



Strategic Planning,
Trafford Council,
Trafford Town Hall,
Talbot Road,
Stretford,
M32 0TH.

June 6th, 2025

Dear Sir or Madam,

CONSULTATION ON TRAFFORD COUNCIL'S DRAFT LOCAL PLAN (REGULATION 18 STAGE)

CPRE (formerly the Campaign to Protect Rural England) Cheshire Branch welcomes the opportunity to participate in the consultation on Trafford Council's Draft Local Plan.

CPRE is known as 'the countryside charity' because of its work towards achieving a thriving and beautiful countryside for everyone. However, as well as being a member of the Rural Coalition and the Wildlife and Countryside Link, we are also aligned to the 'Smart Growth Coalition' and with sustainable transport bodies. And, promoting urban regeneration, sustainable and active travel and more environmentally friendly logistics is a big part of our work. So is campaigning for affordable housing and against urban sprawl and for 'rooftop solar' and against fracking. Next year we will be celebrating our 100th birthday as an organisation. During the time we have existed, we were largely responsible for the formation of the Green Belt. We were therefore deeply saddened by the loss of Green Belt in the Greater Manchester Spatial Plan 'Places for Everyone' (PfE), but we are relieved to note that Trafford Council is not proposing any further loss of Green Belt in its Draft Local Plan.

INTRODUCTION. VISION AND STRATEGIC OBJECTIVES

Q.1-1 Do you support the draft Policies Map?

Are there any changes required which would improve it?

A.1-1 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.

Q.1-2 Do you agree with the proposed Vision for the Trafford Local Plan?

A.1-2 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'.

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Q.1-3 Do you agree with the proposed Strategic Objectives and feel that they capture the priorities for Trafford? (Policies SO1 – S10 inc)

A.1-3 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: <https://www.greatermanchester-ca.gov.uk/what-we-do/environment/natural-environment/our-plan-for-nature-recovery/>).
- 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: <https://www.cpre.org.uk/resources/cpre-transport-policy/>.
- 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.

THE STRATEGY

Core Growth Area (Trafford)

Q.2-1 Do you support Policy ST1? (Core Growth Area Trafford)
Are there any changes required that would improve the policy?
Please provide any supporting evidence which you think is relevant.

A.2-1 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.

Inner Areas

Q.2-2 Do you support Policy ST2? (Inner Areas Trafford)
Are there any changes required which would improve the policy?
Please provide any supporting evidence which you think is relevant.

A.2-2 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).

Southern Areas

Q.2-3 Do you support Policy ST3? (Southern Areas Trafford)
Are there any changes required which would improve the policy?
Please provide any supporting evidence which you think is relevant.

A.2-3 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.

Sustainable Development

Q.2-4 Do you support Policy ST4? (Sustainable Development)

Are there any changes required which would improve the policy?

Please provide any supporting evidence which you think is relevant.

A.2-4 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: <https://www.bbc.co.uk/news/articles/cvgdk9g39rlo> and <https://www.placenorthwest.co.uk/rethink-for-1000-home-macc-scheme-due-to-peat-concerns/>).

Climate Change

Q.2-5 Do you support Policy ST5? (Climate Change)

Are there any changes required which would improve the policy?

Please provide any supporting evidence which you think is relevant.

A.2-5 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.

Site Allocations within Trafford and Monitoring

Q.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?

A.2-6 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 Decadal 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 (<https://wmo.int/publication-series/wmo-global-annual-decadal-climate-update-2025-2029?access-token=pNLbDBu8q2rFHbkLrdh9YE5cold58lc7lc47kQiUg4U>). Also, see our responses to questions 2-4 and 2-5.

RENEWABLE TECHNOLOGIES AND METHODS

Carbon and Energy

Q.3-1 Do you support Policy RT1? (Carbon and Energy)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.3-1 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: <https://www.cpre.org.uk/rooftop-solar/>.

Networking Renewables

Q.3-2 Do you support Policy RT2? (Decentralised Energy Generation)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.3-2 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.

Living with and Addressing Increasing Heat

Q.3-3 Do you support Policy RT3? (Overheating and the Urban Heat Island)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.3-3 This sounds like a sensible policy which can be supported in principle.

