

**APPENDIX 1 – CPRE CHESHIRE COMMENTS**  
**DRAFT STOCKPORT LOCAL PLAN TO 2042 (October 2025)**

[a blank space indicates we have no comments on that particular chapter or policy]

POLICY/PARAGRAPH NUMBER	CPRE CHESHIRE RESPONSE
<b>FOREWORD</b>	
	CPRE shares the frustration expressed here about the imposition of the Government’s flawed standard method for calculating housing needs and rules concerning “grey belt”.
<b>CHAPTER 1) INTRODUCTION</b>	
<b>CHAPTER 2) OUR VISION</b>	
<b>2.1 One heart, one home, one future</b>	We broadly support the principles set out here. We also support the “brownfield first” approach set out in figure 3 of the Plan and would urge the Council to be as ambitious as possible in bringing forward suitable brownfield land to meet development needs. We suggest that clause 2 of the high-level principles (in figure 3) should reference the protection of countryside as well greenspaces, as people often interpret “greenspaces” as just meaning formal open spaces such as parks.
<b>2.2 Our places and neighbourhoods</b>	
<b>CHAPTER 3) OUR STRATEGY</b>	
<b>3.1 Objectives</b>	We broadly support the objectives although they will need to be supported by clear, quantifiable and justified monitoring indicators and targets. This is to ensure an appropriate balance of economic, social and environmental aims are met. We assume that the term “zero carbon development” in objective 1 should refer to “net zero”. Given the extensive loss of Green Belt proposed it is also questionable whether objective 4 (about the protection of landscapes and open spaces) will be achieved in full.
<b>Strategic Policy 1: Spatial Strategy</b>	<u>Clause 1</u> - CPRE supports the aspirations to deliver a “brownfield first” approach as expressed here and in some other parts of the Plan, and the focus on development being concentrated in the most sustainable locations. However, this is likely to be undermined by the scale of Green Belt release proposed, particularly in the absence of any detailed phasing policy later in the Plan giving preference to redevelopment of brownfield land.

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	<p>We are also concerned that the Council’s Brownfield Register has not been updated since 2020. The Town and Country Planning (Brownfield Land Register) Regulations 2017 require Councils to review the register at least once each year and this should be done in Stockport as elsewhere.</p> <p>As the Plan progresses it will also clearly be important for the Council to continue reviewing its supply of suitable brownfield sites for development, not just for the overall Plan period but also for the deliverable 5-year supply. This will require on-going and comprehensive work to address any barriers to development of such sites (e.g. funding, site preparation, marketability etc.) in order to maximise urban regeneration and minimise pressure for Green Belt release.</p> <p><u>Clause 4</u> - We welcome the reference to biodiversity net gain in clause 4.</p> <p><u>Clause 6</u> – this clause should be strengthened by giving strong protection to agricultural land, particularly Best and Most Versatile land (grades 1,2 and 3a).</p> <p><u>Clause 7</u> - We support clause 7 (about the protection of Green Belt) although the benefits of this clause will be undermined by the scale of Green Belt loss which would be caused by the Plan’s proposed site allocations.</p> <p><u>Clause 10</u> - CPRE Cheshire acknowledges the depth of the housing crisis in the UK and the Government’s mandated ambition to deliver 1.5 million homes. However, we have concerns about the standard method that the Government has introduced to attribute Local Housing Need (LHN) to individual local authorities, including Stockport. We believe that local housing need should be calculated on the basis of local and regional demographic data. The standard method lacks this evidential basis and is therefore flawed.</p> <p>We note that the Council’s proposed housing requirement of 25,371 new dwellings between 2025 to 2042 only represents 80% of the Government’s LHN figure (31,790<sup>1</sup>). This “shortfall” is likely to have the effect of saving some Green Belt in Stockport from new development and to</p>

<sup>1</sup> The figure of 31,790 is from paragraph 111 of “Stockport Local Plan: Addressing our development needs”, October 2025

