

Trafford Local Plan

Summary of
comments received on
the Regulation 18
Draft Local Plan
consultation - February
2021

April 2025

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1. Introduction

- 1.1 This document provides a summary of consultation responses that were received during the public consultation on the draft Trafford Local Plan, accompanying draft Integrated Assessment and Local Plan Call for Sites which was held between the 4th February to 18th March 2021.
- 1.2 These comments were reviewed and used to inform the version of the draft Trafford Local Plan Policies document which is undergoing public consultation in April 2025.
- 1.3 Before the February 2021 consultation on the draft Trafford Local Plan began, work on the Greater Manchester Spatial Framework (GMSF) was halted. As the GMSF set the strategic framework for the Local Plan, identifying the housing and employment land targets and strategic allocations, references to the GMSF 2020 were kept in the 2021 draft Trafford Local Plan.
- 1.4 Following this, work commenced on a new Places for Everyone Plan (PfE) which is a plan for nine of the Greater Manchester authorities (excluding Stockport) which was adopted in March 2024.
- 1.5 Further information on the April 2025 Local Plan consultation and PfE can be found on the Trafford Council Strategic Planning web pages.

2. The February 2021 Regulation 18 Consultation

- 2.1 The February 2021 Regulation 18 Draft Trafford Local Plan included:
 - A full draft plan including a draft vision and set of strategic objectives for how this would be delivered,
 - Draft place and area of focus policies which established local priorities and where most change was expected to take place;

- A full set of draft thematic policies covering issues such as housing need, retail and town centres, inclusive growth and green infrastructure.
- 2.2 Accompanying the consultation on the draft Local Plan was the draft Trafford Local Plan Integrated Assessment (IA) which assessed all elements of the Local Plan against a set of IA Objectives that were previously established through consultation on the Integrated Assessment scoping report. The draft IA considered the impact that each element of the Local Plan (and associated site allocations) against each IA objective and determined if the impact would be positive, neutral or negative.
- 2.3 A 'Call for sites' exercise was also part of the consultation which allowed submissions from developers, landowners, residents and other stakeholders to submit sites for potential allocation in the emerging Local Plan. Sites could be submitted for consideration for development as well as protection. Sites that were submitted as part of the GMSF process were not reconsidered through the Local Plan.

3. The Consultation Process

- 3.1 In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, notice was given that Trafford Council was preparing a new Local Plan. The decision to prepare a Trafford Local Plan was agreed by Trafford Council's Executive on 25th June 2018. Consultation on the Regulation 18 Issues Paper was undertaken in July 2018.
- 3.2 Trafford Council's Executive approved the Regulation 18 full draft Trafford Local Plan for public consultation on 14th December 2020.
- 3.3 Consultation took place during the Coronavirus pandemic, therefore the options available for public consultation were limited, documents were not able to be made accessible in Trafford Council libraries and in person consultation events were not able to be held.

4. Responses to the Draft Trafford Local Plan

- 4.1. Comments received on the February 2021 Draft Trafford Local Plan have been fully summarised in this report and they form part of to understand any implications or any actions that needs to be taken and will be published with a Council response to each on the Council website alongside the next stage of Local Plan consultation.
- 4.2. The full list of those who responded to the consultation is at Appendix A of this report. A high level summary of comments is as follows:

Town centres and retail / inclusive neighbourhoods

- Need to understand what impact Covid has had on the changing role of town centres before establishing policies;
- Representatives from the Trafford Centre consider is should be prioritised for main town centre uses above all other out of centre locations and that its role should be recognised throughout the Plan, including in the Vision;
- Trafford Centre Rectangle area should be treated flexibly, allowing all uses, broadening the scope of what is acceptable;
- Altrincham Retail Park should be included in the retail hierarchy, effectively giving it status as a centre; and
- Altrincham Town Centre should be serving community needs and there should be no intention for retail growth.

Employment

- New Class E uses (main town centre uses) should be allowed within employment areas as they generate employment;
- Any employment generating uses should be allowed in designated employment areas
- Trafford Park and Broadheath Employment Areas should be considered suitable for residential development;

- New Carrington and Timperley Wedge should be identified as key employment locations;
- New Carrington should be identified as an innovation hub for technical and digital businesses; and
- Large employment areas should cover a variety of sectors offering jobs to local residents.

Housing

- Local Plan should directly address under supply of housing and previous failed delivery;
- Concern over strategic sites that have been carried forward from the Core Strategy still being the most appropriate locations at the numbers proposed;
- Cumulative impact of smaller development should be considered and allocated for;
- Affordable Housing policy is too restrictive and doesn't take in to account developments that deliver other community benefits;
- Specifically reference affordable housing in each set of Trafford's place policies;
- Office and retail uses should be redeveloped for housing but some consider there is an over reliance of this in the identified supply; and
- Assessment needed if self-build would contribute to boosting housing land supply.

Transport and accessibility

- Local Plan should address poor accessibility of Dunham Massey area, its contribution to the local economy and their community should be recognised beyond just being a leisure asset;
- A new bridge across the Ship Canal, potentially in Carrington, should be considered;

- Large scale development should commit to public transport and active travel improvements;
- Cycling and walking routes should be segregated; and
- 20 minute neighbourhoods should be promoted, reducing the need to travel.

Climate change / carbon reduction

- The Local Plan should address air quality not just defer to Greater Manchester;
- Carrington Moss should be recognised as a green asset and Biodiversity Opportunity Area. The Local Plan should commit to protecting and restoring the degraded peat mosses;
- Pomona should be identified as a Biodiversity Opportunity Area;
- Biodiversity Net Gain should be mandatory for all new development;
- All planning decisions should reflect the response to the climate emergency;
- Flood risk issues and measures for mitigation should be identified in the Local Plan's "Places"; and
- Extensions or alterations to existing development should demonstrate how the impacts of climate change have been considered.

Green Belt protection / release

- Green Belt release helps to provide a variety of sites available for housing development to ensure delivery – brownfield high density schemes should not be relied upon;
- Green Belt replacement dwelling policy is inconsistent with national policy and should be re-drafted;
- Continuing objection to Green Belt review and release;

- Development at New Carrington continues to undermine Local Plan Strategic Objectives;
- Developing Green Belt goes against carbon neutrality aims; and
- GMSF policy should not be repeated and the Local Plan should carry out its own Green Belt review.

General comments

- A brownfield first / sustainable location policy should be added to the Local Plan;
- Carrington and Partington should be considered as separate places within the Local Plan and not combined as proposed;
- Health Impact Assessments should only be required where proposals are a departure from planning policy;
- There should be a post Covid review of housing and employment needs and supply before allocating for any development;
- Heritage impact assessments on allocations need to be undertaken to demonstrate that they can be delivered in a way that minimises and mitigates against harm on the historic environment;
- Inclusive Economy policy is repetitive of other policies and should not be included in the plan; and
- William Wroe should be protected and recognised for the role it plays for health within the Local Plan.

Housebuilder consortium

- 4.3. A consortium of housebuilders active within Greater Manchester submitted a report to the GMCA raising some concerns over the content of the GMSF 2020. This was submitted as a response to the Local Plan consultation as one of the housebuilders, Redrow, is active in Trafford. Within it concerns are raised regarding how housing markets in Greater Manchester are inaccurately understood, the lack of variation of the types of site that make up housing supplies and that the housing requirement

should be above the standard methodology to reflect growth ambitions. Comments are made over insufficient social infrastructure to support growth in existing urban locations and worsening affordability in Trafford is noted as being a continuing problem within the report.

5. Draft Trafford Local Plan Integrated Assessment

- 5.1 The full list of those who responded to the consultation is at Appendix B of this report. A summary of comments is as follows:
- 5.2 Comments were received from the Friends of Carrington Moss who felt that the IA report presents an over positive assessment of the draft Local Plan and that it does not appear to be an independent unbiased piece of work. The IA was commissioned by the Council and was completed by Capita independently. Strategic Planning worked closely with Capita to ensure a thorough and accurate assessment of the Local Plan was undertaken.
- 5.3 Natural England commented that whilst the most relevant issues have been identified through the IA there are some others that are worthy of inclusion, for example improving people's access to nature and they have therefore provided some amendments. Natural England also felt that some significant work on the Habitats Regulation Assessment is required as insufficient information is provided to allow them to determine the impact on European designated sites.
- 5.4 Historic England considers that the IA has established an appropriate baseline to assess the draft Local Plan's proposals but do suggest alternative objectives and indicators. There is some disagreement over the conclusions reached and the likely significant effects that the Local Plan will have on the historic environment.
- 5.5 Other comments received included:

- The IA is very high level and potential policy approaches need to be put through more rigorous testing – the IA will need to be revisited when the policy position is finalised;
- Housing and employment implications cannot be fully assessed as these matters that the draft Trafford Local Plan defers to the GMSF 2020;
- The draft Trafford Local Plan relies on an out of date evidence base and the IA cannot properly assess policies until the evidence base is fully up to date; and
- The IA does not consider development strategy alternatives.