Updating and Adapting Existing Buildings

Q.3-4 Do you support Policy RT4? (Sustainable Retrofitting)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.3-4 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.

A New Greener Economy

Q.3-5 Do you support Policy RT5? (Circular Economy)
Are there any changes required which would improve the policy?
Please provide any supporting evidence which you think is necessary.

A.3-5 We can support the aims of this policy.

Monitoring

Q.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?

A.3-6 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: <https://www.cpre.org.uk/what-we-care-about/climate-change-and-energy/renewable-energy/community-energy-visioning-showcasing-renewables-done-well/>. Also, see our response to q. 3-1 in this consultation.

RESIDENTIAL DEVELOPMENT

Meeting the Housing Requirement

Q.4-1 Do you support Policy R1? (Housing Delivery)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.4-1 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 in 2022: <https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/>).

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).

Loss of Existing Homes

Q.4-2 Do you support Policy R2? (Protecting Existing Homes)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.4-2 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.

Meeting Affordable and Social Housing Needs

Q.4-3 Do you support Policy R3? (Affordable and Social Housing)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.4-3 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: <https://www.cpre.org.uk/news/rural-housing-crisis-demands-action-in-planning-and-infrastructure-bill/>.

Q.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?

A.4-4 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 renege on their promises, playing the non-viability card.

Q.4-5 Should 10% of all affordable/social housing be delivered as Truly Affordable Net Zero Homes (TANZ)?

A.4-5 Yes – as a minimum.

Q.4-6 Should any other policy approaches to affordable and social housing be explored?

A.4-6 Yes.

A Diverse Housing Stock

Q.4-7 Do you support Policy R4? (Size and Type of New Homes)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.4-7 We support a policy that calls for a range and mix of dwelling sizes and types.

Q.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?

A.4-8 The success of a policy like this depends on it being closely aligned with the Council's Design Guide.

Q.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?

A.4-9 Yes.

Housing Density

Q.4-10 Do you support Policy R5? (Housing Density)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.4-10 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.

Homes for Older People

Q.4-11 Do you support Policy R6? (Homes for Older People)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.4-11 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.

Q.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?

A.4-12 Trafford could consider adopting the definition used by Age UK for assisted living/ extra care housing: (<https://www.ageuk.org.uk/information-advice/care/housing-options/assisted-living-and-extra-care-housing/>).

Lifetime Homes

Q.4-13 Do you support Policy R7? (Adaptable and Accessible Housing)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.4-13 We very much support the concept of 'Lifetime Homes' and therefore can support this policy.

Homes for Children

Q.4-14 Do you support Policy R8? (Homes for Children and Care Experienced Young People)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.4-14 The commitments made in this policy appear to be sound and sensible and are therefore supported.

Other Types of Homes

Q.4-15 Do you support Policy R9? (Other Types of Homes)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.4-15 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.

Q.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?

A.4-16 This seems to be a sensible concept.

Q.4-17 Should nomination agreements be used to ensure that accommodation is reserved for students enrolled at a named institution?

A.4-17 We are unsure and therefore decline to answer this question.

Gypsies, Travellers and Travelling Showpeople Accommodation

Q.4-18 Do you support Policy R10? (Gypsies, Travellers and Travelling Showpeople)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.4-18 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.

Bespoke Homes

Q.4-19 Do you support Policy R11? (Self-Build and Custom Housing)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.4-19 CPRE is unable to support this policy because it specifically endorses building on the two major sites to which we are fundamentally opposed.

Monitoring

Q.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

A.4-20 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.

ECONOMY AND JOBS

Land Requirements

Q.5-1 Do you support Policy EJ1? (Employment Land Requirements)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.5-1 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).

Trafford Park

Q.5-2 Do you support Policy EJ2? (Trafford Park)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.5-2 It is fully understood and accepted that Trafford Park is a major industrial and employment area in the North West, 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.

Industrial and Warehousing uses

Q.5-3 Do you support Policy EJ3? (Industry and Warehousing)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.5-3 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).

Q.5-4 Do you agree with the proposed boundary shown on the policies map for Trafford Park?

A.5-4 We cannot find a sufficiently detailed map in the Draft Trafford Local Plan to be able to respond to this question.