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	<p>this extent is an approach which we support. However, we also have concerns about whether the figure of 25,371 dwellings is adequately rooted in objective demographic data.</p> <p>We also have concerns about how the “missing 20%” (i.e. the difference between the figures of 25,371 and 31,790 dwellings) may be addressed as the Plan progresses. For the avoidance of doubt, we do not consider that this 20% should be accommodated via additional Green Belt release in Stockport or transferred to the nearby Borough of Cheshire East as this is also facing extreme pressures for new development in unsuitable countryside and Green Belt locations. An example is the poorly conceived proposal for a New Town at Adlington, just a mile or so from the boundary with Stockport. It may be worth investigating whether a New Town at Manchester Victoria, which has (like Adlington) been recommended in the New Towns Task Force Report but is in a far more suitable urban location in need of regeneration could accommodate some or all of the 20%.</p> <p>We also note that the Council’s housing target – which equates to an annual average of 1,492 dwellings per annum over the 2025 to 2042 period - significantly exceeds the rate of 1,097 additional households in Stockport as shown in the latest, 2022-based Office for National Statistics (ONS) household projections. This figure of 1,097 is the annual average of the projected household increase in Stockport between 2022 and 2032 as derived from the interactive map on the ONS website<sup>2</sup>. Whilst the projections should not (as has been stated by the ONS) be used in isolation to predict numbers of new dwellings needed, we nevertheless believe that they provide some context to the much higher housing targets now proposed.</p> <p><u>Clause 17</u> – we support the approach to transport issues set out within this clause.</p>
<b>Strategic Policy 2: A strategy for our centres</b>	<p><u>Clause 2</u> – we support the ambition to focus substantial amounts of residential development within and around Stockport town centre and other centres. We also support the use of the highest appropriate densities in these locations to achieve an efficient use of land. However, the phrase “optimised” density should be further defined in the policy, as meaning the maximum that can be achieved whilst also achieving good quality urban form appropriate to its surroundings, a</p>

<sup>2</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/householdprojectionsforengland/2022based#projected-change-by-local-authority>

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	suitable living environment for future occupants and avoiding adverse impacts on neighbouring uses.
<b>Strategic Policy 3: Sustainable development in Stockport</b>	<p>Clauses 2 and 3 – these clauses are similar to the wording in paragraph 11c) and 11d) of the National Planning Policy Framework. Given the need to avoid duplication of NPPF policies (see para. 16 f of the NPPF) it is not clear why they are included here, particularly as there are some differences of wording which could cause confusion when applied to individual planning proposals. The clauses will also need to be reviewed in the light of the revised NPPF, scheduled to be published in 2026.</p> <p>Clause 4 – we support all parts of this clause, including the reference to 20% biodiversity net gain.</p>
<b>Strategic Policy 4: Equality, impact and opportunity</b>	
<b>CHAPTER 4) DEVELOPMENT MANAGEMENT POLICIES</b>	
<b>Policy COM1: Healthy and active across all ages</b>	We support this clause. However, the ambition to improve access to open spaces and green infrastructure is likely to be jeopardised by the loss of Green Belt proposed within the Plan.
<b>Policy COM2: Community and social infrastructure</b>	We support this policy. Community facilities such as pubs, shops etc. can play a central part in the life of rural communities. We therefore welcome the protection provided by clause 4. Clause 4a) should be changed to read “...adequate replacement provision <del>can be</del> <b>would be</b> made available in a suitably...etc.”
<b>Policy COM3: Educational facilities</b>	
<b>Policy COM4: Protection of open space and recreation facilities</b>	We support this policy including for example the protection given to allotments and areas for community gardening in clause 3 and the ecological network in the supporting text.
<b>Policy COM5: Local Green Space</b>	We support this policy as Local Greenspace such as village greens etc. can play a hugely important role in local communities. With regard to clause 2) it should be noted (perhaps in the supporting text) that development which falls within the exceptions listed for Green Belt would not necessarily be appropriate on a Local Greenspace. This might be the case for example on a village green where development might be regarded as “limited infilling” (and hence be regarded as acceptable under national Green Belt policy) but which would nevertheless have a disastrous effect on village life.
<b>Policy COM6: Sporting facilities</b>	