6. Call for Sites

Total number of sites submitted: 37

- 6.1 It was not the purpose of this call for sites exercise to reconsider sites that had been previously assessed through the GMSF process, the aim of this call for sites was to identify any new sites in the built up area for potential allocation in the Local Plan. However, a number of sites were submitted which had previously been considered through the GMSF process, mainly in the Green Belt, but not exclusively.
- 6.2 Sites were submitted for a variety of uses, predominantly residential and employment. Many sites were submitted for allocation as mixed uses or with a number of different potential uses suggested. Four sites were submitted for protection from development.
- 6.3 Sites that were submitted for development have been considered against national policy and those suitable have been included in Trafford's identified land supply.
- 6.4 The full list of those who responded to the consultation is at Appendix B of this report. The schedule of sites submitted can be found at Appendix C at the end of this report. The sites submitted will be considered for their suitability to be included in the Trafford Local Plan.

7. Appendix A - Summary of comments received on the Regulation 18 Draft Local Plan consultation - February 2021

Q1 Do you agree with the draft vision?

- 7.1 There was mixed feedback on the draft vision with support and objections raised, plus requests to expand the scope of the vision.
- 7.2 Reference to the flourishing historic environment within Trafford is seen as positive, as is Trafford's Statement of Community Involvement to provide the opportunity for residents to be involved in decision making and in the design process for planned changes to local areas.
- 7.3 There is support to deliver housing growth in Trafford in well-connected sustainable locations, but more social housing is needed and the vision does not address the unaffordability of housing in the borough that is leaving local people priced out of the housing market.
- 7.4 There is not sufficient evidence that Trafford will be supported by a sustainable transport network that prioritises active and car free travel. More rail/Metrolink infrastructure is needed to support sustainable travel if more housing development is to happen. Existing roads are already too busy, and parking is limited in key areas. It is suggested that greater use could be made of the Liverpool railway line that runs through Trafford Park and Urmston/Flixton.
- 7.5 Objections to building on green belt land were also strong, and this is seen as contrary to the aim of sustainability. Responses felt brownfield sites should be developed first, and green spaces should be protected, enhanced and created. The proposed developments (particularly New Carrington) conflicts with Trafford's ambition to be Carbon Neutral. The carbon released by developing on Carrington Moss will have a major impact on Trafford's carbon footprint. It is felt that the vision does not go far enough to ensure that Trafford is resilient and well-adapted to the effects of climate change with attractive, well designed, sustainable

communities, and it fails to mention the ongoing biodiversity crisis or a need for net biodiversity gain achieve carbon neutrality. The vision and emerging development strategy should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity.

Other points:

- A need for a diverse supply of housing (by type and size) which is assisting with the attraction and retention.
- Good access to green space is a key priority, as highlighted by the COVID pandemic. The vision should priorities equal access to services, facilities and green space.
- It is not clear why Partington is the only specifically mentioned local centre in the Vision statement.
- Need to ensure the vision for the local plan and the sub-regional plan align to ensure it fully supports and can deliver the 'Places for everyone' allocations.

Q2 Do you agree with the draft Strategic Objectives and feel that they capture the priorities for Trafford?

- 7.6 The objectives were broadly supported, however some comments for consideration were made.
- 7.7 SO1 Deliver the homes Trafford needs - The provision of affordable and social housing has been omitted, which needs to be a priority. The importance of housing need should be covered, and include adequate space for home-working/home schooling; and supported housing for the elderly and infirm/disabled that will remain accessible to family/friends during future health crises.
- 7.8 SO2 Make Trafford accessible and equal for all - promote people accessing the natural environment in a sustainable manner for their own

personal wellbeing, and to foster a greater appreciation of the natural environment and the need to protect these spaces.

- 7.9 SO3 Ensure Trafford's resilience and carbon neutrality – can new developments can be carbon neutral by 2028 when much of it will be built on Carrington Moss? The achievement of this objective is critical and should underpin everything else. The use of new technologies, and other appropriate measures were suggested, such as carbon neutrality statements accompanying planning applications. This objective should reference the role that sustainable transport can play in achieving its target.
- 7.10 SO4 Secure successful, sustainable and healthy communities - Reference to blue infrastructure, public realm and indoor facilities for sport and recreation is recommended. Comments suggest that the loss of green space to development will reduce people's ability to engage in physical activity.
- 7.11 SO5 Maintain Trafford's economic potential – The plan needs to be more forward-looking and be able to adapt to the new post-pandemic requirements for employment and industry, with digital connectivity seen as a priority and key to future growth. This objective should also protect the best and most versatile agricultural land to support food security, local jobs and the local economy.
- 7.12 SO6 Revitalise Trafford's town centres – Consideration needs to be made to the lasting effects of the pandemic. It was noted that town centres are already important community hubs (i.e. the focus of community services and community groups serving an increasing local residential populations) and will become increasingly more important in the future. It is questioned why Partington is the only local centre that is specifically mentioned in this objective.
- 7.13 SO7 Protect, improve and connect green assets - specific and targetable measures are needed, for example a quantifiable biodiversity net-gain requirement Environmental loss at Carrington and Timperley, which is viewed as contradicting this objective.

- 7.14 SO8 Reduce the need to travel - The commitment throughout the draft plan to provide to improve active travel opportunities are supported. Concerns are raised that much of this commitment to active travel appears to be on a reactive and piecemeal basis, and dependent on ad hoc opportunities. Genuine integration of land-uses to meet all household needs (employment, shopping, leisure, recreation, etc.) must blend into the sphere of accessibility by active travel modes at every opportunity.
- 7.15 SO9 Enhance cultural, heritage and leisure assets - There is overall support for this, but it is felt the principles are not reflected in the vision. It is highlighted that New Carrington and Timperley Wedge both have assets that will be lost through the proposed developments, and Warburton has land put forward for development affecting many heritage assets such as the former deer park, ancient woodland and several grade 2 listed properties.

Other issues:

- There should be a greater emphasis on efficiently using of previously developed land to deliver development requirements, particularly housing in sustainable locations.
- There is some confusion between Greater Manchester's target to be carbon neutral by 2038, and Trafford's target to achieve this by 2028. It is questioned if the 2028 target referenced is correct, and so a line to clarify this might be required.
- The term 'Carbon neutral' should be replaced with 'net-zero carbon' to align with the draft 'Places for Everyone'.

Q3 Do you agree with the draft Trafford's Places policies and feel that they capture the priorities for Trafford?

- 7.16 There is a mix of opinion in regards to these policies, predominantly provided detailed commentary in relation to specific locations planned for places. This question was used to raise objections to development at Pomona, New Carrington and Timperley Wedge.

- 7.17 Specific comments were made to help provide detail to the policy wording in relation to most places that would be useful to include and will be reviewed as part of preparing the next stage of the Local Plan.
- 7.18 Many comments were received that consider Carrington and Partington should be considered two separate places with two distinct sets of place policies.
- 7.19 The Rural Communities policy TP12 should restrict development in most cases, with the green space remaining retained for future generations. It should also be revised to include Warburton Moss and Warburton Deer Park. Warburton moss should be restored and valued for its potential for carbon capture and flood alleviation, as well as providing green space to support the health and wellbeing of local communities.

Other issues:

- Carrington and Partington should not be considered together or merged as this is contrary to Green Belt purpose.
- Policies should be revised to make clear that any enhanced recreational or active travel use in the Mersey and Bollin Valleys should include measures to avoid or mitigate any harm to existing biodiversity interests and provide a net gain in biodiversity.
- Transportation links are only “good” from Sale Town Centre. The Sale West area suffers from very limited public transport and isolation.
- There is concern surrounding the proposed development of Pomona Island and the loss of important urban green space, but there is also some request for specific wording to state that biodiversity will only be maintained or enhanced where appropriate.
- The focus and priority to improve sustainable transport and active travel networks to encourage more people to travel by walking, cycling and public transport is welcomed.

- The Mersey Valley policy is broadly supported, particularly in enabling appropriate public access to the area.
- In regards to the Altrincham policy TP7, the Civic Society has asked for the Grange estate to be added to the Village Partnership.
- There is no reference to any proposal to systematically identify an integrated active travel network.
- A number of 'Places' policies could be strengthened by including Active Design principles.
- It is suggested that the role of sport be added to the policies that refer to maximising recreational opportunities.

Q4 If you feel the Local Plan should identify a different Trafford Place, please provide further information including a map indicating its location.