Q.5-5 Do you agree with the proposed boundary shown on the policies map for Broadheath Employment Area?

A.5-5 We cannot find a sufficiently detailed map in the draft Trafford Local Plan to be able to respond to this question.

Office Development

Q.5-6 Do you support Policy EJ4? (Offices)

Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.5-6 CPRE does not support this policy because it includes in it endorsement of office development on Davenport Green/the Timperley Wedge.

Q.5-7 Do you support Policy EJ5? (Safeguarding Trafford's Employment Land)

Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.5-7 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.

Modern Economy

Q.5-8 Do you support Policy EJ6? (Data and Energy Storage)

Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.5-8 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"*.

The Rural Economy

Q.5-9 Do you support Policy EJ7? (Rural Economy)

Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.5-9 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.

Monitoring

Q.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?

A.5-10 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.

TRANSPORT AND MOVEMENT

Walking, Wheeling and Cycling

Q.6-1 Do you support Policy TM1? (Walking, Wheeling & Cycling Improvements in Trafford West)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.6-1 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.

Public Transport

Q.6-2 Do you support Policy TM2? (Public Transport)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.6-2 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.

Car Clubs

Q.6-3 Do you support Policy TM3? (Car Clubs)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.6-3 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.

Mobility Hubs

Q.6-4 Do you support Policy TM4? (Mobility Hubs)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.6-4 CPRE supports the principle of mobility hubs.

The Highway Network

Q.6-5 Do you support Policy TM5? (The Local Highway Network)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.6-5 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).

The A56

Q.6-6 Do you support Policy TM6? (The A56)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.6-6 CPRE supports this policy.

Movement of Goods

Q.6-7 Do you support Policy TM7? (Freight)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.6-7 CPRE supports this policy.

The Manchester Ship Canal

Q.6-8 Do you support Policy TM8? (Manchester Ship Canal)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.6-8 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.

National Infrastructure Schemes

Q.6-9 Do you support Policy TM9? (Potential Future Rail Route)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.6-9 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.

Parking

Q.6-10 Do you support Policy TM10? (Parking Standards)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.6-10 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).

Lorry Parking

Q.6-11 Do you support Policy TM11? (Lorry Management)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.6-11 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.

Park and Ride Facilities

Q.6-12 Do you support Policy TM12? (Park and Ride)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.6-12 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.

Crowd Movement

Q.6-13 Do you support Policy TM13? (Crowd Movement and Routes)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.6-13 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.

Monitoring

Q.6-16 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?

A.6-16 There is no policy which supports and sets out a sustainable transport hierarchy. (CPRE's adopted hierarchy is appended as an annex to 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.

TOWN CENTRES AND RETAIL

Trafford Town and Retail Centres

Q.7-1 Do you support Policy TC1? (Hierarchy of Centres)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.7-1 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).

Q.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?

A.7-2 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?

Roles and Functions

Q.7-3 Do you support Policy TC2? (Role and Function of Centres)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.7-3 As members of the Smart Growth Coalition (<https://smartgrowthuk.org/>), 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).

Beyond the Town Centres

Q.7-4 Do you support Policy TC3?
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.7-4 As members of the Smart Growth Coalition (<https://smartgrowthuk.org/>), 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).

Monitoring

Q.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?

A.7-5 There should be a policy which commits to carrying out fully comprehensive master planning assessments of all major centres.

GREEN INFRASTRUCTURE & NATURAL ENVIRONMENT

Landscape Character

Q.8-1 Do you support Policy G11? (Landscape Character Areas)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.8-1 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.

Trafford Green Infrastructure Network

Q.8-2 Do you support Policy GI2? (Green Infrastructure Network)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.8-2 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.

Wetlands Nature Improvement Areas

Q.8-3 Do you support Policy GI3? (Greater Manchester Wetlands Nature)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.8-3 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.

Mersey Valley

Q.8-4 Do you support Policy GI4? (Mersey Valley)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.8-4 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.

Green Infrastructure Opportunity Areas

Q.8-5 Do you support Policy GI5? (Green Infrastructure Opportunity Areas)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.8-5 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.

New Developments

Q.8-6 Do you support Policy GI6? (Green Infrastructure in New Developments)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.8-6 We support this policy.