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Policy COM7: Health care facilities	
Policy COM8: Cemeteries and crematoria	
Policy ENV 1: Protection of the natural environment	We support the overall thrust of this policy. However, the positioning of irreplaceable habitats at third place in the hierarchy (and hence implied reduced weight compared for example to SSSIs) seems inconsistent with the strong protection given by paragraph 193 c) of the National Planning Policy Framework, the wording of which is also reflected in policy ENV4 clause 6. Irreplaceable habitats such as ancient woodlands are extremely important and there should be no inconsistency in the Plan about the weight given to their protection.
Policy ENV 2: Enhancing nature	We welcome this policy including its reference to 20% biodiversity net gain.
Policy ENV 3: Nature Recovery	We welcome this policy including its reference to the Greater Manchester Local Nature Recovery Strategy.
Policy ENV 4: Trees, woodland and hedgerows	We broadly support this policy. In clause 6), the Council should consider including peatland in the list of irreplaceable habitat types, given its immense value to biodiversity and carbon retention, and the substantial difficulty and timescales involved in regenerating peatland once it is damaged.
Policy ENV 5: Landscape	We support this policy. We are concerned however that the removal of land from the Green Belt set out in the Plan will have adverse effects on the Borough's landscape.
Policy ENV 6: Soils	<p>CPRE partially supports this policy. The policy should be titled "Agricultural land and soils". The wording in clause 3 needs to be strengthened to "Development which involves the permanent loss of the best and most versatile agricultural land will not be permitted unless it <del>can be</del> <b>has been</b> demonstrated that <b><u>the benefits of the development would clearly outweigh the harm caused by loss of the agricultural land and that the development could not be practicably located elsewhere</u></b> <del>agricultural value of the land is outweighed by other factors</del>. Proposals involving extensive use of land should be capable of easy reversion to agricultural use."</p> <p>The reason for this change is that research undertaken by CPRE has indicated how rapidly the nation is losing good quality farmland and also how quickly farms are being lost around the fringes of large cities. It is crucial that further protections are provided to support food security and a strong farming economy. See the hyperlinks here:</p>

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	<p><a href="https://www.cpre.org.uk/news/uk-farmland-at-risk-under-system-using-1940s-data-new-report-reveals/">https://www.cpre.org.uk/news/uk-farmland-at-risk-under-system-using-1940s-data-new-report-reveals/</a>  <a href="https://www.cpre.org.uk/news/farms-vanishing-around-towns-and-cities-our-new-report-reveals/">https://www.cpre.org.uk/news/farms-vanishing-around-towns-and-cities-our-new-report-reveals/</a>.</p> <p>A fourth clause should be added to the policy to require developers proposing loss of BMV land to undertake a detailed agricultural land quality assessment which – if there is not sufficient data already available – should incorporate on-site investigation (i.e. not just desk-based study) in line with Natural England’s “Guide to assessing development proposals on agricultural land 2021”. This is available to view at <a href="https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land#lpas-carry-out-alc-assessments-to-support-your-planning-decisions">https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land#lpas-carry-out-alc-assessments-to-support-your-planning-decisions</a>. An equivalent level of evidence should also be gathered to inform any Local Plan site allocations potentially involving loss of BMV land.</p>
<b>Policy ENV 7: Environmental protection</b>	We support this policy including its references to control of lighting in clause 3. The phrase “where appropriate” at the start of paragraph 152 is too vague. A light impact assessment should normally be required for major applications (e.g. for more than 10 dwellings) and in some cases for more minor ones as well, particularly where light pollution could cause problems for example for biodiversity in the area or is in a rural area without substantial light pollution at present.
<b>Policy ENV 8: Clean air</b>	
<b>Policy ENV 9: Groundwater protection</b>	
<b>Policy ENV 10: Land stability, contamination and storage of hazardous substances</b>	We support the “brownfield first” approach referred to here – see earlier comments.
<b>Policy ENV 11: Safeguarding of Manchester Airport and air navigation facilities</b>	
<b>Policy ENV 12: Aircraft noise</b>	No comments on the policy. The policy does however illustrate the damaging noise effects of the airport (both for residents and for the tranquillity of affected areas) which must be taken into account in any future decisions about airport expansion or changes in flight paths.
<b>Policy ENV 13: Delivering design quality</b>	We broadly support this policy. In clause 3a) should the references to policies HOM3a and BUS2B be changed to HOM2a and BUS3b?

