which the existing Old Trafford stadium is demolished, the processional route would then be amended to follow an appropriate, permanent route.

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Policy TM2 – Public Transport

Whilst the Club understands that contributions towards improvements to public transport are necessary, especially in areas with poor existing connectivity, consideration should be given to how development proposals reduce the need to travel by providing other essential services and community infrastructure. In addition, greater transparency regarding the method of calculation for contributions would be welcomed.

When considering existing matchday demand, the current modal share of supporters shows that c.70% of trips are made by car. A bespoke event day strategy is still being developed but will aim, as a minimum, to work towards Transport for Greater Manchester's (TfGM) policy of 50% of trips to be made by sustainable (non-car) modes of transport. This would equate to approximately 50,000 trips being made on a match day by sustainable modes such as, walking, cycling and all modes of public transport.

Policy TM4 – Mobility Hubs

The Club is supportive of including mobility hubs within the area of the new stadium, in order to facilitate active travel between transport nodes during match day and non-match day operations. The Club would seek to work with TfGM to identify suitable locations for hubs that would not negatively impact stadium operations and the streetscene, such as areas for cycle storage and electric vehicle charging.

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Policy TM6N – The A56 in Trafford North

Whilst the Club accepts that contributions will be sought for improvements to the Old Trafford section of the A56 and the Sir Matt Busby Way / A56 junction, it should be noted that the Civic Quarter Action Plan 2023 has already set out public realm improvements from the Old Trafford Metrolink Station until the junction between Chester and Warwick Road. Therefore, it should be specified that this stretch be under the jurisdiction of developments within the Civic Quarter AAP and not be a requirement of development relating to the area of the new stadium and/or Stadium District.

Policy TM7 – Freight

Whilst MUFC understands the Council's aims to support and enhance freight usage for sustainable distribution, the Club's ambition to make use of land currently operated as part of Freightliner's Old Trafford and the Manchester International Freight terminals would be seen as running contrary to this policy. It is widely known that Freightliner are exploring opportunities to relocate their existing operations out of Old Trafford (and the borough), creating opportunities for regeneration of this land for other uses. To ensure that there does not exist a contradiction between the policy objectives of TM7, and the aspirations of the Club and Council in regeneration of this area, it is requested that specific wording is included in this policy that acknowledges freight may be relocated from Old Trafford and use of this land other than for freight would, as a result, not be contrary to the policy objectives of the local plan.

Policy TM10 – Parking Standards

The Club agrees with the overarching requirement to include electric vehicle charging points and cycle parking within the stadium development. The outcomes of the *"further evidence base studies"* will be crucial to ensure the parameters set out within the policy are fair and robustly justified and the Club would wish to be consulted upon these at the appropriate time.

Policy TM13 – Crowd Movement and Routes

The Club acknowledges the importance and requirements of this policy. Therefore, it has been ensured that new stadium design work safeguards routes through the wider Old Trafford masterplan to public transport nodes. Additionally, static modelling – based on the Green Guide Version 6 – continues to be undertaken to ensure sufficient widths for both egress routes and the outer stadium concourse are provided linked to the evolving design stages. The various construction phases relating to the new stadium will see alteration of existing crowd routes and creation of new ones that will inform the wider Wharfside locale. It is considered that these routes will be established in consideration of all users in line with the methodology set out above and in accordance with TM13.

Policy TC1 – Hierarchy of Centres

Given the status of Trafford Wharfside and strategic importance of the Stadium District within it to facilitate regeneration, growth, and expansion of not just the borough but also Greater Manchester, as well as the extensive variety of uses anticipated within this new area, it is suggested that future consideration could be given to designating targeted areas within the Stadium District and Wharfside as a town/district Centres under Policy TC1.

The Stadium District and Trafford Wharfside Masterplan have the potential to deliver more than 17,000 new homes, accommodating c.42,000 more residents – a population size similar to the already designated town centres of Altrincham, Sale, and Urmston and far in excess of recognised districts or local centres. The anticipated number of new homes would also be in excess of both the Civic Quarter and MediaCityUK Phase 2 combined.

These designations would streamline the inclusion of retail, leisure, and other town centre uses within the Stadium District and around the new stadium, helping to facilitate a vibrant and dynamic extension to Manchester City Centre and Greater Manchester. However, until such a time that Wharfside has within it a significant resident population to justify town/district centre designations under TC1, a policy akin to the Civil Quarter Area Action Plan (CQAAP) Policy CQ3 could be considered for Wharfside that would allow other main town centre uses to meet local needs.

Policy BE2 – Tall Buildings

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The Club supports the Council's stance of the Stadium District being an identified zone suitable for tall buildings. This designation aligns with the Club's aspirations to create a landmark stadium, with a highly positive presence on the Trafford and Greater Manchester skyline that is well-integrated with other tall buildings in the locality. The Club will be assessing the townscape and visual impact of the new stadium through the design process, to ensure a considered and sensitive approach to complement the local and wider context.

Policy CL1N – Manchester United Football Stadium and Immediate Surrounds

MUFC is very supportive of the Council's recognition of the importance of the stadium and the immediate surrounds in policy terms. The Club is committed to developing a new stadium that will act as a catalyst for wider regeneration in the area, be of high-quality design with associated public realm, be contextually appropriate to its surroundings in terms of siting and scale, and incorporate appropriate energy generation measures. However, a clear definition of *"Be wholly sustainable over its lifecycle"* would be welcomed to ensure the scheme can appropriately comply with what is expected by the Council.

The current proposals for the new stadium will significantly reduce the existing provision of match-day parking. Even though new parking will be provided in new locations within the development boundary/vicinity of the stadium, it will be a reduced quantum compared to the current scenario. Similarly for the Stadium District, due to the existing and future levels of accessibility in this area, it is envisaged that low levels of parking will be provided in accordance with existing and emerging policy. It is suggested that Points D and E are linked – Point E should be revised to clarify that new surface parking 'above existing provision' will not be supported, as the current wording suggests no new surface level car parking would be allowable at all, which would not be a practicable solution given the nature of stadium operations.

The Council's support of uses including a mixture of residential, commercial, retail, education, community, leisure, and hotel around the Stadium District is welcomed by the Club. It is agreed that allowances for a wide array of land uses in the area will ensure that the stadium acts a catalyst for creating a vibrant destination on both match and non-match days.

The Club acknowledges the wider benefits beyond the stadium of re-opening or relocating the Manchester United Football Ground railway station, alongside the safeguarding of land for a location yet to be identified and subject to a TfGM Transport Study, However, it is essential that this policy requirement does not impede the ongoing plans to develop a new stadium, insofar as it being a requirement that the train station be reopened or provided before the new stadium were to be developed or become operational. Given the anticipated benefit of the train station to other proposed developments in the area, as discussed with both TMBC and SCC, it is suggested that the protection in perpetuity of the train station is best served through inclusion within Policy TM2, to not unintentionally place the onus of providing the train station onto MUFC within the remit of CL1N.

MUFC is committed to ongoing engagement with key stakeholders and site neighbours to ensure an inclusive development that benefits those with both direct and indirect interactions with the Club.

IP1N – Trafford North Infrastructure Contributions

IP1N states that developments within Trafford North will be required to make financial contributions towards the provision of infrastructure in accordance with the following rates: i. Residential (Class C3 and C4): £150 per sq. m; and ii. All other development: £70 per sq. m.

At present, there is no published evidence base provided to justify these proposed rates. Therefore, an up-to-date area-wide viability assessment should be prepared, in accordance with relevant national policy and guidance, to robustly test the deliverability of draft plan policies – including the propensity of developments to fund infrastructure contributions.

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We trust this representation will be taken into consideration when progressing with the Local Plan preparation. Should the Council wish to discuss further with MUFC and CBRE, please do not hesitate to make contact using the details within this letter.

Yours sincerely,

[redacted]

Iain Jenkinson MRTPI FRICS
Executive Director
CBRE PLANNING & DEVELOPMENT

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Local Plan Submission
United Kingdom | June 2025

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Call for Sites Submission and Local Plan Comments

Land to East of A5181 (Kellogg's Plant) Park Rd, Trafford Park, Stretford, Manchester, M32 8RA

Kellogg Company of Great Britain Limited

JLL SEE A BRIGHTER WAY

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1. Introduction

1.1. This representation has been prepared on behalf of our client, Kellogg Company of Great Britain Limited (Kellogg's) ('the client') by JLL ('the agent').

1.2. On 16th May 2024 Kellogg's announced the closure of the Kellogg's Trafford Park manufacturing facility.

1.3. The representations set out are made in the context of seeking to work with Trafford Council to ensure that an effective and deliverable plan for the future of the site as part of the New Trafford Local Plan. The site is also submitted to the "Call for Sites" consultation exercise, alongside our clients' comments on specific policies and questions requested as part of the April 2025 consultation, which seeks feedback on the draft policies, strategy, vision, and objectives of the Local Plan.

1.4. As a part of this submission the following documents have been reviewed and commented on:

- Trafford Local Plan Regulation 18 Consultation Draft - Policies (April 2025)
- Policies Map
- Site Selection Methodology

1.5. These representations have direct regard to a circa 7.02 Ha site which is located to the east of A5181(Kellogg's Plant) Park Rd, Stretford, Manchester M32 8RA, which our client is promoting for development and continued use as an employment site ('the Site'). The Site is shown at **Appendix 1.**

1.6. Within the Emerging Local Plan Consultation Document, the Site is specifically designated as part of the Trafford Park Area under Policy EJ2 and is therefore expected to continue in employment use.

1.7. It is understood from a review of the consultation document that in order to ensure that Trafford makes a sufficient contribution to meeting the employment requirements identified in Places for Everyone (PfE), Trafford is required to deliver 736,308 sqm total employment land by 2042 with 551,748 sqm proposed for industry and warehousing floorspace.

1.8. The Site in Trafford presents an opportunity to consolidate the employment use on the site either through the retention and reuse of the existing building or through the potential re-development of the building; such a development would deliver a sustainable, modern employment development, including Use Classes B2, B8, E(g)(ii)) on previously developed land following the relocation of the

existing business from the site to assist the Local Planning Authority in meeting the above needs as set out in PfE.

1.9. The Site has the potential to continue to deliver sustainable employment to the benefit of the Borough with very limited impact to the surrounding townscape and landscape. JLL consider that the site is suitable, soon to be available and achievable and therefore should be allocated as an employment development opportunity with recognition that it has potential for uses which could deliver wider benefits to other employers in the Borough.

2. The Site

The Site and Surroundings

2.1. The Site is located in the Trafford Park Area and extends to approximately 7.02 hectares and is bounded by employment development to the North, West and Southwest, with residential dwellings to the east. However, the general character of the area is industrial.



Figure 1: Site Location

2.2. Trafford Park train station is located a short distance to the southwest of the site and bus stops are located close to the access roads on the A5181.

Kellogg's Plant

2.3. The Kellogg's Plant has access via A1518. It is split into two sections covering approximately 11.9 ha of land, with a conveyer bridge link between the two sites.

2.4. Kellogg's currently have approximately 360 employees on site and operate on a 24/7 basis.

Access and Accessibility

2.5. The application site is located and accessed on land off the A5181 Park Road / B5211 Barton Dock Road / shared access road junction, in Trafford Park.

2.6. Trafford Park benefits from a wide range of facilities and services as is set out below. As part of the Emerging Trafford Local Plan, it sets out a total supply of approximately 350,000 sqm of

employment land, accounting for 45% of the borough's overall employment land supply. The ELR also indicated approx. 25,000 sqm of employment land with extant permission at Trafford Park, largely for industry and warehousing. A key issue facing Trafford Park is the threat of leisure expansion (thus reducing stock of traditional employment space)[1].

2.7. The Site, made up of the developable area **(Figure 1)** edged in red above and is located in a sustainable location for employment allocation, in an established area for employment use that is served by public transport. Furthermore, Trafford Park has a wide range of facilities, such that many of the daily, economic, social, and community needs can be met within the area surrounding the site which further indicates that employment allocation at this site can be regarded as sustainable.

2.8. We also consider it important to note that there are excellent quality bus services in close proximity to the site that provide access to Manchester City Centre and the Trafford Centre which provide a wider range of services, and direct access to this site. There is also a Train Station at Trafford Park which provides connections to Manchester and Liverpool.

2.9. On this basis we consider that either continued employment use development provided at the site would allow it to be reached by modes other than the private car, reinforcing the public transport accessibility of the site and its overall accessibility credentials.

Assessment of Potential Constraints

2.10. The Site does not present significant environmental or physical challenges to development, as we demonstrate below in **Table 1** and is therefore suitable for allocation:

Table 1: Site Constraints	
Potential Constraint	**Response**
Access	The Site is already accessible, and access is available from A5181, which involves the provision of suitable visibility splays for the site access, which is considered to be achievable without third party land. The site is therefore suitable for allocation.
Flood risk	The Site is located in EA Flood Zone 1, the lowest zone of flood risk. The site is therefore not constrained by Flood Risk. The site is therefore suitable for allocation.

[1] April 2025 Trafford Local Plan: Trafford North Place Profile: P26

Contamination	The Site has been in historic use as a food manufacturing facility and employment site. Therefore, the potential risk of contamination on the site is to be highly unlikely. As part of the plant closure due diligence a Phase 1 Desktop Study and Phase 2 Geo-environmental Site Assessment would be undertaken. Therefore, it is considered that the site is suitable for allocation.
Heritage	The Site is not in a Conservation Area and does not contain any heritage assets, including nationally or locally listed buildings. It is considered that development at the site would not adversely affect the setting of any heritage assets and would ensure the long-term provision of employment land. The site is therefore suitable for allocation.
Landscape	The landscape surrounding the site is influenced by its urban character and is of generally low value. There are no trees, TPO's or significant hedgerows within the site that would be affected by development and a limited landscape and ecological baseline that would be altered. The Site is also previously developed. The site is therefore suitable for allocation.
Ecology	The Site is likely to be classified as having a very low nature conservation value, given the lack of trees or hedgerows on site and its previously developed nature. The site is therefore suitable for allocation.

Planning History

2.11. The Site has an extensive planning history associated with its existing use as the Kellogg's Food Manufacturing Facility.

3. Suitability for Allocation

3.1. The building was originally constructed in the 1930's specifically for the production of cereal products. The buildings don't meet the current occupiers' requirements for modern food manufacturing processes or warehousing. Therefore, the site needs to be promoted to ensure maximum flexibility and attractiveness to the market. As is discussed below, the site is suitable for allocation.

Suitability for Employment

3.2. The Site has operated as an employment site for a significant period of time and the intention is for employment use to continue on the site.

3.3. Maintaining its designation for employment and other associated uses aligns with current planning policies.

3.4. The site's existing utility infrastructure enhances its position as a strategic employment site and widens the potential to attract employers that are strategically beneficial to the Borough. Such a project presents an opportunity for strategic regeneration, attracting further investment and enhancing the area's overall appeal.

3.5. Importantly, retaining employment use addresses community needs, mitigating potential disruption associated with other land uses, while also offering a viable and sustainable option in cases where alternative developments might not be feasible. A modern, high-quality employment space is the logical option and allocation of this nature should be considered.

Accordance with Trafford Guidance

Greening Trafford Park Study

3.6. Allocating the site as an employment site would align with the Greening Trafford Park Infrastructure Framework by enhancing the area's attractiveness to businesses and employees. Promoting sustainable transport options like walking, cycling, and public transport reduces car dependency, supporting broader environmental objectives. Furthermore, integrating green infrastructure mitigates potential environmental impacts from development. The site is an existing employment site, in need of redevelopment. However, it is in a sustainable location with access to sustainable modes of transport. It is therefore suitable for allocation.

Low Carbon Trafford Park

3.7. The Low Carbon Trafford Park 2038 further supports the allocation of the site by providing a clear decarbonisation plan, enhancing the site's sustainability credentials.

Summary

3.8. It is considered that any future development of the site would accord with the recommendations from these reports, therefore the allocation of the site for continued employment use should be considered acceptable. The Local Plan can ensure that if the site is allocated, it is developed in a way that is both economically viable and environmentally sustainable. This would ensure that businesses, reduce carbon emissions, and improve the quality of life for the local community.

4. Comments on Emerging Planning Policy

4.1. The below summary provides comments on the two main policies of relevance (ST1 and EJ2) to our clients site to assist with reinforcing the site's allocation credentials for employment use.

4.2. However, other policies of potential relevance to the future development of the site are also commented on to assist Trafford Council's ongoing consultation exercise.

Draft Local Plan Policies Review

Table 2: Comments on Proposed Local Plan Policies		
Policy	**Question**	**Kellogg's Comment**
Policy ST1: Core Growth Area	Do you support Policy ST1? Are there any changes required which would improve the policy?	*This policy aligns well with the overall spatial strategy set out in Places for Everyone by focusing on growth and development in key locations like Trafford Park, where the site proposed for allocation is located, which, our client is in full agreement with. The emphasis on mixed-use development is positive for creating vibrant, sustainable communities. However, the policy could perhaps provide more detail on the types/scale of development envisioned for each of the key growth locations mentioned.*
Policy ST4: Sustainable Development	Do you support Policy ST4? Are there any changes required which would improve the policy?	*This provides a clear overarching commitment to sustainable development, in line with national policy. The policy appropriately emphasises working proactively with applicants to find solutions. However, it could potentially be strengthened by providing more specific criteria or examples of what sustainable development looks like in the Trafford context.*
Policy ST5: Climate Change	Do you support Policy ST5? Are there any changes required which would improve the policy?	*Any future development of the site would likely include climate prevention mitigation measures and as such our client is supportive of the wording of this policy.*
Policy RT1: Carbon and Energy	Do you support Policy RT1? Are there any changes required which would improve the policy?	*Our client is generally in agreement with the wording of Policy RT1 given it sets the overarching framework for sustainable development and carbon reduction in Trafford. It is considered that any future development at the Kellogg's site would adhere to these requirements by incorporating sustainable design principles into any redevelopment.*
Policy RT2: Decentralised Energy Generation	Do you support Policy RT2? Are there any changes required which would improve the policy?	*The Site is located within the JP-S3 Heat Network Opportunity Area. As such, any future development would need to accord with the requirements of Policy RT2 which seeks to promote local energy generation and distribution. Any future development would evaluate the feasibility of connecting to existing networks or establishing a new one. If network connection is not pursued, a financial contribution to the Council's energy initiatives would be explored. Further to this*

Table 2: Comments on Proposed Local Plan Policies		
Policy	**Question**	**Kellogg's Comment**
		our clients have no further comments or concerns with the wording of this condition.
Policy RT3: Overheating and the Urban Heat Island	Do you support Policy RT3? Are there any changes required which would improve the policy?	*Our client has no comments to make on this policy and considers that the measures outlined to reduce overheating, cooling and integrating green infrastructure will be considered as part of any future redevelopment of the site.*
Policy RT4: Sustainable Retrofitting	Do you support Policy RT4? Are there any changes required which would improve the policy?	*With respect to Policy RT4, our client has no major concerns provided that where retrofitting of existing building is not a viable option that the demolition and redevelopment of sites within designated employment areas, is not hindered by the requirements of this policy.*
Policy RT5: Circular Economy	Do you support Policy RT5? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy EJ1: Economic Growth	Do you support Policy EJ1? Are there any changes required which would improve the policy?	*Our client is pleased that Policy EJ1 includes employment land targets align with the Places for Everyone requirements, which is positive for strategic consistency. The focus on protecting existing employment areas while also identifying new opportunities is appropriate. However, the policy could potentially provide more guidance on the types of employment uses that will be prioritised in different locations. This is to ensure that the policy extends to the evolving needs of modern infrastructure. Given their importance to the digital economy and the increasing demand for such facilities, their inclusion would provide maximum flexibility and future-proof the policy against emerging requirements.*
Policy EJ2: Trafford Park	Do you support Policy EJ2? Are there any changes required which would improve the policy?	*Trafford Park, where the site proposed for allocation is located falls under this policy. Policy EJ2 effectively aims to protect and enhance Trafford Park as a vital employment area, aligning with strategic economic objectives. Our client agrees that the policy rightly recognises Trafford Park's importance as a major industrial estate and seeks to safeguard its primary employment function, supporting modernisation and sustainable practices to adapt to changing economic needs. Encouraging improvements to public transport and active travel is also positive for accessibility and sustainability, while the support for a Trafford Park Heat Network demonstrates joined up thinking on sustainability and infrastructure. The allowance of some supporting uses in the Trafford Park Village Neighbourhood Centre provides flexibility, and the emphasis on urban greening and sustainable drainage is beneficial for environmental quality and climate resilience. To add flexibility for other employment uses, the following could be considered: amending policy wording to explicitly*

Table 2: Comments on Proposed Local Plan Policies		
Policy	**Question**	**Kellogg's Comment**
		recognise other compatible employment uses within Trafford Park. To enhance the policy, more detail could also be provided on design standards and development criteria to ensure new development is high-quality and fits the area's character. Consideration should also be given to how Trafford Park interacts with and complements other key employment areas in the borough.
Policy EJ3: Industry and Warehousing	Do you support Policy EJ3? Are there any changes required which would improve the policy?	*The policy as written focuses primarily on traditional industrial and warehousing uses within specific key employment areas, with one being Trafford Park where the site is located. While this provides a degree of certainty, it might stifle innovation and prevent the development of other employment generating uses that could be equally or even more beneficial to the local economy.*
Trafford Park Boundary	Do you agree with the proposed boundary shown on the policies map for Trafford Park?	*Our client is in full agreement with the proposed boundary for Trafford Park which includes our clients land within it.*
Policy EJ5: Safeguarding Trafford's Employment Land	Do you support Policy EJ5? Are there any changes required which would improve the policy?	*Our client commends the Council for ensuring that the policy aligns with national planning guidance on safeguarding employment sites while providing clear, locally specific criteria for assessing potential loss of employment land in Trafford. Our client would like this policy to ensure that other suitable employment uses are not restricted through the wording of this policy and with respect to our comments on Policy EJ2 – Trafford Park.*
Policy EJ6: Data and Energy Storage	Do you support Policy EJ6? Are there any changes required which would improve the policy?	*Our client supports this policy.*
Policy TM1: Walking, Wheeling and Cycling	Do you support Policy TM1? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy TM2: Public Transport	Do you support Policy TM2? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy. It is also located in a sustainable location with access to a range of sustainable transport modes.*
Policy TM5: Local Highway Network	Do you support Policy TM5? Are there any changes required which	*Any future development of the site would likely include measures to ensure compliance with this policy.*

Table 2: Comments on Proposed Local Plan Policies		
Policy	**Question**	**Kellogg's Comment**
	would improve the policy?	
Policy TM10: Parking Standards	Do you support Policy TM10? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy TM11: Lorry Management	Do you support Policy TM11? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy GI5: Green Infrastructure Opportunity Areas	Do you support Policy GI5? Are there any changes required which would improve the policy?	*Our clients are happy with the wording of this condition and enhancement of green corridors, provided it does not stop designated employment areas and sites within it from coming forward for redevelopment. I.e. Trafford Park.*
Policy GI6: Green Infrastructure in New Developments	Do you support Policy GI6? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy GI7: Trees, Woodland and Hedgerows	Do you support Policy GI7? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy: GI10 Building Biodiversity into New Developments	Do you support Policy GI10? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy WA1: Managing Flood Risk	Do you support Policy WA1? Are there any changes required which would improve the policy?	*Our client has no comments on the wording of this policy.*
Policy WA2: Sustainable	Do you support Policy WA2? Are there any	*Our client has no comments on the wording of this policy.*

Table 2: Comments on Proposed Local Plan Policies		
Policy	**Question**	**Kellogg's Comment**
Drainage – Surface and Foul Water	changes required which would improve the policy?	
Policy WA4: Water Efficiency	Do you support Policy WA4? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy CT5: Social Value in New Developments	Do you support Policy CT5? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy with regard to labour and training agreements.*
Policy BE1: Design	Do you support Policy BE1? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy BE8: Noise and Vibration	Do you support Policy BE8? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy BE9: Land Contamination and Remediation	Do you support Policy BE9? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy IP1: Infrastructure Delivery and Planning Obligations	Do you support Policy IP1? Are there any changes required which would improve the policy?	*Our client has no comments on the wording of this policy, provided it does not hinder the redevelopment of key employment areas such as those within the Trafford Park area.*
Policy IP2: Managing and Monitoring	Do you support Policy IP2? Are there any changes required which would improve the policy?	*Our client has no comments on the wording of this policy, provided it does not hinder the redevelopment of key employment areas such as those within the Trafford Park area.*

Table 2: Comments on Proposed Local Plan Policies		
Policy	**Question**	**Kellogg's Comment**
Planning Obligations		

Summary

4.3. As set out above, Policies ST1 and EJ2 are considered to be of most relevance to the allocation of the site. In summary:

4.4. **Policy ST1 (Core Growth Area):** Our client supports the policy's focus on growth in key locations like Trafford Park where the site is located. However, it has been suggested that more detail is provided on the types and scale of development envisioned for each growth location.

4.5. **Policy EJ2 (Trafford Park):** Our client agrees with the policy's aim to protect and enhance Trafford Park as a vital employment area.

4.6. In general, our client expresses support for the various policies outlined in the consultation document, particularly those related to sustainable development, climate change, and economic growth.

5. Conclusion

5.1. The Site lies within the Trafford Park Area, in this context, our client is pleased that the Local Plan continues to recognise the potential for Trafford Park as a key employment area for the area.

5.2. On 16th May 2024 Kellogg's announced the closure of the Kellogg's Trafford Park manufacturing facility.

5.3. The allocation of the site for employment uses is proposed and, pending minor alterations to the policy wording of the policies listed above, could be delivered in the short term (0-5 years), with few constraints that would prevent development.

5.4. The Site presents an opportunity to consolidate the employment use on the site either through the retention and reuse of the existing building or through the potential re-development of the building; such a development would deliver a sustainable, modern employment development, including Use Classes B2, B8, E(g)(ii)) on previously developed land following the relocation of the existing business.

5.5. The main policies relevant to the site are ST1 and EJ2. These policies have been addressed to ensure the site can be redeveloped positively and proactively, offering maximum market flexibility.

5.6. The Site is well-contained, and there is an opportunity for employment allocation to be provided sensitively with buffer landscaping.

5.7. The Site also has good access to facilities, services and public transport links to ensure employees can access the site in a sustainable way. It is therefore considered to be a suitable location for employment development with no constraints that cannot be overcome through mitigation measures.

5.8. The Site has the potential to continue to deliver sustainable employment to the benefit of the Borough with very limited impact to the surrounding townscape and landscape. JLL consider that the site is suitable, soon to be available and achievable and therefore should be allocated as an employment development opportunity with recognition that it has potential for uses which could deliver wider benefits to other employers in the Borough.

5.9. Finally, it is therefore considered on the basis of the information contained within this submission that the site is able to meet and pass stages 1-3 of the Site Assessment Methodology and is therefore an ideal site for allocation as an employment site.

5.10. For completeness a copy of the site submission proforma is appended to this submission.

5.11. My client would welcome the opportunity to meet with Trafford Council at a mutually convenient time to discuss our comments before the Local Plan progresses to full assessment of the sites and understand from recent discussions with officers that this is possible.

5.12. In the meantime, please do not hesitate to contact me or Tom Procter at JLL should you have any queries or require clarification of any point.

Yours faithfully,



Mike Hopkins MRTPI

Director

Mike Hopkins MRTPI
Director
[redacted]

Tom Procter MRTPI
Senior Planner
[redacted]

About JLL

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Local Plan Submission
United Kingdom | June 2025

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Call for Sites Submission and Local Plan Comments

Land to West of A5181 (Kellogg's Plant) Park Rd, Trafford Park, Stretford, Manchester, M32 8RA

Kellogg Company of Great Britain Limited

JLL SEE A BRIGHTER WAY

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1. Introduction

1.1. This representation has been prepared on behalf of our client, Kellogg Company of Great Britain Limited (Kellogg's) ('the client') by JLL ('the agent').

1.2. On 16th May 2024 Kellogg's announced the closure of the Kellogg's Trafford Park manufacturing facility.

1.3. The representations set out are made in the context of seeking to work with Trafford Council to ensure that an effective and deliverable plan for the future of the site as part of the New Trafford Local Plan. The site is also submitted to the "Call for Sites" consultation exercise, alongside our clients' comments on specific policies and questions requested as part of the April 2025 consultation, which seeks feedback on the draft policies, strategy, vision, and objectives of the Local Plan.

1.4. As a part of this submission the following documents have been reviewed and commented on:

- Trafford Local Plan Regulation 18 Consultation Draft - Policies (April 2025)
- Policies Map
- Site Selection Methodology

1.5. These representations have direct regard to a circa 4.85 Ha site which is located to the west of A5181(Kellogg's Plant) Park Rd, Stretford, Manchester M32 8RA, which our client is promoting for development and continued use as an employment site ('the Site'). The Site is shown at **Appendix 1.**

1.6. Within the Emerging Local Plan Consultation Document, the Site is specifically designated as part of the Trafford Park Area under Policy EJ2 and is therefore expected to continue in employment use.

1.7. It is understood from a review of the consultation document that in order to ensure that Trafford makes a sufficient contribution to meeting the employment requirements identified in Places for Everyone (PfE), Trafford is required to deliver 736,308 sqm total employment land by 2042 with 551,748 sqm proposed for industry and warehousing floorspace.

1.8. The Site in Trafford presents an opportunity to consolidate the employment use on the site either through the retention and reuse of the existing building or through the potential re-development of the building; such a development would deliver a sustainable, modern employment development, including Use Classes B2, B8, E(g)(ii)) on previously developed land following the relocation of the

existing business from the site to assist the Local Planning Authority in meeting the above needs as set out in PfE.

1.9. The Site has the potential to continue to deliver sustainable employment to the benefit of the Borough with very limited impact to the surrounding townscape and landscape. JLL consider that the site is suitable, soon to be available and achievable and therefore should be allocated as an employment development opportunity with recognition that it has potential for uses which could deliver wider benefits to other employers in the Borough.

2. The Site

The Site and Surroundings

2.1. The Site is located in the Trafford Park Area and extends to approximately 4.85 hectares and is bounded by employment development to the North, Northeast and Northwest, with residential dwellings to the South, Southeast and Southwest. However, the general character of the area is industrial.



Figure 1: Site Location

2.2. Trafford Park train station is located a short distance to the southwest of the site and bus stops are located close to the access roads on the A5181.

Kellogg's Plant

2.3. The Kellogg's Plant has access via A1518. It is split into two sections covering approximately 11.9 ha of land, with a conveyer bridge link between the two sites.

2.4. Kellogg's currently have approximately 360 employees on site and operate on a 24/7 basis.

Access and Accessibility

2.5. The application site is located and accessed on land off the A5181 Park Road / B5211 Barton Dock Road and contains an internal vehicle circulation road around the perimeter of the existing building which is proposed for demolition.

2.6. Trafford Park benefits from a wide range of facilities and services as is set out below. As part of the Emerging Trafford Local Plan, it sets out a total supply of approximately 350,000 sqm of employment land, accounting for 45% of the borough's overall employment land supply. The ELR also indicated approx. 25,000 sqm of employment land with extant permission at Trafford Park, largely for industry and warehousing. A key issue facing Trafford Park is the threat of leisure expansion (thus reducing stock of traditional employment space)[1].

2.7. The Site, made up of the developable area **(Figure 1)** edged in red above and is located in a sustainable location for employment allocation, in an established area for employment use that is served by public transport. Furthermore, Trafford Park has a wide range of facilities, such that many of the daily, economic, social, and community needs can be met within the area surrounding the site which further indicates that employment allocation at this site can be regarded as sustainable.

2.8. We also consider it important to note that there are excellent quality bus services in close proximity to the site that provide access to Manchester City Centre and the Trafford Centre which provide a wider range of services, and direct access to this site. There is also a Train Station at Trafford Park which provides connections to Manchester and Liverpool.

2.9. On this basis we consider that either continued employment use development provided at the site would allow it to be reached by modes other than the private car, reinforcing the public transport accessibility of the site and its overall accessibility credentials.

2.10. The Site does not present significant environmental or physical challenges to development, as we demonstrate below in **Table 1** and is therefore suitable for allocation:

Table 1: Site Constraints	
Potential Constraint	**Response**
Access	The Site is already accessible, and access is available from A5181, which involves the provision of suitable visibility splays for the site access, which is considered to be achievable without third party land. The site is therefore suitable for allocation.
Flood risk	The Site is located in EA Flood Zone 1, the lowest zone of flood risk, however a small parcel of land so the Southeast of the site is in EA Flood Zone 2, development would remain free of this area.

[1] April 2025 Trafford Local Plan: Trafford North Place Profile: P26

	The site is therefore not constrained by Flood Risk. The site is therefore suitable for allocation.
Contamination	The Site has been in historic use as a food manufacturing facility and employment site. Therefore, the potential risk of contamination on the site is to be highly unlikely. As part of the plant closure due diligence a Phase 1 Desktop Study and Phase 2 Geo-environmental Site Assessment would be undertaken. Therefore, it is considered that the site is suitable for allocation.
Heritage	The Site is not in a Conservation Area and does not contain any heritage assets, including nationally or locally listed buildings. It is considered that development at the site would not adversely affect the setting of any heritage assets and would ensure the long-term provision of employment land. The site is therefore suitable for allocation.
Landscape	The landscape surrounding the site is influenced by its urban character and is of generally low value. There are no trees, TPO's or significant hedgerows within the site that would be affected by development and a limited landscape and ecological baseline that would be altered. The Site is also previously developed. The site is therefore suitable for allocation.
Ecology	The Site is likely to be classified as having a very low nature conservation value, given the lack of trees or hedgerows on site and its previously developed nature. The site is therefore suitable for allocation.

Planning History

2.11. The Site has an extensive planning history associated with its existing use as the Kellogg's Food Manufacturing Facility.

3. Suitability for Allocation

3.1. The warehouse land was purchased in the early 1960's and developed, specifically for the production of cereal products. The buildings don't meet the current occupiers' requirements for modern food manufacturing processes or warehousing. Therefore, the site needs to be promoted to ensure maximum flexibility and attractiveness to the market. As is discussed below, the site is suitable for allocation.

Suitability for Employment

3.2. The Site has operated as an employment site for a significant period of time and the intention is for employment use to continue on the site.

3.3. Maintaining its designation for employment and other associated uses aligns with current planning policies.

3.4. The site's existing utility infrastructure enhances its position as a strategic employment site and widens the potential to attract employers that are strategically beneficial to the Borough. Such a project presents an opportunity for strategic regeneration, attracting further investment and enhancing the area's overall appeal.

3.5. Importantly, retaining employment use addresses community needs, mitigating potential disruption associated with other land uses, while also offering a viable and sustainable option in cases where alternative developments might not be feasible. A modern, high-quality employment space is the logical option and allocation of this nature should be considered.

Accordance with Trafford Guidance

Greening Trafford Park Study

3.6. Allocating the site as an employment site would align with the Greening Trafford Park Infrastructure Framework by enhancing the area's attractiveness to businesses and employees. Promoting sustainable transport options like walking, cycling, and public transport reduces car dependency, supporting broader environmental objectives. Furthermore, integrating green infrastructure mitigates potential environmental impacts from development. The site is an existing employment site, in need of redevelopment. However, it is in a sustainable location with access to sustainable modes of transport. It is therefore suitable for allocation.

Low Carbon Trafford Park

3.7. The Low Carbon Trafford Park 2038 further supports the allocation of the site by providing a clear decarbonisation plan, enhancing the site's sustainability credentials.

Summary

3.8. It is considered that any future development of the site would accord with the recommendations from these reports, therefore the allocation of the site for continued employment use should be considered acceptable. The Local Plan can ensure that if the site is allocated, it is developed in a way that is both economically viable and environmentally sustainable. This would ensure that businesses, reduce carbon emissions, and improve the quality of life for the local community.

4. Comments on Emerging Planning Policy

4.1. The below summary provides comments on the two main policies of relevance (ST1 and EJ2) to our clients site to assist with reinforcing the site's allocation credentials for employment.

4.2. However, other policies of potential relevance to the future development of the site are also commented on to assist Trafford Council's ongoing consultation exercise.

Draft Local Plan Policies Review

Table 2: Comments on Proposed Local Plan Policies		
Policy	**Question**	**Kellogg's Comment**
Policy ST1: Core Growth Area	Do you support Policy ST1? Are there any changes required which would improve the policy?	*This policy aligns well with the overall spatial strategy set out in Places for Everyone by focusing on growth and development in key locations like Trafford Park, where the site proposed for allocation is located, which, our client is in full agreement with. The emphasis on mixed-use development is positive for creating vibrant, sustainable communities. However, the policy could perhaps provide more detail on the types/scale of development envisioned for each of the key growth locations mentioned.*
Policy ST4: Sustainable Development	Do you support Policy ST4? Are there any changes required which would improve the policy?	*This provides a clear overarching commitment to sustainable development, in line with national policy. The policy appropriately emphasises working proactively with applicants to find solutions. However, it could potentially be strengthened by providing more specific criteria or examples of what sustainable development looks like in the Trafford context.*
Policy ST5: Climate Change	Do you support Policy ST5? Are there any changes required which would improve the policy?	*Any future development of the site would likely include climate prevention mitigation measures and as such our client is supportive of the wording of this policy.*
Policy RT1: Carbon and Energy	Do you support Policy RT1? Are there any changes required which would improve the policy?	*Our client is generally in agreement with the wording of Policy RT1 given it sets the overarching framework for sustainable development and carbon reduction in Trafford. It is considered that any future development at the Kellogg's site would adhere to these requirements by incorporating sustainable design principles into any redevelopment.*
Policy RT2: Decentralised Energy Generation	Do you support Policy RT2? Are there any changes required which would improve the policy?	*The Site is located within the JP-S3 Heat Network Opportunity Area. As such, any future development would need to accord with the requirements of Policy RT2 which seeks to promote local energy generation and distribution. Any future development would evaluate the feasibility of connecting to existing networks or establishing a new one. If network connection is not pursued, a financial contribution to the Council's energy initiatives would be explored. Further to this*

Table 2: Comments on Proposed Local Plan Policies		
Policy	**Question**	**Kellogg's Comment**
		our clients have no further comments or concerns with the wording of this condition.
Policy RT3: Overheating and the Urban Heat Island	Do you support Policy RT3? Are there any changes required which would improve the policy?	*Our client has no comments to make on this policy and considers that the measures outlined to reduce overheating, cooling and integrating green infrastructure will be considered as part of any future redevelopment of the site.*
Policy RT4: Sustainable Retrofitting	Do you support Policy RT4? Are there any changes required which would improve the policy?	*With respect to Policy RT4, our client has no major concerns provided that where retrofitting of existing building is not a viable option that the demolition and redevelopment of sites within designated employment areas, is not hindered by the requirements of this policy.*
Policy RT5: Circular Economy	Do you support Policy RT5? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy EJ1: Economic Growth	Do you support Policy EJ1? Are there any changes required which would improve the policy?	*Our client is pleased that Policy EJ1 includes employment land targets align with the Places for Everyone requirements, which is positive for strategic consistency. The focus on protecting existing employment areas while also identifying new opportunities is appropriate. However, the policy could potentially provide more guidance on the types of employment uses that will be prioritised in different locations. This is to ensure that the policy extends to the evolving needs of modern infrastructure. Given their importance to the digital economy and the increasing demand for such facilities, their inclusion would provide maximum flexibility and future-proof the policy against emerging requirements.*
Policy EJ2: Trafford Park	Do you support Policy EJ2? Are there any changes required which would improve the policy?	*Trafford Park, where the site proposed for allocation is located falls under this policy. Policy EJ2 effectively aims to protect and enhance Trafford Park as a vital employment area, aligning with strategic economic objectives. Our client agrees that the policy rightly recognises Trafford Park's importance as a major industrial estate and seeks to safeguard its primary employment function, supporting modernisation and sustainable practices to adapt to changing economic needs. Encouraging improvements to public transport and active travel is also positive for accessibility and sustainability, while the support for a Trafford Park Heat Network demonstrates joined up thinking on sustainability and infrastructure. The allowance of some supporting uses in the Trafford Park Village Neighbourhood Centre provides flexibility, and the emphasis on urban greening and sustainable drainage is beneficial for environmental quality and climate resilience. To add flexibility for other employment uses, the following could be considered: amending policy wording to explicitly*

Table 2: Comments on Proposed Local Plan Policies		
Policy	**Question**	**Kellogg's Comment**
		recognise other compatible employment uses within Trafford Park. To enhance the policy, more detail could also be provided on design standards and development criteria to ensure new development is high-quality and fits the area's character. Consideration should also be given to how Trafford Park interacts with and complements other key employment areas in the borough.
Policy EJ3: Industry and Warehousing	Do you support Policy EJ3? Are there any changes required which would improve the policy?	*The policy as written focuses primarily on traditional industrial and warehousing uses within specific key employment areas, with one being Trafford Park where the site is located. While this provides a degree of certainty, it might stifle innovation and prevent the development of other employment generating uses that could be equally or even more beneficial to the local economy.*
Trafford Park Boundary	Do you agree with the proposed boundary shown on the policies map for Trafford Park?	*Our client is in full agreement with the proposed boundary for Trafford Park which includes our clients land within it.*
Policy EJ5: Safeguarding Trafford's Employment Land	Do you support Policy EJ5? Are there any changes required which would improve the policy?	*Our client commends the Council for ensuring that the policy aligns with national planning guidance on safeguarding employment sites while providing clear, locally specific criteria for assessing potential loss of employment land in Trafford. Our client would like this policy to ensure that other suitable employment uses are not restricted through the wording of this policy and with respect to our comments on Policy EJ2 – Trafford Park.*
Policy EJ6: Data and Energy Storage	Do you support Policy EJ6? Are there any changes required which would improve the policy?	*Our client supports this policy.*
Policy TM1: Walking, Wheeling and Cycling	Do you support Policy TM1? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy TM2: Public Transport	Do you support Policy TM2? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy. It is also located in a sustainable location with access to a range of sustainable transport modes.*
Policy TM5: Local Highway Network	Do you support Policy TM5? Are there any changes required which	*Any future development of the site would likely include measures to ensure compliance with this policy.*

Table 2: Comments on Proposed Local Plan Policies		
Policy	**Question**	**Kellogg's Comment**
	would improve the policy?	
Policy TM10: Parking Standards	Do you support Policy TM10? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy TM11: Lorry Management	Do you support Policy TM11? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy GI5: Green Infrastructure Opportunity Areas	Do you support Policy GI5? Are there any changes required which would improve the policy?	*Our clients are happy with the wording of this condition and enhancement of green corridors, provided it does not stop designated employment areas and sites within it from coming forward for redevelopment. I.e. Trafford Park.*
Policy GI6: Green Infrastructure in New Developments	Do you support Policy GI6? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy GI7: Trees, Woodland and Hedgerows	Do you support Policy GI7? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy: GI10 Building Biodiversity into New Developments	Do you support Policy GI10? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy WA1: Managing Flood Risk	Do you support Policy WA1? Are there any changes required which would improve the policy?	*Our client has no comments on the wording of this policy.*
Policy WA2: Sustainable	Do you support Policy WA2? Are there any	*Our client has no comments on the wording of this policy.*

Table 2: Comments on Proposed Local Plan Policies		
Policy	**Question**	**Kellogg's Comment**
Drainage – Surface and Foul Water	changes required which would improve the policy?	
Policy WA4: Water Efficiency	Do you support Policy WA4? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy CT5: Social Value in New Developments	Do you support Policy CT5? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy with regard to labour and training agreements.*
Policy BE1: Design	Do you support Policy BE1? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy BE8: Noise and Vibration	Do you support Policy BE8? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy BE9: Land Contamination and Remediation	Do you support Policy BE9? Are there any changes required which would improve the policy?	*Any future development of the site would likely include measures to ensure compliance with this policy.*
Policy IP1: Infrastructure Delivery and Planning Obligations	Do you support Policy IP1? Are there any changes required which would improve the policy?	*Our client has no comments on the wording of this policy, provided it does not hinder the redevelopment of key employment areas such as those within the Trafford Park area.*
Policy IP2: Managing and Monitoring	Do you support Policy IP2? Are there any changes required which would improve the policy?	*Our client has no comments on the wording of this policy, provided it does not hinder the redevelopment of key employment areas such as those within the Trafford Park area.*

Table 2: Comments on Proposed Local Plan Policies		
Policy	**Question**	**Kellogg's Comment**
Planning Obligations		

Summary

4.3. As set out above, Policies ST1 and EJ2 are considered to be of most relevance to the allocation of the site. In summary:

4.4. **Policy ST1 (Core Growth Area):** Our client supports the policy's focus on growth in key locations like Trafford Park where the site is located. However, it has been suggested that more detail is provided on the types and scale of development envisioned for each growth location.