- 7.20 Carrington Moss, Timperley Wedge and Pomona Island should be treated as separate "Places" given their natural and ecological value. All are uniquely positioned in Trafford to deliver habitat banking.
- 7.21 Carrington and Partington are two separate communities with different socio-economic demographics, and should each have a distinct 'Trafford Place'. In addition, the area of Warburton, south of Partington, which has been included in the New Carrington Strategic Allocation lacks integration with Partington and should also be treated as an isolated location.

Q5 Do you agree with the draft Areas of Focus policies?

- 7.22 AF1 Pomona Island - There is agreement with the general concept of a mixed-use community and that this location supports a high-rise development; and the provision of open space and green infrastructure, incorporating existing and creating new areas of open space is also supported. However, there are concerns with flood risk, and the approach to biodiversity.

- 7.23 The benefits of Pomona Island's position on the Manchester Ship Canal and Bridgewater Canal should be maximised by preserving and enhancing the existing canal side walkways and improving public access to these routes and therefore their role within the active travel network. There should also be no main town centre uses here that are of scale that will serve a wider community, as this would undermine the policies relating to nearby centres – especially Stretford.
- 7.24 AF2 Trafford Wharfside - The creation of a major mixed-use area of regional and international significance in the Trafford Wharfside Area of Focus is supported, and the overarching development principles are broadly accepted. However, additional policy support for small and medium business accommodation is recommended, and there is some objection to the need for family homes. The protection and enhancement of views of MUFC Stadium and the Imperial War Museum North, particularly from the Manchester Ship Canal, relate to buildings which are not subject to any statutory heritage or landscape designation or protected views in planning terms.
- 7.25 AF3 Trafford Park – There is a need for residential development linked to compatible businesses to reduce the need to travel. The policy could be softened to allow it to adapt to changes in economy during the plan period, and to allow other uses deemed acceptable in Trafford Park if they generate jobs, bring economic benefits and are compatible with other uses in the area.
- 7.26 AF4 Trafford Centre Rectangle - This policy needs to include the Trafford Centre itself and identify specific policy objectives for its protection and future evolution (including repurpose of its vacant and underutilised space). There are objections to residential led mixed use developments and new non-major leisure development not being supported within this area. Flexibility for food and drink uses is needed.
- 7.27 AF5 Town Centres - The reference to further residential units is welcomed. Stretford and Sale are areas that are seriously and adversely affected by the A56, and support is given for monitoring air quality and pollution. The

suggestions that further office space in Altrincham should be provided is not convincing. The changing nature of high streets and the inevitable change of office working to home working, suggests a decrease in the need for retail and office space. Viewing town centres as primarily retail is an outdated approach. The Local Plan needs to better describe how shopping habits generally, and town centre activity specifically, have changed over recent years to produce a roadmap for what this means for town centres in the future. For example, the policy should include references to community facilities that need to be provided in a town centre setting.

Other issues:

- There are concerns with the type of developments being proposed in the north of the borough (in AF1, 2 and 4) and the risks of flooding.
- There is objection to the requirement for family homes at Trafford Waters.
- New developments will put further strain on hospitals / GPs, local schools, and other essential services and infrastructure (including travel) in the borough.
- Major developments will lead to health problems, with a likely increase in air and noise pollution and the potential for surface water flooding impacting residential areas.
- The Local Plan should commit to a comprehensive post-Covid review of land supply to ensure the Brownfield First and Sustainable Locations First policies can be applied. A review of housing allocations is required due to the likely release of significant office space within the borough post-Covid.

Q6 If you feel the Local Plan should identify a different Area of Focus please provide further information including a map indicating its location

- 7.28 A specific Area of Focus should be included for the Carrington and Warburton Mosses with the aim of transforming these areas into a carbon and biodiversity bank to support Trafford's carbon neutral action plan and their declaration of a climate emergency.
- 7.29 Altrincham Town Centre is identified as part of AF5. As it provides a scale of opportunity for major new development, this could warrant it to be specifically identified as an additional Area of Focus.

Q7 Do you agree with the draft Inclusive Places policies IP1 – IP7?

- 7.30 IP1 Inclusive Economy - This received a significant number of comments. National policies allow for retail, leisure and town centre uses in edge and out of centre locations where they would not have a 'significant adverse impact' on a defined town centre. The wording of Policy IP1 should be amended accordingly to be consistent with national planning policy.
- 7.31 This policy should make clear that all not be just for social rent as stated, as other tenures of affordable housing can be important in meeting housing needs, not just social rent, and are supported by other draft policies in the plan. Safe and accessible routes must be segregated and be factored in from the start of design to better encourage cycling and walking.
- 7.32 The policy should be bolder and require carbon budgets for all residential and employment proposals, so that Trafford can understand baseline impacts and monitor progressive reduction in impact.
- 7.33 It must be clarified that proposals will be expected to contribute to the necessary infrastructure, services and community facilities needed to mitigate the impacts of development in accordance with CIL.
- 7.34 IP2 Presumption in favour of sustainable development - The Local Plan should ensure future applicants provide evidence of early dialogue

between developers and infrastructure providers to identify the infrastructure needs arising from new development, and ensure that these are addressed through building design, utility networks and connections before Green Belt sites are released.

- 7.35 IP3 Health and Wellbeing – Insufficient regard is given to the demand for, and impact upon, local open spaces. Mechanisms should be put in place by the Local Plan to ensure suitable developer contributions are paid where appropriate towards the maintenance and enhancement of offsite open space provision and greenways. In addition the Local Plan should allow for suitable levels of sustainable development at key cultural/recreational assets such as Dunham Massey, in order to provide a sustainable income and to accommodate increasing visitor numbers. IP3 should also include more specific coverage of issues relating to air pollution.
- 7.36 IP4 Education and Skills – The requirements of this policy are not considered to be justified across all major developments and are seen to be inconsistent with national planning policy, which does not require all major developments to provide local employment schemes and to use local supply chains; and the feasibility of expecting all major development proposals to provide apprenticeships and opportunities for residents to improve their skills is questioned.
- 7.37 Other respondents welcomed the link made between homebuilding and improving the skill sets of the workforce, and would like the policy to include a mechanism that would allow educational institutions to be able to secure funding from development for investment in educational, sporting and community facilities. In addition, although the Trafford Pledge has support, some feel it needs to be coupled with a wider commitment to link people and jobs and the means of travel between them.
- 7.38 IP5 Design – Some consider that this policy can be improved:

- It should refer to the need to incorporate measures to protect and enhance green infrastructure and biodiversity as part of the design process.
- No details are provided as to what a Health Impact Assessment would comprise, or when one would be required.
- There is opportunity to expand on the policy to provide for design guidance through masterplans and design codes, and specific mention of issues relevant to local design considerations within Trafford such as development in waterside locations and tall buildings could be made.
- There is no mention of a design review panel within the policy, which should be a consideration for major development.
- This policy should integrate energy conservation and microgeneration, as well as creation/enhancement of biodiversity, into the overarching concept.

7.39 IP6 Digital connectivity - It is important to ensure that rural communities such as Dunham Massey communities are fully involved in Greater Manchester's Full Fibre Programme and in the development of the digital infrastructure. It is important to ensure the most up to date digital infrastructure is available in the town centres, and it would be appropriate to make specific reference to the significance of doing so in the borough's four town centres as part of a wider policy approach to re-configure town centres to reflect the current, much changed, market conditions.

7.40 IP7 Community Facilities – The protection of community facilities is welcomed however there was some criticism as the justification required for the loss of a community facility is too vague and open to interpretation; and the lack of mention of public houses is concerning as these will require post-pandemic support. Community Needs Assessments should be carried out.

Other Issues:

- 'Building for a Healthy Life' and the forthcoming Trafford Design Guide should be referenced.
- Increasing the number of people working within the construction workforce, and the skills and diversity of this workforce, is a key priority.
- There is concern over numbers of school places.
- Disability needs to be addressed in a number of policies. The most severely disabled people require dedicated transport and cannot use public transport or active travel modes. This section of the society should not be indirectly discriminated against.

Q8 Do you agree with draft policy HO1 in relation to the distribution of development, concentrating higher densities in the most accessible locations?

- 7.41 A comprehensive post COVID-19 review of housing and employment should be undertaken, including surveying office occupiers to understand capacities and determine those which could be allocated for housing, offices are typically well located for transport links and with good connectivity.
- 7.42 Some comments submitted considered that the Housing requirement is excessive for Trafford whilst some considered that the LHN should be considered a minimum and that it may be appropriate to plan for a higher need in certain circumstances. Concern was raised over housing requirement through PfE being lower than standard methodology calculation and felt the Local Plan should address Trafford's whole requirement. The plan is not considered to be positively prepared, as it does not seek to meet the objectively assessed housing need requirements of Trafford, which is below the Standard Methodology.