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<b>Policy ENV 14: Making effective use of land for residential development</b>	We support this policy as it should minimise the need for further loss of Green Belt. We also support the statement in paragraph 188 that well designed places do not necessarily need to copy their surroundings although it should be clarified that it <u>may</u> be appropriate to introduce increased densities, depending on site circumstances.
<b>Policy ENV 15: Residential design</b>	
<b>Policy ENV 16: Taller buildings</b>	We broadly support this policy which is in line with the ambition to make efficient use of land.
<b>Policy ENV 17: Public realm</b>	
<b>Policy ENV 18: Shop frontages</b>	
<b>Policy ENV 19: Development and the historic environment</b>	
<b>Policy CR 1: Climate resilience, mitigation and adaptation</b>	We support the policy. We hope that the Government's proposed Future Homes Standard and Future Buildings Standard (both referred to in the supporting text) will include mandatory rooftop solar in line with national CPRE campaigning on this issue.
<b>Policy CR 2: Energy efficiency, resources and carbon</b>	We support this policy.
<b>Policy CR 3: Renewable and low carbon energy development</b>	<p>We support much of this policy. However, we have concerns about the potential uncontrolled expansion of ground mounted solar and wind power schemes (referred to in clauses 3 and 4). There should be clear cross references here to policies protecting landscapes such as the Peak District and its setting, other important rural landscapes and to the protection of Best and Most Versatile Agricultural land. CPRE has set out principles in its "Solar Done Well" document, which we would recommend to the Council. See <a href="https://www.cpre.org.uk/resources/principles-for-ground-mounted-solar-done-well/">https://www.cpre.org.uk/resources/principles-for-ground-mounted-solar-done-well/</a>.</p> <p>We support the statement in clause 3 that solar developments should aim to provide 20% biodiversity net gain.</p>
<b>Policy CR 4: Heat networks and cooling</b>	
<b>Policy CR 5: Retrofit and re-use of buildings</b>	
<b>Policy HOM 1: Delivering new homes</b>	CPRE has concerns about the evidential basis for the housing target of 25,371 new homes – see our response to strategic policy 1 "spatial strategy".