4.5. **Policy EJ2 (Trafford Park):** Our client agrees with the policy's aim to protect and enhance Trafford Park as a vital employment area.

4.6. In general, our client expresses support for the various policies outlined in the consultation document, particularly those related to sustainable development, climate change, and economic growth.

5. Conclusion

5.1. The Site lies within the Trafford Park Area, in this context, our client is pleased that the Local Plan continues to recognise the potential for Trafford Park as a key employment area for the area.

5.2. On 16th May 2024 Kellogg's announced the closure of the Kellogg's Trafford Park manufacturing facility.

5.3. The allocation of the site for employment uses is proposed and, pending minor alterations to the policy wording of the policies listed above, could be delivered in the short term (0-5 years), with few constraints that would prevent development.

5.4. The Site presents an opportunity to consolidate the employment use on the site either through the retention and reuse of the existing building or through the potential re-development of the building; such a development would deliver a sustainable, modern employment development, including Use Classes B2, B8, E(g)(ii)) on previously developed land following the relocation of the existing business.

5.5. The main policies relevant to the site are ST1 and EJ2. These policies have been addressed to ensure the site can be redeveloped positively and proactively, offering maximum market flexibility.

5.6. The Site is well-contained, and there is an opportunity for employment allocation to be provided sensitively with buffer landscaping.

5.7. The Site also has good access to facilities, services and public transport links to ensure employees can access the site in a sustainable way. It is therefore considered to be a suitable location for employment development with no constraints that cannot be overcome through mitigation measures.

5.8. The Site has the potential to continue to deliver sustainable employment to the benefit of the Borough with very limited impact to the surrounding townscape and landscape. JLL consider that the site is suitable, soon to be available and achievable and therefore should be allocated as an employment development opportunity with recognition that it has potential for uses which could deliver wider benefits to other employers in the Borough.

5.9. Finally, it is therefore considered on the basis of the information contained within this submission that the site is able to meet and pass stages 1-3 of the Site Assessment Methodology and is therefore an ideal site for allocation as an employment site.

5.10. For completeness a copy of the site submission proforma is appended to this submission.

5.11. My client would welcome the opportunity to meet with Trafford Council at a mutually convenient time to discuss our comments before the Local Plan progresses to full assessment of the sites and understand from recent discussions with officers that this is possible.

5.12. In the meantime, please do not hesitate to contact me or Tom Procter at JLL should you have any queries or require clarification of any point.

Yours faithfully,



Mike Hopkins MRTPI

Director

Mike Hopkins MRTPI
Director
[redacted]

Tom Procter MRTPI
Senior Planner
[redacted]

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unitedutilities.com

[redacted]

By email only: localplan.consultation@trafford.gov.uk

Your ref:
Our ref:
Date: 12-JUN-25

Dear Sir / Madam

TRAFFORD LOCAL PLAN (APRIL 2025) REGULATION 18 CONSULTATION DRAFT – POLICIES

Thank you for your consultation seeking the views of United Utilities Water Limited (UUW) as part of the Local Plan process. UUW wishes to build a strong partnership with all local planning authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

UUW wishes to highlight the benefit of early, constructive communication with the Council and site promoters to ensure a co-ordinated approach to the delivery of sustainable growth in sustainable locations. When preparing the local plan, new development should be focused in sustainable locations which are accessible to local services and infrastructure. We can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity.

We encourage you to direct future developers to our **pre-application service** to discuss their schemes and highlight any potential issues by contacting:

Developer Services – Wastewater
[redacted]

Developer Services – Water
[redacted]

We note paragraph 1.1 which explains that this consultation relates only to the policies of the draft Trafford Local Plan. Any site allocations and designations will be the subject of a separate future consultation later in 2025. We would welcome the opportunity to provide our comments on any sites that are suggested to you as potential development sites when available. We are keen to

undertake an initial assessment so that this can be fed into your site assessment process before the next stage of consultation. Please ensure that you have regard to the main body of the letter and the associated supporting information, which includes additional recommended policies.

UUW has reviewed the consultation information and wishes to comment on the following selection of matters.

1. Introduction, Vision and Strategic Objectives

Vision for Trafford
Qu 1.2

UUW considers a vision to the local plan to be critical. We welcome the proposed vision, which includes clear references to the need to address the climate crisis with ambitious targets for new development to ensure resilient and well adapted sustainable communities that are attractive and well designed. Sustainability and climate resilience should be '*golden threads*' that guide the preparation of policy in the local plan. A critical element of climate resilience is sustainable water management and water efficient development. We are also supportive of high quality design and place-making.

Strategic Objectives
Qu 1.3

We are wholly supportive of the strategic objectives. In particular, we note:

- SO3 B *'combat and adapt to climate change';*
- SO3 C *'Harness the role that green and blue environments play in mitigating Climate Change and its effects';*
- SO3 D *'Strengthen resilience to the impacts of flood risk, extreme heat and weather events';*
- SO7 B *'Protect and enhance designated green and blue spaces';*
- SO7 C *'Strengthen and expand Trafford's green infrastructure network and improve its accessibility'; and*
- S10 G *'Maintain and strengthen local character and distinctiveness through high quality design and placemaking'*.

These are critical strategic objectives and reflect the need to respond to the climate emergency.

2. Strategy

Policy ST5: Climate Change
Qu 2.5

We request that this policy is rephrased so that expectations of development are clear. We request the following amendments:

A. *Development proposals ~~which~~ must 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~~ must demonstrate how Climate Change has been considered in the design of the development and what adaptation and mitigation measures have been put in place.*

3. Renewable Technologies and Methods

Policy RT2: Decentralised Energy Generation
Qu 3.2

We suggest that it is clear that this policy only relates to relevant major developments. For example, it should not be applicable to infrastructure proposals for water and wastewater infrastructure which fall within the definition of major development. In this regard we note that Figure 3.1 incorporates the operational land of UUW. This includes land at Altrincham Wastewater Treatment Works and Davyhulme Wastewater Treatment Works. Although our operational may be sources for future energy generation, proposals for major development in these locations should not be the subject of the Policy RT2 requirement. We request the opportunity to liaise with you in more detail so that the locations of our sites can be provided.

Policy RT3: Overheating and the Urban Heat Island
Qu 3.3

UUW is particularly supportive of criterion E, which relates to integration of strategic infrastructure. However, we request that the policy is rephrased so that expectations of development are clear. We request the following amendments.

E. Proposals must incorporate green infrastructure which contributes to urban cooling and surface water management. Where feasible, developments should include green roofs, vertical gardens, and strategic tree planting to provide cooling – in accordance with Policy GI6.

Policy RT4: Sustainable Retrofitting
Qu 3. 4

UUW requests that the policy is rephrased so that expectations of development are clear. We request the following amendments.

A. The Council will support the retrofitting of existing buildings where they secure energy efficient improvements or adaption to climate change as established in policy RT3. Proposal for changes of use of existing buildings will be required to consider and, where feasible implement, retrofitting opportunities.

4. Residential Development

Policy R1: Housing Delivery
Qu 4.1

We request that criterion B of Policy R1 includes the following additional text.

B. The following strategic matters of scale, phasing and distribution of new housing development will be taken into consideration in releasing land for new homes. The release of land for new homes will be subject to the capacity of the urban area and infrastructure to accommodate the development and the need to protect the environment. <u>It may be necessary to co-ordinate the delivery of development with the delivery of new / improved infrastructure</u>. The protection of existing homes is important given the need to increase the supply of housing in Trafford.

Policy R11: Self-Build and Custom Housing
Qu 4.19

We request the following additional criterion to Policy R11:

<u>Proposals for self-build and custom housing plots must be built in line with a site-wide infrastructure strategy for foul, surface water and clean water. Fragmented approaches to infrastructure delivery will not be acceptable where sites are part of a wider site</u>.

5. Economy and Jobs

Policy EJ1: Employment Land Requirements
Qu 5.1

In accordance with our response to Qu 4.1, we suggest the following amendment to Policy EJ1:

The release of land for new offices and industry and warehousing will be subject to the capacity of the urban area and infrastructure to accommodate the development and the need to protect the environment. <u>It may be necessary to co-ordinate the delivery of development with the delivery of new / improved infrastructure</u>.

Policy EJ2: Trafford Park
Qu 5.2

UUW requests that Policy EJ2 is rephrased so that expectations of development are clear. We request the following amendments to criterion J.

J. ~~The Council will support the provision of~~ <u>In accordance with wider development plan policies, proposals for development must incorporate</u> urban greening and Sustainable Drainage Systems (SuDS) within Trafford Park to mitigate the adverse impacts of development, building resilience to Climate Change, in accordance with Policies RT1 and WA2.

Policy EJ6: Data and Energy Storage
Qu 5.8

We request that this policy includes the following additional criterions:

'<u>Applications for data or energy storage must be supported by a strategy for foul and surface water management and clean water supply. Proposals must be designed to minimise the impact on water resources and wastewater infrastructure</u>. '

We also suggest the following explanatory text:

'Elements of the new modern economy can be major users of water resources, with associated consequential requirements for wastewater discharge. Applicants must demonstrate how the impact on water resources, wastewater infrastructure and the environment has been mitigated and managed. Reducing impact on water resources and wastewater infrastructure is essential to ensure that critical water and wastewater infrastructure is available for wider growth opportunities and to ensure that the impact on the environment of the emerging modern economy is minimised.'

We also request that paragraph 5.40 is amended as follows:

'5.40. Proposals for new Data Storage facilities will be required to undertake early engagement with Electricity North West to ensure that their power requirements can be met and with United Utilities in relation to water and wastewater requirements. ~~cooling needs.~~'

8. Green Infrastructure and Natural Environment

Policy GI2: Green Infrastructure Network
Qu 8.2

UUW objects to the inclusion of operational land at our wastewater treatment works as green infrastructure network. This includes land at Altrincham Wastewater Treatment Works. Land at our wastewater treatment works will be required to meet longer term growth and environmental drivers. The designation of the land as green infrastructure, where development proposals will be strictly controlled is inappropriate. As such, we request that this designation is deleted on the operational land of UUW. We request the opportunity to liaise with you in more detail so that the locations of our sites can be provided.

Policy GI13 Greater Manchester Wetlands Nature Improvement Areas
Qu 8.3

We request the following additional supporting text to this policy:

Any proposals for new wetlands must ensure no adverse impact on utility assets. Early dialogue with UUW will be required to agree the detail of any proposals.

Policy GI5: Green Infrastructure Opportunity Areas
Qu 8.5

UUW objects to the inclusion of operational land as green infrastructure opportunity areas. Land at our operational sites will be required to meet longer term growth and environmental drivers. The designation of the land as green infrastructure opportunity areas is inappropriate. As such, we request that this designation is deleted insofar as it relates to our operational land. We request the opportunity to liaise with you in more detail so that the locations of our sites can be provided.

Policy GI6: Green Infrastructure in New Developments
Qu 8.6

We request that this policy includes the following additional criterion:

Green infrastructure and landscaping proposals must evaluate and identify opportunities for sustainable surface water management. Landscaping proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management.

Policy GI7: Trees, Woodland and Hedgerows
Qu 8.7

We request that this policy includes the following additional wording to the fourth bullet point of criterion B i.:

Where new streets form part of the proposal, tree lined streets must be integrated into the design and with the strategy for surface water management, considering key constraints such as highway safety, street furniture, lighting and underground services. Planning applications will need to provide clear, justifiable and compelling reasons where this cannot be achieved.

Policy G10: Building Biodiversity into New Developments
Qu 8-10

We note criterion A which states:

All development proposals should seek to enhance biodiversity beyond the minimum mitigation requirements, where appropriate and practical.

Whilst UUW is supportive of the need ensure a robust response to halt the decline of biodiversity, we would welcome clarity on what is meant by '*beyond the minimum mitigation requirements'*. If this is intended to request beyond the 10% of biodiversity net gain specified in legislation, it is important that further thought is given to the practical reality of whether such an approach is deliverable and viable in practice.

9. Open Space, Sport and Recreation

Policy OS: Open Space
Qu 9.1

We request that this policy includes the following additional criterion:

The delivery of open space must evaluate and identify opportunities for sustainable surface water management. Open space proposals must be integrated with the strategy for sustainable surface water management.

10. Water Flooding and Drainage

Policy WA1: Managing Flood Risk
Qu 10.1

We request the following changes to this Policy WA1:

C. Applicants will be required to demonstrate, where necessary by a Flood Risk Assessment (FRA), that account has been taken of existing and future flood risk from all sources, as identified in the Strategic Flood Risk Assessment (SFRA) or other available information, and having regard to climate change. A site-specific FRA is required where a development proposal is:

i. In High Probability (Flood Zone 3)

ii. In Medium Probability (Flood Zone 2)
iii. On sites of 1ha or above within Low Probability (Flood Zone 1)
iv. On sites of 0.5ha, or above with Critical Drainage Areas as identified in the SFRA
v. Within Canal Hazard Zones or where flood risk from canals is overwise considered to be an issue as identified in the SFRA.
vi. at risk from sewer or reservoir flooding.

We also requests the following additional explanatory text:

'Applicants will be required to consult with the water and sewerage undertaker to confirm the nature and extent of any flood risk from sewers and reservoirs.

For sewers, the consultation must confirm:

a) if there are any sewer surcharge levels at the point of connection that could influence site design;

b) whether there is an incident of sewer flooding at, or in the vicinity of, the proposed development site; and

c) if sewer modelling data indicates that existing sewers that pass through or near to the site present a modelled risk of sewer flooding, which could affect the developable area.

Applicants must not assume that changes in levels or that changes to the public sewer (including diversion), will be acceptable as such proposals could increase / displace flood risk.'

Policy WA2: Sustainable Drainage – Surface and Foul Water
Qu 10.2

We request the following amendments to this policy:

A. ~~All major developments must be supported by a site-specific drainage strategy or statement.~~ Where required by the local planning authority, applications must be supported by a strategy for foul and surface water management. Surface water must be discharged in the following order of the surface water hierarchy:
i. into the ground (infiltration), then
ii. to a surface water body, then
iii. to a surface water sewer, highway drain, or another drainage system; and only then
iv. to a combined sewer.

This change reflects paragraph 182 of the recently published National Planning Policy Framework which states:

> *182. Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major development should: a) take account of advice from the Lead Local Flood Authority; b) have appropriate proposed minimum operational standards; and c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development.*

On this basis, it is not appropriate to only request drainage details for major development proposals.

We also request the following amendment to criteria B, F, I and J:

C. Proposals must be designed to maximise the retention of surface water on-site and minimise the volume, and rate of, surface water discharge off-site. Such designs will be required to be multi-functional and integrated with the landscaped environment and the strategy for biodiversity net gain.

F. For any development proposal which is part of a wider development or allocation, foul and surface water drainage details ~~a site-specific drainage strategy or statement~~ must be part of a holistic site-wide drainage strategy. Pumped drainage systems must be avoided wherever possible. The proliferation of pumping stations on a phased development, will not be acceptable.

I. Applicants for major development must engage with United Utilities or relevant water authorities early in the planning process to assess the need for infrastructure upgrades or improvements. New developments should make provisions for connection to the mains foul water network where available. It may be necessary to co-ordinate the delivery of development with the delivery of new / improved infrastructure.

J. Proposals which are likely to result in contaminants entering formal surface or foul water drainage systems will not be permitted, without the express consent of the asset owner. Where consent of the asset owner is refused, applicants must demonstrate how contaminated water will be addressed at source in their remediation strategy.

We request the following amendment to paragraph 10.18:

All new developments will be required to apply the surface water hierarchy and ~~The preference of the Council is that all new developments and major redevelopments,~~ incorporate proportionate Sustainable Drainage Systems (SuDS) to manage surface water runoff. This can include measures such as rainwater harvesting, permeable surfaces, green roofs, and other natural SuDS features that enhance biodiversity and water quality simultaneously. Discharge to public sewer will only be allowed ~~Only~~ where all other ~~these~~ options in the surface water hierarchy, including in combination, are fully discounted through the submission of clear evidence ~~not feasible should discharge to public surface water or combined sewers be considered~~.

Policy WA4 Water Efficiency
Qu 10.4

United Utilities is wholly supportive of Policy WA4. In addition to evidence previously submitted to the council, it is material to note that:

1) UUW has recently adopted an updated Water Resource Management Plan 2024, which requests that all local authorities implement the tighter standard for water efficiency of 110 litres per person per day (see page 74 of our Water Resource Management Plan 2024). An up to date WRMP is primary evidence that can be used to justify the implementation of the optional standard. See paragraph Paragraph: 016 Reference ID: 56-016-20150327 of the National Planning Practice Guidance; and

2) In relation to the question of the impact on viability, please note recent evidence which confirms that the optional standard can be achieved at no additional cost to the developer. See Table 3 of Future Homes Hub Water Ready A report to inform HM Government's roadmap for water efficient new homes (April 2024). It would be prudent to ensure that your viability evidence reflects this point.

12. Built Environment

Policy BE10: Design
Qu 12.1

We request the following amendments to this policy in accordance with our above comments:

A. Development must be of a high standard of design and construction and make a positive contribution to the character and distinctiveness of the borough and incorporate measures that are resilient to climate change.

B. All development must clearly demonstrate where appropriate, via a written submission (including appropriate impact assessments) to the satisfaction of the Council, how the proposal would be compatible with the surrounding area, by:
i. Ensuring built form, layout, massing, scale, height and materiality are appropriate to the development's function and local context;
ii. Making best use of opportunities to enhance the character and quality of the immediate area, including where appropriate the street scene; and
iii. Not adversely impacting the amenities and / or operations of existing occupiers / land uses by virtue of overbearing, overshadowing, overlooking, visual intrusion, noise and/or disturbance, odour or in any other way.

D. Where appropriate, incorporate multi-functional green and blue spaces which provide both biodiversity habitat benefits and improved natural capacity to mitigate the impacts of a changing climate including SuDS, as required by Policies GI6, ~~and~~ GI10, WA2 and WA4.

Policy BE3: Elevated Green Spaces
Qu 12.3

We request the following amendments to this policy:

B. Such spaces could incorporate green walls, green roofs and elevated amenity spaces which incorporate fixed areas of planting / green space. The inclusion of any such features should be considered and factored into the design process from an early stage, to help ensure its long-term functionality, and be integrated with the strategy for surface water management.

Policy BE8: Noise and Vibration
Qu 12.8

We request the following amendments to this policy:

A. The Council will require a Noise and Vibration Impact Assessment to assess the impact of noise and vibration generating sources which may affect amenity and the structural integrity of existing utility assets during the construction and operational phases of development.

B. The Assessment must demonstrate how the proposal:

i. is located in the most appropriate location; and
ii. protects and where appropriate, provides appropriate mitigation for both current and future occupiers and utility assets against existing and proposed sources of noise and vibration, in accordance with the Agent of Change Principle.

C. Development which has the potential to generate unacceptable levels of noise and / or vibration (taking into account appropriate mitigation) impact(s) on local residential amenity or utility assets will not be supported.

13. Culture, Tourism and Leisure

Policy CL1N: Manchester United Football Stadium and Immediate Surrounds
Qu13.1

We request the following additional text to criterion B:

B. All new development at/of the stadium must:
i. Be of the highest quality design and incorporate new public realm and green spaces across and throughout the wider stadium district.
ii. Respect and have regard to its immediate surroundings and neighbours.
iii. Be fully accessible for everyone.
iv. Be wholly sustainable over its lifecycle.
v. Connect to and/or make passive provision for future connection(s) to renewable heat and power networks; and
vi. Incorporate renewable heat and energy generation measures onsite, alongside heat and energy reduction measures.
vii. Be delivered in accordance with a holistic strategy for foul and surface water management which makes space for multi-functional sustainable drainage systems within the design of the site.

14. Infrastructure Delivery and Planning Obligations

Policy IP1: Infrastructure Delivery and Planning
Qu 14.1

We request the following amendment to criterion A:

A. The Council will ensure that sufficient supporting infrastructure, is delivered to support the levels and types of growth identified in the Local Plan. The Council will require that there is adequate infrastructure to serve developments, using planning contributions, working with infrastructure providers and stakeholders to identify requirements. It may be necessary to co-ordinate the delivery of development with the delivery of new or improved infrastructure.

D. Proposals that form part of wider (or potentially wider) sites will be assessed in terms of the capacity of the site as a whole. All applications, including those which are submitted on land which is part of a wider allocation / development, will be required to submit allocation/development wide infrastructure strategies to demonstrate how the site will be brought forward in a holistic and co-ordinated manner.

We also recommend the below additional supporting text:

The infrastructure strategies required by criterion D shall be prepared in liaison with infrastructure providers and demonstrate how each phase interacts with other phases, ensure a holistic approach, and coordination between phases of the development over lengthy time periods and by numerous developers. The strategy must be updated to reflect any changing circumstances between phases during the delivery of the development.

In addition to the above comments we also wish to recommend additional policies which are included in the appendix to this letter.

Moving forward, we respectfully request that the Council continues to consult with UUW for all future planning documents. In the meantime, if you have any queries or would like to discuss this representation, please do not hesitate to contact me at [redacted]

Yours faithfully

Andrew Leyssens
Planning, Landscape and Ecology
United Utilities Water Limited

Enc. Supporting Information and Additional Recommended Policies

United Utilities Water Limited
Supporting Information and Additional Recommended Policies

Investment in Future Infrastructure

Investment associated with our water and wastewater infrastructure is influenced by a number of drivers including the construction of new facilities to take account of new environmental requirements, growth, the need to respond to the carbon challenge, or the need to invest in new updated infrastructure. In our current investment period (2025-30), we are proposing the biggest investment in water and wastewater services across the North West in over 100 years. The total expenditure by UUW for the period 2025-2030 is approximately £13 billion. This includes various enhancements and improvements to infrastructure, resilience, and environmental standards

The drivers for investment include the Environment Act 2021, which has set a requirement to progressively reduce storm spills into the environment. Such investment will be constrained by engineering circumstances to determine the most appropriate location for additional storage to reduce spills. This may necessitate investment in constrained locations in our urban and rural environments such as in/on land in protected locations (green belt, local green space and open countryside). Consistent with meeting this obligation, UUW requests that the future local plan includes support for investment in water and wastewater infrastructure that is ultimately beneficial to the environment, biodiversity and our watercourses so it can be delivered in the most timely and effective manner. Specifically, we request that policy supports investment in our infrastructure in constrained locations such as local green space, open countryside and green belt.

With regard to sites which may be situated in the Green Belt, National policy within the NPPF allows for:

- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

- limited infilling or the partial or complete redevelopment of previously developed land (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the green belt; and

- the development of grey belt land.

On this basis, National Policy is broadly supportive of investment at existing operational sites in the Green Belt. However, we ask for this to be specifically referred to in your future planning policies. UUW requests the Council's support for investment in infrastructure in order to be able to expeditiously respond to the needs of the borough. The following policy wording is recommended:

Recommended Policy

The Council will support water and wastewater infrastructure investment including development proposals for water and wastewater infrastructure in protected areas such as

the Green Belt, open countryside or in existing green spaces, where the investment is needed to respond to future growth and environmental needs.

Explanatory Text

Infrastructure is key to the delivery of sustainable development, economic growth and environmental improvement. The council will support infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives by water and sewerage providers.

In relation to existing water and wastewater infrastructure sites, we request that these are identified on your proposals map and covered by the following policy.

Recommended Policy

Development proposals at existing utility sites in the green belt or open countryside either in the form of infilling or redevelopment, will be supported where they are needed to respond to future growth and environmental needs.

We can provide plans of sites which are located in open countryside / green belt by separate cover.

We request that such sites are specifically identified on the proposals map where investment in future water and wastewater needs would be acceptable.

These policies would enable us to ensure we can continue to meet the growth and development aspirations of the borough, and current / future environmental drivers.

Our Assets

It is important to outline to the local planning authority (LPA) the need for our assets to be fully considered in development proposals. We will not permit development over or in close proximity to our assets. Our assets will need to be afforded access for maintenance, repair and replacement and be fully considered in the design and masterplanning process for a site. This should include careful consideration of landscaping proposals in the vicinity of our assets and any changes in levels.

We strongly recommend that the LPA advises future applicants of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood. Where our assets exist on a site, we ask site promoters to contact UUW to understand any implications using the above contact details.

Please note:

- **UUW will not allow building over or in close proximity to a water main.**

- **UUW will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances.**

- **Site promoters should not assume that our assets can be diverted.**

- **On occasion, an asset protection matter within a site can preclude delivery.**

Site-Specific Policies for Allocations

When considering the format of your emerging development plan, we request that your site allocations are guided by detailed site-specific policies / site-specific development requirements. This can be critical to ensuring that the issues which are identified via the site selection process are clear to applicants. When you have sites available for assessment, UUW will be able to highlight any issues for consideration as part of an initial site assessment. For example, large on-site infrastructure which is material to site layout, or the location of a site in a groundwater source protection zone, which may mean that a site needs to be further assessed so that any potential impact on the groundwater environment and public water supply can be appropriately reduced / mitigated. We believe that the identification of such site-specific constraints is critical and therefore, we recommend that your development plan includes these details as site-specific policy / development considerations for all new allocations.

UUW also wishes to note a preference to see specific allocations identified as part of the new local plan in preference to a reliance on windfall sites. This helps to add certainty for infrastructure providers.

On-site Flood Risk

When considering potential new development sites, it is important to identify where there are existing public sewers within or near to the site, which are predicted to be at risk from flooding and/or sites where there is a record of previous flooding from the public sewer. Proposals could also be affected by overland flows from nearby off-site public sewers. Policy should be clear that existing flood risk must not be displaced and that any flood risk needs to be considered early in the design process. This can be better understood once more details become available on specific sites, for example, topographic information, which will inform where exceedance paths flow.

The strong preference of UUW is for development to take place outside of any identified flood risk in accordance with the sequential approach. In instances where sites are affected by sewer flood risk and it is your decision to continue to allocate the site, we suggest the following additional site-specific policy wording for each site. Where there is a modelled flood risk, we would recommend the following wording:

Recommended Policy

Modelled Sewer Flood Risk

Existing public sewers pass through and near to this site which modelling data (and / or flooding incident data) identifies as being at risk of sewer flooding. This will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. The risk of sewer flooding could affect the developable area of the site and the detail of the design.

Where there is a record of flooding on-site, or in the vicinity of the site, we would recommend the following wording:

Recommended Policy

Sewer Flooding Incidents

There are flood incidents from the public sewer on-site / in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. The risk of sewer flooding could affect the developable area of the site and the detail of the design.

We also recommend the following explanatory text in respect of sewer flood risk matters:

Explanatory Text

A range of sites have been identified as at risk of sewer flooding or in the wider vicinity of sewer flooding. In respect of these sites, the applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants must consider site topography and any exceedance flow paths. Resultant layouts and levels must take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants must not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'

Foul and Surface Water Drainage

In addition to the proposed policy relating to foul and surface water drainage, we request that you include site-specific policies regarding the approach to drainage when allocating a site, preferably informed by a flood risk assessment / drainage strategy. When allocating new major development sites, we request that your site-specific policy clearly states that applicants must make space available in their proposals for multi-functional sustainable drainage. We recommend the following wording.

Recommended Policy

Applicants must identify land at the site that ensures the delivery of multi-functional sustainable drainage in accordance with the four pillars of sustainable drainage which is integrated with the landscaped environment.

It is important that the new local plan and associated design guidance includes clarity in relation to the requirement for sustainable drainage systems on sites. This clarity is critical to avoid regulatory / policy uncertainty and ensure a level playing to developers operating in a competitive setting when acquiring a site (see Sustainable drainage and new housing developments, Payne, Walker, Illman and Sharp, 2023). We strongly recommend that policy and design guidance clearly identifies the need for major developments to make space for multi-functional sustainable drainage systems. As evidenced in the aforementioned research, clarity of policy requirements will help to secure better

sustainable drainage results in the final design of the development. We believe that adding this clarity to site-specific policy helps to remove uncertainty, which in turn helps to contribute to a level playing field during the land acquisition process.

Groundwater Source Protection Zones

The Environment Agency has defined Groundwater Source Protection Zones (SPZs) for groundwater sources, which are often used for public drinking water supply purposes. **The prevention of pollution to drinking water supplies is critical.** The SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction. The details of SPZs can be viewed on the website of the Environment Agency. We would also be happy to provide details if that would be helpful.

With respect to the site selection process, we wish to highlight that new development sites are **more appropriately located away** from locations which are identified as sensitive groundwater protection areas especially within and adjacent to Groundwater Source Protection Zone 1 (SPZ1) which is closest to the water abstraction point and the most sensitive. This is of relevance if there are SPZs in the local authority. The location of SPZs can be found on gov.uk and we request that you refer to these in your approach to site selection. The position of UUW is that when considering a range of sites to meet housing needs, it would be more appropriate to identify new development sites, which do not encroach on SPZ1.

The preference of UUW would be to have a standalone policy in the local plan relating to water quality. Our recommended policy is below.

Recommended Policy

In consultation with the Council and relevant statutory bodies, applicants must consider the potential impacts on water quality resulting from the design, construction and operation of proposed development. Where necessary, development proposals must include measures to reduce any risk to the water environment and aim to protect and improve water quality.

Development proposals within Groundwater Source Protection Zones must accord with the latest national guidance on Groundwater Protection. Applications for new development within Groundwater Source Protection Zones will be required to be supported by:

i) A risk assessment and mitigation strategy;

ii) Masterplanning which mitigates the risk to the water environment; and

iii) A development management plan relating to construction and activities that will take place during the operation / lifecycle of any permitted development.

Explanatory Text

Any risk assessment will be expected to comprise a quantitative and qualitative risk assessment and mitigation strategy to manage the risk of pollution to public water supply and the groundwater / water environment. The risk assessment should be based on the source-pathway-receptor

methodology and provide detailed information on ground conditions. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. Subject to the outcome of the risk assessment, the mitigation measures may include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, manholes, pumping stations and attenuation features). It may also identify that the principle of development is not acceptable.

Careful masterplanning will be required to mitigate the risk of pollution to public water supply and the water environment. For example, open space should be located so that it is closest to the boreholes in order to minimise the potential impact on groundwater.

A development management plan will be required to identify the potential impacts from all activities related to the development both during construction and during the operational life of the proposal. The management plan shall address how activities on both groundwater, public water supply and surface water will be managed through the identification and implementation of appropriate mitigation measures necessary to protect and prevent pollution of these waters. For example, an appropriate management regime may be required for open space features in a groundwater source protection zone.

In the event that sites are allocated in a SPZ, we request site-specific policy that identifies the constraint and the need for development to be appropriately mitigated / managed.

Development next to Water and Wastewater Treatment Works, Wastewater Tanks, Pumping Stations, Overflows and Other Wastewater Assets

During the site-selection process, we would urge you to carefully consider our existing treatment works, pumping stations and other assets. It is important to explain that:

1. Treatment works are key infrastructure for the borough which may need to expand in the future to meet growth needs or respond to new environmental drivers. Maintaining a space around a treatment works is therefore desirable to respond to any future investment requirements.

2. As a waste management facility, a wastewater treatment works is an industrial operation which can result in emissions. These emissions include odour and noise. A wastewater treatment works can also attract flies. A wastewater treatment works is also subject to vehicle movements from large tankers which need to access the site.

3. Water and wastewater treatment works can include the storage or processing of hazardous materials such as biogas or chlorine, where there may be safety concerns.

The position of UUW is that when considering a range of sites to meet development needs, it would be more appropriate to identify new development sites, especially sensitive uses, such as housing, which are not close to a treatment works, where amenity could be a concern, or where there are process issues which could represent a safety risk. This position is in line with the '*agent of change*' principle set out at paragraph 200 of the NPPF. Paragraph 200 states:

> *'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.'*

Paragraph: 009 Reference ID: 30-009-20190722 of the NPPG expands on this by stating:

> *Development proposed in the vicinity of existing businesses, community facilities or other activities may need to put suitable mitigation measures in place to avoid those activities having a significant adverse effect on residents or users of the proposed scheme.*
>
> *In these circumstances the applicant (or 'agent of change') will need to clearly identify the effects of existing businesses that may cause a nuisance (including noise, but also dust, odours, vibration and other sources of pollution) and the likelihood that they could have a significant adverse effect on new residents/users. In doing so, the agent of change will need to take into account not only the current activities that may cause a nuisance, but also those activities that businesses or other facilities are permitted to carry out, even if they are not occurring at the time of the application being made.*
>
> *The agent of change will also need to define clearly the mitigation being proposed to address any potential significant adverse effects that are identified. Adopting this approach may not prevent all complaints from the new residents/users about noise or other effects, but can help to achieve a satisfactory living or working environment, and help to mitigate the risk of a statutory nuisance being found if the new development is used as designed (for example, keeping windows closed and using alternative ventilation systems when the noise or other effects are occurring).*
>
> *It can be helpful for developers to provide information to prospective purchasers or occupants about mitigation measures that have been put in place, to raise awareness and reduce the risk of post-purchase/occupancy complaints.*

Similarly Paragraph: 005 Reference ID: 34-005-20140306 of the NPPG states:

Plan-making may need to consider:

- *whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern).*

On the basis of the above, we welcome the provision for the agent of change principle in Policy BE1.

Property Interests of UUW

We would wish to assess any possible future development sites to determine whether we have any land interests such as easements and rights of access which are in addition to our statutory rights for inspection, maintenance and repair. These land interests may have restrictions that must be

adhered to. It is the responsibility of the developer to obtain a copy of the associated legal document, available from our Legal Services department or Land Registry and to comply with the provisions stated within the document. We would request that these matters are addressed in site-specific policy / development considerations if you allocate the sites.

We recommend that landowners/developers contact our Property Services team at [redacted] to discuss how any proposals may interact with our land interests. Our easements, pipe structures and access rights should not be affected by the design and construction of new development.

[redacted]

From: Frass, Will (Councillor)
Sent: 12 June 2025 20:33
To: Local Plan Consultation
Cc: Liberal Democrat Councillors
Subject: Local Plan - submissions by Cllr Frass

Follow Up Flag: Follow up
Flag Status: Completed

Categories: LP April 2025 comment

Please find below my comments and suggestions on the Local Plan:

6. Transport	Paragraph 6.13	Page 146	"Council will encourage development of areas well-connected by transport modes". This paragraph conflicts with the major decision by Trafford to put Flixton's William Wroe Golf Course into a Field of Trust and release Davenport Green and Carrington Moss for housing, both of which are the mostly poorly connected parts of Trafford
6. Transport	Paragraph 6.17	Page 147	This paragraph states that "The enhancement of Metrolink will provide improved connectivity", which is self-evident in the most general sense, but does not add any meaningful value. What expansion? Connecting what to what?
6. Transport	Paragraph 6.19	Page 147	Factual error: Navigation Road is not in Sale, it is in Timperley.
6. Transport	Paragraph 6.20	Page 148	The addition of a "Timperley East" station on the Navigation Road-Stockport Station line would add several minutes to the journey time risking this local train's slot in Stockport station. Being a local service it would have to give way to mainline services, making it less attractive to travellers wishing to make onward journeys to London, if users regularly miss their connection. Wider changes are needed to make this a success.
6. Transport	New green box Policy TM2S	Page 145/6	**Trafford South Transport connectivity East-West** * Greater East-West connectivity is needed in the South of the Borough. * New residents moving into the proposed Davenport Green development will associate more with Altrincham because of their new Hale Barns adjacent location. * Public transport links connecting Davenport Green to Altrincham should be prioritized and routes for future trams or trains should be safeguarded.

10. Water, Flooding and Drainage	New green box Policy WA1S	Page 257	**Trafford South Managing Flood Risk** * The likelihood and severity of flooding in Trafford South cannot be correctly quantified without sufficient Water Level Gauges on Fairywell Brook, Timperley Brook and Sinderland Brook. * The Council has formally recognised the Environment Agency's data deficit for Fairywell Brook, Timperley Brook and Sinderland Brook due to the lack of Water Level Gauges. * Development on Davenport Green must include the provision of infrastructure to resolve this data deficit in order to correctly assess the SuDS required to correctly manage the flood risk, in conjunction with the Environment Agency, United Utilities and the Combined Authority.

10. Water, Flooding and Drainage	Paragraph 10.6	Page 258	Paragraph 10.6 says the 15-year-old Strategic Flood Risk Assessment is a "useful" source of information on groundwater and canals. Since 2010, flooding events in Timperley have increased in frequency and severity considerably. Most recently on 1st January 2025, the canal embankment collapsed and household flooding reached such severity that a Section 19 Report was triggered. Therefore paragraph 10.6 should say that any Strategic Flood Risk Assessments from 2010 need to be re-assessed.
10. Water, Flooding and Drainage	Policy WA2S	Page 261	**Trafford South Sustainable Drainage** * Without sufficient new infrastructure, surface-water discharge into watercourses on Davenport Green will increase the likelihood of flooding events to existing properties beyond Davenport Green itself. * Therefore some of the CIL or s106 funding from the development of Davenport Green must support significant flood mitigation strategies for areas downstream of the development in Trafford South. * Surface water run-off into public sewers should not be allowed as existing public sewers are already overwhelmed during storms leading to severe surface flooding. * Therefore the final sentence of paragraph 10.18 shall be disapplied for the catchment zone of Fairywell Brook, Timperley Brook and Sinderland Brook - development should not take place if SuDS are not possible. * During heavy storms, the current green field run off rates cause flooding events for properties and areas downstream of the brooks flowing from Davenport Green. So building SuDS which maintain the existing run off rates will not reduce the impact of flooding. * Therefore paragraph C of Policy WA2 shall be disapplied for Davenport Green and the Council will require developers to install SuDs which exceed the requirements to merely replicate green field run off rates post-development; instead requiring SuDS that mean the run off rates will be lower than they were pre-development.
10. Water, Flooding and Drainage	Paragraph 10.18	Page 263	Development should NOT take place in areas of Davenport Green where SuDS are not possible.
10. Water, Flooding and Drainage	Policy WA3	Page 265	**Trafford South Flood Storage Areas** Timperley Flood Basin is downstream of the properties in Timperley which are affected by flooding. Therefore protecting and safeguarding the flood basin does not in itself mitigate the impact of flooding on many existing properties in Trafford South. In the long-term, a new flood basin is required in Trafford South - utilising the fact Beech Fields naturally floods. However, currently when Beech Fields floods the houses on the western edge are threatened with, or experience, flooding incidents. Therefore suitable embankments to surround Beech Fields and create a third Flood Water Storage Area are required.

12. Built Environment	New green box Policy BE10S	304	**Trafford South Power to Fly Lines** Areas that have historically avoided overhead lines for telecoms should preserve the character of the street scene by restricting the use of poles and lines, instead opting to continue the existing practice of underground conveyance of telecoms cables.

13. Culture & Leisure	Policy CL2	317	Add point (E) as follows: "Trafford will support enhancements to local parks that are currently under-supported in order to make it more attractive for residents to walk to their local green space, rather than drive to a "destination" green space as often. This would improve well-being by bringing more pleasant green spaces closer to more residents, improving residents' sense of local pride, and reducing non-active travel journeys."
13. Culture & Leisure	Policy CL2	317	Add point (F) as follows: Trafford will support public art in the form of murals as a way to tackle graffiti blackspots"

14. Infrastructure and Planning Obligations	New green box Policy IP1S	326	**Trafford South Infrastructure Contributions: Trigger points for phased construction** Trafford will require developers to adhere to a system of infrastructure "trigger points" for phased development, such that after a predetermined number of properties are built, development cannot continue to the next phase of construction until certain physical and/or social infrastructure provision has been met.

Peel Land and Peel Waters

Representations to the Trafford Local Plan Regulation 18 consultation

June 2025

Turley
Planning

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Our reference
00370/00370
Date
June 2025

1. Introduction and background

1.1 This report forms the formal representation of Peel Land and Peel Waters to the Trafford Local Plan Regulation 18 consultation ("the Draft Local Plan"), specifically in relation to their land interests at Pomona Island, Trafford Wharfside and and within the Trafford Centre Rectangle.

1.2 A further representation is made by Peel Land in relation to its land interest at Peak Nook which forms part of the Places for Everyone allocation at New Carrington via Policy JPA30).

The Peel Group

1.3 Peel Land and Peel Waters form separate companies within the Peel Group ("Peel"). Peel is a major investment company and one of the leading infrastructure, real estate, transport and investment enterprises in the UK.

1.4 Peel is a major landowner and developer within Trafford Borough. It is a key partner to Trafford Council with which it is working to deliver a number of the Borough and wider conurbation's largest and most exciting regeneration opportunities in which it has a significant stake.

1.5 In combination, land within Peel's control has the potential to deliver several thousand new homes and a range of commercial and leisure development and significant new employment opportunities. These include Pomona Island (Manchester Waters), sites within Trafford Wharfside, (including sites owned outright and as part of a Joint Venture with Transport for Greater Manchester) and key locations within Trafford City, including Trafford Waters. These representation relates to these land interests.

1.6 Peel welcomes the progression of the Trafford Local Plan and the strategic support it provides for the delivery of the above investment and regeneration opportunties, building on the foundation provided by Places for Everyone (PfE).

1.7 It is noted that detailed policies for allocations at these locations will be presented as part of the next iteration of the Local Plan. For completeness, separate 'call for sites' submissions are made in relation to Peel's land interests at Trafford Wharfside, Pomona and Trafford Waters (part of the Trafford Centre Rectangle).

The strategic context to the Local Plan

The framework for assessing soundness

1.8 The emerging Local Plan will be subject to an independent examination into its soundness and legal compliance. The tests of soundness are presented in paragraph 36 of the National Planning Policy Framework (NPPF). This notes that Local Plans are sound only if they are:

> • *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated*

where it is practical to do so and is consistent with achieving sustainable development;

• Justified - an appropriate strategy taking into account reasonable alternatives, and based on proportionate evidence;

• Effective - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

• Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies of the Framework.

1.9 The comments in this representation report are made in the context of the need to satisfy the above tests and are directed at ensuring the soundness of the Local Plan as it is progressed.

Delivering the Government's Plan for change and the Greater Manchester Places for Everyone

1.10 In this instance, the Local Plan is being progressed against the backdrop of a clear ambition for growth and prosperity set out in PfE; a strategic spatial plan covering 9 of the 10 Greater Manchester Local Authority areas, including Trafford.

1.11 PfE reflects a shared aspiration for the future of the City Region. The definition of a 'Core Growth Area' lies at the heart of PfE which will be the focus for development and investment, covering the commercial core of the City Region and located within Trafford, Manchester and Salford.

1.12 Further, the Government has recently set out its strategic ambitions for growth, presenting planning reforms and putting a new national plan (the National Planning Policy Framework 2024) in place to deliver this. Central to this is its commitment to rebuild Britain, deliver 1.5m new homes along and the critical infrastructure that underpins economic growth.[1]

1.13 As a subregional manifestation of this commitment, Greater Manchester Mayor Andy Burnham has set out his committment to deliver 75,000 in Greater Manchester over the current parliament to 2029[2].

1.14 At the centre of the fastest growing city region in England with a large brownfield land resource and several strategic scale regeneration opportunity locations of regional significance, Trafford's role in realising the Government and Mayor's growth ambitions cannot be overstated.

[1] rebuilding Britain, delivering 1.5m new homes along with the critical infrastructure that underpins economic growth.

[2] Greater Manchester is ready to build" – Mayor steps up housing ambition as he unveils UK-first landlord charter - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)

1.15 The Local Plan is thus tasked with delivering a step change in the sustainable growth of Trafford and fulfiling its role within that of Greater Manchester through accelerating development and investment and faciliating regeneration on an unprecedented scale.

1.16 As an indicator of this step change, Trafford has a requirement to deliver a minimum of 1,122 dwellings per annum (average) over the plan period, and an average of 1,198 dwellings per annum from 2025. By contrast the output of the latest Housing Delivery Test shows that an average delivery of just 805 dwellings per annum has been delivered in Trafford during the three years to 2023[3] - some 33% less than the annual requirement from 2025.

1.17 It is also noted that in 2023/24 – the last year for which data is available – only 270 dwellings commenced construction[4], notwithstanding that planning permisson was in place for nearly 6,000 homes at the start of 2023/24[5]. This points to a high risk of under delivery during early years of the plan period, reinforcing the need for a policy framework which can enable a step change in delivery.

1.18 Further it is noted that the Government's recently published new 'Standard Methodology' for calculating housing need indicates a requirement for Trafford to provide c1,600 dwellings per annum. This will become a mandatory requirement for Trafford in just 4 years time (i.e. once PfE is 5 years old), putting even greater focus on delivery.

1.19 Significant work is needed to realise this step change in delivery with collaboration across the public and private sectors never being more important in this regard.