- 7.43 Carrying over Strategic Locations from the Core Strategy is questionable as they have not progressed as anticipated. Evidence and justification on the expected delivery of these sites is required.
- 7.44 A stepped target is not supported and there should be an emphasis on boosting supply and facilitating early delivery. Phasing the housing target is inconsistent with NPPF particularly as Trafford has been under delivering. The proposed phasing for the first five years is not ambitious and doesn't reflect recent delivery rates, more housing should be brought forward in the plan period to address it.
- 7.45 Many comments were in support of a "Brownfield First" policy, including on land in rural locations, however it should be ensured that brownfield sites will be appropriately remediated and not pose a contamination risk or harm to biodiversity sites.
- 7.46 There were also views that whilst "brownfield first" is supported but not where this would compromise development in sustainable locations to meet local need. The NPPF sets out a spectrum of accessibility and something "less sustainable" should not preclude it from development. Highly sustainable Green Belt locations adjacent to settlement boundaries can help address the requirement for housing land as there are insufficient brownfield sites.
- 7.47 There should be higher densities in urban areas with good public transport links with most development concentrated in areas where there is existing infrastructure. Minimum densities for areas outside of the Areas of Focus should be set. There needs to be a clear explanation for how growth will be planned for and directed at a local level. There needs to be better coverage of providing for school and health service requirements as a result of growth.

Other Issues:

- Providing accessible and adaptable homes is the most important area of housing provision.

- Policies setting a “No net loss of housing” approach could cause issues where RPs have inherited stock that is not fit for purpose
- The viability of PDL and high density urban living will need to be considered post COVID-19.
- Trafford Wharfside presents an opportunity for a new inclusive neighbourhood in a highly sustainable location
- Housing targets for each Area of Focus should not be considered a maximum
- Town Centre housing numbers should be a minimum in light of the changing nature of retail in town centres
- It is inconsistent that existing employment areas cannot be redesignated for housing when Green Belt land is being released

Q9 Do you agree with our proposed approach of only allocating for major residential development, as define in the National Planning Policy Framework?

- 7.48 There was some confusion over the wording of this question which some thought suggested only major development would take place and that the question was asking if there should be a divergence from national policy. The wording of the question was seeking views on if only major sites (i.e. 10 or more units as defined in national policy) should be allocated, not suggesting smaller sites could not come forward.
- 7.49 Comments were submitted which supported the approach of only allocating for major development sites which accords with the NPPF. It was suggested that guidance on density, heights, scale for non allocated sites is provided for developers.
- 7.50 Heritage Impact Assessments need to be undertaken which demonstrate that allocated sites can be delivered in a way that minimises and mitigates harm to the historic environment and sustainability assessments

undertaken to determine the most sustainable sites in terms of climate change and biodiversity goals.

Q10 Do you agree with the draft Land for New Homes policies HO2 and HO3?

- 7.51 The Local Plan should allocate more land than is required to act as a buffer to meet housing delivery targets and ensure the maintenance of a five year housing land supply. A strategy should be put in place to provide a range of sites that can enable delivery to be maintained throughout the plan period. There should be a sufficient supply of deliverable and developable land to meet the housing requirement.
- 7.52 Housing allocations should be a mix of strategic and non-strategic sites to offer the widest range of site sizes and market locations to facilitate housing delivery and to provide choice and competition. There should not be an over concentration of homes in particular locations to allow for spatial distribution across a number of market areas.
- 7.53 National space standards should be a guideline with sufficient flexibility to allow for new typologies and innovation, considering each case on a scheme by scheme basis. There should be minimum density standards set for the whole of Trafford, not just within Areas of Focus.
- 7.54 Major developments should demonstrate biodiversity net gain as part of proposals and smaller scale development should demonstrate biodiversity enhancement. Smaller scale development spread across Trafford will have a lower impact on local communities compared to large scale development and should be allocated for in the Local Plan.
- 7.55 The partial or complete redevelopment of previously developed land in the Green Belt should not be considered inappropriate development and can contribute to the housing supply for Trafford.

Q11 Do you agree with the draft Meeting Housing Need policies HN1 – HN6?

- 7.56 There needs to be a choice of quality accommodation for an aging population. As older persons accommodation is more expensive its development should be incentivised by reduced developer contributions.
- 7.57 A 50/50 small/large homes split may not be suitable for all locations and markets and is overly prescriptive– needs to be supported by evidence relating to market viability and be more flexible. This split will not be suitable for most of the Areas of Focus. Market demand should facilitate the delivery of homes people want to live in. There needs to be a specific assessment of the needs of different groups in the community, especially those priced out of affordable homes and those who wish to self-build.
- 7.58 The Council should meet housing needs whilst maintaining its commitments to protected valued greenspace when releasing land for new development.
- 7.59 There needs to be flexibility where site specific conditions make it impossible to meet higher accessibility requirements (M4(2)). The highest accessibility standard should only be applied to dwellings where a person is nominated to live in the dwelling (M4(3)). There needs to be a robust evidence base to justify their inclusion.
- 7.60 Affordable housing - Comments received considered that the 40% affordable housing requirement is highly excessive and unachievable. A detailed viability assessment across a range of value areas needs to be done. There should be flexibility in the provision of affordable housing which can address identified local need. One comment was submitted considered that a blanket affordable housing policy across Trafford, not dependent on market conditions or location, is the most suitable approach as it provides certainty for developers. There should be no “exceptional circumstances” to justify a lesser off-site contribution. There should be no opportunity for developers to use viability as a get out. Affordable housing should be prioritised over other contributions including open space.

- 7.61 Affordable housing should be defined as per national policy which includes affordable housing to rent, starter homes, discounted market sales housing and other routes to home ownership including shared ownership, rent to buy and homes at 20% below market value.
- 7.62 The Local Plan should recognise that affordable housing is important in rural areas.
- 7.63 Self Build - Smaller sites should also be allocated for self-build development, primarily or solely for this purpose, but only outside of Areas of Focus and not within apartment developments. There needs to be a proper review of data on self-build to determine an appropriate policy direction for this in the Local Plan.

Other Issues:

- Policy to not group more than 6 Affordable Units together is onerous and does not reflect operational requirements of RPs – developments should be “tenure blind”.
- Smaller homes are needed, limit number of larger family homes

Q12 Do you agree with the draft Climate Change and Low Carbon policies CC1 and CC2?

- 7.64 These policies should be at the forefront of the development plan however if it is shown that these policy requirements undermine the delivery of affordable housing, in viability terms, consideration needs to be given to which is given principal weight.
- 7.65 Carbon sequestration enabled by peat moss should be highlighted and the development of peat moss prohibited. Developing on Peat Moss makes this policy a fallacy. Trafford cannot be carbon neutral when this is taking place, releasing carbon in to the atmosphere.
- 7.66 There were conflicting views submitted on the Local Plan’s zero net carbon target with some urging the target to be brought forward from 2028 to as soon as possible, that all development can and should utilise the best technology at all times to maximise sustainable construction, viability is not an excuse. Wording stating “where technically feasible and viable”

should be omitted to not provide a get out clause, all developments should use current and future technology to maximise sustainable design and construction.

- 7.67 In contrast other responses stated that zero net carbon by 2028 will negatively impact on costs of development, prejudicing the deliverability of schemes and there needs to be local justification for such an approach.
- 7.68 There should be specific reference to nature based solutions for climate change. The role of the natural environment in climate change mitigation needs to be considered. Green infrastructure and resilient ecological networks play an important role in climate change mitigation. There needs to be a stronger link with this policy to biodiversity harm avoidance, mitigations and compensation.
- 7.69 There is a significant role for existing buildings to play in tackling the impact of climate change, more detail needed on the importance of the approach to sympathetically restore, retain and retrofit buildings. The Local Plan should encourage the low-carbon redevelopment of existing infrastructure and property not only in new development. This would cover renovation and alterations to reduce carbon.
- 7.70 Policies should set out proposed energy efficiency measures for the existing housing stock as this is where the biggest issue or energy efficiency lies. A written statement should be required for any extension / substantial alterations to an existing development to demonstrate how the impacts of climate change have been considered. The materials and labour used in construction also contain carbon through their manufacture, transportation, installation, durability and reusability.

Other Issues:

- Account for naturally occurring carbon when determining carbon neutrality.
- Flood risk needs to be referenced in climate change policies
- Provide distinction between historic and modern fabric and materials. Durable, sustainably sourced materials as part of a

circular economy and whole life cycle assessments of materials are needed when considering carbon neutrality

- There should be flexibility on the development of heat and energy networks where they are not feasible
- Reduce rather than minimise energy consumption
- Necessary energy infrastructure and capacity needs to be carefully planned and delivered

Q13 Do you agree with the draft Sustainable Transport and Accessibility policies ST1 – ST7?