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<p><b>Policy HOM 2a: New residential communities</b></p>	<p>CPRE is concerned that many of the sites proposed in this section fall outside the current urban area, within the Green Belt. We have set out in response to policy 1 “spatial strategy” our concerns about the housing targets which have given rise to this level of Green Belt release.</p> <p>We note that a number of the sites (HOM 2.15 to HOM 2.35 inclusive) have been put forward by the Council as they consider them to fall within the Government’s definition of “grey belt”. As mentioned in our covering letter, CPRE’s recent <a href="#">national study</a> of major housing schemes approved on appeal by Inspectors found that 88% of the new homes on land identified as “grey belt” would be built on previously undeveloped countryside. The term “grey belt” is therefore a misnomer. Whether or not the sites are considered to count as grey belt as defined by the Government, the fact is that these proposals would cumulatively add significantly to urban sprawl in Stockport.</p> <p>In addition, we are aware that local community groups and residents have raised a wide range of site-specific issues relating to individual sites, relating for example to their openness, landscape value, biodiversity and in some cases loss of farmland. One example is site 2.16 (“High Lane”) which would provide for an estimated 1,000 dwellings on an area of open countryside. We would urge the Council to fully take account of all material factors raised about each site before progressing the Plan to the next stage.</p> <p>CPRE Cheshire is also extremely concerned about the proposal outlined in the New Towns Task Force report (September 2025) to locate a New Town of up to 20,000 dwellings at Adlington in Cheshire East. Whilst this New Town would be outside Stockport Borough it would be immediately next to the Borough boundary and in conjunction with the Stockport Local Plan proposals would extend urban sprawl in a more or less continuous arc down into rural Cheshire. This factor weighs against the proposed site allocations in that area (e.g. site 2.38 for 550 dwellings at Chester Road, Woodford).</p>
<p><b>Policy HOM 2b: Site specific requirements</b></p>	<p>As specified in our response to Policy HOM 2a, we have concerns about the principle of developing some of the sites proposed for allocation. Without prejudice to this position, we acknowledge the need for any sites which are allocated in the final Plan to include robust master planning and phasing requirements, as set out in Policy HOM 2b.</p>




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	<p>Clause 4 “affordable housing” – we support the requirement for 50% affordable housing on sites. However, the planning benefits from this are likely to be reduced by the Government’s definition of affordable housing (set out in annex 2 of the National Planning Policy Framework) which allows most types of housing to be counted as “affordable” if it is provided for rent or purchase at up to 80% of market value. CPRE believes that affordability should instead be defined by reference to local income levels.</p>
<b>Policy HOM 3: Protecting the future supply of housing</b>	<p>We broadly support this policy as it aims to prioritise delivery of new homes on brownfield land. The Council should do all it can to address the viability of development on brownfield land to maximise use of this resource and minimise loss of greenfield sites. The phrase "where appropriate" is important as some PDL areas are not suitable for development e.g. due to their biodiversity value.</p>
<b>Policy HOM 4: Housing mix</b>	<p>We support this policy as it is important to ensure the type of housing is appropriate to local needs. Clause 2c) (regarding provision of housing for older people) could also bring wider benefits by enabling down-sizing and thereby freeing up larger stock and easing supply/affordability pressures within the wider housing market.</p>
<b>Policy HOM 5: Affordable housing</b>	<p>We support the requirements of this policy. However, the resultant planning benefits may be reduced by the Government’s definition of affordable housing (set out in annex 2 of the National Planning Policy Framework) which allows most types of housing – including the “shared ownership” category included in Policy HOM5 - to be counted as “affordable” if it is provided for rent or purchase at up to 80% of market value. CPRE believes that affordability should instead be defined by reference to local income levels.</p>
<b>Policy HOM 6: Build to rent</b>	
<b>Policy HOM 7: Housing for older people and specialist accommodation</b>	<p>We support this policy.</p>
<b>Policy HOM 8: Provision and enhancement of outdoor recreational space in new residential development</b>	