1.20 Peel is a committed partner to Trafford Council and the Greater Manchester Combined Authority and through its ambitious plans for its significant and strategically important land holdings, looks forward to playing its part.

Approach to representation

1.21 Peel's specific comments on the Draft Local Plan are provided against the strategic context set out above and in respect of its land interests as identified. These representations set out that whilst broadly supportive of the proposed Plan Strategy, Peel has a number of concerns around detailed aspects of the Draft Plan and particularly its deliverability in the context of requirements of various policies.

1.22 Key questions to which this consultation response relates are identified at the beginning of each chapter with comments provided on a policy by policy basis thereafter.

1.23 In a limited number of instances, Peel requests alterations or additions to the text as currently drafted, reflective of the comments provided. Additions to policies and text are shown in *red italics* whilst deletions are shown ~~struck-through~~.

[3] Housing_Delivery_Test_2023_measurement.ods
[4] LiveTable253.ods
[5] Microsoft Word - Trafford Housing Strategy 2025_2030 - DRAFT

2. Chapter 1: Plan Vision and Strategic Objectives

Question 1.2: Do you agree with the proposed Vision for the Trafford Local Plan?

Question 1.3: Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

2.1 Whilst Peel supports each component of the Vision and the Startegic Objectives SO1 to SO10, it is concered that these do not fully reflect the strategic role that Trafford will play in realising the sustainable and inclusive growth of Greater Manchester which is presented as the central theme of PfE[6].

2.2 As noted, a significant part of Trafford is located in the Core Growth Area as defined in PfE. Paragraph 4.24 of PfE describes the Core Growth Area as a '*huge agglomeration of economic activity at the centre of Greater Manchester*' and *'…perhaps the city region's greatest strength.*' It goes on to note that '*This area provides a huge scale and diversity of economic and residential opportunity, which is accessible from across Greater Manchester and beyond*'

2.3 The significance of the Core Growth Area and its centrality to the delivery of PfE is perhaps best conveyed at paragraph 4.25 of PfE which notes that this area:

> *'…provides the greatest growth potential and best opportunity to increase the international competitiveness of the city region. It offers a significant opportunity to create jobs for existing local communities, particularly those from the more deprived communities, thereby reducing poverty and delivering inclusive growth.*

2.4 This area is thus the focus for attracting investment in realising the ambitions of PfE. The area has a broad and strategic role which transcends the boundaries of the nine Local Authortiy areas which PfE covers.

2.5 A significant part of this Core Growth Area is located in Trafford and within this area some of Greater Manchester's most significant regeneration opportunities are located. These include Pomona Island, Trafford Wharfside and the Trafford Centre Rectangle (Trafford City).

2.6 These locations will drive the growth of Greater Manchester, consistent with the definition of and strategy for the Core Growth Area set out in PfE. Individually and collectively they are of a scale and strategic significance which enable them to deliver transformational (and inclusive) growth working with other locations within the Core Growth Area located in Salford and Manchester.

2.7 The role that that part of the Core Growth Area located in Trafford will play in delivering PfE takes on greater significance given the residual untapped potential of the key

[6] Places for Everyone (Greater Manchester Combined Authority 2024) para 4.1

regeneration locations referred to above. They are well placed to attract investment and for the full scale of the opportunity which they present to be capitalised upon in the short term and over the plan period.

2.8 The Local Plan is an important vehicle for realising this and ensuring the environmental, social and economic benefits of this are optimised for Greater Machester and Trafford. This context is however not conveyed in the Vision and Strategic Objectives of the Draft Local Plan which present a misleading picture as to the scale of growth in Trafford and the role it plays in the context of a wider strategic ambition for Greater Manchester presented in PfE.

2.9 The Vision makes no reference to Trafford's role in this regard, with the aims and aspirations being firmly grounded in delivering the development which Trafford needs rather than that which will deliver a step change in the Borough, and Greater Manchester's, economic future and which reflects PfE as the strategic spatial plan to the Trafford Local Plan. There is a tension between the Vision and PfE in this regard.

2.10 This can be readily corrected via the introduction of additional wording into the Vision, as follows:

> *Trafford will play a leading role in delivering the sustainable and inclusive growth of Greater Manchester, reflective of the aspirations set out in Places for Everyone*

2.11 This better reflects the subsequent Plan Strategy (Chapter 2) which defines and supports the delivery of key strategic development proposals, including those identified above, and which encapsulates the focus and role of the Core Growth Area. This is reflected in the opening line of paragraph 2.1 which notes that the Plan Strategy is the direct descendent of PfE. This principle applies equally to the Vision which should be modified to reflect this.

2.12 This tension should also be addressed through a corresponding Strategic Objective (in addition to SO1 to SO10) which follow the Vision. This may be worded as follows:

> ***SO11: Contribute to the sustainable economic growth of Greater Manchester***
>
> *A. Support investment in and delivery of key development locations within the Core Growth Area*

3. Chapter 2: Plan Strategy

Question 2.1: Do you support Policy ST1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 2.2: Do you support Policy ST2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 2.3: Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant

Question 2.4: Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 2.6: The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Policy ST1: Core Growth Area (Trafford) and Figure 2.3: Strategy Plan

3.1 The tension between PfE and the Draft Local Plan's Vision and Strategic Objectives does not generally present itself in respect of the Plan Strategy. However Peel suggests some limited changes to improve the Local Plan's clarity, useability and accuracy:

3.2 For clarity, and given that it is a central component of the overall strategy, the **Strategy Plan at Figure 2.3** should define the Core Growth Area.

3.3 In respect of **Policy ST1**, the reference to the Core Growth Area being 'employment-led' is misleading and not reflective of the Council's (and indeed the Draft Local Plan's) aspirations and expectations for the key development locations within this area.

3.4 Whilst as a whole the Core Growth Area (across Trafford, Salford and Manchester) is an employment focused location, not least in accommodating Manchester City Centre and Trafford Park as particular employment / economic focal points, key Core Growth Area development locations within Trafford, such as Pomona, Trafford Waters and Trafford Wharfside, will be more mixed in nature with, to some degree, a residential-led focus.

3.5 This is reflected in Table 4.2 of the Draft Local Plan which notes that 66% of new housing in Trafford will be provided in the North Locality, approximately 50% of which is covered by the Core Growth Area. In this context, para 4.11 goes on to note:

> *A large proportion of new housing will be delivered in the North Locality, reflecting the sustainable location of this area and the opportunity to redevelop brownfield sites for housing. This includes strategic sites at Pomona, the Civic Quarter and Trafford Waters, as well as the Old Trafford Stadium District which includes the Wharfside area.*

3.6 The aforementioned strategic sites are all located in the Core Growth Area. It is therefore evident that of the 18,704 homes which are expected to be provided within the North Locality, the majority will come from sites witihn the Core Growth Area.

3.7 Set against this context Peel considers the **Part Bii** of Policy ST1 to be misleading and not reflective of how these areas are expected to be developed.

3.8 Further the emphasis on 'employment uses' does not reflect that much of the commercial development within these locations will not be conventional employment uses (office, logistics and manufacturing) but will include leisure, food and drink and tourism facilities (i.e. employment generating) reflective of the envisaged evolution of their role and function over the longer term.

3.9 Accordingly a more accurate description of how this area will develop would be:

> *Will collectively deliver mixed-use ~~employment led~~ development including ~~with supporting~~ residential, employment and employment generating and ancillary uses*

Policy ST4: Sustainable Development

Balancing potentially competing objectives

3.10 The Local Plan is an important vehicle for both delivering the growth and investment needed to realise the strategic ambitions of PfE and ensuring this happens in a way that optimises positive social, econmic and environmental outcomes.

3.11 It is right that it contains policies and seeks to set standards which will enable this. However, there is a critical balance to be struck in the context of potentially competing objectives.

3.12 First and foremost, PfE, and the Local Plan, are about faciliating positive change via investment. They rely on investment being deployed into new development to realise its principal aspired outcomes. It is therefore more than a regulatory tool rather is a faciliator of investment, regeneration and positive social, econmic and environmental change.

3.13 Set against this backdrop, Peel is concerned that the combined effect of policy expectations set out, many of which mark a step change from standards and requirements that have been applied in the past, has not been fully considered in terms of their practical achievement in the context of the scale of development which Trafford needs to deliver and in respect of commercial viability. These are two separate but related issues.

3.14 This representation considers these on an individual basis through comments on Chapters 3 to 14.

Impact on commercial viability

3.15 Development, and the positive outcomes which come from this, will only be realised if this is commercially viable. Without development, these positive outcomes, be then environmental, social or economic in nature, will not be realised.

3.16 Peel would note that the Council has not yet produced any viability evidence for the Local Plan which logically would need to be informed by a consideration of the policy standards and expections which the Local Plan is seeking to impose. Again Peel would note the step-change in such standards compared to existing policy which will inevitably put pressure on development viability.

3.17 Indeed there is already clear evidence of significant development viabilty constraints affecting the delivery of development within Trafford even before consideration of the additional requirements of the Local Plan (and the recently adopted Trafford Design Code) noting the very low recent residential starts in the Borough based on the latest data and notwithstanding a reasonably healthy hypothetical pipeline supply by reference to planning permission data (see Section 1).

3.18 Peel reserves the right to provide further comment on the Local Plan following the publication of the aforementioned evidence base.

Practical effects on scheme design and compatibility

3.19 Separate but related to development viability, it is important to consider the practicality of achieving the prescriptive policy standards and expectations set out whilst delivering the level and density of development sought and which is appropriate in the context of the strategic drivers of the Local Plan.

3.20 A number of these policy expectations have a spatial impact on sites, with land or space within buildings having to be set aside to accommodate such requirements – e.g. the Urban Greening Factor requirements in Policy GI6.

3.21 This poses the question as to whether sites will be able to accommodate both the scale of development needed to meet the stated (and significant) development needs of the Borough and the Plan and these wider infrastruture requirements at the same time.

3.22 Such requirements are not without merit and Peel supports their intent but a real world assessment of the practical achievement of these requirements, alongside the scale of development which the Plan seeks, is needed. This is presently absent.

3.23 It is a fundamental cornerstone of any sound Local Plan that the Plan is proven to be 'Effective' and deliverable. At this stage, Peel is concerned about the potential internal incompatibility of the Draft Local Plan in this regard and that the impostion of the additional standards and expections, as noted above, could constrain the delivery of the Plan and ultimately Trafford's ability to play its part in the delivery of PfE and the strategic outcomes it seeks.

Suggested key amendment

3.24 This issue and potential tension could be readily addressed by a general provision within the Local Plan which notes that the practicaility of achieving the aspired policy standards will be considered on a case-by-case basis. This would need to acknowledge that the Council will be need to balance the desire to achieve these standards against the need to deliver sufficient levels of development from sites and ensure that development is viable, such that there may be site specific reasons why the standards are not fully enforced in the prescriptive manner presented.

3.25 This does not dilute the effectivess of the policies in each case and it may be appropropriate that the default expectation is that the standards are met where possible. However, such a provision recognises that there needs to be scope to apply judgement as to achievement of these standards and reflects the spirit of the 'planning balance' being embedded into policy.

3.26 It is noted that the recently adopted Trafford Design Code incorporates a 'comply or justify' provision which reflects the above suggested approach. Peel considers that an equivalent provision in the Local Plan is important for the stated reasons. A general provision to this effect should be included in **Part E of Policy ST4** as follows:

> *Planning applications that accord with the policies in this Local Plan (and, where relevant, with polices in Places for Everyone, adopted Neighbourhood Plans and Supplementary Planning Documents) when taken as a whole, will be granted permission unless material considerations indicate otherwise. The Council will use the policies in the Local Plan positively to facilitate sustainable development and will consider compliance with the standards set out in this Local Plan in the round, reflecting the application of the 'planning balance' in the context of a need for development to contribute positively to a range of social, environmental and economic objectives.*

3.27 Without prejudice to the above point, a number of policies should be amended to reflect the requirement for flexible application of the standards and expectations set out consistent with the above principle. Such instances are outlined in comments on relevant chapters in the sections that follow.

4. Chapter 3: Renewable technologies and methods

Question 3.2: Do you support Policy RT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant

Question 3.3: Do you support Policy RT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 3.4: Do you support Policy RT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Policy RT2: Decentralised energy generation

4.1 There is no detail regarding the decentralised energy initiatives referred to in **Part C**, where these are located, what form they take and when they may be advanced. In this context, it is unreasonable to expect developments to contribute financially to initiatives and projects which may or may not happen.

4.2 Should such initiaitives be advanced to the extant that CIL Regulation compliant planinng contributions would be justified, then this could be secured through Policy IP1 at the appropropriate time.

4.3 At this stage, and without a clearly defined energy initiative or project which development would contribute to, and which is evidently needed to mitigate impacts in the context of prevailing policy, then such a requirement wouldn't meet the CIL 122 tests, namely that the obligation is:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

4.4 Notwithstanding the above, were such a project to progress in the timeframe of the Local Plan being advanced and to the extent a planning obligation could be justfied, **Part C** of the policy should be modified as follows:

> *Major developments that do not connect to a network will be required to contribute financially to the Council's decentralised energy initiatives in the area where viable and feasible*

Policy RT3: Overheating and urban heat island

4.5 Overheating is a detailed design matter and principally an issue for the building regulations regime. It is important that an equivalent planning policy does not unnecessarily duplicate or conflict with building regulations in this regard or indeed present a more onerous requirement.

4.6 The overall aim of the policy is to improve the energy efficiency of development. Peel would note that there are a range of measures which can be deployed to improve a development's energy efficiency and to achieve the requisite standards and expectations in this regard. One of those measures may be to optimise the use of natural ventiliation. However, this is clearly only one such measure

4.7 It is important that Policy RT3 is presented and applied in this context. The important outcome sought is reduced energy demand. This is achieved via implementation of other policies in the Local Plan, most notably via the standards set out in Policy RT1 which acts as a strategic control in relation to the overall carbon and energy performance of development.

4.8 To this end, whilst seeking to reduce reliance on mechnical ventiliation is laudable, the focus on this specific measure, as a means of reducing energy usage within development, in the context of the requirements of Policy RT1, is unreasonbly constraining and is not appropriate. As noted, Policy RT1 provides the overall control in relation to development sustainability and energy useage and, within the context of the need to comply with this policy, there is no justified reason why mechanical ventilation should be singled out as a specific area to target over any other as Policy RT3 seeks.

4.9 It is important that developments have the flexibility to achieve the objectives of RT1 in the most appropriate and feasible manner. No one measure is more important than any other in this regard and it is the overall performance of the development which matters.

4.10 Reflecting this, **Part A** of the policy should be amended to read:

> *All new developments must be designed to minimise overheating risks in accordance with prevailing Building Regulation requirements ~~and reduce reliance on active cooling systems, such as air conditioning~~. An Overheating Risk Assessment, including thermal modelling will be required, where appropriate.*

4.11 **Part B** should be amended to read:

> *Active cooling (mechanical systems, such as air conditioning, refrigeration, or fans) will only be permitted where this does not compromise the development's compliance with Policy RT1 of the Local Plan and the achievement of the standards and requirements it sets out.*

Policy RT4: Sustainable retrofitting

4.12 **Part B** should read:

> *All proposals for significant demolition and reconstruction must be fully justified, ensuring the efficient use of resources and energy compared to the existing structure. When demolition is unavoidable, developments must divert at least 85% of waste from landfills and either reuse materials on-site or salvage appropriate materials for reuse off-site, where feasible*

4.13 **Part C** presents a tension with paragraphs 215 and 216 of the NPPF which provides for harm to heritage assets being potentially acceptable where given appropriate weight in

the specific planning balance applicable, including where harm is deemed to be less than substantial in respect of a designated heritage asset.

4.14 Part C of Policy RT4 currently indicates that any form of harm would be unacceptable which is not aligned with national planning policy. It should be updated to correct this, applying the balanced approach directed by NPPF. It should therefore be modified to read:

> *Retrofitting heritage assets (including properties within conservation areas) should minimise ~~must not~~ harm to the special historic and ~~or~~ architectural character of the building(s), historic fabric of the building(s), and ~~nor,~~ where applicable, ~~harm~~ to the character and appearance of the conservation area. Any harm will be considered in the planning balance applying the relevant tests set out in national planning policy. Proposals involving the retrofitting of heritage assets will be determined in accordance with the requirements of Policy BE2.*

5. Chapter 4: Residential development

Question 4.3: Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 4.4: Should the Local Plan set an affordable housing requirement, including a tenure mix, for each locality (similar to Core Strategy policy L2) that reflects market conditions?

Question 4.5: Should 10% of all affordable and social housing be delivered as Truly Affordable Net Zero Homes (TANZ)?

Question 4.6: Should any other policy approaches to affordable and social housing be explored?

Question 4.10 Do you support Policy R5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 4.19: Do you support Policy R11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Policy R3: Affordable and Social Housing

5.1 **Part A** sets out a prescrptive mix in the typology of affordable homes to be provided as part of residential schemes. Whilst this mix may reflect the greatest and most pressing level of need at a point in time, it is important that this is flexibly applied allowing for changes in circumstances around need particularly.

5.2 Furthermore, it is commercially challenging to provide social rent products via market-housing schemes and setting a high expectation around this typology of affordable housing is likely to limit the overall total of affordable housing which individual schemes can viably deliver.

5.3 Any requirement for affordable provision must also only be enforced where viable and options for off site provision, including via financial contributions, should be accommodated within the policy.

5.4 It is requested that **Part A** of the policy is modified to read:

> *All major residential developments will be required to provide ~~on site~~ affordable housing, where viable, via on site provision as a first priority and via financial contributions towards off site provision where circumstances justify this in accordance with Locality policies R3N, R3S, R3C, R3W. The following tenure mix will be sought as a starting point with the specific mix to be determined on a case-by-case basis:*
>
> - *60% rented (40% social rent and 20% affordable rent)*

- *40% affordable home ownership*

5.5 **Part B** is aimed at schemes where affordable homes are delivered as part of a wider market housing scheme and through Section 106 Agreements – i.e. rather than an affordable scheme provided an an independent development with no non-affordable provision. This should be clarified in the policy.

5.6 The second part of Part B is ambiguous and it is not clear what this is referring to. In anycase, Peel would note that in respect of apartment-led schemes, the most efficient and effective way to deliver affordable homes is via the provision of a critical mass of dwellings in a single location which Registered Providers can effectively manage.

5.7 Where dwellings are transferred to a Registered Provider (i.e. rather than being held as discounted market rent dwellings as part of build to rent developments) mixed ownership of buildings is unviable from a management and maintainence point of view. Registered Providers will not typically take on dwellings which form part of a wider block which they do not control therefore.

5.8 Accordingly, affortable dwellings provided as apartments should be excempt from the clustering requirement of Part B.

5.9 Reflecting these points, Part B should be modified to read:

> *With the exception of apartment developments, affordable housing secured through Section 106 obligations and provided on site as part of a wider market housing-led scheme should be ~~must~~ be evenly distributed where possible with no more than six affordable housing units located adjacent to each other, or clustered together when delivered as part of a wider scheme*

5.10 Whilst Peel does not object to the aim of **Part C**, it should be noted that this will put additional pressure on the commercial viability of development and is likely to reduce the total amount of affordable provision which individual schemes can fund.

5.11 Further, this should be required to apply only to non-apartment schemes. As noted above, in the case of apartment schemes, where affordable dwellings are secured, these are most likely to take the form of single blocks which are affordable in their entirity. In this context, it would be unreasonable to require the whole building to achieve the TANZ standard and it would not be feasible to make only a select number of dwellings within a single building TANZ compliant.

5.12 To reflect these points, **Part C** should be modified as follows:

> *With the exception of apartment developments, a minimum 10% of the affordable homes which are provided as part of market housing schemes must be Totally Affordable Net Zero (TANZ) homes*

5.13 The second part of this amendment ("which are provided as part of market housing schemes") clarifies that this requirement would apply to the affordable homes which are provided rather than being an additional requirement to the percentages in R3N, R3S, R3C and R3W.

5.14 The use of the term '*only in limited and exceptional circumstances'* in **Part E** is inappropriate. It is not for the Local Plan to prejudge whether and to what extent there will be circumstances where a reduced level of affordable housing is justified and how many schemes may proceed with a reduced level of provision.

5.15 Each case must be considered on its own merits and the acceptabiltiy of a scheme providing a below policy level of affordable housing is not measured by reference to whether other schemes have done the same and thus whether this is the exception.

5.16 The wording implies otherwise, particularly by use of the term 'exceptional'. Whether a reduction in affordable housing provision becomes the exception will be determined through the process of assessing viability of individual schemes entirely independently of each other and of what might have gone before.

5.17 A provision which requires the prescribed level of affordable housing unless proven not to be viable is more than adequate. 'Limited and exceptional' are not appropriate terms in this context and should be removed from **Part E**.

5.18 In respect of the percentages identified in **Policies R3N, R3S, R3C** and **R3W**, it is noted that the Council has yet to produce any viability evidence to support these. Peel reserves the right comment on this aspect of the Local Plan once such evidence is available. Notwithstanding this, without public sector financial support, the provision of 25% afforable housing in Trafford North is unviable. Peel would note that there is no precedent for this level of affordable housing being secured without such funding in respect of apartment-led developments in Trafford North.

Policy R5: Housing Density

5.19 Figure 4.1 does not reflect that whilst major development sites at Pomona and Trafford Wharfside do not sit within or adjacent to designated town centres within Trafford – which is presented as a key influence on density standards – the sustainability of their location, and thus suitability as locations for density, is influenced by their wider strategic context and particularly the character and function of the areas immediately beyond the boundary of the Borough, noting that these sites sit on the Local Authority's boundary with Manchester and Salford.

5.20 Pomona Island is effectively integrated with and part of Manchester City Centre, with a direct walking route to it and benefitting from access to two Metrolink Stations. Trafford Wharfside forms part of the wider Salford Quays environs in a location of significant commercial activity and where major mixed use development is proposed, again with access to several Metrolink stations. In the case of the latter, this is located immediately adjacent to the designated Salford Quays town centre located in Salford (Policy TC1/5 of the Salford Local Plan Development Management Policies and Designations (2023) relates). The boundary of the town centre runs along the boundary between Salford and Trafford.

5.21 The wider spatial context to these locations, including by reference to their relationship, integration and interaction with key areas of activity and major investment proposals beyond the boundaries of Trafford, will see these locations become an integral part of a

wider and expanded City Centre over the next 20 years. A consideration of density in these locations should look beyond their context in Trafford and should recognise their wider strategic situation in that regard.

5.22 Considered in this context, these locations present the opportunity to deliver high density development on a sustainable basis, making efficient use of their unrivalled connectivity and strategic situation within the commercial centre of the City Region. Refecting this, they should be identified as locations for the highest density of development – 120 dph.

Policy R11: Self-Build and Custom Housing

5.23 Part Ai should be modifed to clarify that this provision does not apply to apartment schemes.

6. Chapter 5: Economy and jobs

Question 5.7: Do you support Policy EJ5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant

Question 5.8: Do you support Policy EJ6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant

Policy EJ5: Safeguarding Trafford's Employment Land

6.1 Policy EJ5 sets out the Council's proposed approach to protecting employment land in defined locations, including detailing the criteria which are to be satisified in respect of proposals for the development or use of land in these locations for non-employment uses.

6.2 The defined locations include existing operational employment areas, such as Trafford Park, as well as key regeneration areas such as Trafford Wharfside, Trafford Waters and Pomona (including the Cornbrook Office Area); the latter three locations by virtue of their reference as 'key employment areas' in Policy EJ4/EJ4N. The policy also applies to existing employment uses outside of the defined locations (see Part E).

Pomona (including the Cornbrook Office Area), Trafford Waters and Wharfside

6.3 Trafford Wharfside, Trafford Waters and Pomona (including the Cornbrook Office Area) undoubtedly have an important role to play in accommodating employment generating development as part of the comprehensive, mixed use regeneration proposals being advanced for these locations. Through these proposals, these locations will be a focus for investment through which they will take on a broad role as areas which support jobs and homes and as visitor destinations.

6.4 These are areas of significant planned change in the context of their location within the defined Core Growth Area. Active promotion of these areas as locations for future office development is approproate, as reflected in Policy EJ4, but their characterisation as 'key employment areas' which should be subject to the same level of protection from non-employment uses as established employment areas, which will not be a focus for investment and repurposing, is misleading. Trafford Park is an example of such an employment area where the area's role is not expected to fundmentally change and where its existing economic function needs to be protected and reinforced.

6.5 By contrast Trafford Wharfside, Trafford Waters and Pomona (including the Cornbrook Office Area) represent key areas of change which can accommodate employment and employment generating uses but as part of a sustainable mixed use approach to their redevelopment.

6.6 At present, Policy EJ5 would effectively preclude these areas from being redeveloped in the way envisaged through respective masterplanning proposals, including in providing the homes and wider uses expected, by virue of treating them as existing employment

areas and subjecting them to the same criteria as employment areas, such as Trafford Park, through Policy EJ5, in respect of proposals for non-employment use. Evidently the application of the criteria in Part B and C of EJ5 will stifle their redevelopment and effectively close off the opportunity for the regeneration of these locations in the manner proposed.

6.7 Peel does not believe this to be intended.

6.8 As a point of principle, Peel does not accept the defintion of Trafford Waters and Pomona Island (including the Cornbrook Office Area) as key employment areas. Aside from a single office building (Adamson House) at Pomona Island, these locations contain no employment uses and masterplans are in place, and approved by the Council, for the residential-led redevelopment of these locations. An outline planning application is being prepared for the comprehensive development of Pomona pursuant to the approved masterplan whilst planning permission for the comprehensive development of Trafford Waters is already in place, with controls over how the site comes forward via that permission.

6.9 Whilst Trafford Wharfside contains some existing employment uses, of varying types, this area is subject to a live masterplanning exercise which will detail how the area is to be redeveloped over time, including where new employment uses will be located and existing employment uses and sites repurposed for other uses.

6.10 In these cases, the role of the respective masterplans (and in the case of Trafford Waters the outline planning permission) is to carefully manage their redevelopment to ensure the envisaged mix of uses, including employment generating development, is delivered as needed to realise the ambition for these locations.

6.11 Applying employment land protection policies to these locations therefore serves no purpose and indeed will only serve to prevent the delivery of the masterplans for these areas. Accordingly, and by reference to their respective masterplans, proposals for non-employment development in these locations should be exempt from the requirement to satisfy the criteria at Parts B and C of Policy EJ5.

6.12 It is then expected that a site specific allocation policy will be put in place for each of these locations through the onward development of the Local Plan which will require, amongst other things, development to come forward in accordance with their corresponding masterplans.

Trafford Centre Rectangle

6.13 The Trafford Centre Rectangle is a unique visitor leisure, entertainment and retail destination of national significance and profile. Its development as such has taken place over the last 30 years, being repurposed from former industrial use. This is recognised in the Draft Local Plan. This process, whilst largely complete, is ongoing, reflective of Policy CL2N of the Draft Plan.

6.14 In this context, there still remains some residual lower quality industrial-type uses witihn the Trafford Centre Rectangle which have yet to be redeveloped as part of this process. However, these ‘left over’ uses do not sit comfortably in the context of the area’s

current and future envisaged role and purpose and, in context of a policy framework which actively supports the ongoing development of this location.

6.15 For this reason, and in the interests of enabling the continued development of the Trafford Centre Rectangle in the manner envisaged, and indeed to complete this process over the plan period, this location too should be excempt from the requirements of Parts B and C of Policy EJ5.

6.16 Accordingly, **Part B** of Policy EJ5 should be updated to read:

> *Non-employment development (uses other than those specified in all EJ3 and EJ4 policies), other than for operational development required to support existing employment uses, will be resisted within these Employment Areas, with the exception of Pomona, including the Cornbrook Office Area and Wharfside which are subject to area specific allocation policies and masterplanning proposals, unless it is demonstrated to the Council's satisfaction that:*
>
> *i. The site or building(s) is no longer suitable for employment use;*
>
> *ii. The possibility of retaining, reusing or redeveloping the site or building(s) for similar or alternative employment use has been fully explored;*
>
> *iii. There is a clear demonstrable need for the proposed nonemployment use;*
>
> *iv. The proposed redevelopment would not compromise the primary employment function of the locality or the operations or amenity of neighbouring users*

6.17 **Part E** of the policy should be updated to read:

> *Non-employment uses (non B2, B8 or E(g)) on land and/or buildings that are currently in employment use outside of places listed in all EJ3 and EJ4 policies, with the exception of the Trafford Centre Rectangle, will only be supported where proposals can accord with part B, C and D of this policy.*

Policy EJ6: Data and Energy Storage

6.18 **Part E** of Policy EJ6 sets out the proposal that Section 106 contributions are made in respect of data centre proposals towards academia and skills organisations by virtue of their 'low direct economic benefits'.

6.19 Data centres are a critical infrastructure needed to support the economy as it evolves and modernises. They will play an important role in ensuring the economic competitiveness of Greater Manchester and the UK.

6.20 There are many forms of infrastructure which a modern economy needs to thrive which themselves may not directly support a large number of jobs on site but which has a wider role. Utiliies and transport infrastructure are good examples of this.

6.21 A recent study by techUk - *Foundations for the future: How data centres can boost UK economic growth*[7] - has considered this point. It identifies that an increase in data centres provision has the potential to provide:

- £44 billion in additional GVA between 2025-2035 from construction and operation
- 40,200 additional jobs directly employed in (often high paying) data centre operational roles
- 18,200 additional jobs directly employed in data centre construction roles over the period 2025-35
- £9.7 billion in additional tax revenue generated by the industry over the period 2025-35

6.22 The existance of data centres reflects a changing economy and an evolving demand for how land is used. Far from 'pushing out' existing or alternative employment uses, data centres typically utilise land which is otherwise not going to be needed for employment use in the context of a rapidly evolving economy. This is entirely consistent with Policy EJ6's requirement that such facilities are directed to 'low profile' former industrial land – effectively land which is otherwise surplus to requirements.

6.23 Data centre provision will put such land to productive and beneficial use, securing significant economic gains. For these reasons, Peel strongly objects to the suggestion that data centres should be required to provide compensation for absence of direct economic benefit. This requirement of Policy EJ6 should be removed.

[7] techUK report - November 2024.pdf

7. Chapter 6: Transport and Movement

Question 6.1: Do you support Policy TM1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant

Question 6.2: Do you support Policy TM2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 6.3: Do you support Policy TM3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 6.5: Do you support Policy TM5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant

Question 6.13: Do you support Policy TM13? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Policy TM1N: Walking, Wheeling and Cycling Improvements in Trafford North

7.1 Peel supports the aspirations of Policy TM1N but would note that, consistent with other points made in this representation, the ability of development to fund active travel infrastructure will need to be considered in the context of the viability of individual developments – see general points made in Section 2 of this representation on this theme.

Policy TM2: Public Transport

7.2 Peel would highlight the same point as that made above in relation to the ability of individual developments to fund public transport improvements.

Policy TM5: Local Highway Network

7.3 **Part C** refers to the Western Gateway Infrastructure Scheme (WGIS) which comprises several phases of strategic highway investment between Junctions 9 and 11 of the M60 to improve the functionality and safety of the strategic road network and release capacity to accommodate additional development in this part of the PfE Core Growth Area, both within Trafford and Salford.

7.4 WGIS is a consented scheme but is subject to ongoing review to reflect changes in circumstances, including subsequent highway improvements and additional development now proposed in this area – such as the expansion of Port Salford as allocated through PfE.

7.5 To reflect this, Peel would suggest that Part C of the policy is updated to read:

Whilst not safeguarded, improvements will also be sought for the enhancement of the Western Gateway Infrastructure Scheme (WGIS) or an alternative to this which has the equivalent function

Policy TM13: Crowd Movement and Routes

7.6 Peel is concerned about the ambiguity in this policy. It is somewhat open ended in setting a very broad requirement to safeguard routes for crowd movement. This is open to wide interpretation as to what areas it applies to, which routes should be safeguarded and the extent (in width and length) of safeguarded routes.

7.7 This is a somewhat niche planning issue which is undoubtedly relevant in Trafford. However, the need for the safeguarding of routes and their defintion is a matter which should be resolved through masterplans for the affected areas (those in the vicinity of Old Trafford football and cricket grounds), including Trafford Wharfside, with which future development proposals will need to comply. It is inappropriate for a general and such open ended requirement of this nature to be included in a Local Plan.

7.8 Policy TM13 should therefore be removed.

8. Chapter 7: Town centres and retail

Question 7.4: Do you support Policy TC3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant

Policy TC3: Out of Centre Retail and Leisure

8.1 Reflective of comments provided below in relation to Policy CL2N, **Part A** should be modified as follows:

> *Outside of the centres identified in Policy TC1 (and defined on the policies map) and those locations where other policies of the Plan expressly support it, the Council will not support development of retail, leisure and other town centre uses, except where it can be demonstrated that the proposal satisfies the requirements of the sequential test.*

9. Chapter 8: Green infrastructure and natural environment

Question 8.6: Do you support Policy GI6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 8.7: Do you support Policy GI7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant

Policy GI6: Green Infrastructure in New Developments

9.1 The purpose and overall aim of of GI6 is supported by Peel.

9.2 However in the context of comments above, Peel is concerned that where prescriptively expressed, and with particular reference to the Urban Greening Factor requirements, the standards and expectations of the policy may not be practically achieveable whilst delivering the wider development ambitions of the Local Plan in the context of some sites and when considered on a case-by-case basis.

9.3 This is not to suggest such standards should not be referenced in the Local Plan but simply that an appropriate level of flexibility as to their application needs to be included to ensure development can come forward and thus the Local Plan delivered.

9.4 This speaks to the need for judgements on policy compliance to be made in the round in the context of potentially competing objectives (see section 2 of this representation). Where requirements are imposed with no flexibility, there is a risk of policy conflict arising to an extent and level which cannot be reconcilled in the planning balance, stifiling the Local Authority's ability to progress schemes favourably through the planning development and ultimately the delivery of the Plan.

9.5 Peel does not believe this to be the intention but would highlight that this is a real risk, and one which the Local Authority may struggle to mitigate without an appropriate level of flexibility being incorporated into the plan.

9.6 Peel does not wish to water down the ambition of the Local Plan in respect of such areas or to reduce the effectiveness and enforcement of such policies. A default position that such standards, where they are themselves reasonable and justified, are met may be approriate. However, for the reasons pointed out these need to be flexibly applied.

9.7 To that end, and to complement the suggested amendments to Policy ST4 outlined above, Peel would suggest the Policy GI6 is amended as follows:

Part C:

All proposals for major development must be supported by a dedicated green infrastructure plan, which may be included within a site wide landscape strategy, and will be required to:

i. Include an Urban Greening Factor (UGF) calculation, in accordance with Natural England's latest guidance, demonstrating how the development will meet a UGF score of:

- *0.4 as a minimum for residential development on brownfield development sites*
- *0.5 as a minimum for residential development on greenfield development sites*
- *0.3 as a minimum for non-residential development*

Where this is not feasible in the context of the development, and having regard to the requirements and ambitions of other policies within the Local Plan, this will need to be expressly justified based on sound planning reasons.

Part D:

Where it is considered that the development will have a detrimental effect on the quantity, quality or function of existing green infrastructure, then the development will not be supported unless it can be demonstrated that an assessment has been made and suitable mitigation measures proposed. Any mitigation measures should be of equal or greater value than that which is to be compromised or lost through development or where the detrimental effect is justfied having regard to wider material considerations, including the requirements of policies of the Local Plan

Policy GI7: Trees, Woodland and Hedgerows

9.8 An equivalent point is raised in respect of the aspirations of GI7 relating to tree canopy cover. To that end, **Part Bi** should be amended as follows:

A Tree Canopy Cover Assessment must be provided that demonstrates how the development will incorporate trees on-site, and:

- *where there is no existing tree canopy cover, provide a minimum of 20% tree canopy cover (upon maturity) across the whole site area; or*
- *where there is existing tree canopy cover, provide a minimum increase of 10% tree canopy cover (upon maturity over the existing onsite tree canopy cover); or*
- *where there are existing ecological, historical, landscape, operational or design-led reasons that justify not meeting the canopy requirements (as*

applicable), provide evidence to support this and agree an alternative percentage of canopy cover with the Council;

10. Chapter 9: Open space, sport and recreation

Queston 9.1: Do you support Policy OS1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 9.2: Do you support Policy OS2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 9.3: Do you support Policy OS3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant

Question 9.5: Do you support Policy OS5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Policy OS1: Open Space

10.1 In respect of **Part D**, whilst the accessibility standards are noted, and these should inform a consideration of whether and to what extent on site provision of open space is justified, ane indeed whether a site's development is acceptable in principle, it is not necessarily within the control of applicants to ensure these standards are met and notwithstanding that the site may otherwise occupy a sustainable and suitable location for development. This is particularly the case in relation to typologies of open space which have a larger land take (e.g. local, neighbourhood or district access open space) where meeting the standards can't be achieved via on site provision.

10.2 In this context, the binary requirement that developments must meet the stated standards is inappropriate. To bring Part D in line with Part E, the first part of Part D should be modifed to read:

> *All major developments should seek to ~~must~~ ensure their occupants are able to access relevant and appropriate high-quality open space(s) having regard to ~~in accordance with the~~ following walkable accessibility standards*

10.3 **Part F** seeks to set out standards for the quantum of on site open space provision in respect of residential developments. These standards are unachievable in respect of dense residential developments particularly.

10.4 As a working example, Peel's proposals at Pomona Island (Manchester Waters) will provide in excess of 3,000 homes, delivered at a density which reflects the site's Core Growth Area location, situation within the wider environs of Manchester City Centre and access to public transport. This level of development is supported by a masterplan approved by Trafford Council in 2020 and pursuant to which an outline planning application for the comprehensive development of the site is currently being prepared.

10.5 The development at Pomona Island will deliver development at a density which makes efficient and effective use of a highly sustainable site. Indeed, this density is directly supported by the Draft Local Plan which, as noted above, seeks to deliver a significant

quantum of the Borough's residential development over the plan period via a limited number of locations in the Core Growth Area. These also include Trafford Wharfside, the Civic Quarter and Trafford Waters.

10.6 Assuming a site's resident population is calculated on the same basis as the Council's existing Planning Obligations SPD, Pomona Island could accommodate a population of say 5,000 people based on a reasonable split between 1, 2 and 3 bed properties. Part F of Policy OS1 would require the provision of some 15 ha of open space on site to serve this population. This is in the context of a site which extends to c9ha in total. Clearly this is impractical.

10.7 Such is the extent to which the standards are unrealistic, they have no practical use in informing developers and decision makers as to what level and form of open space provision is appropriate and acceptable in respect of such schemes or even as a helpful starting point. An alternative approach to defining the appropriate level of open space in respect of high density apartment schemes is therefore needed.

10.8 The policy should be modified to reflect this by being clear that these standards apply to housing-led schemes (i.e. with apartment-led schemes being exempt). The suggested modified wording is as follows:

> *Housing-led ~~R~~residential developments over 50 homes will be required to provide a minimum of 3ha of new accessible public open space per 1,000 population (i – iii) and other open space (iv – v) on-site including:*
>
> *i. Minimum 1ha of parks, gardens and recreation grounds per 1,000 population*
>
> *ii. Minimum 1ha of natural and semi-natural greenspace per 1,000 population*
>
> *iii. Amenity greenspace*
>
> *iv. At least 0.25ha provision for children and teenagers per 1,000 population*
>
> *v. At least 0.25ha of allotments per 1,000 population*
>
> *In respect of high density, apartment-led developments, where these are appropriate, the level and form of accessible public open space to be provided on site will be determined on a case-by-case basis. This will be considered by reference to the site's context and having regard to the need to balance the requirement for new homes and the need to make efficient and effective use of land by delivering development at the appropriate density with the need to ensure an attractive and liveable environment where residents can access external space for active and passive use*

Policy OS2: Outdoor Sports and Recreation Facilities and Provision

10.9 Consistent with point raised in respect of Policy OS1 Part D, **Part D** of Policy OS2 should be modified to read:

All major residential developments should seek to ~~must~~ ensure their occupants are able to access at least one type of outdoor sports provision within a repeating radius of 1.2km, starting at the site's centre point, as listed under criterion B where this is feasible.

Policy OS3: Indoor Sports and Recreation Provision

10.10 Consistent with point raised in respect of Policy OS1 Part D and Part D of Policy OS2, **Part C** of Policy OS3 should be modified to read:

All major residential developments should seek to ~~must~~ ensure their occupants are able to access at least one type of indoor sports and recreation provision within a repeating radius of 1.2km, starting at the site's centre point, as listed under criterion B where this is feasible.

Policy OS5: Allotments and growing space

10.11 To reflect that the requirement of Part D may not always be feasible in respect of specific sites, this should be modified to read:

Major residential development over 50 homes must provide opportunities to incorporate food growing areas such as allotments, community gardens, roof gardens and/or temporary use of vacant land where feasible.

11. Chapter 10: Water, flooding and drainage

Question 10.1: Do you support Policy WA1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 10.2: Do you support Policy WA2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Policy WA1: Managing Flood Risk

11.1 Consistent with comments provided elsewhere within this representation, the expectation set out at **Part F** in relation to the opening of culverts needs to be balanced against other requirements and objectives of the Draft Local Plan, noting that this could have an impact on the extent of developable area within a site or the area available to provide critical infrastructure to support the development.

11.2 The aspiration of Part F is supported by Peel but this requirement needs to be applied with a higher degree of flexibility to ensure it does not unnecessarily comprise the delivery of the plan and of the scale of development is seeks to enable over the plan period.

11.3 Part F of should be adjusted to read:

> *Applicants will be required to use alternatives to culverting and re-open existing culverts in the design and delivery of new development where feasible having regard to the site and its wider constraints .*

Policy WA2: Sustainable Drainage – Surface and Foul Water

11.4 Consistent with comments made elsewhere within this representation, and particularly in relation to Policy GI6 and in Section 2 (Policy ST4), the requirement of **Part B** to maximise the retention of surface water on-site could have practical implications for the ability to deliver the level of development proposed, and needed, in respect of individual sites, depending on their context. This depends partly also on how surface water is retained on site, noting the second component of Part B which indicates a requirement to provide attention at surface.

11.5 The ability to meet this objective, whilst delivering the level of development which the Local Plan seeks to enable, is untested. It is therefore important that this requirement is flexibly applied reflecting the potential for tension between this and other objectives of the Plan and to ensure it does not unduly constrain the delivery of the Plan. To this end Part B should be adjusted to read:

> *Proposals must be designed to maximise the retention of surface water on-site and minimise the volume, and rate of, surface water discharge off-site to the*

extent achievable in the context of the site and wider considerations. Such designs will be required to be integrated with the landscaped environment and the strategy for biodiversity net gain where achievable.

12. Chapter 11: Community and Social Infrastructure

Question 11.1: Do you support Policy CT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 11.2: Do you think the Council should protect the loss of community facilities and local services through a sequential test (as set out in Policy CT1 above), or by requiring a statement setting out evidence as to why a particular facility is not needed?

Question 11.3: Do you support Policy CT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 11.4: Do you support Policy CT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 11.5: Do you support Policy CT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Policy CT1: Protecting Existing Community and Social Facilities

12.1 Peel supports the need to provide adequate protection to existing community and social facilities. However, there will be instances where, in the interests of securing wider benefits, in the context of the ambitions of the Local Plan, the loss of such facilities is justified.

12.2 That there is no provision for this within Policy CT1 is an omission. It is recognised that express justification for such losses should be required, but if and when this is provided, including via evidence that the facility is no longer needed, the policy should support alternative use/development.

12.3 Accordingly, a 4th limb should be added to the sequential approach set out as follows:

> *Permit the loss of an existing community or social facility, where protection necessary applying Policy CT2, only where it is proven that there is no ongoing demand for that facility or that alternative provision is available in a suitable location and has sufficent capacity to accommodate that demand in accordance with the requirements of Policy CT2*

Policy CT2: Loss of Community Facilities

12.4 The requirement for a two year vacancy period before a site/building's use or development for non-commuity use can be supported is considered to be onerous. Whilst it is important to establish that there is no ongoing need or demand for such facilities before they are permitted to be lost, long term vacancy is not the only means of evidencing this. Indeed actively promoting the vacancy of space in the context of there

being a potential alternative use of the space which generates jobs and secures efficient use of a site and existing accommodation does not represent positive planning.

12.5 Further, Peel would note that the definition of community facilities is broad with the suggestion of some such facilities (such as some types of private health clinics) being 'community' facilities worthy of protection being tenuous, notwithstanding that they may be operating under the same use class as a more convential community facility (such as a GP surgery).

12.6 It is accepted that this is not a straightforward issue to reconcile. However, this is possible through the policy acknowledging that the function of the existing operation, rather than just the use class, should be taken into account in determining the applicability of the policy.