- 7.71 Twenty minute neighbourhoods are supported. To encourage a modal shift for shorter journeys the Local Plan should assist in the provision of direct, well-maintained and well-lit walking routes, quality footways in towns and cities, quiet lanes in rural areas and improved walking related infrastructure. Infrastructure should meet the needs of different groups of society.
- 7.72 The Local Plan should identify active travel routes across Trafford to allow for their proactive creation and development, safe routes should segregate and categorise users. Better cycling routes are required and need to be identified and promoted.
- 7.73 Connectivity between cyclists, pedestrians and horse riding routes need to improve extending in to countryside routes, not just to the Trans Pennine Way. Sustainable transport requires adequate public transport in rural areas which is currently lacking.
- 7.74 Walking should be encouraged and the use of the private car reduced. Road building should be considered a last resort with no support for new road building unless it can be demonstrated that all other alternatives, including making more efficient use of existing infrastructure have been shown to not provide an adequate solution.
- 7.75 Ensure developments are well connected and accessible by all modes of transport, preventing new development from having an adverse impact on

existing road network. The close proximity of proposed housing and employment site allocations will have a significant impact on the road network. Growth needs to be accounted for cumulatively and properly accounted for so that sustainable transport interventions form part of the planning decision making process. The Local Plan should identify capacity enhancements and infrastructure requirements.

- 7.76 Travel Plans should be required for developments that are identified as needing to mitigate against air pollution, including Trafford Wharfside, the Trafford Centre Rectangle and New Carrington. Developers should produce evidence of the impact of their Travel Plan. Where developments that require public transport improvements cannot guarantee they will occur or evidence funding for them, permission should be refused. Some comments made suggested all developments should require a Travel Plan.
- 7.77 The need for off airport car parking needs to be addressed. Some comments consider there is no additional need following the pandemic whereas some were in support of identifying more land for this type of use. Any scheme needs to be considered against genuine need and what impact to the natural environment there might be.
- 7.78 Policies don't currently recognise the importance of sustainable distribution, there needs to be acknowledgement of the change in consumer retailing and the impact this will have on the logistics industry. Logistics should rely on multi modal networks to take HGVs off road network

Other Issues:

- Many suggestions for areas in need of traffic calming, reduced speed limits, changes to management of Metrolink rolling stock and bus timetabling which are outside of the scope of this Local Plan
- The Bridgewater Canal should be protected for potential future use for transferring goods and people

- Local Plan policy should specify what types of Electric Vehicle charging points should be installed, if they are rapid charging then fewer points should be required
- Support for reduced parking provision in the most sustainable locations

Q14 Do you agree with the draft Trafford's Economy policies EC1 – EC3?

- 7.79 Employment land requirements should be reconsidered in light of Brexit and COVID-19 as there has been a huge change in the need for employment land since the policies were drafted. There should be flexibility in what uses can take place in employment areas to allow them to adapt to different economic circumstances.
- 7.80 Changes to the Use Class Order means the Local Plan should allocate land for economic use which covers all of Class E as these uses will often provide a higher level of employment than former B use class. Other employment generating uses should be acceptable in employment locations provide they are in compliance with other Local Plan policies. Local Plan should consider mixed use areas where any type of employment use will be considered acceptable.
- 7.81 Proposed policy requirements for land to be released from existing employment use to other uses will prevent the release of brownfield land for development for housing. The evidence that is required to demonstrate an employment use is no longer suitable for the site needs to be reconsidered and made less onerous.
- 7.82 Broadheath has a number of development parcels and should be revitalised before Green Belt land is released for development. Broadheath could also be suitable for redevelopment as residential as is adjacent to existing residential properties and has capacity in local schools.
- 7.83 There is a substantial qualitative shortfall of land capable of meeting larger industrial and warehousing need, there is exceptional demand for modern

large scale units and a lack of supply. New office development should not be speculative and should be tied to specific and definite business start-up or expansion plans.

Other issues:

- The Local Plan should directly reference what sustainable means in terms of employment development
- Heritage Impact Assessments will need to be undertaken on employment allocations to identify necessary measures to avoid and mitigate harm to heritage assets
- Local Plan should refer to rural businesses and jobs. Green jobs should be added to the list of key economic growth sectors in Trafford
- Large employment areas should show that they will offer a variety of jobs to local residents across different sectors including digital, technology and green jobs
- New and emerging Digital and Creative sector businesses should be encouraged in town centre locations linking to their cultural, artistic and creative activities

Q15 Do you agree with the draft Town Centres and Retail policies TC1 – TC3?

- 7.84 Retail policies and evidence need to be revisited and reconsidered following the impact of COVID-19. Economic activity should be encouraged, providing flexibility to landowners and existing businesses that will support town centres and their viability.
- 7.85 The revitalisation of existing centres by focusing development on them is crucial. Different views were submitted on what uses should be considered in designated centres. Some comments consider that Article 4 Direction should be used to prevent the conversion of retail properties to residential in designated centres as this is counter-productive to town centre revitalisation. Other comments consider that residential

development can enhance the vitality and viability of town centres, policies should be flexible to allow centres to grow and diversify in a way that can respond quickly to changing retail, office and leisure industries. Policies should recognise that Local Centres in urban locations are appropriate for new residential development so long as the primary retail function is retained.

- 7.86 There should be no further out of centre retail development whilst there are existing vacancies in town centres. All out of centre retail should be prohibited and progressively ceased as it is too reliant on car use. All retail development should be accessible by a fully integrated sustainable transport network.
- 7.87 National policy, allows the development of town centre uses outside of designated centres subject to sequential and impact tests being undertaken, the wording of the draft Local Plan is too restrictive. The Local Plan sets an impact test threshold which needs to be clearly justified as it appears far too low and much lower than the national policy requirement.
- 7.88 The impact test should have a different threshold for food and non-food retail, with food retail using the higher national policy threshold. The food retail market has shifted to predominantly mid-large format food stores which are often in out of centre locations which have limited impact on designated centres. These out of centre locations are not protected through policy.
- 7.89 The Trafford Centre – The Trafford Centre had a range of comments submitted on it including:
- The Trafford Centre should have specific Local Plan policies relating to it and the Local Plan should not state that its expansion will not be supported
 - Leisure development should be allowed to take place in the Trafford Centre rectangle without the need for a sequential test
 - There should be no further development at the Trafford Centre so as to protect existing centres and plans for its re-use made

- The Trafford Centre should be considered suitable as an accessible and sustainable housing development site

Other issues:

- The Local Plan policies should reference and closely relate to the Altrincham Neighbourhood Business Plan
- Altrincham Retail Park should be included in the hierarchy of designated centres
- Policies for Trafford Retail Park should allow a wider range of alternative uses including leisure, residential and employment uses

Q16 Do you agree with the draft Historic Environment policies HE1 – HE4?

- 7.90 Comment received that there is little understanding shown for the archived, documented historic environment. With concern in particular that wider development plans for the region would diminish the region's landscape and historic value.
- 7.91 Important the Council complete and publish the Local List so that any heritage assets can be identified and that their significance is established.
- 7.92 HE1 – Historic Environment - Raised by several objectors, concern this policy is inconsistent with national policy as it sets a higher threshold when considering harm development may cause to a heritage asset or its setting. This policy fails to deal properly with the difference between designated and non- designated heritage assets as set out in national policy.
- 7.93 The characterisation of Carrington Moss as “chemical works” does not adequately reflect the other historic attributes of this area. The surviving rides and path network reflect historic railway lines and tramways that ran throughout all parts of this area, and many historic features of these survive today, often hidden. Additionally, the Open Field type, the main areas of which are in Warburton and Davenport Green therefore it is inconsistent that Davenport Green is proposed for development.

- 7.94 HE4 – The historic environment and new development - The distinction between designated and non designated heritage assets needs to be recognised. Policy needs to clarify and advise that if harm arises it should be assessed against the framework set out in the NPPF for designated and non designated heritage assets.
- 7.95 The National Trust suggest that reference is also made in HE4 to the protection of the setting of Dunham Massey, and the conservation of designed views from the Old Park to the countryside beyond. Additional heritage assets: ancient woodland, Carrington and Warburton Mosses, Warburton Deer Park and the Carrington Rides should also be included.

Other issues:

- Reference the resources and information that many organisations have that can help identify, preserve and enhance historic assets. For example, CAMRA maintains a register of historic pubs of both national and regional importance and publishes books and articles giving details of these.
- There is much to be done on enforcement of the conservation area appraisals and management plans, including associated Article 4 directives.

Q17 Do you agree with draft Culture and Tourism policy CT1?

- 7.96 Historic England advise that as a number of the assets listed are designated heritage assets the policy should also support their conservation alongside enhancements.
- 7.97 Attractive areas such as Old Market Place in Altrincham need to be integrated into wider tourism policies. Conservation Areas are rarely used outside of planning, yet the research done to identify them could be used to promote wider tourism.
- 7.98 The Theatres Trust raise that the plan currently lacks policy protecting cultural uses from unnecessary loss and this should be addresses either

through addition to this policy or amendment to the scope of the Community Facilities policy.