Trafford Trees and Hedges

Q.8-7 Do you support Policy GI7? (Trees, Woodlands and Hedgerows)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.8-7 CPRE welcomes and supports this policy.

Safe Places for Nature

Q.8-8 Do you support Policy GI8? (Protection of Locally Designated Sites & Natural Environmental Assets)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.8-8 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?

Encouraging and Improving Biodiversity

Q.8-9 Do you support Policy GI9? (Biodiversity Opportunity Areas)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.8-9 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.

Q.8-10 Do you support Policy GI10? (Building Biodiversity into New Developments)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.8-10 Yes, we can support this policy.

Monitoring

Q.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?

A.8-11 As we say in response to question 8-4, there should be a policy about improving water quality in the River Mersey.

OPEN SPACE, SPORT AND RECREATION

Trafford's Open Spaces

Q.9-1 Do you support Policy OS1? (Open Space)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.9-1 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.

Trafford Outdoor Sports and Recreation Offer

Q.9-2 Do you support Policy OS2? (Outdoor Sports and Recreation Facilities Provision)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.9-2 We do not support this policy because it does not mention horse riding, despite the proliferation of horses stabled around Carrington Moss in particular.

Trafford's Indoor Sports and Recreation

Q.9-3 Do you support Policy OS3? (Indoor Sports and Recreation Provision)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.9-3 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.

Protection of Sport and Recreation Land and Facilities

Q.9-4 Do you support Policy OS4? (Loss of Sport and Recreation Land or Facilities)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.9-4 We can support this policy.

Places to Grow

Q.9-5 Do you support Policy OS5? (Allotments and Growing Space)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.9-5 We can support this policy.

Places for Remembering

Q.9-6 Do you support Policy OS6? (Cemeteries and Burial Grounds)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.9-6 We can support this policy.

Monitoring

Q.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 are missing and which should be included in the Local Plan?

A.9-7 We question the value of using the number of planning applications as an indicator. A better one is needed.

WATER, FLOODING AND DRAINAGE

Managing Flood Risk

Q.10-1 Do you support Policy WA1? (Managing Flood Risk)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.10-1 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.

Sustainable Drainage

Q.10-2 Do you support Policy WA2? (Sustainable Drainage – Surface and Foul Water)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.10-2 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: <https://www.gov.uk/government/news/drought-declared-in-north-west-of-england>.

Flood Storage Areas

Q.10-3 Do you support Policy WA3? (Flood Storage Areas)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.10-3 We do not support this policy as it fails to list Carrington Moss as a flood storage area.

Water Efficiency

Q.10-4 Do you support Policy WA4? (Water Efficiency)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.10-4 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*”.

Monitoring

Q.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?

A.10-5 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.

COMMUNITY AND SOCIAL INFRASTRUCTURE

Social Infrastructure and Facilities

Q.11.1 Do you support Policy CT1? (Protecting Existing Community and Social Facilities)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.11-1 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.

Q.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?

A.11-2 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.

Loss of Community Facilities

Q.11-3 Do you support Policy CT2? (Loss of Community Facilities)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.11-3 This policy can be supported.

New Community and Social Facilities

Q.11-4 Do you support Policy CT3? (New Community and Social Facilities)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.11-4 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.

Fast Food

Q.11-5 Do you support Policy CT4? (Fast Food)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.11-5 We can support this sensible and caring policy, drawn up in the best interests of young people.

Upskilling Trafford

Q.11-6 Do you support Policy CT5? (Social Value in New Developments)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.11-6 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.

Monitoring

Q.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?

A.11-7 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.

BUILT ENVIRONMENT

Well Designed Places

Q.12-1 Do you support Policy BE1? (Design)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.12-1 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.

Tall Buildings

Q.12-2 Do you support Policy BE2? (Tall Buildings)
Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.

A.12-2 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.

Elevated Green Spaces

Q12-3 Do you support Policy BE3? (Elevated Green Spaces)

**Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.**

A.12-3 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.

Adverts and Signs

Q.12-4 Do you support Policy BE4? (Advertisements and Signage)

**Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.**

A.12-4 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.