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<b>Policy HOM 9: Gypsies, travellers and travelling show people</b>	We support the protection to Green Belt and other greenfield land in clause e) of policy HOM9.
<b>Policy HOM 10: Children's residential care and semi-independent supported living for young people</b>	
<b>Policy HOM 11: Houses in multiple occupation</b>	We support controls on HMOs set out in this policy as such controls can help make older residential areas more attractive to live in and hence aid urban regeneration.
<b>Policy HOM 12: Self-build and custom build homes</b>	
<b>Policy HOM 13: Protection of existing housing</b>	We support the protection of existing housing stock as set out in Policy HOM13.
<b>Policy HOM 14: Homes for agricultural workers in the Green Belt</b>	We support this policy. Clause 1d) could be strengthened to specifically state that the agricultural dwellings should be no larger than required to meet the need identified, to prevent excessively large dwellings being developed and thereby protect the rural landscape from unnecessary intrusion.
<b>Policy HOM 15: Residential infill development in the Green Belt</b>	We support this policy. The supporting text could be amended to refer to the statutory neighbourhood planning process, as this can provide a useful way to engage local communities in identifying sites for infill development in villages.
<b>Policy STC 1: Stockport Town Centre principles</b>	We support this policy and the subsequent town centre policies STC2 to STC7.
<b>Policy STC 2: Town centre policy areas</b>	
<b>Policy STC 3: A hub for culture and lifestyle</b>	
<b>Policy STC 4: Town centre living</b>	
<b>Policy STC 5: Public realm and design in the town centre</b>	
<b>Policy STC 6: Movement to and through the town centre</b>	
<b>Policy STC 7: Main town centre uses and retail development</b>	
<b>Policy BUS 1: Economy and employment principles</b>	We support elements of this Policy. However, CPRE Cheshire is concerned about the large-scale expansion of logistics uses across our branch area in recent years, which has in many cases led to harmful development in the Green Belt, and massive traffic increase on the area's motorways and other roads. The projected need for 29.2 hectares of land for such uses in Stockport (identified in the Employment Land Review) appears to be at least partly based on extrapolating

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	forward past trends in this one Borough. This is a matter which should be addressed on a consistent basis across the wider sub-region, particularly as the evidence has been used to justify release of Green Belt land.
<b>Policy BUS 2: Key employment locations</b>	We support clause 1 of this policy. We are concerned about clause 3 as it appears to encourage more road-based logistics uses.
<b>Policy BUS 3a: Employment Areas</b>	We are pleased that clause 3) allows a degree of flexibility for housing uses to be considered on former employment land.
<b>Policy BUS 3b: New employment development locations</b>	<p>CPRE notes that both the proposed site allocations listed here are outside the current urban area. As already mentioned the Green Belt areas in Stockport perform a crucial function in controlling urban sprawl.</p> <p>Site BUS3.1 Bredbury Gateway - This site allocation would cause loss of Green Belt and also provide for an extension of industrial scale buildings into the Tame Valley and Brinnington East Landscape Character Area. With a site area of 16.9 hectares, it forms part of a larger area on which a proposal for employment development has been previously refused on appeal (appeal decision reference APP/C4235/W/21/3279967, dated 17 March 2022). The appeal was dismissed for reasons based on Green Belt harm and harm to the character and appearance of the area. Whilst the site allocation would be smaller than that subject to the appeal it would nevertheless also cause impacts on the Green Belt and landscape which must be taken into account.</p>
<b>Policy BUS 4: Employment uses outside of designated employment areas</b>	We believe that former employment land can often provide a suitable source of land for housing development. We are not convinced that the 12-month marketing period referred to in clause 2) will always be necessary as there are likely to be cases (particularly on employment sites located in otherwise residential areas) where a re-development for housing is simply the better planning option, even if there is some residual demand for employment. Greater flexibility in this regard would be consistent with paragraph 128a) of the National Planning Policy Framework, and the policy should therefore be amended.
<b>Policy BUS 5: Flexible workspace</b>	
<b>Policy BUS 6: Local employment and training</b>	
<b>Policy CEN 1: Development principles for vibrant centres</b>	We support this policy, including the support for diversification of uses in existing centres, which should enable more housing development where this is appropriate.