- 7.99 Cultural and tourism assets that could also be included: Altrincham Little Theatre; Altrincham Garrick Playhouse; Carrington Moss; Dainewell woodlands; Pomona Island / Manchester Waters; St John's Church, Carrington; St Werburgh's Church, Warburton; Warburton medieval landscape; Warburton Moss; and Warburton Village.

Other issues:

- Reference the vital role of the hospitality industry
- Trafford Centre Rectangle to be amended to TraffordCity
- GMEU recommend that in the Justification that the need for HRA assessment of new marinas/moorings on the Bridgewater Canal is included as a precaution.
- In terms of the Civic Quarter, this would be best served by accelerating the development of parcels along Talbot Road in the early part of the Plan period, especially those closer to the Metrolink station.

Q18 Do you agree with the draft Green Trafford policies GT1 – GT3?

- 7.100 Concern these policies are contrary to many of the other policies, especially the proposed New Carrington and Timperley Wedge developments, loss of Green Belt and Carrington Moss.
- 7.101 GT1 – Green Infrastructure - Organisations such as Natural England and GMEU support GT1. The reference to the NPPF definition of GI is welcomed however, the Natural England definition could also be used to give a wider interpretation of GI. Reference could also be made to the Government's 25 Year Plan commitment for a new national Framework of GI Standards the Trafford Local Plan could include an objective to assess GI provision against these.

- 7.102 Natural England considers that the Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of biodiversity networks. Biodiversity Net Gain should be considered for all aspects of the plan and development types. It should also be underpinned by up to date environmental evidence.
- 7.103 A strategic approach for green infrastructure is required to ensure its protection and enhancement, it should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Encourage the provision of green infrastructure to be included as a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.
- 7.104 There is an opportunity within this policy to highlight opportunities for how future development has the ability to restore the natural environment and green infrastructure network. It is also recommended that existing retained woodland areas near future development and within existing GI assets are positively managed and maintained.
- 7.105 Suggestion that the policy needs to offer some flexibility. Where it is not possible to protect green infrastructure, the policy should allow for some losses where there is adequate compensation.
- 7.106 GT2 – Green Belt - There is no requirement in national policy for a replacement building in the Green Belt to overlap with the footprint of the original building, nor is there a requirement for the new building to be assessed against the size of the original building.
- 7.107 Concerns that section on redevelopment of previously developed land in the Green Belt is inconsistent with national policy, particularly with reference to high quality. Design requirements should be covered under separate design policies.
- 7.108 The lack of a Green Belt boundary review is considered to be a significant missed opportunity and a flawed approach. It is not considered acceptable

to assume that this will be undertaken at a sub-regional level. This approach has potential to result in a severe lack of developable land and if the sub-regional plan fails to materialise there would be no Green Belt release within Trafford. CPRE does not think the justification for release exists nor has a strategic review been conducted.

- 7.109 A suggestion that the Local Plan seems to favour some Green Belt parcels over others and this is an incorrect approach. There must be exceptional circumstances to release and a strategic review.
- 7.110 GT3 – Agricultural land - Policy should be revised to reference biodiversity net gain. The Environment Agency add that it should be amended to include consideration of water management. Trafford should also support in policy, diversification proposals which principally focus upon delivering environmental improvements.
- 7.111 The Natural Trust consider that this policy could be worded more positively, in order to support farm diversification. In particular, do not consider that requiring access to public transport as part of new farm building development or diversification is practical, or enforceable, given the small scale and marginal nature of many diversification proposals, and the fact that they are often in locations not well served by public transport. This criteria should only be applicable where the development is anticipated to generate a large number of additional private car journeys.

Other issues

- Reference the role of the historic environment in green and blue infrastructure.
- Focus on nature-based solutions to climate change, flood management and water quality.
- Suggestion that the policy should include a new section on the protection and enhancement of Peat Mosses at Carrington and Warburton.
- There may be scope to mention explicitly the emerging Clean Air plan.

- Requirement to safeguard aviation safety when considering any proposals that may attract birds, these include areas of landscaping and creation or modification of water bodies.
- Commitment to protect the best and most versatile agricultural land (Grades 1 and 2) to support food security and the local economy.

Q19 Do you agree with the draft The Natural Environment policy NE1?

- 7.112 Natural England consider Policy NE1 sets out a clear strategy for the protection and enhancement of biodiversity. To strengthen this policy further reference could be made to the neighbouring designated sites such as the Manchester Mosses SAC, specifying how Trafford's policies will provide further protection and enhancement. Further information could be included to demonstrate how this policy will achieve measurable net gains.
- 7.113 Cheshire Wildlife Trust suggest that the evidence underpinning the policy is unacceptable given its age and recommends that the policy and policies map are updated. The policy requirement for major development to consider its impact on the natural environment should apply to all development. In contrast some comments consider that this policy need flexibility, some losses should be allowed where there is appropriate mitigation / overall enhancement. Biodiversity Net Gain place additional financial burdens on development which should be acknowledged through the viability review.
- 7.114 It should set out in precise terms the strong protection given to irreplaceable habitats in national policy and specific that Trafford's peatlands/mosslands (regardless of condition) are regarded as irreplaceable by the Council.
- 7.115 The policy should include additional wording to set out the biodiversity net-gain 10% requirement for all development and the Council should commit to a measurable biodiversity net-gain of 20% for all development.

Other issues

- GMEU supports the policy provided by NE1 and the justifications provided, but recommends amendments to accommodate recent legislative changes and to recognise within the policy key elements of the biodiversity hierarchy.
- It is recommended that both Pomona Island and Carrington Moss are added as additional Biodiversity Opportunity Areas.
- Carrington & Warburton Mosses are by far the most important Green Infrastructures in Trafford.
- Suggestion that designations need to be reviewed comprehensively and updated.

Q20 Do you agree with the draft Open Space, Sport and Recreation policies OS1 – OS3?

- 7.116 People need informal greenspace to enjoy in addition to more formal parks and greenspaces. This valuable asset should be protected in the future. Opportunities for public access in Trafford's Green Space for more appropriate leisure opportunities should be considered.
- 7.117 OS1 – Open Space - Obligations for open space provision in new developments will impact viability and may conflict with the overriding objective to deliver an appropriate quantum of quality new homes in accessible locations. Where it is not possible to conserve and protect all natural assets, planning policy should allow for some losses where there is appropriate mitigation/overall enhancement. The Fields in Trust recommendation is clear that “quantity guidelines should not be interpreted as either a maximum or a minimum level of provision; rather they are benchmark standards that can be adjusted to take account of local circumstances.” As such, if these standards are to be adopted through the Plan, it should be as guidelines rather than requirements.
- 7.118 Replacement provision should not always be seen as simply like for like in terms of quantity, but also acknowledge the benefits of improved facilities in terms of quality and access to those facilities for the community

- 7.119 The Environment Agency comment that it will be important to ensure that any new cemetery/burial developments proposed are situated within appropriate locations. The EA would oppose any such development proposals that might pollute groundwater.
- 7.120 OS2 – Indoor leisure - Sport England supports the policy, but recommends the addition of a clause to help tackle health inequalities and encourage non-sport physical activity.
- 7.121 The policy as worded could conflict with permitted development rights which would now enable the change from a gym to a retail use as they both fall under Class E. Helpful if the policy clarified that it expressly excluded consideration of changes of use (or redevelopment of similar form) which would otherwise be capable of completion through the permitted development route.
- 7.122 OS3 – Outdoor sports facilities - Sport England are broadly supportive of OS3 Outdoor Sports Facilities, but makes multiple comments and to strengthen the policy.
- 7.123 A comment received that the Council should be identifying now what the needs are across the Borough so it can be established what provision will be required as part of new developments, including the strategic allocations. This can then be factored into the masterplanning and viability work for these sites. Additionally, where it can be demonstrated that outdoor sports facilities are surplus to requirements, proposals for the repurposing of surplus facilities where the benefits of will be delivered to meet the needs of the educational or sporting institution should be supported.
- 7.124 Objections to the policy around golf courses, the policy is overly restrictive. The role of golf clubs as custodians of the countryside should be recognised by policy. Proposals for investment by clubs that are intended to enable them to continue to provide for the needs of their members and the wider public should be supported by the council. Proposals would need to be supported by evidence that the investment will benefit the club.

- 7.125 The Environment Agency would be supportive of policy looking at how wider green infrastructure functionality could be enhanced as part of existing golf course design, maintenance and management, particularly those located within riparian corridors and floodplains of adjoining river systems.

Other issues

- National Trust query why Dunham Old Park is not identified as a 'Protected Park & Open space.

Q21 Do you agree with the draft Natural Resources policies NR1 and NR2?