12.7 Further, in some locations, such facilities evidently do not have a 'community' function in that they are unlikely to serve a residential community local to the site, recognising that the policy is centred on the protection of those facilities which function as civic infrastucture for local residential communities.

12.8 Given its role as a predominately visitor, entertainment and employment destination, serving a catchment significantly beyond Trafford, Peel considers it appropriate the the Trafford Centre Rectangle is exempt from the requirements of Policy CT2. This would not apply to facilities provided within the Trafford Waters development which will serve the residential community in that location.

12.9 Accordingly, Peel suggests that Policy CT2 is updated to include an additional sub-section (Aii) which states:

> *Whether an an existing use comprises a community facility will be determined by the Council on a case-by-case basis by reference to the nature of the existing operation and its location. Other than those provided as part of the Trafford Waters development, uses within the Trafford Centre Rectangle are not treated as community facilities for the purposes of this policy reflecting the wider visitor and commercial function of this location.*

Policy CT3: New community and social facilities

12.10 In respect of some community and social facilities, developers are not wholly in control of whether operators will take up the opportunity open and operate new facilities on site. Accommodation and infrastructure can be provided within schemes for this purpose and active steps taken to promote occupation by operators of such facilities. To reflect this, **Part D** should be modified to read:

> *All major larges cale residential developments will be required to provide on-site space for the provision of community and/or social facilities to facilitate the creation of sustainable and mixed communities. Such facilities must not result in a shared or communal residential/social and community entrance.*

12.11 This applies to a range of facilties which have a community and social function.

Policy CT4: Fast Food

12.12 Reflecting its leisure and entertained focused role and as a major nationally significant visitor destination, Peel considers that the requirements of **Part A** should not apply to the Trafford Centre Rectangle, beyond Trafford Waters.

12.13 A varied food and drink offering, including fast food provision, is a key component of the overall draw of the Trafford Centre Rectangle as a destination and therefore to its commercial success and economic contribution to Trafford and Greater Manchester. It serves a large catchment and facilities within are not aimed at or of a scale which serve the local community. This contrasts with retail, leisure and food and drink uses which are situated within the residential communities they are targeted at.

12.14 It is important to the long term success of the Trafford Centre Rectangle as a visitor destination that it is able to continue broadening its food and drink offer to ensure it remains competitive and capable of fulfilling its significant economic role within Greater Manchester. An unnecessary restriction on the provision of new fast food facilities in this location is inappropriate in this context.

12.15 Part A of the policy should be modified to read:

> *With the exception of sites within the Trafford Centre Rectangle, reflective of its entertainment and leisure focused role and its large catchment as a visitor destination, proposals for hot food takeaways and fast-food outlets will not be supported within a 2-mile walking distance from a primary or secondary school, unless the location is within a designated retail centre, as defined by Policy TC1.*

Paragraph 11.7

12.16 Noting that at paragraph 11.7 of the Draft Local Plan, public houses are defined as being a type of commuity facility, cafes should also be referenced in this paragraph as such reflecting their role as a place for the community to gather and the wider social function they too can perform but which does not revolve around alcohol consumption.

13. Chapter 12: Built Environment

Question 12.2: Do you support Policy BE2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant

Policy BE2: Tall Buildings

13.1 Peel supports Policy BE2 and the identification of the named locations for tall buildings. This reflects the sustainability of these locations and that they are well placed to support a high density of development given their regeneration potential and envisaged role in delivering the Local Plan, their situation within the Core Growth Area and the pressing need to made efficient and effective use of this land.

14. Chapter 13: Culture, tourism and leisure

Question 13.1: Do you support Policy CL1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant

Question 13.2: Do you support Policy CL2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Policy CL1N: Manchester United Football Stadium and Immediate Surrounds

14.1 The spatial extent of this area is not yet defined within the Draft Local Plan. Notwithstandning this, Peel supports the ambitions of the policy which seeks to define some key principles as to how the area will be developed, particularly in terms of the key public realm and movement interventions.

14.2 The means of delivering these wider infrastructure proposals is not yet resolved. Whilst there are a range of development sites within this broad area which could contribute, it highly unlikely that they can be funded solely through the delivery of development plots. Public sector support will inevitably be needed as part of a strategy for the delivery of the masterplan/s for this area.

14.3 Peel would also highlight the risk of duplication of contributions sought, noting the roof tax proposal in Policy IPN1 which is covered in section 15 of this representation.

14.4 A definitive expectation that development will fund these infrasutcture proposals is, in this context, inapprpropriate. Peel would therefore suggsted that **Part I** of the Policy is modified as follows:

> *I. ~~All d~~ Where appropriate and viable, development proposals will be required to support and contribute towards the delivery of:*
>
> > *i. New and improved walking and cycling connections across the Manchester Ship Canal to/from Media City.*
> >
> > *ii. An extension of the Processional Route (Policy CQ9 of the Civic Quarter Area Action Plan) into the stadium district*
> >
> > *iii. Improved bus services and infrastructure along the A56.*
> >
> > *iv. Improvements to Metrolink services and infrastructure; and*
> >
> > *v. A new and/or improved design and delivery of the White City Circle Interchange.*

Policy CL2N: Trafford Centre Rectangle

14.5 Policy CL2N provides direct support for reinforcing and enhancing the tourism, leisure and economic function and contribtion of the Trafford Centre Rectangle, reflecting its position as a nationally significant visitor destination which makes a substantial contribution to the economy of Greater Manchester. This is also reflected in the definiton of the Core Growth Area extending to cover this location.

14.6 This area contains a number of significant leisure and entertainment facilities, with supporting ancillary uses. Many of these are of a type, in terms of their scale, land take and form, which wouldn't be suited to a town centre location and indeed would compromise the function of a town centre if situated there. This particularly applies to the area's unique recreational and sporting uses.

14.7 'Leisure uses' has a broad defintion in this regard and it is important to recognise that some such uses are suited to the Trafford Centre Rectangle, by virtue of their size and form they take, and indeed would be inappropirate within a town centre setting, whilst others have a function directly associated with the area as a visitor destination and are designed to support that function.

14.8 The policy should draw this distinction which will improve its clarity and practical application. This would be achieved via the requirement for a screening test to determine whether the leisure use proposed is of a type that could theorteically be suited to a town centre location. This would determine the need to then pursue a sequential and impact assessment in respect of individual proposals.

14.9 To reflect this, the following modificaiton to **Part C** is suggested:

> *Major leisure, visitor and tourism development would be welcomed in this location when it satisfies the tests for main town centre uses as set by national guidance or where it is demonstrated that the use is of a form and type which would not be suited to a town centre location or where it is proven that the facility directly supports the location's success as a visitor destination and its positive econmic contribution*

14.10 In respect of **Part D** of the policy, planning permission for the comprehensive development of Trafford Waters is already in place. This provides a control over how the site comes forward, prescribing and committing the scheme to a suite of infrastructure improvements with appropriate triggers for their delivery.

14.11 The only 'substantial improvement' to public transport needed to accommodate this and other development in the immediate locality is the extension of the Metrolink to serve the Trafford Centre Rectangle. This has now been delivered by Transport for Greater Manchester, with no further obligation placed on outline planning permission with regard to public transport improvements.

14.12 There is therefore no policy-led basis for any form of reconsideration of the transport improvements which the Trafford Waters development should fund to the extent that these improvements have already being delivered or are 'locked in' via the permission.

14.13 As such, Part D of the policy should be updated as follows:

> *Development within the Trafford Waters area of the Trafford Centre Rectangle will be required to delivery transport and infrastructure improvements in accodance with the outline planning permisison. ~~make substantial improvements to: i. the public transport network ii. significant new and enhances local and strategic road infrastructure as part of the Western Gateway Infrastructure Scheme~~*

15. Chapter 14: Infrastructure and Planning Obligations

Question 14.1: Do you support Policy IP1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 14.2: Do you support Policy IP2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Question 14.3: Do you agree that the Council should require a fee to monitor and report on all planning obligations?

Question 14.4: Do you agree or have any observations or suggestions on the proposed planning obligation monitoring fees for either minor and/or major developments?

Policy IPN1: Trafford North Infrastructure Contributions

15.1 Policy IPN1 effectively sets out a 'roof tax' to fund infrastructure which may be needed to accommodate new development. At the same time, various policies of the Draft Local Plan, including a number which have been identified through this representation, seek to secure the provision of such infrastructure on site – e.g. community facilities, open space, affordable housing, indoor and outdoor sports facilities etc.

15.2 The suggestion of a blanket roof tax to fund infrastructure on top of the requirement (and expectation) for on site provision or funding for off site provision is inappropriate and is clearly a duplication of planning gain expectations.

15.3 Further, the scale of contribution sought appears to the arbitary and no evidence has been provided as to why it is set at this level and whether this level of contribution is needed to fund infrastructure on a proportionate basis. It present a number of tensions with the Community Infrastructure Levy Regulations 2010 (as amended) in this regard.

15.4 The roof tax approach is therefore wholly unjustified and likely will place a burden on development which will prevent it being delivered, particularly so if applied alongside other Section 106 expectations. Attention is again drawn to the recent track record of delivery of development in Trafford as referenced above which demonstrates that viability in the Borough is already commercially compromised

15.5 In any case, planning obligations should only be sought where needed to mitigate the impact of development. For instance, in respect of education provision, contributions may be justified in respect of individual schemes but only where it is proven that there is insufficient capacity within existing schools to accommodate the additional demand resulting from development (in combination in some instances). Where this is not the case, a contribution towards education cannot be justifed.

15.6 There is therefore no basis for the standardised approach being proposed through Policy IPN1 and this policy should be deleted as a result. Instead, the scope of any Section 106 Agreement should be determined on a case-by-case basis having regard to

1) On site provision of infrastucture which a contribution would otherwise fund

2) The direct and evidenced impact of the development – individually and cumulatively – and the extent to which the development will utlise existing remaining capacity within existing infrastructure

3) The viability of development

15.7 Notwithstanding these points, Peel would note that no viability evidence has been presented to demonstrate that schemes in North Trafford can viably provide such a level of financial contribution. It reserves the right to supplement the above comments upon publication of such evidence.

Policy IP2: Managing and Monitoring Planning Obligations

15.8 Peel does not object to the expection that applicants make a contribution towards the funding of managing and monitoring planning obligations, but the requirement for major developments to pay 5% of the value of the planning obligation is excessive.

15.9 In the context of a relatively modest planning obligation valued at say £2m, this would represent a £100,000 additional fee for a relatively limited process. This is likely to be significantly more than than value of the planning application fee for such a scheme, which funds a more intense and involved stage of work undertaken by the Local Authority than merely the managing and monitoring of a planning obligation.

15.10 This requirement is not justified and should be adjusted to a level based on genuine costs incurred by the Council. At present the Council has produced no evidence that the level of contribution sought is reasonable in this context. To highlight that the fees proposed are excessive, it is noteworthy that Leeds City Council seeks contributions of up to £1,200 for the same purpose whilst Liverpool City Council requests a fee equivalent to 15% of the planning application fee payable.

[redacted]

From: Newgrosh, Julian
Sent: 12 June 2025 23:03
To: Local Plan Consultation
Cc: [redacted]
Subject: Response to Local Plan : Omission of Broomwood
Attachments: Appendix A Broomwood as a Local Centre of Trafford - Boundary Commission Submission.doc

Follow Up Flag: Follow up
Flag Status: Completed

Categories: LP April 2025 comment

Dear Local Plan Team,

I am writing with my personal response to the Local Plan as a ward Cllr for Timperley Central and [redacted].

The overarching issue I have with the draft Local Plan is the complete omission of Broomwood.

Broomwood is clearly a distinct "place" of Trafford, it has been accepted so by external national bodies as recently as 2022 (the Boundary Commission), and yet Trafford's local plan fails to recognise, or mention, it at all. To compound this, Broomwood is an area of high need.

I would like to make the case that Broomwood makes matches the criteria to be included as a Local Centre of Trafford.
As such I attach Appendix A (my submission to the Boundary Commission referencing the constituent parts that for Broomwood).

Errata changes:
1.74 with a notable (IMD) exception within Timp Central : Broomwood Estate

Major Omissions:
Active Travel :page 159 : Timperley & Hale Barns are not even on the map
it is hard to feature improvements, or need, when not on the map.

there is even a possibility for Timperley East RAIL - not featured on and map

Shaftesbury Avenue (which borders and bounds Broomwood) has an active travel upgrade about to be delivered (not featured)

the eastern gateway to Trafford does not appear.

Brooks Drive is a *fantastic* green corridor - not mentioned or featured. Its importance will only increase as we concrete over Timperley Wedge, which it bisects.

Active Travel Links/corridors East towards Wythenshawe hospital are not mentioned or featured

Policy TC1: Hierarchy of Centres
you list roads and not an ENTIRE housing Estate
Where is Broomwood? (it has its own shops, post office, GP, dentist, primary school, community centre, community park, ancient woodland, historic green corridor and over 2000 homes or which roughly 1000 are social housing, identity, and not a single mention in the local plan)
and area of high need. completely ignored.
I would strongly argue that this is a LOCAL CENTRE (its far bigger, and distinct, than a “neighbourhood”)

With this omission, and bearing in mind that one of the major future developments of Trafford (Timperley Wedge) is happening off map,
I would like the Southern region significantly re-thought & re-written to include the East/Broomwood

Julian

Cllr. Julian Newgrosh
Timperley Central Ward
Trafford Council Liberal Democrats
[redacted]

Appendix A

Boundary Commission Submission against splitting the Broomwood Community

(Broomwood as a Distinct "place" within Trafford : a "Local Centre")

Broomwood Timperley Central/Timperley South & Hale Barns border

I am writing to object to the Draft Boundary decision of the two new wards : Timperley Central and Timperley South & Hale Barns. Particularly the section cutting the Broomwood Estate in two.

At the end of this section, I propose how to correct the obvious error of splitting the Broomwood Community along Mainwood Road, by using Ridgeway Rd as a far more suitable alternative.

The Broomwood Estate was built on the outskirts of Timperley in the 1950's. A large swathe of Council housing bordered to the East by Fairywell Brook (which marked the hard boundary between Manchester & Trafford) to the South by Ridgeway Rd (which, as its historic name suggests, is a physical ridge, one side draining down to Timperley, the other towards Hale Barns) and to the West by the Main A560 Shaftesbury Avenue & Thorley Lane A5144. It was built either side of the historic "Brooks Drive" a former private 160yr old road. It has always been separated from Hale Barns by the expansive "Timperley Wedge" (part Green Belt, part green field)

This Triangular Estate has three main trunk/access roads inside it : Aimson Rd East, Greystoke & Mainwood Rd. Off which all other roads are connected. Of those three, Mainwood Rd was given the Community assets of the Estate: a Parade of Shops (top of Briarfield Rd. Which includes Hairdresser, Supermarket, Post Office Counter, Fast Food Takeaway, Pharmacy & Charity Community Cafe), a GP Health Centre & Dentist, the Primary School, Broomwood Community Park and The Broomwood Community Centre (which includes a Boxing Gym). It used to have its own Council Offices (removed due to cutbacks)

The entire estate was designed to face inwards, and still does.

Over time Council houses became Housing Association houses, but the area still (unfortunately) has multiple indices of deprivation. Disability or lower mobility is far higher prevalence amongst the residents than the general (or surrounding) population. Community spirit, identity and cohesion is also higher.

The majority of the estates basic needs are met within the estate.

Broomwood has enjoyed, for the last twenty-two years, an active dedicated Charity: G-Force who has its Café on the Parade of shops. This, and the Broomwood Community Centre, form two strong community foci. All manner of events are held by each from Coffee Mornings, Friday Clubs (65years established!), Bingo, Xmas Clubs, and Excursions. It has an established Community Partnership of voluntary, civic and housing association members.

If you came to visit and asked anyone walking about the area: “where do you live?” you will either get the answer “here” or “Broomwood” (which are one and the same). Many of the residents have lived here generations. I have assisted four generations of the same family (differing issues) whose family members have all lived on the estate.

Splitting this community, even if only for Electoral purposes, will greatly diminish the attention/focus that the residents ‘combined needs’ require. Hale Barns to the south, although not exclusively, is defined by a very affluent demographic, including several roads of the very most expensive houses in Trafford. The contrast couldn’t be starker.

Between Broomwood and Hale Barns, as was previously mentioned is the open expanse of Timperley Wedge. Unfortunately this green space is now earmarked, under the Places for Everyone (Greater Manchester Spatial Framework) for 1400 new homes. These are planned in two phases, and have not been counted in the provisional numbers by which the Draft Boundary Plan was constructed. However I need to make you aware that such is the demand for housing, and such is the prime location of Timperley Wedge, that developers will build, with surprising haste, as many houses as they can get away with on this allocation. Already 116 new homes have gone to planning at the former World of Water/Pets Centre just a little further down Thorley Lane. It would be foolhardy not to consider this huge development area when calculating the numbers of the future Timperley South & Hale Barns ward.

Voter Numbers (2027 forecast) Draft verses Proposed Changes:

Draft Proposal has Timperley Central at 8169 (-6%) and Timperley South & Hale Barns 9080 (+4%)

Residents in the area we propose to move from Timp South to Timp Central (2027 forecast) = 964

Resultant proposed changes : Timperley Central 9133 (+4%) Timperley South & HB 8116 (-6%)

Additional Supporting Evidence:

As Evidence for the roads making up Broomwood, I attach Trafford Councils catchment area for Broomwood Primary School:

https://www.trafford.gov.uk/residents/schools/school-admissions/docs/Street-Lists/Street-List-Broomwood.pdf

I would also like to reference Transport for Greater Manchester Bus Route 11 (which travels the three main roads of the estate) : the stops of which are all clearly listed as Broomwood:

https://tfgm.com/public-transport/bus/routes/11-stockport

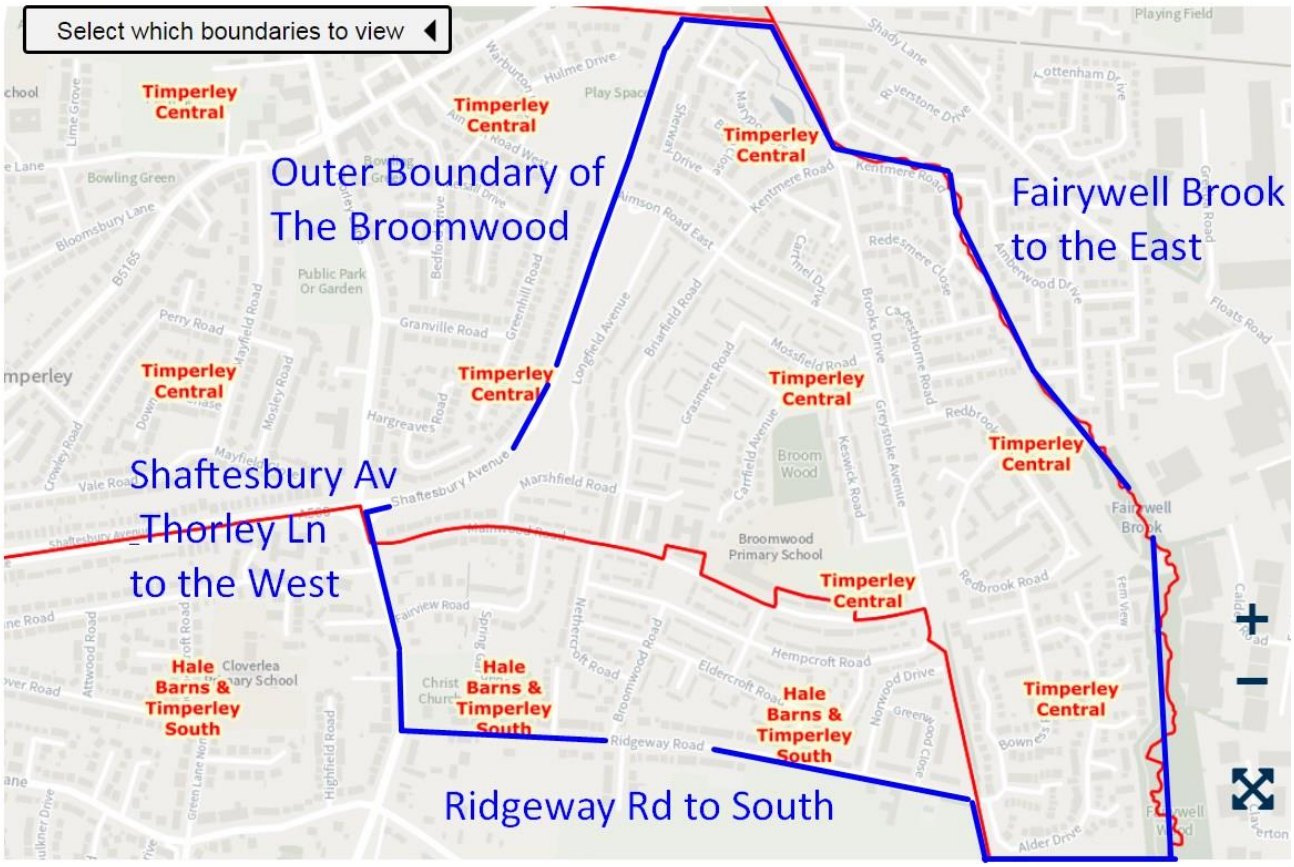
(very near) Future Housing : Planning Application for 116 dwellings World of Pets within 300m of boundary. First Phase of many phases for entire Timperley Wedge (Timperley South & Hale Barns)

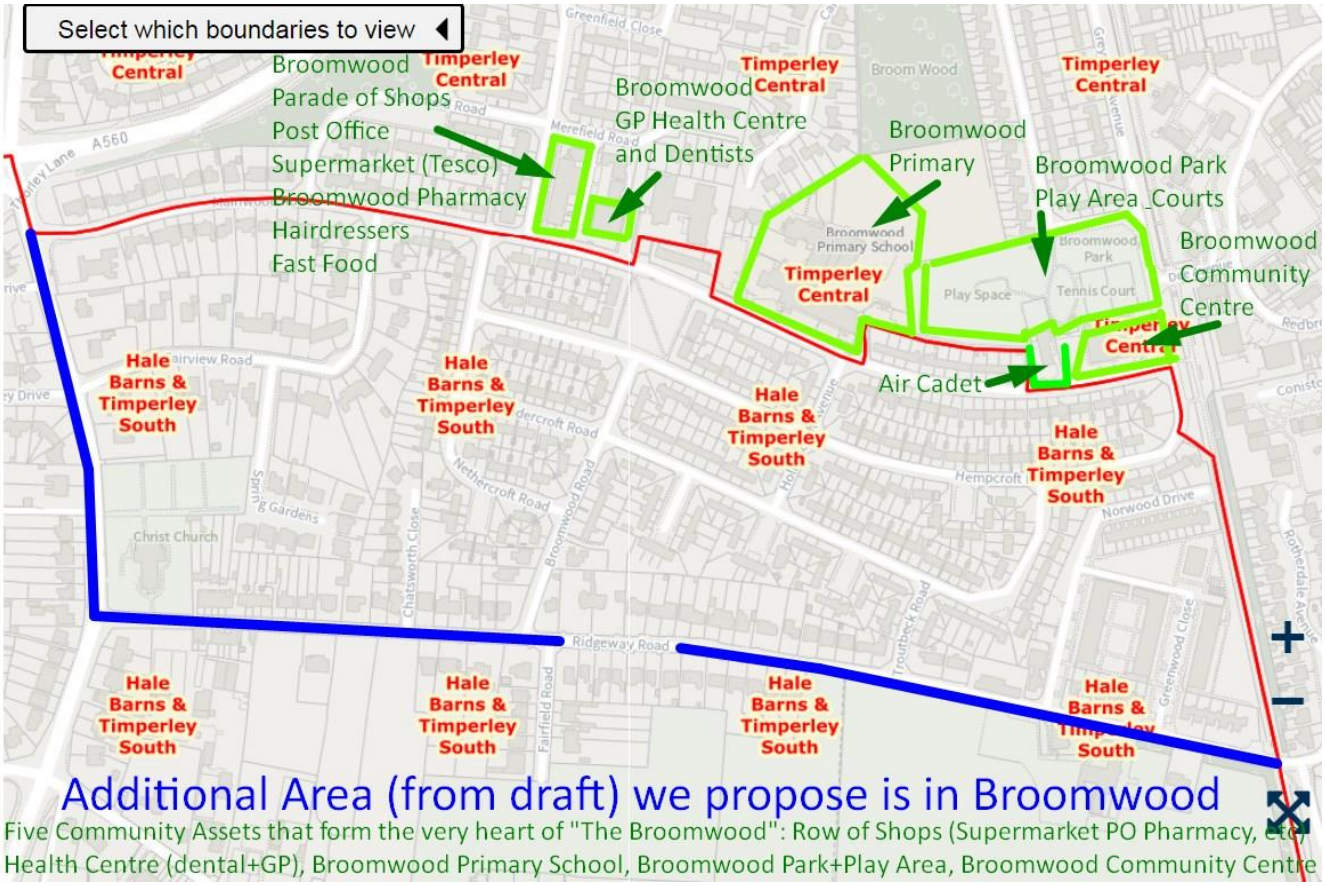
https://pa.trafford.gov.uk/online-applications/applicationDetails.do?keyVal=R0G2ZNQL01T00&activeTab=summary

Next Page has two maps :

Outer Boundary of The Broomwood (as understood by the residents)

Additional Area we propose is Inside Broomwood (from Timperley South to Timperley Central)




Select which boundaries to view
Broomwood
Parade of Shops
Post Office
Supermarket (Tesco)
Broomwood Pharmacy
Hairdressers
Fast Food
Broomwood
GP Health Centre
and Dentists
Broomwood
Primary
Broomwood Park
Play Area _Courts
Broomwood
Community
Centre
Air Cadet
Timperley
Central
Hale
Barns &
Timperley
South
Ridgeway Road
Additional Area (from draft) we propose is in Broomwood
Five Community Assets that form the very heart of "The Broomwood": Row of Shops (Supermarket PO Pharmacy, etc), Health Centre (dental+GP), Broomwood Primary School, Broomwood Park+Play Area, Broomwood Community Centre

Proposed edits – Cllr Simon Lepori, Timperley Central (Liberal Democrats)

General and throughout - The acronym "BAME" (Black, Asian, and Minority Ethnic) is no longer considered an appropriate term in many contexts, particularly within government and media. Instead, it's recommended to use more specific and inclusive language, or to avoid grouping ethnic minorities together altogether.

CT2 11.15a (to be added) – Where un-adopted parks and green spaces are assessed to be in high density areas, and areas of low public green space, all efforts should be made and supported to adopt the space and form more formal management and community engagement before the finality of disposal by the Council, for development.

CT3 D (addition) - Accessible healthcare within our economic centres will encourage active and public travel, thus encouraging healthier lives. We accept that integrating before population has increased in certain areas will be difficult however trigger points in the development process, to force the use of 106 contributions after 250 dwellings, will allow services to integrate alongside population growth, instead of being an afterthought.

CT3 11.21 (addition) The neighbourhood plan as part of Trafford Locality Board is a prime example of how this can be done and is thriving, noting an example of excellence in the Broomwood Move project within the South Neighbourhood.

CT3 11.22 (addition) The development of effective primary care centres and dental practices across the borough will allow for a more robust and effective access in our town, village, and new development areas, taking pressure off over-pressured services in certain areas. This will promote the Healthier Lives agenda at the local and regional level and in the case of dental service allow a more even spread of provision across the borough.

Response ID ANON-MFZ6-4QAN-Q

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-10 19:51:41

Personal details

1 Forename

Enter your forename:
Howard

2 Surname

Enter your surname:
Mason

3 Organisation (if applicable)

Enter your organisation:

4 Position/title (if applicable)

Enter your position/title:

5 Address

Enter your address:

[redacted]

6 Postcode

Enter your postcode:
[redacted]

7 Email address

Enter your email address:
[redacted]

8 Contact phone number

Enter your contact phone number:
[redacted]

9 Please select 'opt in.' if you wish to recieve future consultations on planning policy.

Opt out

Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

Chapter 1 - Strategic Objectives

1 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

Please write your response here::

Chapter 1 - Introduction, Vision and Strategic Objectives

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

I was disappointed to see that the Council still has designs on Warrener Street Car Park. We do not need to try to replicate Stanley Square is near by and this car park is vital to the continuing viability of Sale Moor.

Chapter 4 - Residential Development

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

I've looked through the whole plan for a requirement for new homes to be as near carbon neutral as possible. This may be hidden in some of the more technical coverage of environment issues but I would like to see a clear and explicit commitment to this.

Chapter 6 - Policy TM1: Walking, Wheeling and Cycling

1 Do you support Policy TM1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The policy sounds broadly positive but lacks sufficient specific proposals to give any confidence we'll notice a difference. There seems to have been excessive emphasis on cycling with cyclists currently invisible except on the canal towpath where they are a nuisance. Improvements for pedestrians needs complementary traffic management approaches, for example (just one example) the area around Old Hall Road, Baguley Road, Holy Family church.

Chapter 6 - Policy TM5: Local Highway Network

1 Do you support Policy TM5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 11 - Policy CT1: Protecting Existing Community and Social Facilities

1 Do you support Policy CT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The proposals appear to be head-in-sand wishful thinking. Planning considerations are proving an obstacle, and an expense, to existing community facilities that need modern development for them to remain viable. And redevelopment is being obstructed for community facilities that are no longer viable, with local authority, commercial organisations, voluntary organisations and churches unlikely to be able to fund retention in the foreseeable future; examples that come to mind are the Hare and Hounds site, the Pelican site and the St Francis Church site.

2 Do you think the Council should protect the loss of community facilities and local services through a sequential test (as set out in Policy CT1 above), or by requiring a statement setting out evidence as to why a particular facility is not needed?

Please write your response here::

Chapter 11 - Policy CT2: Loss of Community Facilities

1 Do you support Policy CT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

See response to CT1

Chapter 12 - Policy BE5: Heritage Assets

1 Do you support Policy BE5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

See response to CT1. The Council seems to be obstructive of works to maintain the viability of these assets and the redevelopment of those which are no longer viable..

Response ID ANON-MFZ6-4QUE-2

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-10 22:17:27

Personal details

1 Forename

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[redacted]

8 Contact phone number

Enter your contact phone number:
[redacted]

9 Please select ‘opt in.’ if you wish to recieve future consultations on planning policy.

Opt in

Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

Figure 1-1, as shown in the interactive map does not seem to be in the document. In addition, this does not seem to be a relevant question, as, currently, the map doesn't seem to portray the draft policies in any particularly meaningful way. The draft Policies Map needs to be both accurate and helpful. The changes that are required to improve it are to show and clarify the areas that might be affected and the policies that might be relevant to the affected areas. The key and the symbols need to be improved to relate properly to the draft proposed policies. These need to be checked and tested for ease of use using a representative sample of would-be users.

Chapter 1 - Vision

1 Do you agree with the proposed Vision for the Trafford Local Plan?

Please write your response here::

Obviously, it's difficult, at first sight, to disagree with much of the Utopian Vision, as portrayed by this draft document.

Unfortunately, however, over the last 25 years or so, Trafford Council has had a history of being largely unable to characterise effectively what "Vision" really means, let alone, "Strategic Objectives". Part of this has been a consequence of the immediate objectives of Trafford planners, but it has also been a consequence of the Greater Manchester Combined Authority's planners' influence on the area's land use policies and the out-sourcing of essential services by Trafford Council, such as highway maintenance and complaints' handling, to a company that fails to respond properly to any concerns or criticism.

Basically, few could disagree with the proposed Vision as currently drafted. However, in essence, whilst the planners are commendably aspirational they seem to have little or no better idea as what might be feasible than any ordinary citizen.

What we have right now is a Council, apparently [redacted]), unable to wrest back any meaningful control from the company to which it out-sourced appallingly low levels of maintenance of its highways and processing of complaints and, more recently, putting forward a Vision that is unlikely to be delivered in any meaningful sense (e.g. a Local Highway Network that would be maintained properly. as compared to the stated expectations of TM5).

If such a Vision could be delivered, this would be most welcome. Unfortunately, I do not agree with the proposed Vision as I do not believe the Council currently has the technical or political ability to deliver on any of the Strategic Objectives, without negotiating away yet more of the fundamental spatial, political and economic rights of its hard-pressed, council-taxpaying residents.

What we seem to have at present is a group of individuals who can see that a better future might be possible and, within the very same organisation, yet another group who are equally determined to make it difficult, if not impossible, to deliver that vision by negotiating away the borough's assets and failing to keep operational contracts under proper and effective scrutiny.

Chapter 1 - Strategic Objectives

1 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

Please write your response here::

No, not entirely.

Again, much of this is word-engineering. These declared objectives do not properly capture the real priorities for a good many Trafford residents.

It's yet more of the same. At a practical level, what might change and what might make Trafford a better borough? Better maintenance/better planning? Not much sign of either, so far. Bearing in mind the apparent inability of the current Planning Committee to see through the political agenda of some recent applicants and deal effectively with their lobbying, we have a situation in which Strategic Objectives would make little or no difference and that, in general, are unlikely to reflect the priorities of a good many Trafford council taxpayers.

Chapter 1 - Introduction, Vision and Strategic Objectives

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

It's all very well to say, "The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance." It should be noted that The "Places for Everyone Plan" is largely the result of one particular person's fundamentally flawed, regional thought-process and the national policy / guidance is still evolving so as to articulate yet another person's national planning prejudices.

The text says, "Trafford’s town centres, designated centres and neighbourhoods will be successful and distinct and our communities will feel proud of them. Trafford will continue to be a destination for investment, competitive international businesses will be retained and new ones will be attracted to move in. There will be new opportunities for sustainable businesses that create a range of jobs. Trafford local workforce will be skilled and it will support the high performing local economy."

Hopefully, some or all of this will come true, but no justification is given for any of this text or how any of this will be delivered. As drafted, this is probably wishful thinking.

It is clear that the following areas are missing and should be included in the Local Plan:-

How any of this will be achieved in practice.

Where the money (if needed) would come from to make any of this possible.

Information about how, why and what the current population might do so as to facilitate any of this.

The likely level of support for any of what is proposed.

A statement as to how these aspirations fit with the current state of the borough (e.g. appalling road surfaces, and excessive use of delegated planning powers) and what actions the council will take in the near-term to remedy the situation.

Paragraph 1.91., reads, "Trafford West benefits from a wide variety of green spaces and outdoor recreational activities, including Davyhulme Millennium Nature Reserve, Davyhulme Park (Green Flag park), Davyhulme Golf Club, Flixton Gardens, Abbotsfield Park, Wellacre and Urmston Meadows. It includes Urmston Cemetery, one of the five cemeteries in Trafford. The Mersey Valley and the River Mersey runs east to west across Trafford, separating the urban areas of Urmston and Stretford from Carrington and Sale. It is dissected by the M60 and A56."

The last sentence in Paragraph 1.91 should probably read, "It is bisected by the M60 and A56."

Chapter 2 - Policy ST1: Core Growth Area (Trafford)

1 Do you support Policy ST1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No, but, as drafted, Policy ST1 seems relatively benign.

The Policy would be improved via clarification as to how any of the policy would actually achieve what is proposed or claimed.

Para 1.23 reads:-

"The IA includes four separate but complimentary assessments:"

This should probably read, "The IA includes four separate but complementary assessments."

Chapter 2 - Policy ST2: Inner Areas (Trafford)

1 Do you support Policy ST2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes, but only if it were credible.

The changes that are required would be an admission that a fair amount of this development in the Inner Area would probably not be predominantly residential schemes, would probably not be well integrated with existing communities and would be unlikely to enhance the place or facilitate their regeneration.

Unfortunately, at the moment, Trafford Council does not seem able to improve development very much in Inner, or any other, Area, for that matter. Recently, the Planning Committee has, for example, been busy agreeing to an [redacted] Hale and Hale Barns and the council has been holding discussions with the [redacted] at a particularly unsuitable proposed site, whilst keeping well clear of the full implications of any policy in this area.

Although the words might seem worthy, the track record of this council is that it has apparently limited ability, at present, to improve anything in any meaningful way. Connecting council action to things that actually matter to residents would improve the draft policy considerably.

Chapter 2 - Policy ST3: Southern Areas (Trafford)

1 Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No, I do not support Policy ST3.

This is what the Policy purports to indicate:-

"Policy ST3: Southern Areas (Trafford)
A. The Places for Everyone Spatial Strategy – Southern Areas covers the area shown on Figure 2-2 in Trafford. PfE Policy JP-Strat 9 is relevant to this area.
B. Development in the Southern Areas:
i. will not compromise its economic competitiveness whilst not impacting distinctive local neighbourhood characteristics and/or environmental attractiveness.
ii. will make the most use or previously developed land.

iii. will promote the roles of Trafford's town centres and other assets including education and training facilities."

Most of this is not credible.

"i. will not compromise its economic competitiveness whilst not impacting distinctive local neighbourhood characteristics and/or environmental attractiveness." This double negative still doesn't make Policy ST3 any more worth supporting. It's just words, words, words.

For the last 40 years, Trafford Council has almost never been able to implement a policy that hasn't compromised economic competitiveness or impacted distinctive neighbourhood characteristics and/or environmental attractiveness. Recognising that there are notable exceptions, such as Altrincham town centre and a selective education system that is the envy of some Greater Manchester boroughs, it rarely, if ever, makes the best use of previously developed land. It also has a generally poor record of promoting Trafford's town centres and other assets including education and training facilities.

The changes that are required to improve this policy are:-

1) To provide convincing evidence that the preferred choices made so far are, in fact, the most cost-effective.
2) To make it clear that the borough can prosper without any reliance on Manchester Airport, either for growth, off-or on-airport parking or dividend.

Sentence B ii, which currently reads, "ii. will make the most use or previously developed land" probably was intended to read, "ii. will make the most use of previously developed land."

Chapter 2 - Policy ST4: Sustainable Development

1 Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No, not entirely.

Re para A, the definition of, "sustainable development" still isn't clear, so taking a positive approach to such claims may not always be an appropriate approach.

Re para B, the likelihood of achieving this, with Trafford's current track-record, is likely to be relatively low.

Re para C, again, this may not always be an appropriate approach, especially bearing in mind the fact that, as at [redacted]

Evidence:-

[redacted]

Chapter 2 - Policy ST5: Climate Change

1 Do you support Policy ST5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Not fully. Some politicians are arguing at the moment that a council's climate change zero ambitions are outside its brief, whereas design is not.

Para B. says, "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," so it would be difficult not to argue in favour of para B as it relates to Policy ST5.

Para A needs to be reconsidered, as does para B, to take account of the fact that a Council's climate change zero ambitions are outside its brief.

Chapter 2 - Strategy

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

There are a number of policy areas related to this chapter that are missing and which should be included in the Local Plan and some text which needs correction. These include:-

Explanation as to why Davenport Green suddenly acquired a need for employment land, which was not in the original proposal.

Explanation as to why a rural park at Davenport Green that was within land that was proposed for removal from the Green Belt is now, apparently, to be retained within the Green Belt.

2.2. Places for Everyone (PfE) was adopted in adopted in March 2024 and provides the overarching strategy for each of the nine districts Local Plans, including Trafford.

requires correction as there is repetition of, "adopted in adopted in".

"2.32. The Manchester Airport area includes the Davenport Green (Timperley Wedge) allocated in Places for Everyone Policy JPA 3.2 for 2,500 homes and 60,000 sqm employment floorspace. A comprehensive Masterplan is being prepared for the site which will guide the delivery of development, alongside the require infrastructure"

requires correction of, "alongside the require infrastructure."

Chapter 3 - Policy RT1: Carbon and Energy

1 Do you support Policy RT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write you response here::

Generally, yes. Although the policy is unlikely to do any harm, the impact of carbon emissions is still unproven, but the precautionary principle is worth pursuing unless and until there is contrary evidence.

Chapter 3 - Policy RT2: Decentralised Energy Generation

1 Do you support Policy RT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No, not in its entirety. There is a presumption that Decentralised Energy Generation, as currently interpreted by this policy is, in itself, a "good thing". This would generally only be the case if heat were to be wasted and w(c)ould not be redirected, recovered or repurposed. Simply connecting to, or exploring the feasibility of, connecting to, heat networks may not be an ideal solution, unless decision-makers are in full possession of the facts. This is because there are likely to be (however, few) some who will think that connectivity is more important than using heat energy in an overall optimal fashion.

Chapter 3 - Policy RT3: Overheating and the Urban Heat Island

1 Do you support Policy RT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

In general terms, yes. However, as with other similar policies in this chapter, whilst those drafting this policy display a sophisticated awareness of controlling heat gain, especially via active cooling systems, this sophisticated awareness is not reflected in many other aspects of current Trafford policy or operation. For example, Trafford has a reputation for doing little or nothing about potholes. In terms of evidence, [redacted] outlines just how little has been done by Trafford Council to reduce the number and severity of existing potholes. There is an in-built irony in this draft policy. Whereas the draft policy seeks to address a "problem" that may or may not matter, there are real, continuing problems that are not addressed properly anywhere in the draft Local Plan.

Chapter 3 - Policy RT4: Sustainable Retrofitting

1 Do you support Policy RT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Generally, yes. The requirement to divert at least 85% of waste from landfills and either reuse materials on-site or salvage appropriate materials for reuse off-site seems arbitrary and possibly somewhat over-specific. Has this been tested for specificity and practicability? Have other percentages been considered, e.g. 70, 80, 90 and 100%? Would quantity surveyors be required to police and enforce such a requirement? How would such a requirement be assessed prior to retrofitting? How would this requirement be assessed after retrofitting?

These matters need to be considered and addressed so as to improve the draft policy.

Chapter 3 - Policy RT5: Circular Economy

1 Do you support Policy RT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes. It seems strange that these principles would need to be articulated by an organisation that prides itself on being low-cost and high performing, but there's no harm spelling out reasonable expectations for resource efficiency.

Chapter 3 - Renewable Technologies and Methods

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Effective Risk Assessment does not seem to have been addressed as an interacting policy area. It can be assumed that renewable technologies and methods will have both benefits and disbenefits. For example, large scale solar power harvesting and storage, as currently engineered, would adversely affect food production, as would wind power. Both these technologies would be likely to have an adverse impact on wildlife, as well as having an adverse impact on humans both in terms of their environment, food production and health. Whilst seeming attractive, at first sight, as a possible means to a net zero target, the short, medium and long term risks associated with these technologies need to be assessed properly in a comprehensive, balanced fashion, prior to their possibly ill-conceived and non-evidence-based imposition on an unsuspecting electorate.

Chapter 4 - Policy R1: Housing Delivery

1 Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No. Land at Carrington and Davenport Green should not have been released from the Green Belt. There was no justification for this action. Removal of these allocations are changes that are required. Despite being calculated using standard methods, the housing requirement remains arbitrary and continues to be manipulated by planners, landowners and developers for their own ends. Supporting evidence that this distortion in requirement is continuing is apparent via, for example, the proposed land use at the World of Pets site off Thorley Lane, WA15 7PJ, where numbers of proposed dwellings have varied from 23 (89944/OUT/16) November 2016, to 116 (105905/OUT/21) October 2021 and then to 76 (114619/VAR/24 March 2024. Clearly, there is little or no science or logic in proposals that can be seen to vary by a factor of around 500%. The estimates have little or no basis in reality and this applies to many of the other estimates of housing need and proposed provision across Trafford.

Chapter 4 - Policy R2: Protecting Existing Homes

1 Do you support Policy R2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Probably, if better explained. Changes are required to clarify the rationale for not allowing the amalgamation of existing self-contained (Class C3) homes, i.e. what, exactly, is it that the council is trying to prevent? This needs to be explained.

Chapter 4 - Policy R3: Affordable and Social Housing

1 Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No. Changes to explain the proposed differences between provision for Trafford North, Trafford Central and Trafford South need to be incorporated. As drafted, the rationale for these proposed differences is unclear and open to challenge.

2 Should 10% of all affordable and social housing be delivered as Truly Affordable Net Zero Homes (TANZ)?

Please write your response here::

Probably not, as it is unclear why the figure of 10%, in particular, should have been chosen.

3 Should the Local Plan set an affordable housing requirement, including a tenure mix, for each locality (similar to Core Strategy policy L2) that reflects market conditions?

Please write your response here::

Maybe, but how would that be done in an equitable fashion? This would need to be explained.

4 Should any other policy approaches to affordable and social housing be explored?

Please write your response here::

Yes, abandoning the current "social engineering" approach and letting the market decide.

Chapter 4 - Policy R4: Size and Type of New Homes

1 Do you support Policy R4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

To a limited extent. Changes are required to clarify what the phrase, "based solely on bedroom numbers" is intended to achieve and why.