Heritage and History

Q.12-5 Do you support Policy BE5? (Heritage Assets)

**Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.**

A.12-5 CPRE supports this policy.

Designated Historic Assets

Q.12-6 Do you support Policy BE6? (Designated Heritage Assets)

**Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.**

A.12-6 CPRE supports this policy.

Other Historic Assets

Q.12-7 Do you support Policy BE7? (Non-designated Heritage Assets)

**Are there any changes required which would improve the policy?
Please provide supporting evidence which you think is necessary.**

A.12-7 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.

Considerate Construction and Uses

Q.12-8 Do you support Policy BE8? (Noise and Vibration)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.12-8 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.

Contamination

Q.12-9 Do you support Policy BE9? (Land Contamination and Remediation)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.12-9 CPRE supports this policy.

Digital Connectivity

Q12.10 Do you support Policy BE10? (Digital Connectivity)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.12.10 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.

Monitoring

Q12.11 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?

A.12.11 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.

CULTURE, TOURISM AND LEISURE

Trafford's Existing Cultural, Leisure and Tourism Offer

Q.13-1 Do you support Policy CL1? (Protecting and Supporting Existing Cultural, Leisure and Tourism Assets)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.13-1 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.

New Culture, Leisure and Tourism Attractions

Q.13-2 Do you support Policy CL2? (New Culture, Leisure and Tourism Developments)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.13-2 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.

Monitoring

Q.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?

A.13-3 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.

INFRASTRUCTURE AND PLANNING OBLIGATIONS

Q.14-1 Do you support Policy IP1? (Infrastructure Delivery and Planning Obligations)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.14-1 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.

Managing and Monitoring Arrangements

Q.14-2 Do you support Policy IP2? (Managing and Monitoring Planning Obligations)

Are there any changes required which would improve the policy?

Please provide supporting evidence which you think is necessary.

A.14-2 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.

Q.14-3 Do you agree that the Council should require a fee to monitor and report on planning obligations?

A.14-3 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.

Q.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?

A.14-4 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.

Monitoring

Q.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?

A.14-5 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).

Finally, 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.

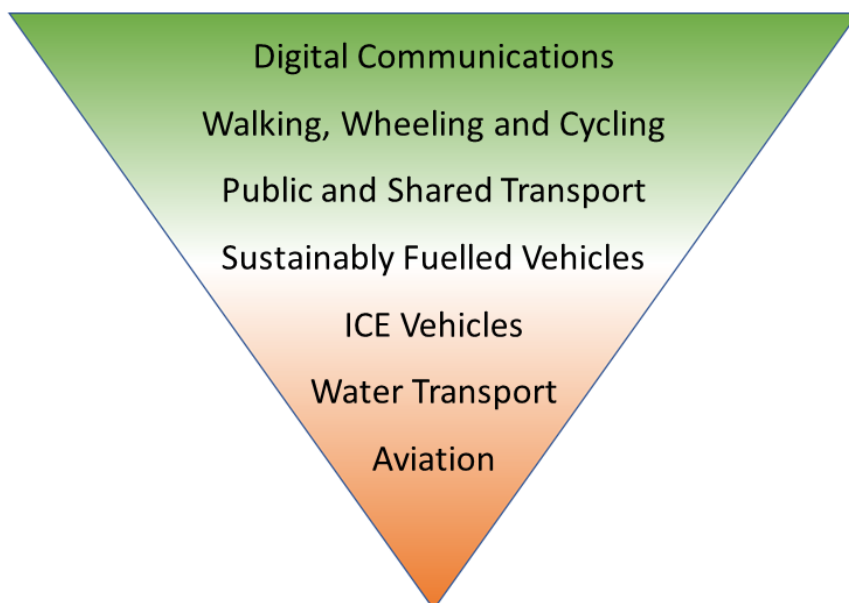
We trust this submission will receive due consideration.

Yours faithfully,

LILLIAN BURNS

Planning and Transport volunteer, CPRE Cheshire Branch

ANNEXE 1: CPRE'S SUSTAINABLE TRANSPORT HIERARCHY



CPRE's transport policy, which includes a full explanation of its support for this hierarchy, is available here: <https://www.cpre.org.uk/resources/cpre-transport-policy/>