- 7.126 The Greater Manchester Joint Minerals Plan was adopted in 2013, covering the period up to 2026; the Waste Plan was adopted in April 2012 and only covers the period up to 2027. Both plans would be expected to be out of date, especially in light of the additional development and housing and employment figures proposed through PfE.
- 7.127 NR1 – Waste - There is a request for evidence to be provided in relation to current waste generation and transfer/recycling/disposal and predictions for the Plan period to establish if the Waste Plan remains realistic and sufficient to meet anticipated future needs. Need to ensure within the policy that any form of waste disposal must reduce carbon emissions and contribute to carbon neutral objectives.
- 7.128 NR2 – Minerals - Cheshire West and Chester Council have raised that more information could be provided on the circumstances under which developments would be permitted in Mineral Safeguarding Areas and the information that would need to be submitted as part of planning applications to enable such assessments to be made.

Other issues

- NR1 does not expressly identify how new housing development should plan for waste management but would note that it should be capable of being undertaken through a framework

- The need to consider the potential impact on aviation safety when assessing planning applications relating to waste and minerals developments. The Safeguarding Authority for Manchester Airport would need to be consulted as a statutory consultee.
- One respondent suggested a stand-alone policy for the peat mosses at Carrington and Warburton, calling for their preservation and restoration.

Q22 Do you agree with the draft Water and Flood Management policies WF1 and WF2?

- 7.129 Concern there is no consideration of local flooding issues or pressure on sewerage and water provision, particularly with developments proposed in areas such as New Carrington and Timperley Wedge which have existing drainage issues. Where there has been extensive surface water flooding, developers should be expected to ensure adequate drainage is planned to mitigate the risk of flooding for existing and new home owners.
- 7.130 Flood risk and water management policies, and planning decisions need to be reviewed to ensure they fully reflect Trafford's declaration of a climate emergency.
- 7.131 United Utilities have recommended that a new policy on Surface Water Management (WF3) is included within the water and flood management chapter, detailed wording has been provided. Surface water should be managed as close to its source as possible with the standard expectation that no surface water shall discharge to the existing public combined sewerage network in all circumstances. United Utilities have recommended that surface water management is considered as part of applications that include basement car parking.
- 7.132 WF1 – Flood risk and water management - Surface water drainage from new development should refer to SUDs ensuring all aspects of sustainable drainage have been considered, and the multifunctional environmental benefits a well-designed SUDs system can provide. Policy should

reference any physical works which seek to modify the shape and size of a water body in order to support flood risk management objectives.

- 7.133 GMEU welcomes the opportunities to re-open culverts and suggest this policy includes improving biodiversity and geomorphological natural processes. United Utilities recommend including a water efficiently policy that new dwellings will be required to meet with evidence to justify their proposed approach. GMEU recommends that the water safeguarding policies are strengthened, in order to ensure exceptional high standards of water management, to achieve net improvement in discharge quality from development within Areas of Focus along the Manchester Ship Canal corridor.
- 7.134 WF2 – Safeguarding areas for flood management - The Environment Agency is in the process of reviewing flood defences along the River Mersey corridor as part of the South Manchester strategy. There will be opportunities to enhance the functionality of the floodplain as part of this approach, but also as part of any future development in the area.
- 7.135 Comment that the recent flooding in January 2021 has highlighted that the Sale and Timperley flood storage areas are not sufficient to prevent damage and the need to release sewage into the river Mersey.

Other issues

- Concern that flooding is becoming an increasingly regular problem in Dunham Massey.
- River Basin Management Plans should inform the development proposed in the Local Plan.
- There should be a presumption in favour of open water ponds for water storage.

Q23 Do you agree with the draft Environmental Protection policies EP1 – EP4?

- 7.136 CPRE recommends that there is inclusion of a policy for lighting as rural areas are relatively dark and should be protected from further light pollution in the future. Additionally, Natural England suggest the Local

Plan should identify relevant areas of tranquillity and provide appropriate policy protection.

- 7.137 Natural England outline that the plan should address the impacts of air quality on the natural environment. It should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable. One of the main issues to be considered are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation.
- 7.138 EP1 – Land contamination - An explanation as to the funding mechanism to safely bring forward derelict land for development may be helpful.
- 7.139 The Environment Agency would advise that for the purpose of assessment and remediation, where soil and / or groundwater contamination exists, that developers should refer to a number of EA and national guidance documents. It would also be beneficial to include policy wording for a requirement of caution on major development sites, even in instances where contamination is not known or suspected. If, during development, contamination not previously identified is found to be present then no further development (unless otherwise agreed by the local planning authority) should be carried out until a remediation strategy detailing how contamination identified will be dealt with is approved and implemented. This requirement should prevent unacceptable levels of pollution from previously unidentified contamination sources.
- 7.140 EP2 – Noise - The Local Plan needs to identify when proposed development would be refused on grounds of unacceptable noise pollution. Through the development process there should be no rise in noise pollution for any residents.
- 7.141 EP3 – Air quality - Trafford Council has a legal duty to ensure that new development does not lead to harmful air pollution. The Local Plan must

clearly set out when development will be refused with regard to air pollution.

- 7.142 A number of roads in Trafford are within the Air Quality Management Area including much of the A56, the M60 and key routes in the north of the borough, particularly around Trafford Park. It is not enough to leave this issue to PfE. The Local Plan needs to set out in what cases it would refuse development on. Trafford has a duty to ensure new development does not lead to harmful air quality. The Local Plan should verify that there will be no rise in air pollution for any residents.
- 7.143 Given that Carrington is in an area with several plants discharging into the air and the diverse nature of these industries; tests on pollutants in the air are needed in the interests of public health, the effects on habitats and sites of biological importance.
- 7.144 One respondent did not support the encouragement of the private ownership of the electric cars as they cause air pollution issues. The focus needs to be on public transport and making active transport safe, pleasant and efficient. This will be to the inconvenience of car drivers but with good quality alternatives this will not be an issue and will free space for the small number of people who can't use these alternatives.

Other issues

- Street trees can trap polluted air below their canopy and are not necessarily a solution.
- Suggests the role of peatlands should be referenced within the chapter.
- The Council should not be involved in providing charging infrastructure for electric vehicles. The costs should fall on the vehicle user.

Q24 Do you agree with the draft Planning Obligations policy PO1?

- 7.145 Concerns regarding reduced planning obligations and the approach contained which has been exploited by developers. There is no need for

policy to explicitly point out loopholes, and the wording could be tightened to make this situation more difficult to exploit.

- 7.146 Clawback of obligations should not be applied to single phase developments, which following the agreement of a viability assessment should be completed within a relatively short timescale. If viability has been assessed at a borough wide level when setting policy, and a site specific level based on the development, then a clawback is unnecessary. Viability will have been assessed satisfactorily. The Local Plan should also include reference to viability review mechanisms to ensure an assessment of viability is not hampered by an inappropriate level of review.
- 7.147 A review of the Trafford Council CIL Charging Schedule should be undertaken. There is a clear need to reflect the changing nature of Trafford, particularly where large format supermarkets are no longer developed and residential land values are higher than retail land values.
- 7.148 The policy needs to be amended to set out that where a contribution is sought for items identified on the Council's CIL Regulation 123 list, that contributions will only be sought where the request is; 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.
- 7.149 Clarification is required as to what infrastructure will be funded through planning obligations and what will be required through CIL, and what the cost of such infrastructure will be. Consider that the plan should provide greater certainty for the funding of infrastructure and use of CIL receipts, as these factors may have significant implications for the viability and delivery of key sites.
- 7.150 The reference to education is inconsistent with this SPD as the SPD states that this is covered by CIL with no requirement for a contribution to mitigate this impact.
- 7.151 Note that there is a concurrent consultation regarding the Council's draft Validation Checklist and this contains detailed information regarding the

submission of viability assessments. It is not appropriate for this to be included in a Validation Checklist which is not subject to the same level of scrutiny as a Local Plan. This information should either be included in policy PO1 or within a bespoke SPD.

Other issues

- Suggest an additional policy is added, setting out timescales for completion of approved development which suggest the Council could apply further action such increasing affordable housing contributions

Other comments

- The impact of COVID 19 may result in more people working from home or using 'hot desk' office space. This should be factored into the local plan.
- The evidence base must be reality checked against Brexit and Covid impacts.
- The consultation document is overly complicated and complex. A number of the policies run to over a page in length with development proposals expected to meet a wide number of detailed criteria. Given the detailed nature of the policies, believe that they are overly prescriptive.
- Concerns are raised over the separate consultation on Trafford's validation checklist update. Guidance should not be appended to a validation checklist, where its reasonableness and soundness cannot be tested and independently examined. The Reg.19 Local Plan consultation will be the correct place and process for this guidance.
- Natural England recommend that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protect Areas) and Ramsar sites should be included on the proposals map for the area so they can be clearly identified in the context of proposed development

allocations and policies for development. Designated sites should be protected and, where possible, enhanced.