2 The intention is to set an appropriate house size and type requirements for new development in each Locality to meet housing needs across the borough. Do you agree with this approach?

Please write your response here::

To a limited extent, but these provisions seem too broad-brush to deliver what might be intended.

3 Do you think specific size and type requirements should be set for major residential development sites in the borough, like Pomona and Wharfside, to align with a Locality approach?

Please write your response here::

Yes, but specific size and type requirements should be more open to market forces than prescription by well-intentioned council officers.

Chapter 4 - Policy R5: Housing Density

1 Do you support Policy R5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Not at the moment. As currently drafted, this policy is pretty meaningless, as no minimum net residential densities are defined. Changes are required to improve the draft policy and make it clear what these net minimum residential densities are expected to be and why.

Chapter 4 - Policy R6: Older Persons Accommodation

1 Do you support Policy R6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes, to some extent.

Whilst the current draft text seems to be heading in a helpful direction, changes are required to explore what might happen to the accommodation once the needs of the current ageing population have been catered for. This is because a different cohort is following that is likely to have different needs and expectations as it ages. To future-proof any proposed line of attack, the draft policy will need to take subsequent and differing needs into account and be responsive to changing needs as between generations.

2 Should the Local Plan set a definition for what constitutes a Care Home, Extra Care and Assisted Living? If so, what should they be defined as?

Please write your response here::

If this is to be pursued as a general concept, then, yes, it is essential that these definitions are given.

Chapter 4 - Policy R7: Adaptable and Accessible Housing

1 Do you support Policy R7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Generally, yes, but this policy probably needs to be more explicit. The figure of 4% seems somewhat arbitrary and other forms of build could probably increase this percentage without compromising accommodation for the able-bodied. It might be worth exploring the implications of a more wide-ranging percentage to see how such an approach might improve access to Adaptable and Accessible Housing.

Chapter 4 - Policy R8: Homes for Children and Care Experienced Young People

1 Do you support Policy R8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes, with the proviso that:-

It is established in appropriate premises and in a suitable, sustainable location; and

Does not result in an undue concentration of provision for looked-after children in any particular area of the borough.

This would make sense for all concerned.

Chapter 4 - Policy R9: Other Types of Homes

1 Do you support Policy R9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Generally, yes.

Provision for student accommodation and the policy, although minimal, seems appropriate, whereas the purpose and provision for Co-Living schemes required to provide affordable housing in accordance with the requirements set out in Policy R3, which must be provided on site as self-contained units, seem much more ethereal and much less justifiable. Has anyone actually thought through the full implications of a long-term Co-Living scheme? If not, this needs to be modelled, understood and brought into sharp relief, in case the medium/long term practicalities have not been fully appreciated.

2 Should the affordable housing requirement apply to student accommodation to enable a proportion of student accommodation schemes to be affordable to students from low-income backgrounds?

Please write your response here::

This may be helpful, but would probably need agile monitoring, especially because of in-built time-lag in any monitoring that might be required to ensure that this is an effective policy.

3 Should nomination agreements be used to ensure that accommodation is reserved for students enrolled at a named institution?

Please write your response here::

Probably, yes.

Chapter 4 - Policy R10: Gypsies, Travellers and Travelling Showpeople Accommodation

1 Do you support Policy R10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Only just. Better, earlier and more meaningful engagement with itinerant populations and those who appear to have chosen, or been driven, to adopt a non site-specific temporary accommodation lifestyle would probably improve the policy, so as to understand what provisions would be helpful, whilst not alienating, or adversely impacting the lives of Trafford's permanent residents. Supporting evidence from the needs and aspirations of Bristol's traveller population, for example, is likely to be relevant to this proposed policy because there is now something of an in-built tension between those who live an itinerant life and those who don't. This needs to be resolved without appearing to favour either population to the detriment of the other.

Chapter 4 - Policy R11: Self-Build and Custom Housing

1 Do you support Policy R11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Whilst I have some sympathy for proposed policy R11, and the criteria might appear reasonable enough at first sight, these should not be applied at New Carrington and Davenport Green (Timperley Wedge).

Re supporting evidence, although there is something of an evidenced need for self-build dwellings, with, apparently, 294 applicants as of 30 October 2024 on the Trafford Self Build Register, just under half of those registered currently live outside the borough, so it's difficult to work out quite how much of this interest would actually benefit Trafford residents. The rhetorical answer is likely to be "not very much".

The proposed policy needs to be amended to make it clear that self-build provision is primarily for Trafford residents and not for those a long way outside the borough. Quite how this would be done in a truly equitable fashion is, admittedly, a challenge for Trafford council planners, but it can't be allowed to disadvantage those who live inside, and wish to remain, within the borough.

Chapter 4 - Residential Development

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

The current draft asserts that, "Meeting the housing needs of our growing population is essential to ensuring the future prosperity of Trafford". No evidence is provided to justify this assertion. Instead, it is simply stated as if it must be correct and no other options are explored.

A policy area that is missing from this chapter is the recent suggestion by the Treasury's Office for Value for Money that a better value for money solution to the asylum seekers' current housing situation would be to house them in new build properties than in hotels.

Whilst this might be correct from a purely economic point of view, there has been no explicit consideration of the political impact of such a policy, even if it were to be adopted. Trafford Council was not consulted about housing asylum seekers in Trafford hotels, so the council needs to be very careful about what it regards as representing genuine housing need and how this is to be determined. This needs to be made clear in any draft policy on housing need and proper, evidence-based, justification given for any proposed policies.

Chapter 5 - Policy EJ1: Employment Land Requirements

1 Do you support Policy EJ1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Not at all.

Much of what has been drafted, currently in support of this draft policy, appears to be misleading, e.g. Re Para 5.12. "The industry and warehousing requirement for Trafford emphasises the importance of protecting, maintaining and enhancing the key employment locations of Trafford Park, Broadheath and New Carrington." There is little or no evidence that Trafford Council has ever properly understood, "the importance of protecting, maintaining and enhancing the key employment locations of Trafford Park, Broadheath and New Carrington".

"Encouraging the modernisation and advancement of these locations will create new opportunities throughout the plan period ensuring that the requirement is realised."

Yet again, there is no evidence, other than wishful thinking, that this will create new opportunities

Para 5.14. "As part of the Davenport Green (Timperley Wedge) PfE allocation there is around 60,000 sqm of office floorspace proposed close to Manchester Airport in the South Locality. Office development in this location is capitalising on its proximity to Manchester Airport’s existing economy and is adjacent to the Manchester Council PfE allocation at MediPark."

This is yet more wishful thinking.

The following changes are required to improve the draft policy:-

All reference to the Davenport Green (Timperley Wedge) PfE allocation to the effect that there is around 60,000 sqm of office floorspace proposed close to Manchester Airport in the South Locality should be removed. This is simply planning-speak designed to make it appear, and seem perfectly reasonable, that someone has used some deep knowledge, other than an implicit derived multiplier, to show that the removal of land from the Green Belt for employment is justified, which, clearly, it isn't.

Chapter 5 - Policy EJ2: Trafford Park

1 Do you support Policy EJ2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes, but only to a limited extent. Changes that are required to improve the proposed policy are:-

Removal of the claim or suggestion that the site should use its rich industrial history and entrepreneurship to act as a beacon for business and a catalyst for sustainable green jobs.

Whether any of this is appropriate or will make a difference remains to be seen.

Chapter 5 - Policy EJ3: Industry and Warehousing

1 Do you support Policy EJ3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No, not completely.

Changes that are required that would improve the proposed policy relate to:-

"Sites allocated for industrial and warehousing use that are in established employment areas, of different scale, which are well-served by existing infrastructure or new infrastructure as proposed by this Local Plan, such as Manchester Airport, Manchester Ship Canal, public transport networks and the motorway network."

A change that would improve the proposed draft policy considerably is removal of any reference to Manchester Airport as a site that is well-served by existing infrastructure. This airport continues to be an operational nuisance in the Trafford, Manchester and Cheshire East areas, at most times of the day, whether it be because of noise pollution, traffic jams or parking charge exploitation. The plan should disengage with the airport and accept that its currently claimed benefits are somewhere near zero. As a minority shareholder, Trafford Council should accept that the airport's "cash cow" status has outgrown its utility.

2 Do you agree with the proposed boundary shown on the policies map for Trafford Park?

Please write your response here::

Not necessarily.

3 Do you agree with the proposed boundary shown on the policies map for Broadheath Employment Area?

Please write your response here::

No, it's almost certainly inappropriate.

Chapter 5 - Policy EJ4: Offices

1 Do you support Policy EJ4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No. The following changes are required:-

As there is no justification, the Council should not be supporting development of offices within the following key employment areas:-

i. Davenport Green (Timperley Wedge)

B. Within Davenport Green (Timperley Wedge), office employment uses (Use Classes E(c)(i), E(c)(ii), E(g)(i), E(g)(ii) and similar employment uses) should not be supported.

These proposed employment areas were not declared at the time that the removal of the Timperley Wedge from the Green Belt was first proposed for housing. In essence, the Planning Inspectorate and the general public appear to have been misled.

Chapter 5 - Policy EJ5: Safeguarding Trafford’s Employment Land

1 Do you support Policy EJ5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

To a limited extent.

It is important that the potential release of employment sites for other uses is carefully controlled to ensure that sites and areas which are identified in

this Local Plan as key to delivering the economic growth of Trafford are not compromised.

The changes that are required to improve the policy are to ensure that Trafford planners are not removing specific decison-making rights from the Trafford electorate.

Chapter 5 - Policy EJ6: Data and Energy Storage

1 Do you support Policy EJ6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No, I do not support Policy EJ6.

Changes are required to the following, in order to improve the draft policy concern, amongst other things:-

"Opportunities for micro data storage to be located adjacent to public facilities and buildings, particularly in town centres, in order to facilitate heat sharing, will be welcomed."

It should be noted that draft policy is only the result of Trafford Council employees' seeking to adopt Policy EJ6, not Trafford's residents.

The presumption in favour of, "micro data data storage to be located adjacent to public facilities and buildings, particularly in town centres, in order to facilitate heat sharing, will be welcomed" needs to be challenged.

At first sight, this might seem to be an appropriate draft policy as a potential heat conservation measure. However, without any proper justification for a presumption that micro data storage should be located adjacent to public facilities and buildings, particularly in town centres, in order to facilitate heat sharing, it looks as though this might be yet another, currently ill-informed, planning-fad misdirection.

The presumption embedded in this draft policy is that an activity that creates waste heat should be welcomed. However, as neither the micro data storage concept, nor the heat sharing concept has been tested via properly-informed public consultation, it should not be assumed that either is necessarily in the public's best interests.

No activities that create waste heat should be welcomed, unless these activities are essential, which, in many cases, they will not be.

Chapter 5 - Policy EJ7: Rural Economy

1 Do you support Policy EJ7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes. Overall, it is a helpful draft policy. However, it only deals with one peripheral aspect of farming. Changes are required to make it clear that agriculture is a highly valued activity in its own right that would benefit from a long-term perspective and not just a list of provisions to accommodate diversification. Support for inter-generational asset protection would improve the policy, thereby making it clear that mainline agriculture as a career is supported by the council. [redacted] provides evidence of what is needed to provide multi-generational continuity and safeguard the future of agriculture.

Chapter 5 - Economy and Jobs

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

The proposed employment land-take for Economy and Jobs at Davenport Green (Timperley Wedge) has never been properly justified. This is principally because the Greater Manchester Combined Authority claimed at Public Examination that the removal of land from the Timperley Wedge was required for housing. The area said to be required for employment was probably derived from a mathematical model and is unlikely to have been tested against reality. So, there are two discrepancies. Removing land from the Green Belt was, in the first place, unnecessary and making provision for employment land was never part of the justification for removal of additional land for employment. Justifications for these measures are missing and should be included in the local plan.

Chapter 6 - Policy TM1: Walking, Wheeling and Cycling

1 Do you support Policy TM1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No, not completely. Reduced emphasis on active travel would improve the policy. It can't all be good in an unqualified sense. The reality is that Walking, Wheeling and Cycling have their own specific hazard profiles, i.e. Walking, Wheeling and Cycling are not without risk and these risks need to be weighed properly against any supposed health benefits to find an appropriate balance. In the bigger scheme of things, mandating Walking, Wheeling and Cycling in preference to other forms of exercise or transport could prove to be more dangerous than not exercising at all. This needs to be evaluated, taking full and proper account of the benefits and disbenefits (e.g. potential injury to cyclists from currently very dangerous Trafford road surfaces) of active travel, before some major mistakes become apparent.

Chapter 6 - Policy TM2: Public Transport

1 Do you support Policy TM2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No. Re para 6.16's statement that, "there is a need for improved orbital bus routes in Trafford, which provide viable sustainable travel options around Greater Manchester without the need to travel via the City Centre. The proposed allocations at Davenport Green (Timperley Wedge) and New Carrington will also make an important contribution to this network, with potential opportunities for bus priority measures to be considered, as well as on other locations on the wider network", this is really just spin, rather than potentially realisable fact.

The changes that are required to improve the draft policy need to recognise that orbital bus routes have always been feasible, but have largely been ignored by bus operators because they do not look to be very profitable.

The proposed allocations at Davenport Green (Timperley Wedge) and New Carrington cannot be justified without policies such as TM2. That's the reason why these have been invoked. It has little or nothing to do with reality.

Chapter 6 - Policy TM3: Car Clubs

1 Do you support Policy TM3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Only to a limited extent. Changes that are required to improve the draft policy include, ensuring that para 6.25, which says, "The Council are currently working with a major car club service provider to deliver the first car club vehicles within Trafford" needs to be clarified to make it much more apparent what the objective of such an initiative is intended to be and how this will be achieved in practice.

Chapter 6 - Policy TM4: Mobility Hubs

1 Do you support Policy TM4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes, but this policy is not really about improving anything.

A change that is required would be clarification of, "C. Proposals for smaller hubs in other appropriate locations will also be supported", so as to make it clear what would constitute an "appropriate location".

Chapter 6 - Policy TM5: Local Highway Network

1 Do you support Policy TM5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Generally, yes, but the current condition of the Local Highway Network is appalling. Changes are required to improve the draft policy to remedy the current situation.

Paragraph A says, "The Council will support the maintenance and improvement of the highway network to ensure it operates in a safe, efficient and environmentally sustainable manner".

The reality is that, over the last 15 years, Trafford's Local Highway Network has been allowed to fall into a permanent state of disrepair, so that it is unsafe, inefficient and environmentally unsustainable.

Evidence:-

"A survey of 122 local authority areas in England and Wales has revealed that Trafford has the 10th highest figure for potholes reported to a council per mile. The survey reveals that in 2022, Trafford received 3,361 reports of potholes on its 500 square miles of roads which equated to 7.32 potholes per mile.

By way of contrast, neighbouring Warrington Council received 526 reports of potholes on its 623 square miles of roads which equates to 0.84 potholes per mile" ([redacted]).

The view of Trafford Council appears to be that highway maintenance is an operational rather than a planning matter and that, as this function has been outsourced to an external contractor, it will be subject to separate scrutiny and accountability. It is clear to everyone in Trafford that maintenance of the Local Highway Network is a disgrace. The roads are full of potholes which are a hazard to all road users, in particular those wishing to cycle.

As there is little or no evidence that those who are responsible for maintenance of the Local Highway Network have had, or will have, any success in persuading the contractor to return the roads to a safe condition, this issue needs to be addressed as a planning, rather than an operational, matter, and as a matter of urgency.

Chapter 6 - Policy TM6: The A56

1 Do you support Policy TM6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No. Changes that are required need to understand that this road is an arterial road, apparently dating from Roman times, that is now carrying traffic for which it was never designed. Effective, safe, crossing points, although they will be much appreciated, won't solve the traffic problem. It's the traffic problem that needs to be addressed first, and then the crossing problem.

Chapter 6 - Policy TM7: Freight

1 Do you support Policy TM7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No, not entirely. There is a presumption in this draft policy that freight movement by road is inherently, "bad" and that movement of freight by rail and/or water is inherently "better". Obviously, this won't always be the case, and so efficient, timely and cost-effective movement of freight needs to be considered independently of transport mode. Whilst it has to be recognised that diesel-powered lorries are fundamentally polluting, noisy and, basically, a potential environmental nuisance, they continue to have an important role to play in transporting goods, such as household removals and food distribution around the country. Trafford seems to be meddling in areas that it might not fully understand and prescribing draft policies that are potentially retrogressive, conflicting, counter-productive and possibly irrelevant.

Chapter 6 - Policy TM8: Manchester Ship Canal

1 Do you support Policy TM8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes,

Re changes that might be required, probably not, at present.

Chapter 6 - Policy TM9: Potential Future Rail Route

1 Do you support Policy TM9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No. This policy should be deleted.

If such a policy were implemented, the removal of spoil for a twin-bore rail tunnel into Manchester would cause road traffic chaos and nuisance of the sort that was opposed by many in Hale Barns when construction of HS2 was being contemplated. Since cancellation of Phase 2B of HS2, this has become a vanity project for the metro mayors of Liverpool and Manchester and, if constructed, such a railway would blight many properties in Hale Barns and elsewhere.

The mayor of Greater Manchester has been busy promoting the concept and has recruited the Manchester Evening News, and now the Chancellor, to the cause.

HS2 never proposed any meaningful noise or environmental mitigation, so the likelihood is that a similar project would blight Hale Barns and adversely impact the area in exactly the same way, as would have HS2.

Supporting evidence against this proposed policy:-

Property blight - [redacted]

Opposition to tunnel construction - [redacted]

Lobbying for support -

[redacted]

[redacted]msed

Chapter 6 - Policy TM10: Parking Standards

1 Do you support Policy TM10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No, not in its entirety. Some parts of the policy make reasonable sense. but the section on off-airport parking is not suitable. The pressure for off-airport parking is a direct consequence of a deliberate policy of expansion promoted by Manchester Airports Group (MAG), 3.2 % of which is owned by Trafford Council. This is, not only an "own goal" for Trafford residents, but it's far worse than that. The mania for expansion has led to the acquisition of large swathes of land around the airport for parking and unauthorised off-airport operators' annexing and using land in Trafford to make a quick buck.

Re Off–Airport Car Parking, the text says,

"6.52. As Manchester Airport expands the demand for airport parking will increase. Some of this pressure is expected to affect Trafford considering its close proximity to the Airport.

6.53. Although it is recognised that additional car parking provision may be required as part of the future expansion and growth of Manchester Airport, the need for additional car parking must be balanced against a need to improve access to the Airport by sustainable travel modes."

There is an implicit acceptance here that the demand for airport parking will necessarily increase, as Manchester Airport expands, and that additional car parking should be balanced against a need to improve access to the Airport by sustainable travel modes.

As mentioned above, this is not some accidental consequence of expansion. It is being promoted by one of the owners of Manchester Airports Group. There is an immediate and obvious conflict of interest here, which Trafford Council planners seem unable, or, more probably, unwilling, to grasp.

Currently, there is no proper balance between the interests of Trafford residents and Manchester Airport and no recognition that some residents' lives are already unbearable because of noise and unauthorised off-airport/on-highway parking, for example, on High Elm Road, Hale Barns, WA15 0RW. Trafford Conservative councillors say that they have demanded that Trafford Council add double yellow lines and no parking between a certain time signs. According to the conservative councillors, the current council says this isn't an issue and that it isn't a priority.

So, here we have it. Trafford Council, as a MAG shareholder, is promoting airport expansion, and not because anyone in Trafford wants this, but only because Trafford planners and the current Trafford Council, as a shareholder, think this is appropriate. Whilst the Council recognises that this policy will create a need for off-airport parking, it proposes to do little or nothing to reduce any such pressure and then, when presented with evidence of a failure to act against the worst consequences of off-airport parking, says there is no problem and does precisely nothing to address the problem.

Clearly, MAG and Trafford should not be promoting expansion at the airport and both should stop pretending that the matter is under control, because this is obviously not the case. Trafford planners could put an immediate stop to expansion, but, for now, they are clearly making an active decision to do the exact opposite, without reference to, or the approval of, many Trafford residents.

Chapter 6 - Policy TM11: Lorry Management

1 Do you support Policy TM11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Generally, yes.

Chapter 6 - Policy TM12: Park and Ride

1 Do you support Policy TM12? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes. A change that would improve the policy would be to clarify what the words, "other considerations" in paragraph 6.57 would mean in practice, for example, the impact on residents.

Chapter 6 - Policy TM13: Crowd Movement and Routes

1 Do you support Policy TM13? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Generally, yes. It may be helpful to give a little more detail on the parameters that would be expected to apply so as to ensure safety and convenience for those in crowds and, in particular, those who are not.

Chapter 6 - Transport and Movement

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

I have not noticed any policy areas that are missing or that should be included. By way of contrast, there appear to be areas that have been included, but which do not need to have been and which should be deleted. One of these is:-

"Public realm improvements to create a Processional Route linking Old Trafford Football and Cricket grounds."

This does not seem to have been a policy that would have been requested by the indigenous population, so this probably has its origins in a central Trafford planning initiative/directive. Justification for any policy area to this effect is missing and, if relevant, should be included in the Local Plan.

If such a draft policy cannot be justified, it should be deleted.

Chapter 7 - Policy TC1: Hierarchy of Centres

1 Do you support Policy TC1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No, not completely. Changes are required to improve the draft policy, so as to make it clear why a statement of Hierarchy of Centres is necessary. The rationale for this, if any, is certainly not clear from what has been drafted so far.

The statement in paragraph 7.10 that, "Housing development along key public transport routes and close to services and facilities will be supported, helping to diversify the uses in these areas" cannot be justified. If implemented, it would promote "ribbon development", precisely the phenomenon that the Green Belt principles were designed to prevent.

2 Do you agree with all of the proposed boundaries for the Town, Other Designated, Local and Neighbourhood centres as shown on the policies map?

Please write your response here::

It's not clear where these are.

Chapter 7 - Policy TC2: Role and Function of Centres

1 Do you support Policy TC2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

To a limited extent, yes. Changes are required to improve the draft policy. These include removal of item F, which states that. "New Local Centres will be designated at New Carrington and Davenport Green (Timperley Wedge) in accordance with the PfE allocation policies."

Neither Carrington nor Davenport Green should be designated in the way described, as neither site should be developed. This is because proposed policy TC2 seeks to legitimise land annexation in both areas that is unjustified.

Chapter 7 - Policy TC3: Out of Centre Retail and Leisure

1 Do you support Policy TC3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No, not entirely. Whilst the objective might seem reasonable enough, the means might not be equitable. Planning frameworks can only force or contain development to a limited extent. I favour retail development in the designated areas and am opposed to out-of-town developments, in general, but feel that the Council is exceeding its powers to restrain and contain development. In a market-led economy, the right of would-be developers to explore possibilities that don't fit pre-conceived notions of "good" and "bad" development need to be preserved. Current towns exist because of long-term, synergistic, entrepreneurial development, much of which was not regulated in the past. I am not arguing for a "free for all", by any means, but feel that opportunities to respond to market forces are being extinguished via policy TC3 and need to be reflected in a much more responsive and inclusive policy.

Chapter 7 - Town Centres and Retail

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

The value added by this part of the draft plan is minimal.

There is little or no explanation as to how, "Loss of retail units for non-commercial, business and service uses (as defined within national regulations) will only be supported in exceptional circumstances (for example where there are clear public benefits, a justified need for another appropriate use or other significant material considerations)."

Even after giving an apparent example as to how "exceptional circumstances" would be determined, this remains largely unexplained. A policy area that is missing, therefore, is a proper explanation as to exactly what "exceptional circumstances" would mean in this context and the criteria by which these would be assessed in practice.

Chapter 8 - Policy GI1: Landscape Character Areas

1 Do you support Policy GI1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No. Changes that are required to improve the draft policy include making it clear that the text that reads:-

"Development will not be permitted where it would have a significant adverse impact on the special quality and sensitivity of a landscape character type, as shown on the Figure 8-1" as applied to land at Davenport Green (Timperley Wedge) is generally meaningless.

Despite the machinations of the Greater Manchester Combined Authority and manoeuvring of Trafford Council to remove land at Davenport Green from the Green Belt, this land continues to have special quality and sensitivity of a landscape character type, as assessed by Land Use Consultants (LUC), which has not been disputed by Trafford Council. LUC reported that "Release of the (Davenport Green) allocation would cause 'Very High' harm to Green Belt purposes". It would have, as GMCA and TMBC are well aware, "significant adverse impact on the special quality and sensitivity of a landscape character type". Whilst trying to take a "balanced view" and understand the planners' alleged dilemma, this is, in reality, yet another example of planning inconsistency - trash one area, but protect another with a similar special quality and sensitivity of a landscape character type for, apparently, pretty much the same rationale, even though this is illogical.

Chapter 8 - Policy GI2: Green Infrastructure Network

1 Do you support Policy GI2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Only in a general sense.

The proposal that draft Policy GI2: Green Infrastructure Network will seek to protect, enhance, and manage Trafford's Green Infrastructure (GI) as an accessible network of connected, varied, multi-functional green and blue spaces, which respond to local character is diametrically opposed to Trafford's policy of releasing Green Belt land from the Timperley Wedge and Carrington, so it closes the stable door once the horse has bolted. This is yet another example of Trafford planners' continuing inability or unwillingness to plan consistently or to consistent criteria.

Chapter 8 - Policy GI3: Great Manchester Wetlands Nature Improvement Area (NIA)

1 Do you support Policy GI3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Not completely.

The current draft policy says,

"8.18. The NIA area within Trafford largely relates to the lowland and mossland areas of Carrington, Partington and Dunham, as well as areas in west Trafford along the Manchester Ship Canal Corridor. It is part of a wider peatland area that spans the Mersey Valley, which includes Manchester mosses and other wetlands. Much of the area within Trafford has historically been used for agricultural and industrial activities, notably Carrington Moss which was used for the deposition of night soil. As a result there are significant opportunities to enhance habitats and this wider green infrastructure network in the area.
8.19. The NIA in Trafford also includes part of the New Carrington strategic allocation (PfE Policy JPA30) and the allocation masterplan will therefore identify opportunities to enhance and / or restore wetland habitats, having regard to the wider NIA objectives."

Changes are required to make it clear that whereas, "significant opportunities to enhance habitats and this wider green infrastructure network in the area" and, "the allocation masterplan will therefore identify opportunities to enhance and / or restore wetland habitats, having regard to the wider NIA objectives" were opportunities that pre-date part of the New Carrington strategic allocation that were missed.

Chapter 8 - Policy GI4: Mersey Valley

1 Do you support Policy GI4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

In general, yes.

There appears to be a spelling error in paragraph 8.20 which reads,

"The River Mersey runs east to west across Trafford, separating the urban areas of Urmston and Stretford from Carrington and Sale. It is dissected by the M60 and A56."

It seems likely that the word, "dissected" was intended to read, "bisected".

Chapter 8 - Policy GI5: Green Infrastructure Opportunity Areas

1 Do you support Policy GI5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

To some extent

The River Bollin Corridor is not properly maintained at present and it appears the proposed Davenport Green Rural Park is a planning device created by developers to make the removal of land from the Green Belt seem more palatable.

The draft policy would be improved if it were changed to make it clear that the River Bollin Corridor will be properly maintained in future, along with land at Davenport Green.

Chapter 8 - Policy GI6: Green Infrastructure in New Developments

1 Do you support Policy GI6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes, most of it.

The precise purpose of the words, "Be clearly defined as public or private space", unfortunately is not at all clear. It might improve the draft policy and be more helpful to make the objective much more apparent than the generality of the statement, as drafted.

Chapter 8 - Policy GI7: Trees, Woodland and Hedgerows

1 Do you support Policy GI7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes

Chapter 8 - Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets

1 Do you support Policy GI8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Generally, yes.

No changes are required that I can think of, at the moment.

Chapter 8 - Policy GI9: Biodiversity Opportunity Areas

1 Do you support Policy GI9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes. It might be helpful to elaborate what is meant by "appropriate" with regard to developer contributions.

Chapter 8 - Policy GI10: Building Biodiversity into New Developments

1 Do you support Policy GI10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Generally, yes, but there seems to be a bit of an unjustified preoccupation with swifts.

Chapter 8 - Green Infrastructure and Natural Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

It is refreshing to read some of what is proposed in this section and it would have been better if some of these thought processes had been applied to the Timperley Wedge before it had been allocated for development. The maps are a little difficult to understand, in particular, the key.

Chapter 9 - Policy OS1: Open Space

1 Do you support Policy OS1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes. Some of the requirements are quite challenging and this is to be welcomed. However, although the abbreviations, "LAP", "LEAP", "NEAP" and "MUGA" may be meaningful to planners, they are not at all obvious to those outside the business. It would improve the policy considerably if these abbreviations could be decoded and made much more transparent within the text.

Chapter 9 - Policy OS2: Outdoor Sports and Recreation Facilities and Provision

1 Do you support Policy OS2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes, but the reference to Gaelic football is somewhat obscure. What is the justification for this?

The policy is entitled, "Policy OS2: Outdoor Sports and Recreation Facilities and Provision". As the emphasis appears to be on team sports rather than individual sport, it might improve the policy to make this clear in the title so that it would read, "Policy OS2: Outdoor Team Sports and Recreation Facilities and Provision".

If the intention was to include individual sport and recreation, as well as team sports, the text would need to be revised to make this clear and bring in individual sport as part of the draft policy.

Chapter 9 - Policy OS3: Indoor Sports and Recreation Provision

1 Do you support Policy OS3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

To some extent, yes.

However, both paragraph 9.26., which reads, "As such, the Council will use Sport England's most up to date Facilities Costs to determine the amount, type and cost of new and/or improved indoor sports facilities required, with further detail and guidance set out in the Planning Obligations SPD."

and paragraph 9.27, which reads, "Requirements and calculations will be informed by the most recent indoor sports assessment or any subsequent updated indoor sports strategy" don't convey much meaningful information, so these need to be changed to improve the draft policy and make it clear what is actually intended.

Chapter 9 - Policy OS4: Loss of Sport and Recreation Land or Facilities

1 Do you support Policy OS4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes, but the policy, as currently drafted, seems a bit woolly. If the policy matters that much, the council should spell out more exactly what it is trying to prevent/promote.

Chapter 9 - Policy OS5: Allotments and Growing Space

1 Do you support Policy OS5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes, but the policy, as drafted, seems somewhat effete. Draft Paragraph 9.34, for example, says, "Provision of additional areas for recreational food production is therefore both encouraged and desired and opportunities to meet as much of that need as possible supported". This contrasts with the determination embodied within, and expressed elsewhere via, other policies. Either this policy matters, or it doesn't. For example, not all food production is recreational. As some of it is essential, why is the council not taking a firm line on what it is trying to achieve? At the moment, it doesn't seem to express any clear idea as to what the desired end-result might look like, or why.

Chapter 9 - Policy OS6: Cemeteries and Burial Grounds

1 Do you support Policy OS6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No.

Although these open spaces are important, a change to draft paragraph 9.38. that currently reads, "Increased need for cemeteries and crematoria that meet the needs of a wide range of faiths and religions, means that additional land will need to be made available to ensure that their essential functions can continue" will need to be revisited and, eventually, removed.

As is the case with the living, however important the issues, the dead should not be allowed to compromise the effective long-term use of land, so the draft is, at present, simply a statement of the blindingly-obvious.

The draft text that reads, "Increased need for cemeteries and crematoria that meet the needs of a wide range of faiths and religions, means that additional land will need to be made available to ensure that their essential functions can continue" needs to be changed to read, "Increased need for cemeteries and crematoria that meet the needs of a wide range of faiths and religions, means that additional land that might need to be made available to ensure that their essential functions can continue will, in due course, be curtailed and, over time, minimised.

Chapter 9 - Open Space, Sport and Recreation

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

With the exception of Gaelic Football, which seems to have been included for no obvious reason, there is little that seems to be missing.

Chapter 10 - Policy WA1: Managing Flood Risk

1 Do you support Policy WA1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Just about, but "the exception test" is not explained. Changes are required to explain what the "exception test" would actually mean in practice.

Chapter 10 - Policy WA2: Sustainable Drainage – Surface and Foul Water

1 Do you support Policy WA2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes

Chapter 10 - Policy WA3: Flood Storage Areas

1 Do you support Policy WA3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes

Chapter 10 - Policy WA4: Water Efficiency

1 Do you support Policy WA4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Generally, yes.

Chapter 10 - Water, Flooding and Drainage

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Whilst the Local Plan seems to repeat other policies, there is no harm in this. I do not consider that there are any policy areas that are missing.

Chapter 11 - Policy CT1: Protecting Existing Community and Social Facilities

1 Do you support Policy CT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Generally, yes.

2 Do you think the Council should protect the loss of community facilities and local services through a sequential test (as set out in Policy CT1 above), or by requiring a statement setting out evidence as to why a particular facility is not needed?

Please write your response here::

Maybe, but a statement setting out evidence as to why a particular facility is not needed would be a better way forward.

Chapter 11 - Policy CT2: Loss of Community Facilities

1 Do you support Policy CT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No, not completely.

Draft Paragraph 11.13 that reads, "The difference in land values between residential and social and community uses means that robust policies aiming to protect these valued uses are essential, so the present land bank of sites in these uses is maintained and preserved for future generations" needs to be changed.

This is because it is unclear to the lay-reader as to why this might be so important to a council. Basically, the draft provides no evidence as to why the present land bank of sites should be maintained or preserved for future generations.

Chapter 11 - Policy CT3: New Community and Social Facilities

1 Do you support Policy CT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes, to a limited extent.

Changes to paragraph 11.22, which says, "Shared entrances with residential development must be avoided as this can impact on residential living conditions and vice versa" are required. As written, the draft text makes little or no sense so needs to make it clear exactly what is to be avoided and why and vice versa.

Chapter 11 - Policy CT4: Fast Food

1 Do you support Policy CT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

In outline, yes, but is paragraph 11.25 drafted correctly?

At the moment, the draft policy, "seeks to avoid an over-centration of the above uses within the borough's smaller retail centres, to help maintain economic vitality and viability whilst at the same time promoting healthy lifestyles and reducing potential issues such as anti-social behaviour, odour, noise and litter," etc...

Is "over-centration" supposed to read, "over-concentration"?

This needs to be checked and corrected, as appropriate.

Also, how might any planning committee be expected to assess the means to help maintain economic vitality and viability, whilst at the same time promoting healthy lifestyles and reducing potential issues such as anti-social behaviour, odour, noise and litter? As no criteria have, so far, been given as to how any such balance might be achieved, the assessment criteria will need to be modified in the near future, so as to make it clear that there will be no ambiguity as to what this draft policy is seeking to achieve and what the council's expectations might be.

Chapter 11 - Policy CT5: Social Value in New Developments

1 Do you support Policy CT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes, but only just.

As the council is unlikely to be able to influence partnership or growth directly, any relevant potential changes need to be identified quickly and articulated properly, without any virtue-signalling or "arm-waving".

Chapter 11 - Community and Social Infrastructure

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Much of this draft policy is "motherhood and apple pie".

A good many of these areas are missing from this chapter For example, re:-

"11.1. Strong communities rely on high-quality social infrastructure, such as health and social care facilities, education uses, cultural centres, and

community centres. These services and spaces provide important opportunities for learning, social interaction, and well-being, contributing to a thriving and inclusive borough."

whilst this might well be the case, a good many of these infrastructures are not readily available in Trafford at the moment.

Paragraph 11.2, says, "This chapter sets out policies to protect and enhance community and social facilities, restricting their loss where necessary. Policy also sets out measures to guide development of new community and social facilities to support local communities. Policy will in particular support PfE Policies on education, skills and knowledge (JP-P5) and health (JP-P6)."

Whilst there is no special harm in paragraph 11.2, it is difficult to see how these measures would actually work, in practice.

Re paragraph, 11.3, which reads." Additionally, policy will manage the development of hot food takeaways, in light of impacts on local health and pollution. Finally, the chapter also supports initiatives to upskill the local workforce through new development, helping to create opportunities for education, training, and employment." It is unclear how this draft policy would "manage" the development of hot food takeaways, in light of impacts on local health and pollution.

There's a series of questions that would need to be asked of this draft policy with regard to managing the development of hot food takeaways. Answers to these questions should be used to inform the text.

The first question is, "what objectives is this draft policy attempting to achieve"?

The next question would be, "how exactly would the draft policy address these objectives?"

At the moment, none of this is obvious.

Chapter 12 - Policy BE1: Design

1 Do you support Policy BE1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Broadly, yes.

The draft policy says, "Development must be of a high standard of design and construction and make a positive contribution to the character and distinctiveness of the borough". This is all very well as a policy, but how will it actually be achieved in practice?

Changes that are required to improve the draft policy are:-

to make it clear how a developer would go about achieving a high standard of design and construction

and

how a developer could demonstrate that their proposed development would make a positive contribution to the character and distinctiveness of the borough

Chapter 12 - Policy BE2: Tall Buildings

1 Do you support Policy BE2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No. This is, basically, unworkable, as drafted.

Tall buildings have not been defined correctly in Trafford so far. Those drafting these policies seem to have limited understanding as to how to consider proposals for well-designed tall buildings, of a high architectural standard and high-quality materials, in appropriate locations.

The draft text has described tall buildings as being either six stories or more, or 30 metres or more in height. It is disappointing that planners have not appreciated that there is an important difference between the spelling of, "stories" and "storeys", or that the number of storeys is largely irrelevant. Clearly, it's the height of the building, and its height relative to those around it, that would lead people to describe it as "tall".

A good many tall buildings are not well-designed from an external point of view, so much better guidance is required to ensure that such buildings contribute to, rather than detract from, the surrounding built form.

Chapter 12 - Policy BE3: Elevated Green Spaces

1 Do you support Policy BE3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Not really. As drafted, the policy seems a bit desperate.

Paragraph 12.16, which reads as follows, "Where carefully designed, elevated green spaces could help to maximise the efficient use of land (particularly previously developed land) as open space and biodiversity net gain requirements could be potentially be delivered above ground level" seems to be clutching at straws.

What, for example, constitutes a, "carefully designed, elevated green space"? Changes are required to improve the draft policy to make it clear how this will be assessed in practice.

The text that reads, "could be potentially be" needs correction.

Chapter 12 - Policy BE4: Advertisements and Signage

1 Do you support Policy BE4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

In the main, yes. However, over the last 20 years, Trafford Council has been encouraging and authorising the placement of advertisements on roundabouts under its own sponsorship, which clearly interfere with public highway safety, in contravention of item A iii, one of the principles that is identified in the draft policy. It is unclear whether the policy to encourage and authorise the placement of advertisements on roundabouts is still in place, but, if it is, this practice should cease forthwith.

Chapter 12 - Policy BE5: Heritage Assets

1 Do you support Policy BE5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes. This is a refreshing change in direction.

Chapter 12 - Policy BE6: Designated Heritage Assets

1 Do you support Policy BE6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes

Chapter 12 - Policy BE7: Non-designated Heritage Assets

1 Do you support Policy BE7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No. The wording needs to be tightened up. As drafted, the policy is too imprecise. In essence, the criteria are open to inappropriate interpretation, assertion and/or unintended manipulation.

Chapter 12 - Policy BE8: Noise and Vibration

1 Do you support Policy BE8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

In part, yes. However,

"C. Development which has the potential to generate unacceptable levels of noise and / or vibration (taking into account appropriate mitigation) impact(s) on local residential amenity will not be supported"

is relevant because noise nuisance from Manchester Airport continues largely unabated and noise and vibration that might be generated by a railway

through Davenport Green is likely to blight Hale Barns if draft Policy TM9 is pursued.

To date, Trafford Council's undeclared conflicted policy on operational noise from Manchester Airport for many years has been, "not generated in Trafford, so outside the scope of Trafford's responsibility".

As a shareholder in Manchester Airport, Trafford has an in-built conflict of interest, a misplaced over-reliance on the management of airport operations and a Duty Holder's responsibility to minimise noise nuisance within Trafford that is generated by Manchester Airport.

Changes are required to make it clear that noise that is generated outside the borough by aviation and noise and vibration that is generated by rail operations inside the borough will be subject to the same controls as are apparent in the draft document.

Chapter 12 - Policy BE9: Land Contamination and Remediation

1 Do you support Policy BE9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes

Chapter 12 - Policy BE10: Digital Connectivity

1 Do you support Policy BE10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Generally, yes, but the text seems overly technology-specific (e.g. reference to, "full fibre connections").

Changes are required to distance the praiseworthy objectives away from the technical detail, whilst retaining the overall intent (i.e. the technology should not drive the objective - rather, the objective should drive the technology).

Chapter 12 - Built Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

The draft text says, "Masterplans are currently being developed for the New Carrington and Davenport Green (Timperley Wedge) strategic allocations, and a new masterplan for the Stadium District and Wharfside is soon to be commissioned". A masterplan for development of the Timperley Wedge was presented some years ago. This was dependent upon there being delivery of HS2. Even though a "Plan B" was presented that attempted to address the possibility that HS2 might not be delivered, there were, and are, no meaningful contingency plans. Policy areas that are missing include:-

Provision of comprehensive NHS dental and general healthcare

Delivery of education that is fully responsive to the needs of any emerging population.

Impact on existing populations in Timperley, Hale and Hale Barns.

Assurance of personal safe cycle and pedestrian movement to and from the Timperley Wedge from Timperley and Hale Barns via, for example, Brooks Drive.

Effective mitigation and reduction of noise from Manchester Airport, the M56 and any proposed rail route through the Timperley Wedge site .

Chapter 13 - Policy CL1: Protecting and Supporting Existing Cultural, Leisure and Tourism Assets

1 Do you support Policy CL1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Generally, yes.

Changes are required to make it clear that Manchester United isn't the only football club that matters in Trafford.

Chapter 13 - Policy CL2: New Culture, Leisure and Tourism Developments

1 Do you support Policy CL2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Generally, yes.

Being designed to a high quality which reflects the location's status as a visitor destination of Regional significance is important.

Supporting and, where possible, facilitating future improvements to the
public transport network, including Metrolink, whilst seeming reasonable enough, depends on what the "improvements" might constitute in practice. Some of these (e.g. those proposed at Davenport Green) would not be appropriate.

Chapter 13 - Culture, Tourism and Leisure

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Policy areas that are missing include non-Manchester United related matters,

Chapter 14 - Policy IP1: Infrastructure Delivery and Planning Obligations

1 Do you support Policy IP1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Yes

Chapter 14 - Policy IP2: Managing and Monitoring Planning Obligations

1 Do you support Policy IP2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No, not completely.

Changes are required to make it much clearer that fees really will be proportionate and reasonable and that this is not just another opportunist income-stream for the council.

Monitoring activities in relation to planning obligations including (but not limited to data entry and maintenance of planning obligations) database need to be proportionate and reasonable. It is not explained, in detail, how this will be achieved in practice. Rather than aggregating internal costs, averaging and passing these on to would-be applicants, it would improve the draft policy if these costs could be itemised and shown to be justifiable.

2 Do you agree that the Council should require a fee to monitor and report on all planning obligations?

Please write your response here::

No, not entirely, for the reasons given above. There is a trust issue here. If the council cannot be depended upon to maintain its local highway network properly, even when, all along, it has had the necessary funds to do this, how can it be trusted to administer a fee so as to monitor and report on all planning obligations in a fair and reasonable way?

3 Do you agree or have any observations or suggestions on the proposed planning obligation monitoring fees for either minor and/or major developments?

Please write your response here::

I do not agree with the council's being free to take proposed planning obligations monitoring fees for either minor and/or major developments. At present, administration of much of the council's business is not fully fit for purpose and does not justify the charging of monitoring fees, without proper scrutiny. I suggest that the council should be more transparent about why such fees would be fair and reasonable and justify its position.

Chapter 14 - Infrastructure and Planning Obligations

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be

included in the Local Plan?

Please write your response here::

The Introduction to Infrastructure Planning says, via:-

Paragraph 14.1. "Infrastructure planning is the process for ensuring the physical needs of an area can be delivered to keep pace with its population's requirements. It is critical to the delivery of vision of the Local Plan."

and Paragraph 14.2. says, "At the heart of national planning policy, is a presumption in favour of sustainable development. To ensure sustainable development, it is critical that the necessary infrastructure is provided to support the level of growth identified in the Local Plan."

Whilst Paragraph 14.1 might be a fair standalone statement, Paragraph 14.2 goes beyond the provisions of the NPPF by stating that, "To ensure sustainable development, it is critical that the necessary infrastructure is provided to support the level of growth identified in the Local Plan." Paragraph 14.2 does not follow from Paragraph 4.1, either in the sense of being necessary or being critical. As the presumed level of growth is, in both cases, arbitrary, neither of these assertions can be justified, either in a relative or absolute sense. So, this is more planning hype - make some "visionary" plan based primarily on connectivity, perceived need or the interests of a landowner, a group of shareholders or ambitious politicians, sell it on the basis of overall public benefit and then support it on the basis that it requires infrastructure to realise the "vision".