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Policy CEN 2: Network and hierarchy of designated centres	
Policy CEN 3: District Centres	We welcome this policy including its emphasis on supporting the viability of each district centre. We also welcome the plans to provide a new railway station at Cheadle.
Policy CEN 4: Development involving main town centre uses	
Policy CEN 5: Hot food takeaways	
Policy CEN 6: Evening economy	
Policy CEN 7: Out of centre locations for retail	Clause 8 - we support the protection that is given here to local community shops. Local shops are extremely important to the quality of life in residential areas, including for example in villages where they can often be the only source of everyday items that can be obtained without travelling in a car.
Policy INF 1: Infrastructure provision and developer contributions	We broadly support this policy as it is essential that new development is supported by appropriate infrastructure. With regard to clause 5) it is crucially important that the Council takes a robust approach to assessing any viability evidence which is submitted by developers. We strongly support the view set out in paragraph 494 of the Plan that any viability evidence should be made publicly available. This is essential to maintain public trust in the operation of the planning system.
Policy INF 2: Digital and telecommunications infrastructure	
Policy INF 3: Flood risk	We support the nature-based approach referred to in this policy. Clause 4 could be worded more concisely and effectively to ensure that development would avoid the risks set out within criteria a), b) and c) of this clause.
Policy INF 4: Drainage	We support the sequential approach set out here.
Policy INF 5: Sustainable drainage systems (SuDS)	We support this policy.
Policy INF 6: Fresh water and wastewater infrastructure	
Policy INF 7: Integrated transport network	We broadly support this policy. However, we note that that the hierarchy shown in clause 1 only refers to road users, and therefore seems to downplay the role of footpaths, cycleways, railways etc. We would also commend CPRE's own version of the hierarchy which is explained in full in our transport policy (at <a href="https://www.cpre.org.uk/resources/cpre-transport-policy/">https://www.cpre.org.uk/resources/cpre-transport-policy/</a> ) and reproduced below:

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	 <p>Policy INF7 should also make it clear that steps to avoid the need to travel altogether e.g. via the provision of high-speed digital communications would be the most environmentally sustainable of all.</p>
<b>Policy INF 8: Sustainable streets</b>	
<b>Policy INF 9: Walking, wheeling and cycling</b>	
<b>Policy INF 10: Public transport</b>	
<b>Policy INF 11: Freight and logistics</b>	<p>CPRE Cheshire is concerned about the large-scale expansion of logistics uses across our branch area in recent years, which has in many cases led to harmful development in the Green Belt, and massive traffic increase on the area's motorways and other roads. It is essential that any proposals for new logistics or freight sites should take account of these considerations as well as impacts on local residents and other land uses. The encouragement to rail freight given in clause 1 c) of Policy INF 11 may bring some benefit where it can be shown that this would provide a realistic alternative to road-based logistics, although rail-based proposals must also be subject to detailed consideration of their impacts, which can be substantial.</p>
<b>Policy INF 12: Public rights of way and strategic recreation routes</b>	<p>CPRE Lancashire, Liverpool City Region and Greater Manchester together with the Ramblers established a new walking trail called the Greater Manchester Ringway via Heritage Lottery Funding. It is 200 miles of connected footpaths around the Greater Manchester conurbation – see details at <a href="https://www.gmringway.org/routes/">https://www.gmringway.org/routes/</a>. It would be ideal if the Local Plan could reference the route of the walk and include policy to encourage further access to countryside and</p>

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	greenspace by local people in line with NPPF policies to improve people's health and recreational opportunities.
Policy INF 13: The highway network	
Policy INF 14: Access and servicing	
Policy INF 15: Vehicle parking and infrastructure	We have not had time in making this submission to review the Council's car parking standards. As a general principle these should be set to avoid excessively large amounts of car parking provision in order to achieve efficient use of land and to encourage other more sustainable forms of transport.
Policy INF 16: Safeguarding future transport infrastructure and routes	CPRE is concerned to note that the Policies Map shows that land would still be safeguarded for the potential future A6 to M60 link road. This proposal would be extremely damaging to the Green Belt and wider environment in this area. It is also unlikely to provide a lasting solution to the problem of traffic in the area as traffic levels are likely to simply increase to fill the road space that would be created. For similar reasons we would be likely to raise concerns about any reprisal of the A6 High Lane bypass proposal.
Policy INF 17: Metrolink	We support the extension of Metrolink in principle subject to adequate consideration of impacts on the environment and nearby land uses.
<b>CHAPTER 5) MONITORING FRAMEWORK</b>	