- The Environment Agency consider that environmental considerations of the current draft could be improved.
- More detail about the rural parts of Trafford should be included in the setting the scene section as it constitutes almost 40% of the area. The important contribution of rural areas should be highlighted in terms of farmland producing food, equestrian uses, land of heritage and cultural value such as Dunham Massey and deer park and wider natural capital along the routes of the Bridgewater Canal, River Mersey and River Bollin.
- Net biodiversity gain should be clearly referenced in the Plan's vision and the plan's policies should consistently set out in clear terms that a measurable net biodiversity gain is mandatory for all new development.
- Natural England recommend that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible and provides for new access opportunities.
- An aerodrome safeguarding policy should be included within the Local Plan.

8. APPENDIX B – Respondents

(local residents have not been listed)

Draft Trafford Local Plan

Altrincham and Bowdon Civic Society
Altrincham Neighbourhood Business Plan
Altrincham Neighbourhood Business Plan Design Panel
Ashton-on-Mersey Golf Club
Bloor Homes
CAMRA
Carrington Parish Council
Cheshire West and Chester Council
Cheshire Wildlife Trust
Church Commissioners for England
CPRE Lancashire, Liverpool City Region and GM
Department for Education
Derwent Properties
Dobbies Garden Centres Ltd
Dunham Massey Parish Council
Eccleston Homes
Emery Planning
Environment Agency
Friends of Carrington Moss
Greater Manchester Ecological Unit
Greater Manchester Older People's Network Housing and Neighbourhoods Working Group
Harlex Property
HEREF
Highways England
HIMOR Carrington Ltd
Historic England
Hollins Strategic Land
Home Builders Federation
Homes England
Housebuilder consortium
Kellen Homes

Lidl Great Britain
Lymm Neighbourhood Plan Group
Maloneview (Sale) Limited
Manchester Airports Group (MAG)
Manchester and Salford Ramblers
Morland Capital Partners No.1 Ltd
My Flixton Neighbourhood Planning Group
National Grid
National Trust
Natural England
P&D Northern Steels Executive Pension Fund
Peak and Northern Footpaths Society
Peel
Railfuture
Redrow Homes Ltd
Ringway Golf Club
Royal London Asset Management
Salford City Council
Savills
Sport England
Stockport Council
Tatton Estate
The Coal Authority
The Emerson Group
The Ramblers Association
The Trafford Centre
The Trafford College Group
Theatres Trust
Therme Manchester
Trafford Green Party
Trafford Housing Trust
Trans Pennine Trail Partnership
Transport for Greater Manchester
United Utilities
United Utilities Property Services
Warburton Parish Council
Warrington Council

WSP

Integrated Assessment

Derwent Properties
Environment Agency
Friends of Carrington Moss
Historic England
Natural England
Redrow Homes Ltd

Call for Sites

Bloor Homes
Cussons Properties
Friends of Carrington Moss
Friends of Cow Field
HEREF
Hollins Strategic Land
Kingward Investments Limited
Mark Priestner
Morland Capital Partners No.1 Ltd
National Grid Land and Property
North Quays Business Park Executive Pension Plan
Peel Land and Property
Redrow Homes Ltd
Savills
Stephen Elias
Therme Manchester
The Emerson Group
The Trafford College Group
Trafford Housing Trust

9. APPENDIX A- Sites submitted through the Call for Sites consultation

Site address (as submitted)	Proposed Use	Consultee	Agent	Within Green Belt	Submitted for consideration in GMSF	GMSF Allocation 2020 ¹	Site within the urban area
CONFIDENTIAL SITE, Hale Barns	Residential	Confidential	Iceni projects	Y	Y	N	N
Cavendish House, Cross Street, Sale	Residential	The Emerson Group	N/A	N	N	N	Y
Charter House, Woodlands Road, Altrincham	Residential	The Emerson Group	N/A	N	N	N	Y
Citygate 1 and 2, Cross Street, Sale	Residential	The Emerson Group	N/A	N	N	N	Y
Crossgate House, Cross Street, Sale	Residential	The Emerson Group	N/A	N	N	N	Y
Dunham House, Cross Street, Sale	Residential	The Emerson Group	N/A	N	N	N	Y
Marshall House, Cross Street, Sale	Residential	The Emerson Group	N/A	N	N	N	Y
Stafford Court, Washway Road, Sale	Residential	The Emerson Group	N/A	N	N	N	Y
Stamford House, Northenden Road, Sale	Residential	The Emerson Group	N/A	N	N	N	Y
Land at Clay Lane, Timperley	Residential	Hollins Strategic Land	N/A	Y	Y	N	N
Site TBC – Urmston	Residential	TTH	N/A	Y	N	N	N
Site TBC – Urmston	Residential	TTH	N/A	Y	N	N	N
Site TBC – Urmston	Residential	TTH	N/A	Y	N	N	N

¹ NC – New Carrington; TW – Timperley Wedge

Site address (as submitted)	Proposed Use	Consultee	Agent	Within Green Belt	Submitted for consideration in GMSF	GMSF Allocation 2020¹	Site within the urban area
Land at Higher House Farm, Dairyhouse Lane	Residential	North Quays Business Park Executive Pension Plan	N/A	Y	N	N	N
Land at Dairyhouse Lane	Residential	North Quays Business Park Executive Pension Plan	N/A	Y	N	N	N
Land to the west of Warburton Lane and to the south of the Red Brook and urban area of Partington.	Residential	Redrow Homes	WSP	N	Y	Y - NC	N
Land to the east of Warburton Lane and to the south of the Red Brook and urban area of Partington	Residential	Redrow Homes	WSP	N	Y	Y - NC	N
Land adjacent to Timperley Brook, Stamford Brook Road, Altrincham	Residential	The Trafford College Group	WSP	N	N	N	Y
Land off Shay Lane, Davenport Green	Residential	Bloor Homes	Stantec UK	Y	Y	N	N
97 Talbot Road, Old Trafford	Residential	Savills	N/A	N	N	N	Y
Land at the Wellacre Academy, Irlam Road, Flixton	Residential	Brookhouse/Wellacre Academy	Savills	Y	N	N	N
Land off Dane Road, Sale	Residential	Brookhouse	Savills	Y	N	N	N
Land off Seymour Grove, Old Trafford	Residential; Retail; Leisure	Savills	N/A	N	N	N	Y
Citygate 3, 203 Cross Street, Sale	Residential; Retail	The Emerson Group	N/A	N	N	N	Y

Site address (as submitted)	Proposed Use	Consultee	Agent	Within Green Belt	Submitted for consideration in GMSF	GMSF Allocation 2020 ¹	Site within the urban area
Land at the junction of John Gilbert Way and Wharfside Way, Trafford Park	Residential-led mixed use development	HEREF	CBRE	N	N	N	Y
Bridge Works, Bridgewater Embankment, Altrincham	Residential led mixed use development or 'unallocated white land'	Stephen Elias	Iceni	N	N	N	Y
Clipper House, Cross Street, Sale	Residential; Leisure	The Emerson Group	N/A	N	N	N	Y
56 Washway Road, Sale	Residential; Offices; Retail; Leisure	Kingward Investments Limited	Gerald Eve	N	N	N	Y
Land to the north of Manchester Road, Carrington	Residential; Offices; Industry/Warehousing; Retail	National Grid	Avison Young	N	N	Y - NC	Y
Land to the north and south of Bradley Lane, Stretford	Offices; Industry/Warehousing	Pennington	Eden Planning	Y	Y	N	Y
Former Peaksnook landfill site to the west of Manchester Road (A6144)	Industry/Warehousing	Peel Land & Property	Barton Willmore	N	N	Y - NC	Y
Land at Carrington Plains Industrial Estate, Manchester Road, Carrington,	Industry/Warehousing	National Grid	Avison Young	N	N	Y - NC	Y

Site address (as submitted)	Proposed Use	Consultee	Agent	Within Green Belt	Submitted for consideration in GMSF	GMSF Allocation 2020¹	Site within the urban area
Land off Barton Dock Road, Mercury Way and Phoenix Way	Well-being resort	Therme Group	WSP	N	Y	N	Y
Land known as Carrington and Warburton Mosses, along with Warburton Deer Park.	Protection from development	Friends of Carrington Moss	N/A	Y	Y	Y - NC	N
Midlands Farm – location TBC	Protection from development; Green Belt	Mark Priestner	N/A	TBC	TBC	TBC	TBC
Land to the north of Moss Lane, Warburton and south of Partington – location TBC	Protection from development	Mark Priestner	N/A	TBC	TBC	TBC	TBC
Land at Stokoe Avenue	Protected green space	Friends of Cow Field	N/A	N	N	N	Y