Policy areas that are missing related to this chapter and which should be included in the local plan are:-

Inclusion of higher rise flatted development, which is currently excluded from the Community Infrastructure Levy (CIL).

Government guidance says, "The term gross internal area (GIA) is not defined in the regulations. It is a matter for charging authorities to determine what aspects of a development should be included in the calculation."

It is perfectly permissible, therefore, for Trafford Council to charge a CIL on
higher rise flatted development and clearly, in the interests of equity, the council should do this with immediate effect.

Integrated Assessment (IA) of the Draft Local Plan

1 Do you have any comments to make on the Sustainability Appraisal and its associated appendices?

Please write your response here::

The document is far too long to form a properly-informed opinion. This, alone, suggests that it should not be assumed that this is, necessarily, a meaningful appraisal.

2 Do you have any comments to make on the Health Impact Assessment?

Please write your response here::

If I could understand the document, I might.

Draft Objective 7, "Housing development will inevitably have an impact on the character of an area, however this policy only sets out the approach to dwelling size, type and tenure. This would not be harmful to the landscape, townscape or character and should result in a neutral effect" looks, at first sight, to be illogical.

If the draft objective is setting out an approach to dwelling size, type and tenure, this is more than likely to have an impact on landscape, townscape or character, which is more than likely to be harmful and result in a "bad effect".

3 Do you have any comments to make on the Equalities Impact Assessment?

Please write your response here::

I've not had time to think this through.

IA: Climate Change Risk Assessment

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

Please write your response here::

There are a lot of words, but whether they will make any material difference remains to be seen.

The assessment says, that, "The Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report" identifies that human activities have "unequivocally caused global warming". Whilst this might be the case, the proof of cause and effect is still not confirmed. The precautionary principle suggests that it would be advisable to act on this interpretation of the data. However, Trafford admits that significant or meaningful action is very much beyond its control.

Integrated Assessment (IA): Scoping Report Addendum

1 Do you have any comments on the IA Scoping Report Addendum?

Please write your response here::

It should not be assumed that consultees will have had the time necessary to assess this document.

The document mentions, "Manage the delivery of the PfE allocation Timperley Wedge (Davenport Green)" as a key issue. This is not a key issue for many residents. It is a presumption on the part of planners that this is necessary, i.e. a presumption that planners are representing the best interests of all Trafford's residents, which, clearly, for some, they are not.

Habitat Regulations Assessment (HRA) of Draft Local Plan

1 Do you have any comments on the Habitats Regulations Assessment (HRA) of Draft Local Plan?

Please write your response here::

I do not have the expertise or time necessary to assess this document.

Site Selection Methodology

1 Do you have any comments on the proposed Site Selection Methodology (Figure SS-1)?Are there any stages / questions / considerations which should be added and/or removed?

Please write your response here::

Paragraph 2.3 of the document says, " The Council does not need to identify any further Green Belt land for development." Whilst this might be the case, there was no need to remove Green Belt land from the Timperley Wedge, in the first place, so this paragraph simply perpetuates the fiction and provides absolutely no reassurance that the council won't be back for more. Basically, when the Green Belt's gone, it's gone, no matter what planners might say.

Stage 3 of the methodology asks whether there is a willing landowner. It is self-evident that, at the right price, there will almost always be a willing landowner. The land prices and profits to be made are usually beyond the experience of ordinary people.

Planners should not be meddling in this area. Whether there is a willing landowner should be removed as a planning criterion.

2 Specific criteria will need to be identified to assess a sites performance at each stage of the site selection process.Do you have any comments on what these site criteria should include?What evidence should inform this assessment?

Please write your response here::

Yes, as stated above, the criteria should not include issues such as, "is there a willing landowner".

The criteria should include a cost-benefit calculation to demonstrate to council tax payers precisely what short, medium and long-term overall return on investment might be expected, as compared to other plausible land use investments, which would include leaving land undeveloped, for enjoyment, for recreation, or for agriculture.

Response ID ANON-MFZ6-4QAV-Y

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-12 10:44:29

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9 Please select 'opt in.' if you wish to recieve future consultations on planning policy.

Opt in

Chapter 11 - Policy CT1: Protecting Existing Community and Social Facilities

1 Do you support Policy CT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We are supportive of this policy, although in relation to part iii. we suggest some minor revision to ensure enabling development does not compromise the original use/function in a manner which would lead to unreasonable restrictions or failure of the social/community use. Examples of this might include residential development which cannot be made to be compatible with an existing noise-generating use and development of land which is necessary for servicing access to enable the existing use to function.

Suggested wording:
Permit enabling development on land and/or buildings where the current use is, or the last use was, a social and community use to significantly improve that use; provide another social and community use on site; significantly improve or provide new social and community uses elsewhere within the borough and where it can be demonstrated that there is a greater benefit to the borough resulting from this enabling development. The enabling

development must demonstrate it would not compromise the future operation and viability of the existing use.

2 Do you think the Council should protect the loss of community facilities and local services through a sequential test (as set out in Policy CT1 above), or by requiring a statement setting out evidence as to why a particular facility is not needed?

Please write your response here::

We consider that the first priority must be to protect the existing use where there remains need and demand for it, before looking to alternative community facilities. On that basis we urge revision of part ii. to refer to change of use between these uses only where it is demonstrated the existing community use is surplus to requirements.

Chapter 11 - Policy CT2: Loss of Community Facilities

1 Do you support Policy CT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We welcome this policy and the strength it affords to protecting facilities. To further enhance robustness we suggest that evidence of marketing should require demonstration that local and national channels appropriate to the use have been actively utilised.

Chapter 13 - Policy CL2: New Culture, Leisure and Tourism Developments

1 Do you support Policy CL2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We support this policy and its promotion of additional facilities.

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Submitted on 2025-06-12 11:18:27

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Chapter 4 - Policy R6: Older Persons Accommodation

1 Do you support Policy R6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Anchor is England's largest provider of specialist housing and care for those in later life.

We fully support draft Policy R6, which sets a target for 4,500 homes for older people, divided between C3 housing, extra care and care homes.

This approach aligns with national planning policy, which is clear that planning policies should reflect the need for different types of housing to meet the diverse needs of older people - including retirement housing, housing with care, and care homes.

Anchor particularly understands the importance of providing supported housing for older people. Anchor's 2020 report, Understanding the Value of an Anchor Hanover Tenancy, highlights that many residents move into supported housing in anticipation of ageing or after a significant life change like

retirement, loss of a partner or the onset of health issues. Older people are attracted to features such as communal areas, a local housing manager, on-site activities, safety pull cords and aids and adaptations. Others seek increased security, peace of mind and independence in declining health. The social value of a supported housing tenancy is estimated to be nearly £3,000 greater than that of an older person in a general needs social tenancy, clearly demonstrating its value.

Anchor has 12 locations in Trafford for older people. 7 of these include homes for rent and have around 550 people on their waiting lists. Our properties are in high demand in Trafford and an increase in older persons' accommodation in the Borough would help alleviate demand on the housing register and Anchor's waiting lists.

We encourage Trafford Council to make specific allocations for older persons' housing through its local plan policies to meet the identified need. Rather than requiring a percentage of homes to be built to M4(2) or M4(3) standards, which are not typically reserved for older people, a percentage of homes should be required to be specialist homes for older people that meet one of the definitions set out in national planning policy. When making allocations, consideration should be given to the minimum number of older persons' homes needed on a site to ensure viability, which in Anchor's experience is at least 65.

2 Should the Local Plan set a definition for what constitutes a Care Home, Extra Care and Assisted Living? If so, what should they be defined as?

Please write your response here::

The Older People's Housing Taskforce recognised that there is inconsistency in treatment by LPAs of planning applications for supported living and assisted living, leading to confusion about which use class is appropriate. Planning Practice Guidance provides clear definitions of the different types of older persons' housing and therefore it is not considered necessary for the Trafford Local Plan to set its own separate definitions.

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Enter your contact phone number:
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9 Please select 'opt in.' if you wish to recieve future consultations on planning policy.

Opt in

Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

The content and format of the policy map is supported, noting the concerns expressed about several of the policies referenced upon it.

Chapter 1 - Vision

1 Do you agree with the proposed Vision for the Trafford Local Plan?

Please write your response here::

The vision is largely supported; however, greater emphasis should be given to meeting the housing needs of specific groups. Currently the vision us for Trafford to have met its housing requirement, and addressed its acute need for affordable housing, to try and ensure people have the types of homes that they both want and need. Whilst there is undoubtedly an acute need for affordable housing, there is also an acute need for many other types of

accommodation, in particular specialist housing for older people as acknowledged in Policy R6. The vision should include an emphasis on seeking to meet not just the acute affordable need, but also the need for specialist housing for older people.

Chapter 1 - Strategic Objectives

1 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

Please write your response here::

No. As written SO1C suggests that a strategic objective to is provide affordable and social rented housing for the borough's ageing population. A strategic objective should be to meet the need (as set out in Policy R6) for both private and affordable housing suitable for an ageing population. It is noted that the population in Trafford is projected to increase by 6.2% up to 2039 with the 85+ age group increasing by 38.6% - suggesting both market and affordable housing suitable for an ageing population will be an essential component in housing need over the plan period.

Chapter 1 - Introduction, Vision and Strategic Objectives

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

Chapter 2 - Policy ST2: Inner Areas (Trafford)

1 Do you support Policy ST2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 2 - Policy ST3: Southern Areas (Trafford)

1 Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Policy is largely supported. Part B ii. appears to have a typo, should read will make the most use 'of' PDL. Part iii of the policy should be amended to also encourage residential development in the Town Centres.

Chapter 2 - Policy ST4: Sustainable Development

1 Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Part E of the policy should be amended to remove reference to SPDs. It is suggested that whilst an SPD is a material consideration, they have not been examined and the weight to be afforded to them is a matter for the decision taker.

Chapter 2 - Policy ST5: Climate Change

1 Do you support Policy ST5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The intention of the policy is supported. It is suggested that clarity could be provided in the explanatory text to Applicants on how the Council expect this to be demonstrated.

Chapter 3 - Policy RT1: Carbon and Energy

1 Do you support Policy RT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write you response here::

Chapter 4 - Policy R1: Housing Delivery

1 Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

In part C of the Policy it is noted that the housing requirement reflects PfE Policy JP-H1 which sets the housing requirement for Trafford up to 2039, but the Local Period is 2042. As such, the suggestion is simply that the additional 3 years are rolled forward using the average annual requirement for the Local Plan period to 2042. This is not a sound approach bearing in mind the higher per year Standard Method figures for Trafford.

Para 4.9 suggests there is a phased approach to housing delivery in the plan period, with
greater per annum requirements later in the plan period, reflecting the significant reliance on large sites with longer lead in periods. It will therefore be essential for the Council to allocate smaller/medium sites (as per NPPF 73. It is a concern that in an area of such acute market and affordable housing need, the delivery is so heavily weighted until later in the plan period and the impact on land supply (which should be against the adopted requirement) will need to be understood.

Part A of Policy R1, it is unclear what is meant by 'made available' - is this windfall sites, granting planning permissions etc

Chapter 4 - Policy R3: Affordable and Social Housing

1 Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No.

Para 4.17 makes clear that this policy has been written without any real understanding of the impacts on viability (in combination with the numerous other policy aspirations that all play into a developments viability). Whilst it is accepted that there is an acute need for affordable housing, it is unclear from the evidence base released to date, how the 45% figure for has been arrived at.

Part B of the policy, stipulates that affordable housing must be evenly distributed, with no more than six
affordable housing units located adjacent to each other, or clustered together when delivered as part of a wider scheme. It is unclear why the figure of 6 has been chosen, it is unclear why 6 is O.K and 7 is suddenly unacceptable. The management and maintenance of these properties by RPs needs to be considered.

2 Should 10% of all affordable and social housing be delivered as Truly Affordable Net Zero Homes (TANZ)?

Please write your response here::

No. Providing Truly Affordable Net Zero (TANZ) Homes at scale is a major challenge for developers. Encouragement should be given for providing such units, but mandating 10% at this stage is too much - cost, skills/experience etc.

3 Should the Local Plan set an affordable housing requirement, including a tenure mix, for each locality (similar to Core Strategy policy L2) that reflects market conditions?

Please write your response here::

4 Should any other policy approaches to affordable and social housing be explored?

Please write your response here::

Chapter 4 - Policy R4: Size and Type of New Homes

1 Do you support Policy R4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The policy should provide support for specialist housing for older people. Major developments should be required to provide a percentage of dwellings suitable for the borough's growing ageing population.

2 The intention is to set an appropriate house size and type requirements for new development in each Locality to meet housing needs across the borough. Do you agree with this approach?

Please write your response here::

Yes

3 Do you think specific size and type requirements should be set for major residential development sites in the borough, like Pomona and Wharfside, to align with a Locality approach?

Please write your response here::

Chapter 4 - Policy R5: Housing Density

1 Do you support Policy R5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 4 - Policy R6: Older Persons Accommodation

1 Do you support Policy R6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Part B of the policy is queried. It is noted that the numbers utilised appear to stem from the Trafford Housing Need Study produced by Arc 4 and dated September 2023. The report highlights "4.16 Table 4.4 sets out an assessment of need for different types of older persons accommodation based on latest metrics provided by the Housing Learning and Information Exchange (Housing LIN)" but does not share what these metrics are/the prevalence rates relied upon to arrive at the need figure for the different types of accommodation. It therefore is not possible to ascertain if the need figure utilised is sound.

Concern is expressed at solely relying on the Housing LIN latest metrics, as these tend to grossly underestimate the need for Use Class C2 extra care as they simply project forward existing low prevalence rates, despite the recent growth of provision and need for the accommodation.

Part B should be amended to relfect the typologies of accomodation listed in the PPG, 010 Reference ID: 63-010-20190626 - a need should be given for each of these typologies.

Part C of the policy is objected to in its current form. Use Class C2 accomodation, including housing with care/extra care and residential care homes should not be required to accord with Policy R3. If a development is providing care bed spaces, there is no juestification for having to provide affordable housing, yet the policy suggests if 10 bed spaces are created on a care home, they would have to accord with policy R3.

One key mechanism that would facilitate the delivery of additional specialist housing for older people would be consider its viability. As referenced in the PPG (Paragraph: 010 Reference ID: 63-010-20190626), there is a significant amount of variability in the types of specialist housing for older people. As such, some forms of specialist elderly accommodation, such as C3 retirement living/sheltered housing could reasonably be expected to provide affordable housing. However, C2 extra care/housing with care should not be required to provide affordable housing – the viability of these schemes is very different. For example, build costs are significantly higher and circa 25% of the building is communal floorspace. The ongoing costs and set up costs of C2 accommodation are significantly greater than other C3 forms of accommodation. Sales profiles are vastly different – very few sales are off plan, occupancy can only occur once a development is complete (and generally sales are less than 2 units a month - the plans viability assessment will have to factor in such matters when considering whether its appropraite to seek affordable houisng on C2 Extra Care accomodation.

The purpose of Part E of the policy is unclear and should be removed.

The local plan should allocate sites specifically for the housing needs of the older population- both as part of wider housing allocations, but also as specific sites purely for older persons housing. The advantage of the latter approach is that it directly addresses the housing needs of the elderly, and the sites required to be allocated can generally be smaller brownfield sites within the settlement boundary. The PPG notes that it is up to the plan making authority to decide whether to allocate sites specifically for older persons specialist housing. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations - particularly important with the level of need currently set out in Policy R6 and step change needed in terms of delivery in Trafford to meet this need.

2 Should the Local Plan set a definition for what constitutes a Care Home, Extra Care and Assisted Living? If so, what should they be defined as?

Please write your response here::

A footnote could be added to the policy to refer to the definitions provided in the PPG if deemed necessary - 010 Reference ID: 63-010-20190626

Chapter 4 - Policy R7: Adaptable and Accessible Housing

1 Do you support Policy R7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Reference to the Lifetime Homes Standard should be removed. The Lifetime Homes standard was superseded in 2015 by M4(2) Part M of Building Regulations, which is broadly equivalent to the Lifetime Homes standard which all dwellings must be built in accordance with.

Chapter 6 - Policy TM10: Parking Standards

1 Do you support Policy TM10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Policy is supported subject to additional studies and setting requirements that reflect different typologies of development. For example, parking requirements for an Extra Care development will be lower than a C3 flatted development or age restricted only development.

Chapter 7 - Policy TC1: Hierarchy of Centres

1 Do you support Policy TC1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

2 Do you agree with all of the proposed boundaries for the Town, Other Designated, Local and Neighbourhood centres as shown on the policies map?

Please write your response here::

No. The boundary of Policy TC1: Shaftesbury Avenue, Altrincham should be amended, and it is unclear why this boundary has been extended to cover a vacant public house that is not in retail use. The UDP included the retail offering on Shaftsbury Avenue as a 'Neighbourhood Shopping Centre' and the extent of the area covered by Policy TC1 should be put back to only include the retail offering.

Chapter 9 - Policy OS1: Open Space

1 Do you support Policy OS1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Part B states any loss of this type of this space will be resisted. The policy should make clear that loss will be resisted unless adequate evidence is supplied to demonstrate the space is no longer needed/alternative provision is made to make up for the loss etc.

Part F of the policy requires all 'residential development' over 50 dwellings to provide a minimum of 3ha of new space per thousand population. The relevance of a number of these criteria is queried for Use Class C2 Extra Care or Use Class C3 Sheltered Housing which will have differing requirements.

Chapter 9 - Policy OS4: Loss of Sport and Recreation Land or Facilities

1 Do you support Policy OS4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Policy OS4 needs to be amended to improve the policy. As written, to accord with the policy you would have to replace recreation provision of the same quantity and quality even were demonstrated that the site is surplus to requirements. The ‘and’ after part ii. should be made or. There would appear little point in replacing something that has been clearly demonstrated to be surplus to requirements.

Chapter 11 - Policy CT1: Protecting Existing Community and Social Facilities

1 Do you support Policy CT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Unclear what 'prolonged marketing would be' but note in CT2 that a timeframe of 2 years is specified as a suitable marketing period. This appears completely unnecessary, and it is unclear on what legitimate basis this timeframe has been arrived at. It is suggested that a comprehensive 6-month marketing period (min period, max should be a year), rather than 24 months is more than adequate to demonstrate whether a use remains viable/alternative community use can be found. T

2 Do you think the Council should protect the loss of community facilities and local services through a sequential test (as set out in Policy CT1 above), or by requiring a statement setting out evidence as to why a particular facility is not needed?

Please write your response here::

A statement setting out evidence why a particular facility is not needed. The sequential test is disagreed with.

Chapter 11 - Policy CT2: Loss of Community Facilities

1 Do you support Policy CT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No. Part i requires that in order to be found acceptable, an applicant must provide evidence that the facility has been vacant or not in active social or community use for a continuous period of 24 months, with evidence of continuous active marketing on reasonable terms during this period. It is unclear why the 24 month period has been chosen and it appears totally unnecessary.

It is suggested therefore that consideration is given to a shorter period of marketing. Experience demonstrates that most interest from parties comes in the first couple of months of marketing (indeed this was the case on a site that we have recently marketed in the Borough). Extending the period to 2 years will simply result in lethargy over the marketing and if there has been no interest/no viable end user found for the site in a 6 moth or 12 month period, it is unlikely that in a 24-month period, that would suddenly change. It will likely result in assets remaining vacant for extended periods too little benefit.

Part i should be amended to make clear that the minimum requirement is for a 6 month marketing period (or if deemed to short, the maximum a year).

Chapter 12 - Policy BE7: Non-designated Heritage Assets

1 Do you support Policy BE7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

It is queried whether policy BE7 is required as it appears to largely repeats paragraph 216 of the NPPF.

Response ID ANON-MFZ6-4QAD-D

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-12 17:01:13

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8 Contact phone number

Enter your contact phone number:
[redacted]

9 Please select ‘opt in.’ if you wish to recieve future consultations on planning policy.

Opt in

Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

Support

Chapter 1 - Vision

1 Do you agree with the proposed Vision for the Trafford Local Plan?

Please write your response here::

Agree

Chapter 1 - Strategic Objectives

1 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

Please write your response here::

Agree

Chapter 1 - Introduction, Vision and Strategic Objectives

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

The National Trust supports the policy approach set out in this chapter. Reference to the Trust's Dunham Massey Estate is welcomed. Dunham Massey is one of National Trust's most visited properties. The estate covers an area of 3000 acres, and includes the Grade I listed main house, set within a Grade II* Registered Park and Garden (RPG). The wider estate contains 14 working farms, 13 tenant businesses, some 107 cottages let to private tenants, and a similar number of homes in private ownership. The park at Dunham Massey currently receives in the region of 800,000 visitors per annum.

The Estate was previously recognised by Trafford Council's Core Strategy as Trafford's "most significant countryside visitor attraction". Given the key role that Dunham Massey plays in Trafford, as a heritage asset, visitor attraction, employer and green space, we would welcome additional reference throughout the Plan. In regard to this section, we would request that paragraph 1.68 is reworded accordingly, as follows: "the ward is significantly enhanced by the presence of The National Trust's 3000 acre Dunham Massey Estate, which receives 800,000 visitors per annum and is Trafford's most significant countryside attraction..."

Chapter 2 - Policy ST3: Southern Areas (Trafford)

1 Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

See response to Chapter 1 - Introduction, Vision and Strategic Objectives, re the key role played by the Dunham Massey Estate. In light of this, the Trust would suggest the addition of another criteria under 'B':

"will support the conservation and enhancement of major heritage assets and visitor attractions, including the Dunham Massey Estate"

In addition, whilst the intention of Criteria B ii is supported, it is insufficiently SMART as currently worded. The criteria should be worded more positively, i.e. "will be supported in principle where it involves the use of previously developed land"

Chapter 2 - Policy ST5: Climate Change

1 Do you support Policy ST5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust is supportive of this policy, but would suggest that "in principle" is added at the end of criteria A, given the need to balance the benefit to addressing climate change with consideration of local environmental and amenity impacts, in accordance with policy.

Chapter 2 - Strategy

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

Chapter 3 - Policy RT1: Carbon and Energy

1 Do you support Policy RT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write you response here::

The National Trust is generally supportive of this policy, but the first criteria is not SMART. Due to its inherent nature, not all development will be able to support Trafford Council's commitment for the borough to be carbon neutral by 2038. The policy should specify the type of development that is applicable, and set meaningful targets. The remainder of the policy and supporting text would suggest that it is mainly applicable to residential development. If this is the case, it should be made explicitly clear.

Chapter 3 - Renewable Technologies and Methods

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Chapter 5 - Policy EJ3: Industry and Warehousing

1 Do you support Policy EJ3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust is supportive of this policy. We would wish to ensure however, that the environmental implications of the allocations, particularly in regard to traffic impact, have been assessed.

2 Do you agree with the proposed boundary shown on the policies map for Trafford Park?

Please write your response here::

3 Do you agree with the proposed boundary shown on the policies map for Broadheath Employment Area?

Please write your response here::

Yes

Chapter 5 - Policy EJ4: Offices

1 Do you support Policy EJ4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Support

Chapter 5 - Policy EJ7: Rural Economy

1 Do you support Policy EJ7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust is supportive of this policy. However, we do not consider that criteria 'D' is justified. Farm diversification schemes are by their nature generally small scale, and developed to support the viability of the farming business. Given the scale of these developments, it is not proportionate or reasonable to require that they improve public transport in rural areas, which is often very limited. Public transport provision is the responsibility of the local authority, who should seek contributions from major developments which are likely to significantly increase the demand for such services. This is reflected in the policy approach set out in TM2, which specifies that such contributions will be sought in respect of major development. We would also note for context that the requirements placed upon farm diversification schemes by Biodiversity Net Gain has already created an additional burden, threatening to undermine the viability of what are already often marginal projects.

Chapter 6 - Policy TM1: Walking, Wheeling and Cycling

1 Do you support Policy TM1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust supports this policy, in particular the interventions proposed in Trafford South. We would welcome the development of further cycle infrastructure along the Bridgewater Canal, which would enable enhanced cycle access to Dunham Massey.

Chapter 6 - Policy TM2: Public Transport

1 Do you support Policy TM2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust supports this policy. We would welcome measures to improve the bus service to Dunham Massey, which as previously noted, receives 800,000 visitors per year, and is Trafford's most significant countryside attraction. The National Trust is seeking to promote modal shift at its properties, and would welcome opportunities to work with the Council to facilitate this.

Chapter 6 - Policy TM6: The A56

1 Do you support Policy TM6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust supports this policy,particularly the interventions proposed in Trafford South. We would note that the A56 in this area currently generates issues with drainage and run-off which affects Trust land. We would therefore wish to ensure that opportunities are taken when implementing the proposed measures to address these issues.

Chapter 6 - Policy TM10: Parking Standards

1 Do you support Policy TM10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust supports this policy, and welcomes in particular the criteria relating to Airport parking. The Council should ensure that regulation of such development is coordinated with Cheshire East Council.

Chapter 8 - Policy GI1: Landscape Character Areas

1 Do you support Policy GI1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust supports this policy. We would wish to ensure that the setting of the Dunham Massey Estate is protected, and would be supportive of the development of finer grained landscape character assessments which would specifically address this.

Chapter 8 - Policy GI2: Green Infrastructure Network

1 Do you support Policy GI2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust supports this policy. However, reference should be made to the seeking of appropriate contributions from developers.

Chapter 8 - Policy GI3: Great Manchester Wetlands Nature Improvement Area (NIA)

1 Do you support Policy GI3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Support

Chapter 8 - Policy GI4: Mersey Valley

1 Do you support Policy GI4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Support

Chapter 8 - Policy GI5: Green Infrastructure Opportunity Areas

1 Do you support Policy GI5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust supports this policy. With regard to GI5S, we would also suggest the inclusion of Dunham Forest Golf & Country Club.

Chapter 8 - Policy GI6: Green Infrastructure in New Developments

1 Do you support Policy GI6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust supports this policy. With regard to criteria C v, we would note that the Trust has worked alongside local authorities across the country in the management of green space, drawing upon best practice from our experience of managing extensive areas of green space for nature and public amenity benefit. We would welcome the opportunity to discuss how this best practice could be applied in Trafford with the Council.

Chapter 8 - Policy GI7: Trees, Woodland and Hedgerows

1 Do you support Policy GI7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Support

Chapter 8 - Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets

1 Do you support Policy GI8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Support

Chapter 8 - Policy GI9: Biodiversity Opportunity Areas

1 Do you support Policy GI9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust supports this policy. With regard to GI9S, we would also suggest the inclusion of Dunham Forest Golf & Country Club.

Chapter 8 - Policy GI10: Building Biodiversity into New Developments

1 Do you support Policy GI10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Support

Chapter 9 - Policy OS1: Open Space

1 Do you support Policy OS1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust is generally supportive of Policy OS1. However, we strongly disagree with the approach set out in criteria D. The great majority of major development is likely to result in increased pressure on public infrastructure, including open space, and as a consequence, contributions should be sought from the developer to mitigate this. The approach set out in criteria D would enable developers to avoid this requirement, if the site in question is within the stated distance of the types of open space listed. This therefore places an additional burden upon those already responsible for the management of these spaces, who will receive no support for doing so. The National Trust does not consider that this is sustainable, or justified.

With regard to Policy OS1S, the National Trust is supportive, but would highlight the need for a clear approach towards long term management to be secured.

Chapter 9 - Policy OS4: Loss of Sport and Recreation Land or Facilities

1 Do you support Policy OS4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Support

Chapter 9 - Policy OS5: Allotments and Growing Space

1 Do you support Policy OS5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Support

Chapter 10 - Policy WA2: Sustainable Drainage – Surface and Foul Water

1 Do you support Policy WA2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust is generally supportive of this policy. We consider that criteria F should contain a stronger presumption against the use of pumped drainage systems.

Chapter 12 - Policy BE1: Design

1 Do you support Policy BE1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust supports this policy. We consider that criteria Bii should be expanded to make specific reference to the setting of heritage assets, and local landscape character, given the importance of both of these to good design.

Chapter 12 - Policy BE5: Heritage Assets

1 Do you support Policy BE5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Support

Chapter 12 - Policy BE6: Designated Heritage Assets

1 Do you support Policy BE6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust supports this policy, and welcomes the reference to the Dunham Massey Estate in the supporting text. However, given the number of designated assets on the estate, we would welcome additional reference to these. The following wording is suggested:

"...the 3000 acre Dunham Massey Estate which includes Dunham Massey Old and New Parks, designated as a Registered Park and Garden, the Dunham Town and Dunham Woodhouses Conservation Areas, and the Grade I listed Hall, Stables and Carriage House buildings, as well as a number of farm buildings and cottages which are listed in their own right."

Chapter 12 - Policy BE7: Non-designated Heritage Assets

1 Do you support Policy BE7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust supports this policy. However, effective implementation is dependent upon the extent of information contained in the Local List. The List does not appear to contain a wide range of information currently.

Chapter 12 - Policy BE10: Digital Connectivity

1 Do you support Policy BE10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust acknowledges the need for digital infrastructure, but is mindful of the impact masts in particular can have upon local character. The Trust therefore supports the approach set out in this policy, particularly criteria G.

Chapter 13 - Policy CL1: Protecting and Supporting Existing Cultural, Leisure and Tourism Assets

1 Do you support Policy CL1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The National Trust supports this policy, and welcomes the reference to the Dunham Massey Estate.

Chapter 14 - Policy IP1: Infrastructure Delivery and Planning Obligations

1 Do you support Policy IP1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Support

Response ID ANON-MFZ6-4Q41-D

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-12 17:37:23

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7 Email address

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8 Contact phone number

Enter your contact phone number:
[redacted]

9 Please select ‘opt in.’ if you wish to recieve future consultations on planning policy.

Opt in

Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

No.

Yes, changes required.

Refer to submitted Site Submission Planning Statement, included within the Call for Sites submission, relating to land off Green Lane, Timperley. For the reasons given this land should be released from the Green belt and re-allocated for housing in the new local plan. The Policies Map should reflect this.

Chapter 1 - Vision

1 Do you agree with the proposed Vision for the Trafford Local Plan?

Please write your response here::

No.

The Vision should adopt a pro-economic growth approach and to support this it should state that Trafford will "...have met and exceeded its housing requirement...". In this context it should also add that some land in the Green Belt must be released to meet future housing needs in the plan period.

Refer to attached Site Submission Planning Statement, included within the Call for Sites submission, relating to land off Green Lane, Timperley.

Chapter 1 - Strategic Objectives

1 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

Please write your response here::

Disagree.

Under SO1 and SO4 it should say that Trafford must meet and exceed their minimum housing supply requirements to meet their housing needs and boost economic growth, and to facilitate this it will be necessary for some Green Belt land to be released (including urban fringe/Grey Belt sites in sustainable locations).

Refer to attached Site Submission Planning Statement, included within the Call for Sites submission, relating to land off Green Lane, Timperley. .

Chapter 1 - Introduction, Vision and Strategic Objectives

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

Changes required.

See previous comments under Strategic Objectives SO1 and SO4.

This section should acknowledge the need to release Green Belt land to meet future housing needs (and boost economic growth).

Refer to submitted Site Submission Planning Statement, included within the Call for Sites submission, relating to land off Green Lane, Timperley.

Chapter 2 - Policy ST3: Southern Areas (Trafford)

1 Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Do not support.

See previous comments under Strategic Objectives SO1 and SO4.

This section should acknowledge the need to release Green Belt land in the Southern Areas (including land off Green Lane, Timperley as suitable Grey Belt land) to meet future housing needs (and boost economic growth).

Refer to submitted Site Submission Planning Statement, included within the Call for Sites submission, relating to land off Green Lane, Timperley.

Chapter 2 - Policy ST4: Sustainable Development

1 Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Chapter 2 - Strategy

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

Yes.

Please note in our representations under Strategic Objectives SO1 and SO4, we advocate that Trafford must meet and exceed their minimum housing supply requirements to meet housing needs and boost economic growth. In this context we disagree with the statement at para 2.13:

"The Local Plan is therefore not proposing any review of the Green Belt in Trafford, this was undertaken as part of PfE and new Green Belt boundaries have recently been established as part of that Plan."

This approach is premature, misconceived, lacks evidence, and fails to recognise the overriding need to release more suitable Green belt land to meet short and longer-term housing and economic objectives. This is not least due to the uplifted housing requirement set out in the latest NPPF (March 2024) and stalled delivery of the strategic PfE allocations at Timperley Wedge and Carrington to date.

The Local Plan should therefore acknowledge the need to release Green Belt land (including 'Grey Belt' sites in sustainable locations) to meet its needs in the plan period.

Refer to the submitted Site Submission Planning Statement, included within the Call for Sites submission, relating to land off Green Lane, Timperley.

Chapter 4 - Policy R1: Housing Delivery

1 Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Disagree.

Changes required.

Please note in our representations under Strategic Objectives SO1 and SO4 where we advocate that Trafford must meet and exceed their minimum housing supply requirements to meet housing needs and boost economic growth. In this context we disagree with the statement in the Draft Local Plan which says at para 2.13:

"The Local Plan is therefore not proposing any review of the Green Belt in Trafford, this was undertaken as part of PfE and new Green Belt boundaries have recently been established as part of that Plan."

This approach is clearly premature, misconceived, lacks evidence, and fails to recognise the overriding need to release more suitable Green Belt land to meet short and longer-term housing and economic objectives. This is not least due to the uplifted housing requirement set out in the latest NPPF (March 2024) and stalled delivery of the strategic PfE allocations at Timperley Wedge and Carrington to date.

The Local Plan should therefore acknowledge the need to release Green Belt land (including 'Grey Belt') to meet its needs in the plan period.

For further evidence refer to the submitted Site Submission Planning Statement, included within the Call for Sites submission, relating to land off Green Lane, Timperley.

Chapter 4 - Residential Development

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Yes, changes needed.

Please note in our representations under Strategic Objectives SO1 and SO4, we advocate that Trafford must meet and exceed their minimum housing supply requirements to meet housing needs and boost economic growth. In this context we disagree with the statement in the Draft Local Plan which says at para 2.13:

"The Local Plan is therefore not proposing any review of the Green Belt in Trafford, this was undertaken as part of PfE and new Green Belt boundaries have recently been established as part of that Plan."

This approach is clearly premature, misconceived, lacks evidence, and fails to recognise the overriding need to release more suitable Green belt land to meet short and longer-term housing and economic objectives. This is not least due to the uplifted housing requirement set out in the latest NPPF (March

2024) and stalled delivery of the strategic PfE allocations at Timperley Wedge and Carrington to date.

The Local Plan should therefore acknowledge the need to release Green Belt land (including 'Grey Belt' sites in sustainable locations) to meet its needs in the plan period.

Refer to the submitted Site Submission Planning Statement, included within the Call for Sites submission, relating to land off Green Lane, Timperley.

Chapter 8 - Policy GI1: Landscape Character Areas

1 Do you support Policy GI1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Do not support.

Should be supportive for the development of urban fringe land which is already well contained by urban development and is otherwise suitable for development, to help meet future housing needs.

Refer to submitted Site Submission Planning Statement, included within the Call for Sites submission, relating to land off Green Lane, Timperley.

Chapter 8 - Policy GI2: Green Infrastructure Network

1 Do you support Policy GI2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No.

The policy should be explicitly flexible to allow development where benefits (e.g. housing supply, affordable housing provision) and compensatory measures (via on-site or on-site provision) can outweigh any harm within this GI network.

Refer to submitted Site Submission Planning Statement, included within the Call for Sites submission, relating to land off Green Lane, Timperley. In context, the site at land off Green Lane, Timperley, should be excluded from the GI network due to its location, size, and containment outside of the wider strategic GI network.

Chapter 8 - Green Infrastructure and Natural Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Do not support.

Should be explicitly supportive for the development of urban fringe land which is already well contained by urban development and is otherwise suitable to meet housing needs. The Character Area boundaries should exclude those areas. Land off Green Lane, Timperley, is a good example in this context. Refer to submitted Site Submission Planning Statement.

Chapter 11 - Community and Social Infrastructure

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

Site Selection Methodology

1 Do you have any comments on the proposed Site Selection Methodology (Figure SS-1)?Are there any stages / questions / considerations which should be added and/or removed?

Please write your response here::

Yes.

Changes required.

The methodology should include a Green Belt land search to identify suitable land for housing (with criteria inclusive of urban fringe and Grey Belt sites in sustainable locations) to meet future housing needs. See our previous comments above.

Refer also to submitted Site Submission Planning Statement, included within the Call for Sites submission, relating to land off Green Lane, Timperley.

2 Specific criteria will need to be identified to assess a sites performance at each stage of the site selection process.Do you have any comments on what these site criteria should include?What evidence should inform this assessment?

Please write your response here::

See comments above.

Response ID ANON-MFZ6-4Q4E-1

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-12 18:21:14

Personal details

1 Forename

Enter your forename:
Bernie Burns

2 Surname

Enter your surname:
Burns

3 Organisation (if applicable)

Enter your organisation:

4 Position/title (if applicable)

Enter your position/title:

5 Address

Enter your address:

[redacted]

6 Postcode

Enter your postcode:
[redacted]

7 Email address

Enter your email address:
[redacted]

8 Contact phone number

Enter your contact phone number:
[redacted]

9 Please select 'opt in.' if you wish to recieve future consultations on planning policy.

Opt in

Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

When the Greater Manchester Spatial Framework (now P4E) was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
We have an incredible opportunity to remove even more if not all green belt from the P4E plans and secure it for future generations by ensuring that brownfield sites are used first for any required development. There may be a time when we have to re-assess whether some green belt has to be used for development but I do not believe that time is now. We can use brownfield sites first. Has their really been sufficient consideration given to the use of alternative urban/brownfield sites? We must do as much as we can to save as much of our green open spaces as possible.
Brownfield sites are effectively recyclable and offer incredible opportunities to regenerate urban wastelands, whereas green belt, once used, is lost forever. I know it's cliche, but now more than ever it is imperative to keep these green open spaces to reduce the loss of biodiversity, protect land for potential agricultural use, and to provide a much needed 'green lung' for the public. As well as this the green belt prevents urban sprawl and acts as a corridor for local wildlife, ensuring that the area does not just become one huge conurbation and that the local wildlife can roam. We can have our cake and eat it, we really can, by using brownfield sits first.
My concerns regard all green belt in the P4E plan, but specifically the area of the Timperley Wedge and Davenport Green. I grew up in the Wellgreen

which is next to this area and it would be a tragedy if much of this area was lost to development, particularly as Northern Powerhouse Rail will see to it that a large swathe will be lost (including Davenport Green Wood, why the route is not on the other side of the M56 on the airport site itself is beyond me). Of course there is the argument that Northern Powerhouse Rail means that there is even more need for development of that area to maximise its potential, but all this will mean is that we lose even more green spaces to an encroaching urban spread. This in itself is even more reason to review the P4E and reduce the amount of green belt and green open spaces that are to be lost because of it. There is also the further expansion of the airport. When I visit the Wellgreen now you can often smell the exhaust fumes from the airport (not to mention the constant noise). That was unheard of when I was growing up and begs the question how does the airport and the extra traffic that will be generated in this area by the current P4E plans help in reducing the carbon emissions and Manchester meeting its emission targets? All these points have a cumulative effect and there needs to be a line in the sand and that is partly what green belt is there for, and should remain for.
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I'm sure that others will echo my views (or at least the spirit of them) and that you have probably had other similar emails/letters. I had never written to an official or politician before the GMSF/P4E was conceived or been on a rally of any sort but I felt/feel compelled to do something, as I feel that we are on the point of no return if this step is taken and these green open spaces are lost.

Chapter 1 - Vision

1 Do you agree with the proposed Vision for the Trafford Local Plan?

Please write your response here::

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My concerns regard all green belt in the P4E plan, but specifically the area of the Timperley Wedge and Davenport Green. I grew up in the Wellgreen which is next to this area and it would be a tragedy if much of this area was lost to development, particularly as Northern Powerhouse Rail will see to it that a large swathe will be lost (including Davenport Green Wood, why the route is not on the other side of the M56 on the airport site itself is beyond me). Of course there is the argument that Northern Powerhouse Rail means that there is even more need for development of that area to maximise its potential, but all this will mean is that we lose even more green spaces to an encroaching urban spread. This in itself is even more reason to review the P4E and reduce the amount of green belt and green open spaces that are to be lost because of it. There is also the further expansion of the airport. When I visit the Wellgreen now you can often smell the exhaust fumes from the airport (not to mention the constant noise). That was unheard of when I was growing up and begs the question how does the airport and the extra traffic that will be generated in this area by the current P4E plans help in reducing the carbon emissions and Manchester meeting its emission targets? All these points have a cumulative effect and there needs to be a line in the sand and that is partly what green belt is there for, and should remain for.
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Chapter 1 - Strategic Objectives

1 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

Please write your response here::

When the Greater Manchester Spatial Framework (now P4E) was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 1 - Introduction, Vision and Strategic Objectives

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

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Chapter 2 - Policy ST1: Core Growth Area (Trafford)

1 Do you support Policy ST1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework (now P4E) was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 2 - Policy ST2: Inner Areas (Trafford)

1 Do you support Policy ST2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework (now P4E) was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 2 - Policy ST3: Southern Areas (Trafford)

1 Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework (now P4E) was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 2 - Policy ST4: Sustainable Development

1 Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework (now P4E) was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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corridor for local wildlife, ensuring that the area does not just become one huge conurbation and that the local wildlife can roam. We can have our cake and eat it, we really can, by using brownfield sits first.
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Chapter 2 - Policy ST5: Climate Change

1 Do you support Policy ST5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 2 - Strategy

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

When the Greater Manchester Spatial Framework (now P4E) was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 3 - Policy RT1: Carbon and Energy

1 Do you support Policy RT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write you response here::

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Chapter 3 - Policy RT2: Decentralised Energy Generation

1 Do you support Policy RT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 3 - Policy RT3: Overheating and the Urban Heat Island

1 Do you support Policy RT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework (now P4E) was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 3 - Policy RT4: Sustainable Retrofitting

1 Do you support Policy RT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 3 - Policy RT5: Circular Economy

1 Do you support Policy RT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework (now P4E) was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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alternative urban/brownfield sites? We must do as much as we can to save as much of our green open spaces as possible.
Brownfield sites are effectively recyclable and offer incredible opportunities to regenerate urban wastelands, whereas green belt, once used, is lost forever. I know it's cliche, but now more than ever it is imperative to keep these green open spaces to reduce the loss of biodiversity, protect land for potential agricultural use, and to provide a much needed 'green lung' for the public. As well as this the green belt prevents urban sprawl and acts as a corridor for local wildlife, ensuring that the area does not just become one huge conurbation and that the local wildlife can roam. We can have our cake and eat it, we really can, by using brownfield sits first.
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Chapter 3 - Renewable Technologies and Methods

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

When the Greater Manchester Spatial Framework (now P4E) was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 4 - Policy R1: Housing Delivery

1 Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 4 - Policy R2: Protecting Existing Homes

1 Do you support Policy R2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 4 - Policy R3: Affordable and Social Housing

1 Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework (now P4E) was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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2 Should 10% of all affordable and social housing be delivered as Truly Affordable Net Zero Homes (TANZ)?

Please write your response here::

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3 Should the Local Plan set an affordable housing requirement, including a tenure mix, for each locality (similar to Core Strategy policy L2) that reflects market conditions?

Please write your response here::

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4 Should any other policy approaches to affordable and social housing be explored?

Please write your response here::

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Chapter 4 - Policy R4: Size and Type of New Homes

1 Do you support Policy R4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework (now P4E) was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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2 The intention is to set an appropriate house size and type requirements for new development in each Locality to meet housing needs across the borough. Do you agree with this approach?

Please write your response here::

When the Greater Manchester Spatial Framework (now P4E) was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central

government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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3 Do you think specific size and type requirements should be set for major residential development sites in the borough, like Pomona and Wharfside, to align with a Locality approach?

Please write your response here::

When the Greater Manchester Spatial Framework (now P4E) was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 4 - Policy R5: Housing Density

1 Do you support Policy R5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 4 - Policy R6: Older Persons Accommodation

1 Do you support Policy R6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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2 Should the Local Plan set a definition for what constitutes a Care Home, Extra Care and Assisted Living? If so, what should they be defined as?

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 4 - Policy R7: Adaptable and Accessible Housing

1 Do you support Policy R7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 4 - Policy R8: Homes for Children and Care Experienced Young People

1 Do you support Policy R8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 4 - Policy R9: Other Types of Homes

1 Do you support Policy R9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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2 Should the affordable housing requirement apply to student accommodation to enable a proportion of student accommodation schemes to be affordable to students from low-income backgrounds?

Please write your response here::

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3 Should nomination agreements be used to ensure that accommodation is reserved for students enrolled at a named institution?

Please write your response here::

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Chapter 4 - Policy R10: Gypsies, Travellers and Travelling Showpeople Accommodation

1 Do you support Policy R10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 4 - Policy R11: Self-Build and Custom Housing

1 Do you support Policy R11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 4 - Residential Development

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

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Chapter 5 - Policy EJ1: Employment Land Requirements

1 Do you support Policy EJ1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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I'm sure that others will echo my views (or at least the spirit of them) and that you have probably had other similar emails/letters. I had never written to an official or politician before the GMSF/P4E/Local Plan was conceived or been on a rally of any sort but I felt/feel compelled to do something, as I feel

that we are on the point of no return if this step is taken and these green open spaces are lost.

Chapter 5 - Policy EJ2: Trafford Park

1 Do you support Policy EJ2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 5 - Policy EJ3: Industry and Warehousing

1 Do you support Policy EJ3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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2 Do you agree with the proposed boundary shown on the policies map for Trafford Park?

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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3 Do you agree with the proposed boundary shown on the policies map for Broadheath Employment Area?

Please write your response here::

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My concerns regard all green belt in the P4E/Local plan, but specifically the area of the Timperley Wedge and Davenport Green. I grew up in the Wellgreen which is next to this area and it would be a tragedy if much of this area was lost to development, particularly as Northern Powerhouse Rail will see to it that a large swathe will be lost (including Davenport Green Wood, why the route is not on the other side of the M56 on the airport site itself is beyond me). Of course there is the argument that Northern Powerhouse Rail means that there is even more need for development of that area to maximise its potential, but all this will mean is that we lose even more green spaces to an encroaching urban spread. This in itself is even more reason to review the P4E/Local Plan and reduce the amount of green belt and green open spaces that are to be lost because of it. There is also the further expansion of the airport. When I visit the Wellgreen now you can often smell the exhaust fumes from the airport (not to mention the constant noise). That was unheard of when I was growing up and begs the question how does the airport and the extra traffic that will be generated in this area by the current P4E plans help in reducing the carbon emissions and Manchester meeting its emission targets? All these points have a cumulative effect and there needs to be a line in the sand and that is partly what green belt is there for, and should remain for.
The obvious point is that green field sites are easier for developers to build on, and having to develop on brownfield sites cuts in to their profit margins, so why would they build? I think that this is a short-sighted view, as losing these green spaces really is like selling the family silver, when there is no need to do it. Developers might even want more greenbelt to be included in P4E/Local Plan, but they will still build no matter what the P4E/Local Plan plans are and profits can still be made. It's hard to be sympathetic for anyone who buys up greenbelt land speculatively hoping to be able to build on it or for it to be re-assigned as brownfield so that they can build more easily, only to see that it remains as greenbelt and their plans and profits are curtailed. We have to get to a more sustainable way of thinking about how we develop the land including how we can retain our greenbelt. We should not be the tail to the developers' dog.
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Chapter 5 - Policy EJ4: Offices

1 Do you support Policy EJ4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 5 - Policy EJ5: Safeguarding Trafford's Employment Land

1 Do you support Policy EJ5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 5 - Policy EJ6: Data and Energy Storage

1 Do you support Policy EJ6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 5 - Policy EJ7: Rural Economy

1 Do you support Policy EJ7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 5 - Economy and Jobs

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

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Chapter 6 - Policy TM1: Walking, Wheeling and Cycling

1 Do you support Policy TM1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 6 - Policy TM2: Public Transport

1 Do you support Policy TM2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 6 - Policy TM3: Car Clubs

1 Do you support Policy TM3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 6 - Policy TM4: Mobility Hubs

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Please write your response here::

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Chapter 6 - Policy TM5: Local Highway Network

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Please write your response here::

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Chapter 6 - Policy TM6: The A56

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Please write your response here::

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Chapter 6 - Policy TM7: Freight

1 Do you support Policy TM7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central

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Chapter 6 - Policy TM8: Manchester Ship Canal

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Please write your response here::

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Chapter 6 - Policy TM9: Potential Future Rail Route

1 Do you support Policy TM9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 6 - Policy TM10: Parking Standards

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Please write your response here::

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Chapter 6 - Policy TM11: Lorry Management

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Please write your response here::

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Chapter 6 - Policy TM12: Park and Ride

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Chapter 6 - Policy TM13: Crowd Movement and Routes

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Chapter 6 - Transport and Movement

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
We have an incredible opportunity to remove even more if not all green belt from the P4E plans and secure it for future generations by ensuring that brownfield sites are used first for any required development. There may be a time when we have to re-assess whether some green belt has to be used for development but I do not believe that time is now. We can use brownfield sites first. Has their really been sufficient consideration given to the use of alternative urban/brownfield sites? We must do as much as we can to save as much of our green open spaces as possible.
Brownfield sites are effectively recyclable and offer incredible opportunities to regenerate urban wastelands, whereas green belt, once used, is lost forever. I know it's cliche, but now more than ever it is imperative to keep these green open spaces to reduce the loss of biodiversity, protect land for potential agricultural use, and to provide a much needed 'green lung' for the public. As well as this the green belt prevents urban sprawl and acts as a corridor for local wildlife, ensuring that the area does not just become one huge conurbation and that the local wildlife can roam. We can have our cake and eat it, we really can, by using brownfield sits first.
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Chapter 7 - Policy TC1: Hierarchy of Centres

1 Do you support Policy TC1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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2 Do you agree with all of the proposed boundaries for the Town, Other Designated, Local and Neighbourhood centres as shown on the policies map?

Please write your response here::

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Chapter 7 - Policy TC2: Role and Function of Centres

1 Do you support Policy TC2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 7 - Policy TC3: Out of Centre Retail and Leisure

1 Do you support Policy TC3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 7 - Town Centres and Retail

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 8 - Policy GI1: Landscape Character Areas

1 Do you support Policy GI1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 8 - Policy GI2: Green Infrastructure Network

1 Do you support Policy GI2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 8 - Policy GI3: Great Manchester Wetlands Nature Improvement Area (NIA)

1 Do you support Policy GI3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 8 - Policy GI4: Mersey Valley

1 Do you support Policy GI4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 8 - Policy GI5: Green Infrastructure Opportunity Areas

1 Do you support Policy GI5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 8 - Policy GI6: Green Infrastructure in New Developments

1 Do you support Policy GI6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

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Chapter 8 - Policy GI7: Trees, Woodland and Hedgerows

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Please write your response here::

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Chapter 8 - Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets

1 Do you support Policy GI8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

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Chapter 8 - Policy GI9: Biodiversity Opportunity Areas

1 Do you support Policy GI9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

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Chapter 8 - Policy GI10: Building Biodiversity into New Developments

1 Do you support Policy GI10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 8 - Green Infrastructure and Natural Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

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Chapter 9 - Policy OS1: Open Space

1 Do you support Policy OS1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 9 - Policy OS2: Outdoor Sports and Recreation Facilities and Provision

1 Do you support Policy OS2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 9 - Policy OS3: Indoor Sports and Recreation Provision

1 Do you support Policy OS3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 9 - Policy OS4: Loss of Sport and Recreation Land or Facilities

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Please write your response here::

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Chapter 9 - Policy OS5: Allotments and Growing Space

1 Do you support Policy OS5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

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Chapter 9 - Policy OS6: Cemeteries and Burial Grounds

1 Do you support Policy OS6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 9 - Open Space, Sport and Recreation

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 10 - Policy WA1: Managing Flood Risk

1 Do you support Policy WA1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 10 - Policy WA2: Sustainable Drainage – Surface and Foul Water

1 Do you support Policy WA2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 10 - Policy WA3: Flood Storage Areas

1 Do you support Policy WA3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 10 - Policy WA4: Water Efficiency

1 Do you support Policy WA4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 10 - Water, Flooding and Drainage

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

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Chapter 11 - Policy CT1: Protecting Existing Community and Social Facilities

1 Do you support Policy CT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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2 Do you think the Council should protect the loss of community facilities and local services through a sequential test (as set out in Policy CT1 above), or by requiring a statement setting out evidence as to why a particular facility is not needed?

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on

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Chapter 11 - Policy CT2: Loss of Community Facilities

1 Do you support Policy CT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 11 - Policy CT3: New Community and Social Facilities

1 Do you support Policy CT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 11 - Policy CT4: Fast Food

1 Do you support Policy CT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 11 - Policy CT5: Social Value in New Developments

1 Do you support Policy CT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 11 - Community and Social Infrastructure

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

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Chapter 12 - Policy BE1: Design

1 Do you support Policy BE1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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that we are on the point of no return if this step is taken and these green open spaces are lost.

Chapter 12 - Policy BE2: Tall Buildings

1 Do you support Policy BE2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
We have an incredible opportunity to remove even more if not all green belt from the P4E plans and secure it for future generations by ensuring that brownfield sites are used first for any required development. There may be a time when we have to re-assess whether some green belt has to be used for development but I do not believe that time is now. We can use brownfield sites first. Has their really been sufficient consideration given to the use of alternative urban/brownfield sites? We must do as much as we can to save as much of our green open spaces as possible.
Brownfield sites are effectively recyclable and offer incredible opportunities to regenerate urban wastelands, whereas green belt, once used, is lost forever. I know it's cliche, but now more than ever it is imperative to keep these green open spaces to reduce the loss of biodiversity, protect land for potential agricultural use, and to provide a much needed 'green lung' for the public. As well as this the green belt prevents urban sprawl and acts as a corridor for local wildlife, ensuring that the area does not just become one huge conurbation and that the local wildlife can roam. We can have our cake and eat it, we really can, by using brownfield sits first.
My concerns regard all green belt in the P4E/Local plan, but specifically the area of the Timperley Wedge and Davenport Green. I grew up in the Wellgreen which is next to this area and it would be a tragedy if much of this area was lost to development, particularly as Northern Powerhouse Rail will see to it that a large swathe will be lost (including Davenport Green Wood, why the route is not on the other side of the M56 on the airport site itself is beyond me). Of course there is the argument that Northern Powerhouse Rail means that there is even more need for development of that area to maximise its potential, but all this will mean is that we lose even more green spaces to an encroaching urban spread. This in itself is even more reason to review the P4E/Local Plan and reduce the amount of green belt and green open spaces that are to be lost because of it. There is also the further expansion of the airport. When I visit the Wellgreen now you can often smell the exhaust fumes from the airport (not to mention the constant noise). That was unheard of when I was growing up and begs the question how does the airport and the extra traffic that will be generated in this area by the current P4E plans help in reducing the carbon emissions and Manchester meeting its emission targets? All these points have a cumulative effect and there needs to be a line in the sand and that is partly what green belt is there for, and should remain for.
The obvious point is that green field sites are easier for developers to build on, and having to develop on brownfield sites cuts in to their profit margins, so why would they build? I think that this is a short-sighted view, as losing these green spaces really is like selling the family silver, when there is no need to do it. Developers might even want more greenbelt to be included in P4E/Local Plan, but they will still build no matter what the P4E/Local Plan plans are and profits can still be made. It's hard to be sympathetic for anyone who buys up greenbelt land speculatively hoping to be able to build on it or for it to be re-assigned as brownfield so that they can build more easily, only to see that it remains as greenbelt and their plans and profits are curtailed. We have to get to a more sustainable way of thinking about how we develop the land including how we can retain our greenbelt. We should not be the tail to the developers' dog.
I'm sure that others will echo my views (or at least the spirit of them) and that you have probably had other similar emails/letters. I had never written to an official or politician before the GMSF/P4E/Local Plan was conceived or been on a rally of any sort but I felt/feel compelled to do something, as I feel that we are on the point of no return if this step is taken and these green open spaces are lost.

Chapter 12 - Policy BE3: Elevated Green Spaces

1 Do you support Policy BE3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Brownfield sites are effectively recyclable and offer incredible opportunities to regenerate urban wastelands, whereas green belt, once used, is lost forever. I know it's cliche, but now more than ever it is imperative to keep these green open spaces to reduce the loss of biodiversity, protect land for potential agricultural use, and to provide a much needed 'green lung' for the public. As well as this the green belt prevents urban sprawl and acts as a corridor for local wildlife, ensuring that the area does not just become one huge conurbation and that the local wildlife can roam. We can have our cake and eat it, we really can, by using brownfield sits first.
My concerns regard all green belt in the P4E/Local plan, but specifically the area of the Timperley Wedge and Davenport Green. I grew up in the Wellgreen which is next to this area and it would be a tragedy if much of this area was lost to development, particularly as Northern Powerhouse Rail will see to it that a large swathe will be lost (including Davenport Green Wood, why the route is not on the other side of the M56 on the airport site itself is beyond me). Of course there is the argument that Northern Powerhouse Rail means that there is even more need for development of that area to maximise its potential, but all this will mean is that we lose even more green spaces to an encroaching urban spread. This in itself is even more reason to review the P4E/Local Plan and reduce the amount of green belt and green open spaces that are to be lost because of it. There is also the further expansion of the

airport. When I visit the Wellgreen now you can often smell the exhaust fumes from the airport (not to mention the constant noise). That was unheard of when I was growing up and begs the question how does the airport and the extra traffic that will be generated in this area by the current P4E plans help in reducing the carbon emissions and Manchester meeting its emission targets? All these points have a cumulative effect and there needs to be a line in the sand and that is partly what green belt is there for, and should remain for.
The obvious point is that green field sites are easier for developers to build on, and having to develop on brownfield sites cuts in to their profit margins, so why would they build? I think that this is a short-sighted view, as losing these green spaces really is like selling the family silver, when there is no need to do it. Developers might even want more greenbelt to be included in P4E/Local Plan, but they will still build no matter what the P4E/Local Plan plans are and profits can still be made. It's hard to be sympathetic for anyone who buys up greenbelt land speculatively hoping to be able to build on it or for it to be re-assigned as brownfield so that they can build more easily, only to see that it remains as greenbelt and their plans and profits are curtailed. We have to get to a more sustainable way of thinking about how we develop the land including how we can retain our greenbelt. We should not be the tail to the developers' dog.
I'm sure that others will echo my views (or at least the spirit of them) and that you have probably had other similar emails/letters. I had never written to an official or politician before the GMSF/P4E/Local Plan was conceived or been on a rally of any sort but I felt/feel compelled to do something, as I feel that we are on the point of no return if this step is taken and these green open spaces are lost.

Chapter 12 - Policy BE4: Advertisements and Signage

1 Do you support Policy BE4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Brownfield sites are effectively recyclable and offer incredible opportunities to regenerate urban wastelands, whereas green belt, once used, is lost forever. I know it's cliche, but now more than ever it is imperative to keep these green open spaces to reduce the loss of biodiversity, protect land for potential agricultural use, and to provide a much needed 'green lung' for the public. As well as this the green belt prevents urban sprawl and acts as a corridor for local wildlife, ensuring that the area does not just become one huge conurbation and that the local wildlife can roam. We can have our cake and eat it, we really can, by using brownfield sits first.
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The obvious point is that green field sites are easier for developers to build on, and having to develop on brownfield sites cuts in to their profit margins, so why would they build? I think that this is a short-sighted view, as losing these green spaces really is like selling the family silver, when there is no need to do it. Developers might even want more greenbelt to be included in P4E/Local Plan, but they will still build no matter what the P4E/Local Plan plans are and profits can still be made. It's hard to be sympathetic for anyone who buys up greenbelt land speculatively hoping to be able to build on it or for it to be re-assigned as brownfield so that they can build more easily, only to see that it remains as greenbelt and their plans and profits are curtailed. We have to get to a more sustainable way of thinking about how we develop the land including how we can retain our greenbelt. We should not be the tail to the developers' dog.
I'm sure that others will echo my views (or at least the spirit of them) and that you have probably had other similar emails/letters. I had never written to an official or politician before the GMSF/P4E/Local Plan was conceived or been on a rally of any sort but I felt/feel compelled to do something, as I feel that we are on the point of no return if this step is taken and these green open spaces are lost.

Chapter 12 - Policy BE5: Heritage Assets

1 Do you support Policy BE5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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development but I do not believe that time is now. We can use brownfield sites first. Has their really been sufficient consideration given to the use of alternative urban/brownfield sites? We must do as much as we can to save as much of our green open spaces as possible.
Brownfield sites are effectively recyclable and offer incredible opportunities to regenerate urban wastelands, whereas green belt, once used, is lost forever. I know it's cliche, but now more than ever it is imperative to keep these green open spaces to reduce the loss of biodiversity, protect land for potential agricultural use, and to provide a much needed 'green lung' for the public. As well as this the green belt prevents urban sprawl and acts as a corridor for local wildlife, ensuring that the area does not just become one huge conurbation and that the local wildlife can roam. We can have our cake and eat it, we really can, by using brownfield sits first.
My concerns regard all green belt in the P4E/Local plan, but specifically the area of the Timperley Wedge and Davenport Green. I grew up in the Wellgreen which is next to this area and it would be a tragedy if much of this area was lost to development, particularly as Northern Powerhouse Rail will see to it that a large swathe will be lost (including Davenport Green Wood, why the route is not on the other side of the M56 on the airport site itself is beyond me). Of course there is the argument that Northern Powerhouse Rail means that there is even more need for development of that area to maximise its potential, but all this will mean is that we lose even more green spaces to an encroaching urban spread. This in itself is even more reason to review the P4E/Local Plan and reduce the amount of green belt and green open spaces that are to be lost because of it. There is also the further expansion of the airport. When I visit the Wellgreen now you can often smell the exhaust fumes from the airport (not to mention the constant noise). That was unheard of when I was growing up and begs the question how does the airport and the extra traffic that will be generated in this area by the current P4E plans help in reducing the carbon emissions and Manchester meeting its emission targets? All these points have a cumulative effect and there needs to be a line in the sand and that is partly what green belt is there for, and should remain for.
The obvious point is that green field sites are easier for developers to build on, and having to develop on brownfield sites cuts in to their profit margins, so why would they build? I think that this is a short-sighted view, as losing these green spaces really is like selling the family silver, when there is no need to do it. Developers might even want more greenbelt to be included in P4E/Local Plan, but they will still build no matter what the P4E/Local Plan plans are and profits can still be made. It's hard to be sympathetic for anyone who buys up greenbelt land speculatively hoping to be able to build on it or for it to be re-assigned as brownfield so that they can build more easily, only to see that it remains as greenbelt and their plans and profits are curtailed. We have to get to a more sustainable way of thinking about how we develop the land including how we can retain our greenbelt. We should not be the tail to the developers' dog.
I'm sure that others will echo my views (or at least the spirit of them) and that you have probably had other similar emails/letters. I had never written to an official or politician before the GMSF/P4E/Local Plan was conceived or been on a rally of any sort but I felt/feel compelled to do something, as I feel that we are on the point of no return if this step is taken and these green open spaces are lost.

Chapter 12 - Policy BE6: Designated Heritage Assets

1 Do you support Policy BE6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Brownfield sites are effectively recyclable and offer incredible opportunities to regenerate urban wastelands, whereas green belt, once used, is lost forever. I know it's cliche, but now more than ever it is imperative to keep these green open spaces to reduce the loss of biodiversity, protect land for potential agricultural use, and to provide a much needed 'green lung' for the public. As well as this the green belt prevents urban sprawl and acts as a corridor for local wildlife, ensuring that the area does not just become one huge conurbation and that the local wildlife can roam. We can have our cake and eat it, we really can, by using brownfield sits first.
My concerns regard all green belt in the P4E/Local plan, but specifically the area of the Timperley Wedge and Davenport Green. I grew up in the Wellgreen which is next to this area and it would be a tragedy if much of this area was lost to development, particularly as Northern Powerhouse Rail will see to it that a large swathe will be lost (including Davenport Green Wood, why the route is not on the other side of the M56 on the airport site itself is beyond me). Of course there is the argument that Northern Powerhouse Rail means that there is even more need for development of that area to maximise its potential, but all this will mean is that we lose even more green spaces to an encroaching urban spread. This in itself is even more reason to review the P4E/Local Plan and reduce the amount of green belt and green open spaces that are to be lost because of it. There is also the further expansion of the airport. When I visit the Wellgreen now you can often smell the exhaust fumes from the airport (not to mention the constant noise). That was unheard of when I was growing up and begs the question how does the airport and the extra traffic that will be generated in this area by the current P4E plans help in reducing the carbon emissions and Manchester meeting its emission targets? All these points have a cumulative effect and there needs to be a line in the sand and that is partly what green belt is there for, and should remain for.
The obvious point is that green field sites are easier for developers to build on, and having to develop on brownfield sites cuts in to their profit margins, so why would they build? I think that this is a short-sighted view, as losing these green spaces really is like selling the family silver, when there is no need to do it. Developers might even want more greenbelt to be included in P4E/Local Plan, but they will still build no matter what the P4E/Local Plan plans are and profits can still be made. It's hard to be sympathetic for anyone who buys up greenbelt land speculatively hoping to be able to build on it or for it to be re-assigned as brownfield so that they can build more easily, only to see that it remains as greenbelt and their plans and profits are curtailed. We have to get to a more sustainable way of thinking about how we develop the land including how we can retain our greenbelt. We should not be the tail to the developers' dog.
I'm sure that others will echo my views (or at least the spirit of them) and that you have probably had other similar emails/letters. I had never written to an official or politician before the GMSF/P4E/Local Plan was conceived or been on a rally of any sort but I felt/feel compelled to do something, as I feel that we are on the point of no return if this step is taken and these green open spaces are lost.

Chapter 12 - Policy BE7: Non-designated Heritage Assets

1 Do you support Policy BE7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Brownfield sites are effectively recyclable and offer incredible opportunities to regenerate urban wastelands, whereas green belt, once used, is lost forever. I know it's cliche, but now more than ever it is imperative to keep these green open spaces to reduce the loss of biodiversity, protect land for potential agricultural use, and to provide a much needed 'green lung' for the public. As well as this the green belt prevents urban sprawl and acts as a corridor for local wildlife, ensuring that the area does not just become one huge conurbation and that the local wildlife can roam. We can have our cake and eat it, we really can, by using brownfield sits first.
My concerns regard all green belt in the P4E/Local plan, but specifically the area of the Timperley Wedge and Davenport Green. I grew up in the Wellgreen which is next to this area and it would be a tragedy if much of this area was lost to development, particularly as Northern Powerhouse Rail will see to it that a large swathe will be lost (including Davenport Green Wood, why the route is not on the other side of the M56 on the airport site itself is beyond me). Of course there is the argument that Northern Powerhouse Rail means that there is even more need for development of that area to maximise its potential, but all this will mean is that we lose even more green spaces to an encroaching urban spread. This in itself is even more reason to review the P4E/Local Plan and reduce the amount of green belt and green open spaces that are to be lost because of it. There is also the further expansion of the airport. When I visit the Wellgreen now you can often smell the exhaust fumes from the airport (not to mention the constant noise). That was unheard of when I was growing up and begs the question how does the airport and the extra traffic that will be generated in this area by the current P4E plans help in reducing the carbon emissions and Manchester meeting its emission targets? All these points have a cumulative effect and there needs to be a line in the sand and that is partly what green belt is there for, and should remain for.
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Chapter 12 - Policy BE8: Noise and Vibration

1 Do you support Policy BE8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 12 - Policy BE9: Land Contamination and Remediation

1 Do you support Policy BE9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 12 - Policy BE10: Digital Connectivity

1 Do you support Policy BE10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

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Chapter 12 - Built Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

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Chapter 13 - Policy CL1: Protecting and Supporting Existing Cultural, Leisure and Tourism Assets

1 Do you support Policy CL1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 13 - Policy CL2: New Culture, Leisure and Tourism Developments

1 Do you support Policy CL2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 13 - Culture, Tourism and Leisure

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

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Chapter 14 - Policy IP1: Infrastructure Delivery and Planning Obligations

1 Do you support Policy IP1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Chapter 14 - Policy IP2: Managing and Monitoring Planning Obligations

1 Do you support Policy IP2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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2 Do you agree that the Council should require a fee to monitor and report on all planning obligations?

Please write your response here::

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3 Do you agree or have any observations or suggestions on the proposed planning obligation monitoring fees for either minor and/or major developments?

Please write your response here::

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Chapter 14 - Infrastructure and Planning Obligations

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

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Integrated Assessment (IA) of the Draft Local Plan

1 Do you have any comments to make on the Sustainability Appraisal and its associated appendices?

Please write your response here::

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2 Do you have any comments to make on the Health Impact Assessment?

Please write your response here::

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3 Do you have any comments to make on the Equalities Impact Assessment?

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IA: Climate Change Risk Assessment

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

Please write your response here::

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Integrated Assessment (IA): Scoping Report Addendum

1 Do you have any comments on the IA Scoping Report Addendum?

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Habitat Regulations Assessment (HRA) of Draft Local Plan

1 Do you have any comments on the Habitats Regulations Assessment (HRA) of Draft Local Plan?

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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Site Selection Methodology

1 Do you have any comments on the proposed Site Selection Methodology (Figure SS-1)?Are there any stages / questions / considerations which should be added and/or removed?

Please write your response here::

When the Greater Manchester Spatial Framework/P4E/Local Plan was first announced there was doubt over the numbers that were being used regarding projections of population growth to determine the number of houses needed and the house-building targets being forced on the council by central government. These numbers, it was argued, meant that some green belt had to be used in order to satisfy the targets. Of course there was pushback on this from the general public in those areas affected and the plans were revised.
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2 Specific criteria will need to be identified to assess a sites performance at each stage of the site selection process.Do you have any comments on what these site criteria should include?What evidence should inform this assessment?

Please write your response here::

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Response ID ANON-MFZ6-4QAC-C

Submitted to Draft Trafford Local Plan - April 2025
Submitted on 2025-06-12 19:12:49

Personal details

1 Forename

Enter your forename:
Mark

2 Surname

Enter your surname:
Aylward

3 Organisation (if applicable)

Enter your organisation:
ATP

4 Position/title (if applicable)

Enter your position/title:
Director

5 Address

Enter your address:

[redacted]

6 Postcode

Enter your postcode:
[redacted]

7 Email address

Enter your email address:
[redacted]

8 Contact phone number

Enter your contact phone number:
[redacted]

9 Please select ‘opt in.’ if you wish to recieve future consultations on planning policy.

Opt in

Chapter 1 - Local Plan Policies Map

1 Do you support the draft Policies Map? Are there any changes required which would improve it?

Please write your response here::

No substantive comments regarding draft Policies Map. Noted that it identifies CQAAP area and Conservation Area boundaries as they stand today.

Chapter 1 - Vision

1 Do you agree with the proposed Vision for the Trafford Local Plan?

Please write your response here::

The overarching objectives and ambitions include for delivery of good growth, in the prism of places to live and work.

There is potential that the proposed framework for infrastructure delivery will not align with (and will directly conflict) growth ambitions because it seeks financial contributions which are essentially arbitrary and wholly untested in terms of whether they would make otherwise acceptable development undeliverable.

If there is a conflict between the realisation of infrastructure and growth targets that should be considered at the Plan-making stage and not left to the DM stage and the assumed reliance on scheme-specific viability appraisals.

Chapter 1 - Strategic Objectives

1 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford?

Please write your response here::

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Chapter 1 - Introduction, Vision and Strategic Objectives

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

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Chapter 2 - Policy ST1: Core Growth Area (Trafford)

1 Do you support Policy ST1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 2 - Policy ST2: Inner Areas (Trafford)

1 Do you support Policy ST2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 2 - Policy ST3: Southern Areas (Trafford)

1 Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 2 - Policy ST4: Sustainable Development

1 Do you support Policy ST4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 2 - Policy ST5: Climate Change

1 Do you support Policy ST5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 2 - Strategy

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write a response here::

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Chapter 3 - Policy RT1: Carbon and Energy

1 Do you support Policy RT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write you response here::

At a high level, there is support for a policy framework that encourages a low carbon approach.

However, we are mindful that the policy seeks to require applicants to demonstrate consideration of matters such as heat networks which require strategic investment (public and private) that is at this point uncertain. Greater reference should be made to only requiring applicants to commit to scheme-specific feasibility work when the strategic framework is in place (in order to make the outcome deliverable and to make the exercise valuable).

Chapter 3 - Policy RT2: Decentralised Energy Generation

1 Do you support Policy RT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The reference to Opportunity Areas identifies CQAAP as an example (under Policy RT2N).

Whilst we are aware that feasibility studies have been commissioned in terms of adopting a Heat and Energy Network within the CQAAP area (as an example), the roll-out requires significant capital investment (circa £36m) and this is subject to grant funding and private sector investment both for the core development and the connections to specific development sites. Given that there are fundamental steps outstanding, we feel that clause A should be reworded so that it is only triggered when the Council is able to commit to the delivery of the capital works (as otherwise connection is plainly infeasible).

Chapter 3 - Policy RT3: Overheating and the Urban Heat Island

1 Do you support Policy RT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 3 - Policy RT4: Sustainable Retrofitting

1 Do you support Policy RT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comment arising.

Chapter 3 - Policy RT5: Circular Economy

1 Do you support Policy RT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

This should only apply to major developments which would result in construction activity. That would exclude (for example) s73 applications to adjust matters such as operating hours or end user restrictions that would not result in any demolition or construction activity.

Chapter 3 - Renewable Technologies and Methods

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

This should only apply to developments which would result in construction activity. That would exclude (for example) s73 applications to adjust matters such as operating hours or end user restrictions that would not result in any demolition or construction activity.

Chapter 4 - Policy R1: Housing Delivery

1 Do you support Policy R1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We support Policy R1, which is directly aligned to overarching objectives and ambitions include for delivery of good growth, in the prism of places to live and work.

There is potential that the proposed framework for infrastructure delivery will not align with (and will directly conflict) growth ambitions because it seeks financial contributions and a tenure mix which are essentially arbitrary and wholly untested in terms of whether they would make otherwise acceptable development undeliverable.

If there is a conflict between the realisation of infrastructure and growth targets that should be considered at the Plan-making stage and not left to the DM stage and the assumed reliance on scheme-specific viability appraisals.

Chapter 4 - Policy R2: Protecting Existing Homes

1 Do you support Policy R2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comment arising.

Chapter 4 - Policy R3: Affordable and Social Housing

1 Do you support Policy R3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The proposed tenure mix (with a bias towards social and affordable rent) will typically have greater impacts on developer returns than a model geared towards intermediate ownership. It is not expressly clear that this has been subject of any viability testing both at a borough-wide and more local level.

There is potential that the proposed framework will not align with growth ambitions if they would make otherwise acceptable development undeliverable. If there is a conflict between the realisation of tenure objectives and growth targets that should be considered at the Plan-making stage and not left to the DM stage and the assumed reliance on scheme-specific viability appraisals.

2 Should 10% of all affordable and social housing be delivered as Truly Affordable Net Zero Homes (TANZ)?

Please write your response here::

The proposed TANZ approach is a new format and needs to be subject of viability testing both at a borough-wide and more local level.

We would accept that TANZ is ostensibly a positive approach, but it will be important to establish whether it could impede deliverability.

3 Should the Local Plan set an affordable housing requirement, including a tenure mix, for each locality (similar to Core Strategy policy L2) that reflects market conditions?

Please write your response here::

Prior evidence has demonstrated that there are significant differences in terms of the performance of the housing market across Trafford and by typology.

The tenure targets should reflect localised housing market requirements and market conditions. We reflect for example that Old Trafford was previously identified as a cold market housing area.

Where market conditions are "colder", it would be logical to apply a tenure mix that would have less prejudicial effects upon deliverability. This acknowledges the established position that tenure mixes biased towards social and affordable rent will typically have greater impacts on developer returns than a model geared towards intermediate ownership.

If there is a conflict between the realisation of tenure objectives and growth targets that should be considered at the Plan-making stage and not left to the DM stage and the assumed reliance on scheme-specific viability appraisals.

4 Should any other policy approaches to affordable and social housing be explored?

Please write your response here::

The typical approach to affordable and social housing delivery relies upon the use of RPs. Deliverability of mixed tenure schemes (particularly those below say 100 homes) can be impeded where RPs decline to bid or bid at a level below expectations. It is noted that Trafford has now adopted RP status, and it is hoped that these issues will become less prevalent moving forward.

Nonetheless, it would be appropriate to consider developer-led formats for housing which would have lower end-user costs but still provide good quality accommodation. This would have the benefit of ensuring deliverability of a greater number of units including those at lower cost.

Chapter 4 - Policy R4: Size and Type of New Homes

1 Do you support Policy R4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

2 The intention is to set an appropriate house size and type requirements for new development in each Locality to meet housing needs across the borough. Do you agree with this approach?

Please write your response here::

We would agree with this approach. However, this will inevitably result in differentiated conditions in terms of viability and the opportunity to deliver other planning objectives whether through legal agreement, infrastructure levy or other Plan-led ambition.

This should be subject of a robust viability assessment at the Plan-making stage which would have proper regard for all reasonably likely residential typologies (and not just be left to developers to provide a scheme-specific viability appraisal).

3 Do you think specific size and type requirements should be set for major residential development sites in the borough, like Pomona and Wharfside, to align with a Locality approach?

Please write your response here::

No comment.

Chapter 4 - Policy R5: Housing Density

1 Do you support Policy R5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 4 - Policy R6: Older Persons Accommodation

1 Do you support Policy R6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

2 Should the Local Plan set a definition for what constitutes a Care Home, Extra Care and Assisted Living? If so, what should they be defined as?

Please write your response here::

No specific comments arising.

Chapter 4 - Policy R7: Adaptable and Accessible Housing

1 Do you support Policy R7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 4 - Policy R8: Homes for Children and Care Experienced Young People

1 Do you support Policy R8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 4 - Policy R9: Other Types of Homes

1 Do you support Policy R9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

2 Should the affordable housing requirement apply to student accommodation to enable a proportion of student accommodation schemes to be affordable to students from low-income backgrounds?

Please write your response here::

No specific comments arising.

3 Should nomination agreements be used to ensure that accommodation is reserved for students enrolled at a named institution?

Please write your response here::

No specific comments arising.

Chapter 4 - Policy R10: Gypsies, Travellers and Travelling Showpeople Accommodation

1 Do you support Policy R10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 4 - Policy R11: Self-Build and Custom Housing

1 Do you support Policy R11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 4 - Residential Development

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

The policy and accompanying text sets out ambitions for delivery by locality, including differential targets for affordable housing.

Through our review of the 2025 evidence base, these locality-based tenure mixes are essentially arbitrary and wholly untested in terms of whether they would make otherwise acceptable development undeliverable.

If there is a conflict between the realisation of tenure mix and growth targets that should be considered at the Plan-making stage and not left to the DM stage and the assumed reliance on scheme-specific viability appraisals.

Chapter 5 - Policy EJ1: Employment Land Requirements

1 Do you support Policy EJ1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 5 - Policy EJ2: Trafford Park

1 Do you support Policy EJ2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 5 - Policy EJ3: Industry and Warehousing

1 Do you support Policy EJ3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

2 Do you agree with the proposed boundary shown on the policies map for Trafford Park?

Please write your response here::

No specific comments arising.

3 Do you agree with the proposed boundary shown on the policies map for Broadheath Employment Area?

Please write your response here::

No specific comments arising.

Chapter 5 - Policy EJ4: Offices

1 Do you support Policy EJ4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 5 - Policy EJ5: Safeguarding Trafford's Employment Land

1 Do you support Policy EJ5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 5 - Policy EJ6: Data and Energy Storage

1 Do you support Policy EJ6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 5 - Policy EJ7: Rural Economy

1 Do you support Policy EJ7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 5 - Economy and Jobs

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

No specific comments arising.

Chapter 6 - Policy TM1: Walking, Wheeling and Cycling

1 Do you support Policy TM1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The policy requirements should not be applied to major developments that would not result in construction activity and/or would have no genuine effect upon the number of anticipated movements. This should specifically exclude s73 applications or changes of use that would not result in any material change to the number of anticipated movements.

Chapter 6 - Policy TM2: Public Transport

1 Do you support Policy TM2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The premise of this policy would appear to be seek contributions towards this objective absent of whether the proposals would result in a deficiency which would require mitigation. It is difficult to reconcile why these contributions would be sought in highly accessible locations such as defined centres.

It is also unclear whether this is deemed as infrastructure that would be included within the range of matters to be funded through blanket IN1 contributions.

There is potential that the proposed framework for infrastructure delivery will not align with (and will directly conflict) growth ambitions because it seeks financial contributions which are essentially arbitrary and wholly untested in terms of whether they would make otherwise acceptable development undeliverable.

If there is a conflict between the realisation of infrastructure and growth targets that should be considered at the Plan-making stage and not left to the DM stage and the assumed reliance on scheme-specific viability appraisals.

Chapter 6 - Policy TM3: Car Clubs

1 Do you support Policy TM3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 6 - Policy TM4: Mobility Hubs

1 Do you support Policy TM4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 6 - Policy TM5: Local Highway Network

1 Do you support Policy TM5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 6 - Policy TM6: The A56

1 Do you support Policy TM6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 6 - Policy TM7: Freight

1 Do you support Policy TM7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 6 - Policy TM8: Manchester Ship Canal

1 Do you support Policy TM8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising,

Chapter 6 - Policy TM9: Potential Future Rail Route

1 Do you support Policy TM9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising,

Chapter 6 - Policy TM10: Parking Standards

1 Do you support Policy TM10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising,

Chapter 6 - Policy TM11: Lorry Management

1 Do you support Policy TM11? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising,

Chapter 6 - Policy TM12: Park and Ride

1 Do you support Policy TM12? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 6 - Policy TM13: Crowd Movement and Routes

1 Do you support Policy TM13? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising,

Chapter 6 - Transport and Movement

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

No specific comments arising,

Chapter 7 - Policy TC1: Hierarchy of Centres

1 Do you support Policy TC1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comment arising.

2 Do you agree with all of the proposed boundaries for the Town, Other Designated, Local and Neighbourhood centres as shown on the policies map?

Please write your response here::

No specific comment arising.

Chapter 7 - Policy TC2: Role and Function of Centres

1 Do you support Policy TC2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comment arising.

Chapter 7 - Policy TC3: Out of Centre Retail and Leisure

1 Do you support Policy TC3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No.

The purpose of the national retail impact threshold (2500 sq m) was originally identified to protect against the potential for food superstores to affect the viability of district and town centres, as it represented a retail format (if located out-of-centre) that could do so. More recent iterations of the NPPF have invited planning authorities to consider locally based thresholds where they can be evidence-based to represent a threshold which would genuinely and materially affect the viability and vitality of defined centres.

The suggested 500 sq m threshold falls far below a format requirement for the type of operator that would result in changes to shopping patterns material to the vitality of a district or town centre. In the context of Trafford, the introduction of a food discounter (such as a modern Aldi or Lidl) could arguably create such a change. These have a typical floorspace of 1800-2200 sq m, far above the 500 sq m threshold proposed.

By way of comparison, the 500 sq m threshold would be broadly comparable to a Tesco Express. It is plainly the case that the introduction of a Tesco Express format would not undermine the vitality of a town centre anchored by a food superstore. We do understand that the 2019 Study did identify that 500 sq m threshold but it was not correct to do so.

Owing to the nature of the shopping hierarchy and the location of smaller centres, it is typically the case that trading locations close to town centres are also relatively close to neighbourhood centres. The 200 sq m threshold which pertains to smaller centres means that virtually all retail proposals are captured and requires assessment of schemes that will evidently not have material effects upon vitality.

Given that the national threshold is 2500 sq m, the adoption of such low thresholds should only be triggered by very unusual circumstances (such as very rural areas and/or where it would impact an historic market town). Plainly, none of these circumstances are applicable.

The consequence of these excessively low locally adopted thresholds is the requirement for retail impact assessments for schemes that should simply not require them.

Chapter 7 - Town Centres and Retail

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

No substantive comments, other than those raised in regard to Policy TC3. The impact thresholds identified are not credible and do not follow the approach encouraged by the NPPF.

Chapter 8 - Policy GI1: Landscape Character Areas

1 Do you support Policy GI1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising,

Chapter 8 - Policy GI2: Green Infrastructure Network

1 Do you support Policy GI2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 8 - Policy GI3: Great Manchester Wetlands Nature Improvement Area (NIA)

1 Do you support Policy GI3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 8 - Policy GI4: Mersey Valley

1 Do you support Policy GI4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 8 - Policy GI5: Green Infrastructure Opportunity Areas

1 Do you support Policy GI5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising,

Chapter 8 - Policy GI6: Green Infrastructure in New Developments

1 Do you support Policy GI6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising,

Chapter 8 - Policy GI7: Trees, Woodland and Hedgerows

1 Do you support Policy GI7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The policy requirements should not be applied to major developments that would not result in significant construction activity and/or would have no genuine effect upon the extent of tree cover. This should specifically exclude s73 applications or changes of use that would not result in any material change to the number of trees on a development site.

Chapter 8 - Policy GI8: Protection of Locally Designated Sites and Natural Environment Assets

1 Do you support Policy GI8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 8 - Policy GI9: Biodiversity Opportunity Areas

1 Do you support Policy GI9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 8 - Policy GI10: Building Biodiversity into New Developments

1 Do you support Policy GI10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

If the Council is seeking development to provide BNG benefits over and above legislated requirements, then it should specifically commit to affording that positive weight in the planning balance. It would not be appropriate to impede a proposal that was otherwise acceptable in planning terms and provided exactly 10% BNG net gain.

This is particularly important given the slew of other new objectives being proposed that will inevitably have viability implications, as well as the market position where off-site BNG mitigation is exceptionally challenging from a cost perspective.

Chapter 8 - Green Infrastructure and Natural Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

No specific comments arising.

Chapter 9 - Policy OS1: Open Space

1 Do you support Policy OS1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

A long-standing premise is that it would be inappropriate to require new development to mitigate an existing deficiency. That being the case, the Council should provide evidence to demonstrate what the baseline position is and set out how they plan to address any deficiency before then seeking commensurate contributions from new development.

Without that, there is potential that the proposed framework for infrastructure delivery will not align with growth ambitions by seeking financial contributions which are untested in terms of whether they would make otherwise acceptable development undeliverable.

Chapter 9 - Policy OS2: Outdoor Sports and Recreation Facilities and Provision

1 Do you support Policy OS2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

A long-standing premise is that it would be inappropriate to require new development to mitigate an existing deficiency. That being the case, the Council should provide evidence to demonstrate what the baseline position is and set out how they plan to address any deficiency before then seeking commensurate contributions from new development.

Without that, there is potential that the proposed framework for infrastructure delivery will not align with growth ambitions by seeking financial contributions which are untested in terms of whether they would make otherwise acceptable development undeliverable.

Chapter 9 - Policy OS3: Indoor Sports and Recreation Provision

1 Do you support Policy OS3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The policy does not appear to provide a positive framework for the consideration of proposals which would result in the loss of indoor sports facilities. It should be noted that there are indoor sports formats which are increasingly difficult to sustain from a viability perspective and this policy would (as worded) impede the potential for the building / land to be put into other gainful uses.

We would recommend a similar framework to that which is utilised to consider the loss of employment sites, such as viability and market interest alongside a general planning balance criterion.

Chapter 9 - Policy OS4: Loss of Sport and Recreation Land or Facilities

1 Do you support Policy OS4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising,

Chapter 9 - Policy OS5: Allotments and Growing Space

1 Do you support Policy OS5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising,

Chapter 9 - Policy OS6: Cemeteries and Burial Grounds

1 Do you support Policy OS6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 9 - Open Space, Sport and Recreation

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

A long-standing premise is that it would be inappropriate to require new development to mitigate an existing deficiency. That being the case, the Council should provide evidence to demonstrate what the baseline position is and set out how they plan to address any deficiency before then seeking commensurate contributions from new development.

Without that, there is potential that the proposed framework for infrastructure delivery will not align with growth ambitions by seeking financial contributions which are untested in terms of whether they would make otherwise acceptable development undeliverable.

Chapter 10 - Policy WA1: Managing Flood Risk

1 Do you support Policy WA1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 10 - Policy WA2: Sustainable Drainage – Surface and Foul Water

1 Do you support Policy WA2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

This should only apply to major developments which would result in construction activity. That would exclude (for example) s73 applications to adjust matters such as operating hours or end user restrictions that would not result in any demolition or construction activity.

Chapter 10 - Policy WA3: Flood Storage Areas

1 Do you support Policy WA3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising,

Chapter 10 - Policy WA4: Water Efficiency

1 Do you support Policy WA4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

This should only apply to major developments which would result in construction activity. That would exclude (for example) s73 applications to adjust matters such as operating hours or end user restrictions that would not result in any demolition or construction activity.

Chapter 10 - Water, Flooding and Drainage

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

No specific comments arising.

Chapter 11 - Policy CT1: Protecting Existing Community and Social Facilities

1 Do you support Policy CT1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

2 Do you think the Council should protect the loss of community facilities and local services through a sequential test (as set out in Policy CT1 above), or by requiring a statement setting out evidence as to why a particular facility is not needed?

Please write your response here::

No specific comments arising.

Chapter 11 - Policy CT2: Loss of Community Facilities

1 Do you support Policy CT2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

This is a negatively worded framework which would prevent buildings being put back into use within a 2 year period, even where the case for the new use is compelling. That is a higher bar than exists in the case of designated heritage assets and this is not justified,

That conflicts with ambitions for good growth and is plainly unsound.

Chapter 11 - Policy CT3: New Community and Social Facilities

1 Do you support Policy CT3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 11 - Policy CT4: Fast Food

1 Do you support Policy CT4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

Criterion A and its 2 mile distance element appears completely arbitrary. In connection with other matters, the Council would typically apply much shorter distances for "proximity" and the use of a 2 mile threshold would appear likely to preclude the majority of Trafford's urban areas.

The Council should provide robust evidence to sustain this distance criterion and/or reduce it to a lower threshold aligned to those adopted by other planning authorities.

In the context of the percentile threshold, it will be important to establish whether this would only apply to larger centres. In the context of very small neighbourhood centres, the threshold could be very easily triggered.

Chapter 11 - Policy CT5: Social Value in New Developments

1 Do you support Policy CT5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

This should only apply to major developments which would result in construction activity. That would exclude (for example) s73 applications to adjust matters such as operating hours or end user restrictions that would not result in any demolition or construction activity.

Chapter 11 - Community and Social Infrastructure

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

No specific comments arising.

Chapter 12 - Policy BE1: Design

1 Do you support Policy BE1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We generally support the policy approach.

We would however note that the adopted validation checklist now requires a level of detail for minor applications creating limited external changes which is neither necessary or helpful. We would encourage the Council to reconsider the need for facade design analysis or design code compliance documents for minor applications unless these directly affect heritage assets.

Chapter 12 - Policy BE2: Tall Buildings

1 Do you support Policy BE2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 12 - Policy BE3: Elevated Green Spaces

1 Do you support Policy BE3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 12 - Policy BE4: Advertisements and Signage

1 Do you support Policy BE4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising,

Chapter 12 - Policy BE5: Heritage Assets

1 Do you support Policy BE5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 12 - Policy BE6: Designated Heritage Assets

1 Do you support Policy BE6? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 12 - Policy BE7: Non-designated Heritage Assets

1 Do you support Policy BE7? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

We note that the Council has recently committed to developing a Local List. Whilst we accept that there will be occasions where a building can be overlooked and then later deemed to represent NDHA, that should follow the same framework identified for local listing in terms of its importance.

In our experience, buildings are often deemed NDHA in the context of DM applications even where neighbour buildings have been concluded NDHA in the evidence base. That would suggest they were of lesser intrinsic importance and that a later decision to deem it NDHA would appear disproportionate and/or inconsistent.

We would argue that the threshold for a building to be deemed NDHA should be clear-cut and that it should not be triggered unless it is genuinely important to do so.

Chapter 12 - Policy BE8: Noise and Vibration

1 Do you support Policy BE8? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comment arising.

Chapter 12 - Policy BE9: Land Contamination and Remediation

1 Do you support Policy BE9? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 12 - Policy BE10: Digital Connectivity

1 Do you support Policy BE10? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 12 - Built Environment

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

This should only apply to developments which would result in construction activity. That would exclude (for example) s73 applications to adjust matters such as operating hours or end user restrictions that would not result in any demolition or construction activity.

Chapter 13 - Policy CL1: Protecting and Supporting Existing Cultural, Leisure and Tourism Assets

1 Do you support Policy CL1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising,

Chapter 13 - Policy CL2: New Culture, Leisure and Tourism Developments

1 Do you support Policy CL2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

No specific comments arising.

Chapter 13 - Culture, Tourism and Leisure

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

The policy should cross-refer to a plan that identifies the precise alignment/location of areas identified for safeguarding, such as the Cheshire Lines Committee railway line.

Chapter 14 - Policy IP1: Infrastructure Delivery and Planning Obligations

1 Do you support Policy IP1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

This appears to seek largely blanket contributions towards infrastructure absent of any viability evidence. We have separately set out our concerns in relation to Policty IP1N regarding the application of this in the CQAAP area.

Through our review of the supporting evidence, we see no new viability evidence and only a cross-reference to the levies adopted following the CQAAP examination. Whilst the roof tax was adopted it was subject to the inclusion of a viability assessment mechanism which reflected the very generic nature of that work and the strong disputes about some of the key inputs that would inform costs or GDV of any given scheme.

We also note that apartment typologies are curently zero-rated in terms of CIL for the CQAAP area, so the addition of a CIL-type levy was never anticipated. Furthermore, the interim period has seen the roll-out of BNG and the recessionary effects of macro-economic events such as the Ukraine conflict. The net result has largely been to increase development cost with no discernible change in sale values.

At a basic level, Policy IP1 proposes a levy for all non-residential development which is inconsistent with the CQAAP (where some use typologies were zero-rated). There is no published evidence to sustain that this would be appropriate and would not prejudice development that would be otherwise acceptable in planning terms.

The caveat that suggests that applicants could submit their own viability assessments (and obligation to meet the costs of independent review) exposes them to considerable cost and delay. This is an unreasonable policy framework without compelling evidence and would be unsound. The only appropriate resolution is for the Council to provide robust evidence. In the event that there are typologies where these obligations cannot be sustained then they should not be sought.

Chapter 14 - Policy IP2: Managing and Monitoring Planning Obligations

1 Do you support Policy IP2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Please write your response here::

The Council should provide justification as to why any such fees should be non-refundable. In the event that the work does not need to be undertaken (an example scenario being a travel plan obligation for 5 years but the occupation ceases after 12 months) then this would be unreasonable.

2 Do you agree that the Council should require a fee to monitor and report on all planning obligations?

Please write your response here::

We concur that the Council should seek fees to meet their reasonable costs. On the assumption that the Council can evidence that these sums are reasonable, we make no substantive comments.

3 Do you agree or have any observations or suggestions on the proposed planning obligation monitoring fees for either minor and/or major developments?

Please write your response here::

The Council should provide justification as to why any such fees should be non-refundable. In the event that the work does not need to be undertaken (an example scenario being a travel plan obligation for 5 years but the occupation ceases after 12 months) then this would be unreasonable.

Chapter 14 - Infrastructure and Planning Obligations

1 The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy. However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?

Please write your response here::

This appears to seek largely blanket contributions towards infrastructure absent of any viability evidence. A particular difficulty is whether or not any such obligations would be applicable in the CQAAP area and (if yes) whether this would be in addition to the levies identified as a roof tax in the CQAAP.

ATP participated in the CQAAP examination and with specific interest in terms of viability implications of the "policy on" framework created through the roof tax and other policy objectives. The viability evidence to the CQAAP examination did not anticipate any additional CIL-type levies for apartment typologies because these were zero-rated through the adopted CIL Charging Schedule.

Even absent of any potential additional planning obligations in the CQAAP area, the background document does not acknowledge that the now adopted roof tax was subject of considerable resistance due to problems with the cost evidence and anticipated sales value. Specifically, the costs evidence was based upon historic data that did not fully capture cost inflation or the effects of emerging policy requirements. Similarly, the GDV reflected an expectation of a very speculative value premium.

Since that point, the development industry has had to respond to the roll-out of BNG and the recessionary effects of macro-economic events such as the Ukraine conflict. The net result of these matters has largely been to increase development cost with no discernible change in sale values. It is notable that the Council has approved residential schemes in the CQAAP area providing planning obligations below those identified by the CQAAP.

Through the CQAAP examination, different levels of roof tax were applied on a typology basis (with some use typologies being zero-rated). At a basic level, Policy IP1N proposes a £70 sq m levy for all non-residential development and that it is inconsistent with the CQAAP. There is no published evidence to sustain that this would be appropriate and would not prejudice development that would be otherwise acceptable in planning terms.

The caveat that suggests that applicants could submit their own viability assessments (and obligation to meet the costs of independent review) exposes them to considerable cost and delay. This is an unreasonable policy framework without compelling evidence and would be unsound.

Integrated Assessment (IA) of the Draft Local Plan

1 Do you have any comments to make on the Sustainability Appraisal and its associated appendices?

Please write your response here::

No specific comments arising.

2 Do you have any comments to make on the Health Impact Assessment?

Please write your response here::

No specific comments arising.

3 Do you have any comments to make on the Equalities Impact Assessment?

Please write your response here::

No specific comments arising.

IA: Climate Change Risk Assessment

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

Please write your response here::

No specific comments arising.

Integrated Assessment (IA): Scoping Report Addendum

1 Do you have any comments on the IA Scoping Report Addendum?

Please write your response here::

No specific comments arising.

Habitat Regulations Assessment (HRA) of Draft Local Plan

1 Do you have any comments on the Habitats Regulations Assessment (HRA) of Draft Local Plan?

Please write your response here::

No specific comments arising.

Site Selection Methodology

1 Do you have any comments on the proposed Site Selection Methodology (Figure SS-1)?Are there any stages / questions / considerations which should be added and/or removed?

Please write your response here::

No specific comments arising.

2 Specific criteria will need to be identified to assess a sites performance at each stage of the site selection process.Do you have any comments on what these site criteria should include?What evidence should inform this assessment?

Please write your response here::

No specific comments arising.

Representations to Draft Trafford Local Plan - April 2025

Forename: Lisa

Surname: Lee

Organisation: Westfields Property Management Ltd

Position: Director

Address: [redacted]

Email: [redacted]

Phone: [redacted]

Opt In/Out: In

These **representations should be read in parallel** with our submission to the Call for Sites exercise.

The submission is supported with:

- a site location plan with the site outlined in red.
- a standalone document prepared by Project 3 Architects.

As per exchanges with the Local Plan team these submissions follow the form of the online survey.

Chapter 1 Do you support the draft Policies Map? Are there any changes required which would improve it?

NO



This extract shows the approximate site outlined in red. As visible, the site is contained to the east and south with existing/proposed allocations. Further, the commercial livery to the north, and storage and industrial site to the west, mean that the site is encompassed with PDL/Allocations. Rolling back the Green Belt (refer to aerial image within the Project 3 document) provides a more defensible and robust Green Belt boundary. Further, the western boundary of the storage and distribution site to the west could be allocated as part of the Green Infrastructure Network.



Q2.1 Do you support Policy ST1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

NO

At paragraph 2.12-2.13 the Council outlines the reason that they are not proposing to review the Green Belt as part of the Local Plan review. We consider this is contrary to the NPPF and will mean the Council, in due course is unable to accommodate the updated housing targets as part of the changing methodology. Also, the Council should also be looking to clarify their approach to responding to the changed NPPF and inclusion of the Grey Belt.

Q2-3 Do you support Policy ST3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

IN PART

The strategy plan and policy acknowledge that Altrincham is a Main Town Centre, yet development within the Southern Areas appears to be focussed in other locations. This policy should positively support sustainable development close to Altrincham, including the jobs and services at Broadheath.

Q 2-5 Do you support Policy ST5? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

IN PART

We feel this policy could go further, confirming that developments putting Trafford at the forefront of sustainable development will be given substantial weight in the planning balance, encouraging forward thinking developers, for example of Grey Belt sites.

Policy R2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Housing targets are not intended to be a cap for growth, and we are concerned that the Council are not taking this opportunity to consider the implications of the standard method with regards to housing targets. The numbers should be increased. An easy way to do this is to acknowledge specifically the contribution that Grey Belt sites could make, in combination with minor amendments to anomalies in the existing Green Belt boundaries.

Q8-2 Do you support Policy GI2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

Further to the answer provided to Q1 (proposals map) the plan could be updated to add additional opportunities for Green Infrastructure to enhance biodiversity and provide more robust / defensible boundaries.

Transport for Greater Manchester

Trafford Local Plan- April 2025, Regulation 18 Consultation Draft- Policies

Thank you for providing TfGM the opportunity to comment on the Draft Trafford Local Plan consultation. To date, a collaborative working approach has seen the effective development and adoption of Places for Everyone joint development plan document. TfGM are keen to continue working collaboratively with Trafford Council in the production and adoption of the Trafford Local Plan as well as post plan, to ensure the effective delivery of the plan's objectives.

This document and the TfGM comments spreadsheet provide a comprehensive set of recommendations and notes to assist where possible, in providing suggestions on the next iteration of the Draft Trafford Local Plan.

TLP: Vision and Strategic Objectives

As you are aware, the integration of land use and transport planning is central to achieving sustainable development. The challenges involved in achieving the expected growth in Greater Manchester and accommodating that growth in a sustainable way without additional traffic congestion and transport emissions on an already busy transport network, will be considerable. There are already some critical transport issues which the city region faces notably peak time congestion on the road network and the knock-on impacts on carbon emissions and air quality.

We have therefore developed our Right Mix Target to improve our transport system so that by 2040, 50% of all journeys in GM will be made by public transport or active travel, with no net-growth in motor vehicle traffic. This will support over 1 million more journeys per day on our Bee Network through walking, wheeling, cycling and public transport by 2040. Achieving this target will require a substantial increase in the level of investment to provide transport services and a cultural change in how people in GM choose to travel. It will also require a joined-up approach that recognises the important influence that decisions and action outside of the transport sector can have on travel outcomes.

We support the Trafford Local Plan vision for a sustainable transport network with car free travel being the priority for how people get around and an overall reduction in the need to travel through the creation of sustainable communities with locally accessible services, jobs and facilities. We also support the Strategic Objectives intended to maximise the potential for walking, wheeling and cycling and public transport use with the highest levels of development being in those locations that are not dependent on car use. The objectives also highlight the key role that Trafford's vibrant town and

designated centres will play in providing local services and facilities to meet day to day needs, which we support as a further key component of reducing the need to travel by car.

It may be helpful if the Trafford Local Plan includes within "SO8 Sustainable movement" part A an objective to improve accessibility. This could be framed around and aligned with the development of, and the design considerations necessary to create, 20-minute walkable neighbourhoods within Trafford, where it is easier for everyone to meet their everyday needs by a short, convenient and pleasant 20-minute return walk.

A 20-minute neighbourhood (or similar name, given some negative connotations with the term in some areas) is essentially a compact and connected place, with a range of services that meet most people's daily needs and that can be accessed within a 20-minute return walk or even quicker by cycling. This includes the daily needs of all people including children, young people, people without access to a car and older and disabled people. The economic, environmental, health and social benefits of such neighbourhoods are far reaching including regenerating urban centres, revitalising local high streets and local economies, improving road safety, enhancing social cohesion, improving health and wellbeing outcomes and supporting the move towards carbon net-zero targets through reducing unsustainable travel.

20-minute neighbourhoods are supported by policies that promote mixed use and higher density developments, help to encourage a diverse mix of uses (including civic, commercial, residential, employment, educational, health care, retail and amenity/leisure uses), that combined support people's day-to-day needs and create a distinctive sense of place, ensuring life and vitality on weekdays, weekends and evenings.

An array of interventions will need to be considered to support the creation and implementation of 20-minute neighbourhoods including:

- Provision of a range of services
- Diverse and affordable housing
- Active travel interventions; maintaining and enhancing walking and cycling infrastructure
- Public realm and greenspace enhancements
- Sufficiency of play opportunities, parks and recreation spaces
- Traffic reduction methods
- Considerations of mixed use and higher density development

Policy support can also be provided to aid access to services for new developments either by supporting the provision of new services in areas deficient of them or encouraging residential developments in areas already well serviced such as town and local centres.

More information on 20-minute neighbourhoods can be found in the TCPA's 2021 report "20-Minute Neighbourhoods- Creating Healthier, Active, Prosperous Communities - An Introduction for Council Planners in England" 20MN_Main.qxd (tcpa.org.uk)

Overall Plan

TfGM supports the overall Draft Local Plan. To support sustainable inclusive growth, we will work in collaboration with Trafford Council, local communities, partners and key stakeholders to deliver improvements to the transport infrastructure and services to meet identified needs. Working with all ten GM Local Authorities we are currently refreshing the GM Local Transport Plan which will include a second LTP 5 Year Delivery Plan and a Trafford Local Implementation Plan. This will require collaborative working and co-ordination as this Trafford Local Plan, the second LTP 5 Year Delivery Plan and the Trafford LIP are developed. It will also require consideration of the transport priorities for the Western Growth Location.

Through the Growth Location workstream (between district officers, the GMCA and TfGM), TfGM are working alongside district officers in the development of Transport Framework Documents for key areas of strategic growth. Transport Framework Documents aim to use an evidence-based, 'sustainable transport first' approach to identify the transport infrastructure needed in support of new development, how the infrastructure will be funded across both the public and private sector, and the phasing of the required infrastructure alongside development as part of the integrated pipeline. This will maximise opportunities to use sustainable modes of transport, therefore reducing the number of car journeys and ensuring that transport acts as an 'enabler' rather than a 'constrainer' to growth.

The scope of a Transport Framework Document for the Old Trafford Regeneration area of the Western Growth Location is currently out to tender, to recruit a consultant to support the delivery of growth aspirations in this area in the short, medium and long term. Discussions are also ongoing between stakeholders, including Trafford and Salford Councils and National Highways, in how to unlock current infrastructure constraints in the Trafford Waters / Port Salford area. TfGM are therefore keen to continue to work in collaboration with you on appropriate study and development work to unlock development in support of your overall strategy. Collaborative working will be required between TfGM, Trafford Council, neighbouring districts, local communities and key stakeholders, linked to the master planning work being undertaken and adopting the principles of the Transport Framework Document approach at an appropriate geographical level, to ensure alignment as part of an integrated growth and transport infrastructure pipeline.

Vision Led Approach

The large scale roll out of active travel and public transport infrastructure across Trafford needs to continue at pace to accommodate the growth in travel demand sustainably and achieve our right mix targets. We are therefore supportive of Policies TM1, TM2 and the series of locality specific interventions detailed in policies TM1N, TM1S, TM1C and TM1W. We are also supportive of the interventions specific to the A56 set out in Locality Policies TM6N, TM6C and TM6S which propose a Streets for All policy approach to this important part of the local highway network. (Although it should be noted that these policies are incorrectly referenced in TM1 as TM3N, TM3C and TM3S).

Collectively all these policies (along with TM4) are very helpful in setting out a "sustainable transport first" vision for transport and movement within and across Trafford which is fully supported by the emerging refresh of the GM Local Transport Plan (GM 2040 Transport Strategy, 5 Year Delivery Plan and LIPs). This vision clearly not only applies to public sector investment, but also to proposals for new development across Trafford.

It would therefore be helpful if Policy TM5 Local Highway Network part D referred to a requirement for a vision-led Transport Assessment and/or Travel Plan designed to prioritise the use of sustainable forms of travel and then mitigate against any residual transport impacts of the development. This would be aligned with the National Planning Policy Framework requirements to ensure that "sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location" (paragraph 115a) and for "all developments that will generate significant amounts of movement.... to be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed" (paragraph 118).

Parking

We welcome proposals in Policy TM10: Parking Standards to set appropriate off-street, car parking provision accordingly to the type of development proposed and the proposed locations' level of accessibility (measured by GMAL). Locations with good accessibility to public transport should be able to support reduced car parking provision. However, GMAL is only one measure of accessibility (relating only to public transport), therefore further considerations may also include the coverage and quality of the active travel network in a particular location and access to services and facilities. It is understood that Trafford Council use GMAL 6+, and for PfE GMAL 5.5+ was used. The most accessible locations such as town centres may therefore be able to support development with very low levels of car parking provision, however this may also be dependent on adequate on-street parking controls (See Manual for Streets 8.3.6).

A review of specific standards determined by evidence based studies could therefore be beneficial in helping to achieve sustainable development and meeting GM wider sustainability aspirations including carbon reduction targets, right mix targets and air quality improvements. Zonal car parking standards based on the type of development and a level of accessibility may be a good starting point and sufficient for most development proposals. However, there may be occasions when Trafford Council may wish to consider a more bespoke approach to car parking provision for larger developments or strategic development sites. This could involve the use of existing car parking standards which can then be tested against site-based elements such as development location, mix and density, proposed site vision, sustainable transport measures to be provided and the need for car parking to act as demand management where appropriate. Reduced car parking provision may form part of a demand management strategy needed to encourage stakeholders such as National Highways to accept site-based vision-led strategies.

For larger developments or strategic development sites, technical assumptions in support of the vision-led strategy (e.g. trip generation and mode share) could be used in the evidence to support

proposed car parking provision with reference to the existing standards. In vision-led transport assessments, evidence could be used to illustrate how the car parking levels to be provided:

- Reinforce the transport vision for the site
- Support any identified need for overall car parking levels to act as demand management as part of the multi-modal access strategy
- Utilise the standards as a reference point to define an appropriate level of car parking linked to available site-specific evidence.

With reference to EV charging Trafford Council may wish to consider a policy that raises the requirement for non-residential development above the current Building Regulation requirement of just one EV charge point per building, especially in those locations where there is little or no off-road residential parking, which are therefore likely to have a higher demand for non-home charging. For example, large retail, commercial or employment development could be required to provide 5% (or 10%) of the total car parking for the development, as EV charge point spaces, depending on the existing local provision.

Site Selection methodology- Bus Network

We want all residents to have access to opportunities, whether that be employment, education, leisure or social. Transport should not be a limiting factor to this and therefore any future residential developments need to consider how sustainable travel can be promoted from the early stage of the planning process. This not only ensures that the people who live in these new developments can live good lives, but it makes these new developments more attractive places to live in.

TfGM should be consulted in the early stages of the planning process, allowing us to provide expert advice and consider sustainable transport options that will complement and enhance the existing transport network. Our bus network can play a crucial role in providing new developments with access to convenient and attractive transport links. Ideally, developments should be close to the existing bus network with direct walking and cycling routes into the development making the full journey from front door to the bus stop attractive and safe. Our Streets for All Design Guide outlines how this can be achieved across all street and road types through putting people first.

Bus routes should be simple to understand and designed to keep journey times low. Therefore, rather than diverting a high frequency service off a main road to serve an estate, feeder services and other methods can connect people to the core network. Where a new service is to be provided, or an existing service diverted to serve the site, the internal road layout should be bus friendly, including bus priority where appropriate and this should include high quality waiting facilities. ‘Dog-legs’ which would inconvenience existing users, should be avoided and buses should be able to run through the site allowing the opportunity to provide maximum impact with minimal resource and disruption.

Document	Page number	Section number	Title	Document extract	Recommendations	Additional notes	TfGM department
Draft Local Plan	22	S01	Homes		Add in wording about creating sustainable communities?		Strategy
Draft Local Plan	22	S01	Homes		Include reference to the sustainable construction of new homes. This could include wording around sustainable building standards (e.g. BREEAM/ PAS 2080) or consideration of whole life carbon.		Strategy
Draft Local Plan	23	S06	Centres		Add in wording about encouraging, creating and maintaining?		Strategy
Draft Local Plan	23	S07	Environment		Add in wording on sustainable materials?		Strategy
Draft Local Plan	23	S07	Environment		Add in wording on protecting wildlife?		Strategy
Draft Local Plan	24	S08	Sustainable Movement		Add in wording on connecting to the rest of Greater Manchester, connecting Local Authorities, regional, national connectivity		Strategy
Draft Local Plan	24	S08	Sustainable Movement		Add increase public and private electric vehicle charging infrastructure to encourage uptake of electric vehicles		Strategy
Draft Local Plan	24	S09	Leisure Assets		Could the points be maximised further? e.g. maximise opportunities in the borough + wider?		Strategy
Draft Local Plan	53	2.4	Climate Change	The Trafford Local Plan seeks to make a major contribution to both mitigating and adapting to the challenges posed by climate change, consistent with the Council's Climate emergency Declaration and Greater Manchester's pathway to achieving zero carbon by 2038.	GM's target is to be carbon neutral by 2038 not zero carbon, and this is the terminology used throughout the SYEP. Net Zero and Carbon Neutrality are not interchangable terms so terminology needs to be the same throughout all public facing documents.		Strategy
Draft Local Plan	66	SO3	Networking Renewables		Could reference to community energy schemes be included here (if there is enough available volume to be a suitable option?)		Strategy
Draft Local Plan	71	SO3/ SO7	A New Greener Economy		Include wording around procurement policy and/ or supply chain engagement as an essential requirement for major developments e.g. GMCA have a target to ensure 80% of their supply chain demonstrates commitment to carbon neutrality. Could something similar be adopted?		Strategy
Draft Local Plan	91	Figure 4-1	Minimum net residential densities in Trafford in accordance with PfE policy JP-H4 and Policy RS		Review densities around Urmston town centre - should it include 70 dph within 400 metres of Urmston station? Compare with GMAL Level 6 map of Trafford - should more of Trafford be 50 dph with GMAL score of 6 or above?		Strategy
Draft Local Plan	95		Lifetime Homes		Should all homes not be made accessible- rather than just 4%?		Strategy
Draft Local Plan	145	6.13	Transport Hubs		Where appropriate developer funding could be used to introduce local hubs, offering a high quality, safe, accessible point where interchange between existing or improved bus services or between modes is encouraged and made easier.		Bus (Strategic Network Planning)
Draft Local Plan	146	6.14	Local Bus Services		Review of connectivity - including development sites and with a focus on areas such as Partington, Carrington, Flixton and Urmston will take place as part of TfGM's Network Review process. Sustainable, long term public transport options must be a key feature of development sites - and consideration to this should be made at an early stage. A good example being where the existing network can be improved or developed therefore delivering a wider network benefit. Developments requiring interventions with potential legacy costs - for example an outlying estate requiring a bespoke bus service, likely to see little usage, should be avoided where possible.		Bus (Strategic Network Planning)
Draft Local Plan	147	6.16	Orbital Bus Services		Improved orbital bus services (in conjunction with other meaures such as Tap & Go, Hopper Ticket and improved passenger information) will support connectivity, enabling service users to make informed decisions which allow them to get to their destination more quickly/efficiently. Upcoming developments will feature as part of area Network Reviews and opportunities to improve the local and wider network (especially to major employment zones such as MIA, and to education, leisure and health facilities) will be considered.		Bus (Strategic Network Planning)
Draft Local Plan	145	Policy TM2	Public Transport		To make the section more readable, grouping together of all comments on each mode may improve the flow of information, if split up modally.		Strategy
Draft Local Plan	148	6.2.2	Tram-Train	The Transport Strategy 2040 Draft Delivery Plan (2021-2026) identifies an opportunity for Tram-Train on the existing Altrincham – Hale railway line as an early pathfinder project.	This is not currently proposed as a "pathfinder" project for tram-train. It is an extensions which is being considered as was outlined within the Draft Greater Manchester Rapid Transit Strategy and one we continue to look at but if this could not be referred to as "pathfinder" that would be appreciated as it risks confusing readers with the Tram-Train Pathfinder project based on Bury-Heywood-Rochdale.		Rapid Transit Extensions
Draft Local Plan	154	TM6	A56 Corridor	Modal shift from the private car.	Proposed interventions to improve bus usage could be stronger. A56 bus running times vary and better bus priority could reduce the variance - making journey times more predictable and allowing more efficient scheduling to increase vehicle productivity(more time in service, less time laying over) and service frequency.		Bus (Strategic Network Planning)
Draft Local Plan	217/ 229		New Developments	In the majority of cases, new green infrastructure will be required as on-site specific mitigation and enhancements and could also contribute to achieving requirements for Biodiversity Net Gain (Policy GI10 and PfE Policy JP-G8). Where specific circumstances justify offsite provision, a financial contribution will be sought as part of a S106 agreement.	Reference to BNG could be stronger throughout the plan. Doesn't explicitly state that BNG of 10% lasting for at least 30 years on all new developments that require planning permission is a requirement. There is specific detail around other metrics e.g. minimum UGF scores but nothing similar for Statutory Biodiversity Metric. In addition a commitment to ensure off site BNG is kept to within Trafford could enhance the biodiversity commitment (for context could reference the biodiversity emergency declared by GMCA).		Strategy
Draft Local Plan	166		Electric Vehicle Charging Points	D. New development will be expected to make provision for electric vehicle charging infrastructure.... ....E. A reduced requirement will be permitted where it can be demonstrated that the specific characteristics of the development proposed would result in lower levels of demand for electric vehicle charging.	This section could be more specific citing or referring to the 2022 regs (Part S Building Regulations) requirements around minimum EV parking bay provision in new/ re-developed residential and non-residential developments with 10 parking spaces or more e.g. Residential buildings undergoing major renovation - 1 in 10 parking spaces to be an EV charging point New non-residential buildings - 1 in 5 parking spaces to be an EV charging point Non-residential buildings undergoing major renovation - 1 in 5 parking spaces to be an EV charging point.		Strategy
Draft Local Plan	221/ 229		Trafford's Trees and Hedges		Is there a policy/ position on management of invasive species and adoption of native species?		Strategy
Draft Local Plan	258		Water, Flooding and Drainage	Development must incorporate flood mitigation and management measures appropriate to the use and location. Such measures will be required to: .... ii. Designing the measures in accordance with the hierarchy of drainage options.	Could a requirement for new developments to follow the design principles set out within Greater Manchester's SUDS Design Guide (published 2024) be incorporated (appreciate use of CIRIA SUDS standard may be all that's required)?		Strategy
Draft Local Plan	40+		Inner and core areas		Would be useful to discuss the public transport/active travel (sustainable movement) opportunities here		Strategy
Draft Local Plan	138	Section 6	Transport and Movement	Map	Are the proposed improvements to Talbot Road in addition to the current segregated cycle tracks and CYCLOPS junctions?		Strategy
Draft Local Plan	137	Section 6	Transport and Movement	Intervention list	Is this a draft or final list? Could further interventions/review be added if appropriate?		Strategy
Draft Local Plan	152	Policy TM4	Mobility Hubs		Further narrative on the opportunities of hubs (particularly larger hubs) supportng growth, community spaces, employment, could be useful here		Strategy
Draft Local Plan	156	Policy TM6N	A56 North		White City Circle- bus is a mode that will have a greater prominence, specifically relating to the OTR boundary (which includes match and non match days)	Emphasis on bus suggested	Strategy
Draft Local Plan	159	Policy TM6S	A56 South		Sinderland Road and Barrington Road are included for pedestrian upgrades as part of the SWANI (CRSTS1 programme) scheme- important area for active travel/connectivity		Strategy
Draft Local Plan	169	Policy TM10	Parking		To make the section more readable, grouping together on all comments on each sub-topic may improve the flow of information if split up modally.		Strategy
Draft Local Plan	187	Policy TC3	Beyond the town centres		Possible addition of including the importance of sustainable transport locally to any new out of town developments		Strategy
Draft Local Plan	145	Policy TM2	Public Transport	Metrolink D. The Council will encourage and support proposals which improve the quality, capacity and extent of the Metrolink network within Trafford. Priority will be given to the delivery of the proposed Manchester Airport Western Leg extension (and associated Davenport Green stop), the route of which will be safeguarded on the Policies Map.	D. Metrolink - Tram. The Council will encourage and support proposals which improve the quality, capacity, and extent of the Metrolink network within Trafford. Priority will be given to the delivery of the proposed Metrolink Airport line Western leg ~~Manchester Airport Western Leg extension~~ (and associated Davenport Green stop), the route of which, while subject to further optioneering, is indicated will be safeguarded on the Policies Map. The Council will work with TfGM to support additional Metrolink proposals including a potential extension of the Trafford Park line through Trafford Waters to Port Salford, and the exploration of additional capacity that may be required at critical parts of the Metrolink network, with an initial focus on the Cornbrook area, which abuts the Trafford Council/ Manchester City Council boundary.	TfGM Rapid Transit Team are happy to continue discussions regarding the correct wording of this policy througout the policy writing process. More specifically the Rapid Transit Team are keen to review final wording as part of the Reg 19 consultation stage.	Rapid Transit
Draft Local Plan	146	Policy TM2	Public Transport	Tram-Train G. The Council will support the development of the Tram-Train Network to provide improved rapid transit links, in line with the most up-to-date Greater Manchester Transport Strategy Delivery Plan (or equivalent document).	G. Metrolink - Tram-Train. The Council will support the development of the Tram-Train Network to provide improved rapid transit links, in line with the most up-to-date Greater Manchester Transport Strategy Delivery Plan (or equivalent document). The Council will work with TfGM in their commitment to develop tram-train pathfinder projects to pilot the technology in Greater Manchester and to unlock future schemes. Such schemes are supported by Trafford Council as there may be future potential for Tram-Train on the Mid- Chester Line (Stockport to Airport, and tram-train services to the north-west, west and south-west of the Airport) and the Warrington (CLC) line.	TfGM Rapid Transit Team are happy to continue discussions regarding the correct wording of this policy througout the policy writing process. More specifically the Rapid Transit Team are keen to review final wording as part of the Reg 19 consultation stage.	Rapid Transit
Draft Local Plan	146	Policy TM2	Public Transport	6.12 The Greater Manchester Transport Strategy 2040 sets an ambitious vision for public transport in Greater Manchester, which will support economic growth, social well-being, environmental improvement and better public health across Greater Manchester.	6.12. The Greater Manchester Transport Strategy 2040 sets an ambitious vision for public transport in Greater Manchester, which will support economic growth, social well-being, environmental improvement, and better public health across Greater Manchester. At the time of writing the Trafford Local Plan, Transport for Greater Manchester's "Draft Greater Manchester Rapid Transit Strategy: trams, trains, busways and beyond for the Bee Network (July 2024)" is publicly available and sets out Rapid Transit future priorities. It is anticipated, however, that the priorities of the Draft Rapid Transit document will be capitulated into an updated Greater Manchester Transport Strategy.	TfGM Rapid Transit Team are happy to continue discussions regarding the correct wording of this policy througout the policy writing process. More specifically the Rapid Transit Team are keen to review final wording as part of the Reg 19 consultation stage.	Rapid Transit
Draft Local Plan	147	Policy TM2	Public Transport	Metrolink	Metrolink - Tram	TfGM Rapid Transit Team are happy to continue discussions regarding the correct wording of this policy througout the policy writing process. More specifically the Rapid Transit Team are keen to review final wording as part of the Reg 19 consultation stage.	Rapid Transit

Strategy department comments-refers to Strategic Planning and Logistics & Environment team comments

Draft Local Plan	147	Policy TM2	Public Transport	6.18 The Manchester Airport Western Leg is safeguarded and will provide connections to proposed Davenport Green Local Centre and Manchester Airport. The Council will continue to work alongside Salford City Council and TfGM to identify and consider options for the extension of the Trafford Park line to Port Salford, including a stop at Trafford Waters.	6.18. The Metrolink Airport line Western leg ~~Manchester Airport Western Leg~~ continues to fall under the consenting powers granted in 1997 ~~is safeguarded~~ and will provide connections to a proposed Davenport Green Local Centre and Manchester Airport, this includes the Councils support to ongoing activities in relation to an east-west rail connection between Manchester Piccadilly and a potential future high speed rail station at the Airport and integrated tram stop. The Council will continue to work alongside TfGM and MAG to support further development of these proposals. The Council will also continue to work alongside Salford City Council and TfGM to identify and consider options for the extension of the Trafford Park line to Port Salford, including a stop ~~at~~ within the Trafford Waters development, where the route corridor is safeguarded in the scheme master plan.	TfGM Rapid Transit Team are happy to continue discussions regarding the correct wording of this policy througout the policy writing process. More specifically the Rapid Transit Team are keen to review final wording as part of the Reg 19 consultation stage.	Rapid Transit
Draft Local Plan	148	Policy TM2	Public Transport	Tram-Train	Metrolink - Tram-Train	TfGM Rapid Transit Team are happy to continue discussions regarding the correct wording of this policy througout the policy writing process. More specifically the Rapid Transit Team are keen to review final wording as part of the Reg 19 consultation stage.	Rapid Transit
Draft Local Plan	148	Policy TM2	Public Transport	6.22. The Transport Strategy 2040 Draft Delivery Plan (2021-2026) identifies an opportunity for Tram-Train on the existing Altrincham – Hale railway line as an early pathfinder project. Such a scheme is supported by Trafford Council and will help to improve access to the city centre. Further to this, there may be future potential for Tram-Train on the mid-Cheshire line and Manchester to Liverpool rail line.	Proposed recommendation is to remove this paragraph in favour of changes made to the main body of the policy.	TfGM Rapid Transit Team are happy to continue discussions regarding the correct wording of this policy throughout the policy writing process. More specifically the Rapid Transit Team are keen to review final wording as part of the Reg 19 consultation stage.	Rapid Transit
Draft Local Plan	50	Policy ST3: Southern Areas (Trafford)	Figure 2-3: Strategy Plan	Map -not possible to include extract.	Could be useful to include rail and Metrolink connections on this map to show alignment / or not with PfE allocations and Other growth allocations. Additionally, a lot of Trafford's key areas are already connected by Metrolink (Altrincham, Old Trafford, Stadium and Wharfside etc.). A key reason why these locations are so prominent is presumably because they are well connected and it's important the plan continues to make best use of the connectivity by prioritising those locations for growth and increasing urban and transport integration.	The Rapid Transit Team are aware that other TfGM departments are commenting on various sections of the plan. Should those departments have their own comments, please use professional judgement to create a more coordinated comment.	Rapid Transit
Draft Local Plan	52	Policy ST5: Climate Change	Climate Change	Not extract as recommendation is a general comment	In the climate change section, could also be worth making the point that prioritising growth and development around existing transport connections will promote further, additional uptake of public transport, supporting the use of more sustainable, less carbon-heavy modes.	The Rapid Transit Team are aware that other TfGM departments are commenting on various sections of the plan. Should those departments have their own comments, please use professional judgement to create a more coordinated comment.	Rapid Transit
Draft Local Plan	89	Policy R5: Housing Density	Housing Density	Not extract as recommendation is a general comment	In relation to the distribution of development, what determined whether a site was strategic? Potentially worth linking to Draft Rapid Transit Strategy if RT / Metrolink was a factor - or equivalent policy document.	The Rapid Transit Team are aware that other TfGM departments are commenting on various sections of the plan. Should those departments have their own comments, please use professional judgement to create a more coordinated comment.	Rapid Transit
Draft Local Plan	91	Policy R5: Housing Density	Housing Density	4.24 Policy R5 builds on PfE Policy JP-H4: Density of New Housing, which sets minimum density requirements for residential development proposals based on their proximity to designated centres and / or public transport stops (rail stations and Metrolink stops).	In relation to housing density, it's good they've included this statement – shows focusing on prioritising intensification where they make best use of existing rail/Metrolink connections.	The Rapid Transit Team are aware that other TfGM departments are commenting on various sections of the plan. Should those departments have their own comments, please use professional judgement to create a more coordinated comment.	Rapid Transit
Draft Local Plan	108	Policy EJ1: Employment Land Requirements	Land requirements	Not extract as recommendation is a general comment	In relation to Trafford Park, could include something about promoting further uptake / usage of the Trafford Park Line for commuting to and from Trafford Park and visits to and from the Trafford Centre to contribute to the Low Carbon Trafford aspiration. In relation to office development, could make reference to what else is needed (i.e., transport investment) is needed to support development aspirations at Trafford Waters and the Ship Canal.	The Rapid Transit Team are aware that other TfGM departments are commenting on various sections of the plan. Should those departments have their own comments, please use professional judgement to create a more coordinated comment.	Rapid Transit
Draft Local Plan	315	Policy CL1N	Manchester United Stadium	A new and/or improved design and delivery of the White City Circle Interchange.	Is Interchange the right word here? White City Circle or White City Circle area?		Strategy
Draft Local Plan			General comment		Could there be any aspects of the Plan (in relation to major development, e.g. OTR) that reinforce the important of cross- boundary working?		Strategy
Draft Local Plan			General comment		Inclusion of the Greater Manchester Strategy into priorities and in support of		Strategy
Draft Local Plan			General comment		Inclusion of the Trafford Walking, Wheeling and Cycling Strategy		Active Travel
Draft Local Plan			General comment		In support of the policies- specifically Policy TM1		Active Travel
Draft Local Plan			General comment	Urmston as a town centre	Does reference cycling, but nothing further/specfic		Active Travel
Draft Local Plan		TM1	Walking, Wheeling and Cycling	A series of locality specific interventions are detailed in policies TM1N, TM1S, TM1C and TM1W.	Welcome requirements associated with new developments i.e. making provision for safe walking, wheeling and cycling and safe convenient routes through new developments and high-quality public realm.		Active Travel
					Welcome instruction to provide cycle parking and amenities for cyclists within new premises.		Active Travel
					Kerbside reallocation to facilitate cycling should also preserve adequate pedestrian provision.		Active Travel
Draft Local Plan		TM1N Trafford North			TM1N Trafford North as I expect but Figure 6.1 is unclear - whilst there is semi-permanent/light segregated cycle lanes on (old) Chester Road the junctions could be better addressed as could pedestrian crossings here. The text and Figure 6.1 suggests that only certain junctions should be improved – suggest text and diagram improved		Active Travel
Draft Local Plan		TM1S			TM1S Altrincham to Trafford Central low traffic route parallel to the A56 in addition to interventions proposed in TM6S		Active Travel
Draft Local Plan		TM1C			TM1C proposes a route parallel to the A56 through Sale along Bridgewater Canal and therefore off road into Sale Water Park overcoming the severance caused by the M60. Out of centre and away from residential properties the off-road route may not provide enough natural surveillance to encourage a wide range of people to feel confident/encouraged to use the route. Additional interventions located on the A56 in Trafford Central are detailed in Policy TM6C		Active Travel
Draft Local Plan		TM1W			TM1W proposes a route through Carrington as I expect/discussed with Trafford Council C&W leads.		Active Travel
Draft Local Plan		TM6			TM6 – as expected reflecting A56 study		Active Travel
Draft Local Plan		TM6N			TM6N – White City Circle supportive of proposals to make safer and more attractive for peds and cyclists.		Active Travel
Draft Local Plan		TM6C			TM6C – A56 junctions through Sale (excludes route along A56)		Active Travel
Draft Local Plan		TM6S			TM6S – A56 junctions south into Altrincham (excludes route along A56)		Active Travel
Draft Local Plan		Policy OS2 (and potentially CL1 & 2)	Outdoor Sports and Recreation Facilities and Provision (& Protecting existing existing and new leisure developments)		Might reference Trafford's Cycling, Walking and Wheeling Strategy - this isn't referenced in the Transport section as far as I can see - could be because it's out of date/needs to be revised.		Active Travel
					Might also reference bike hire stand locations and/or future proofing for extension of such		Active Travel
Draft Local Plan			Site specific policies		The site specific policies (for cycling in particular, but may apply to other modes) need to align with what has been identified in the Growth Locations Wave 1 Pipeline maps for western and airport and southern. E.g. Wharfside Way / Clippers Quay bridge do not appear to have been flagged as needing improvement in TM1N, but were part of GL work, needs alignment on this. Also, if potential schemes are not listed in TM1N, TM1S, TM1C and TM1W, does that preclude the council from seeking contributions towards other schemes that may assist with sustainable access to strategic sites? E.g. off site cycle routes in support of Davenport Green?		Strategy
Draft Local Plan	146	Policy TM2	New Development requirements		Bus policy needs reference to vision-led planning (perhaps in a "New development requirements section" like is covered in the active travel policy) and improving services in accordance with this to grow the Bee Network. (this goes beyond just doing it for New Carrington and Davenport Green as mentioned in the policy). It should be a way of working for all new sites to varying degrees.		Strategy
Draft Local Plan	153	Policy TM5	The Highway Network		New Development Requirements - suggest refering to a vision-led Trasnsport Assessment, and a 'residual highway assessments' (i.e, once the impacts of measures to support sustainable access have been accounted for). Also suggest section in the RJ about vision-led Transport Assessments.		Strategy

Draft Local Plan	161	Policy TM7 Freight			Include references to cycle or e-bike/ e-cargo-bike freight for first and last mile deliveries in appropriate locations, role for freight consolidation centres and sustainable deliveries from them inappropriate locations, and protection of existing wharfs or support for new wharfs to facilitate water freight.		
Draft Local Plan			Parking		Parking- refer to parking for strategic developments to consider vision-led planning and to be based upon vehicular accumulations rather than be purely based on specific standards which could still suggest very high levels of car parking and could undermine a vision-led strategy.		Strategy
Draft Local Plan			General comment		Do the linkages between development and transport policies need to be a bit stronger on the opportunity around OTR/Wharfside? E.g. tram and rail opportunities? As a further general point its not ultra clear if the site specific measures in the transport policies are directly related to specific sites (for a local plan which is focused on new development, you would expect these linkages to be clearer e.g. Figures 6-1 to 6-4 where are the development sites? E.g. wharfside / Pomona?		Strategy