



Integrated Assessment of the Draft Trafford Local Plan

Integrated Assessment Report

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1.0 Introduction

- 1.1 This report sets out an Integrated Assessment (IA) carried out on the draft Strategy, Vision, Objectives and thematic policies of the draft Trafford Local Plan (2025). The IA consists of a Sustainability Appraisal (SA), Equality Impact Assessment (EqIA), Health Impact Assessment (HIA) and Climate Change Risk Assessment (CCRA).
- 1.2 Trafford Council published a Local Plan Issues Paper in 2018 and a draft Local Plan in 2021 for consultation, both were at Regulation 18 stage. An IA was carried out for the 2021 draft Local Plan referencing the IA Scoping Report 2020.
- 1.3 Trafford Council is preparing a new draft Local Plan for Regulation 18 stage for public consultation. The Trafford Local Plan will include detailed planning policies, area designations and site allocations for specific types of development to guide and manage the borough's future growth and development needs up to 2042.
- 1.4 The IA Scoping Report 2020 has been updated by an Addendum for this IA of the draft Local Plan. The Addendum sets out the criteria against which the Local Plan should be assessed, including identifying the type, nature and extent of potential effects that should be considered. Both the Scoping Report 2020 and the Addendum inform this IA of the draft Local Plan 2025.
- 1.5 The Council intends to consult on the draft thematic policies in Spring 2025 and consult on the draft allocations in Autumn 2025. This IA is on the draft Strategy, Vision, Objectives and thematic policies. There shall be a separate IA on the draft allocations.
- 1.6 The two parts of the draft Trafford Local Plan will then be joined together into one Local Plan at the publication (Regulation 19) stage and published for public consultation, in advance of submission to the Secretary of State for Examination.
- 1.7 The Local Plan, when adopted, will replace the Trafford Core Strategy (adopted January 2012) and the Revised Trafford Unitary Development Plan (adopted June 2006). Following the adoption of the Local Plan, the Development Plan for Trafford will comprise:
 - The Trafford Local Plan;
 - Places for Everyone (adopted March 2024);
 - The Greater Manchester Joint Waste Plan (adopted April 2012);
 - The Greater Manchester Joint Minerals Plan (adopted April 2013);
 - Civic Quarter Area Action Plan (adopted January 2023); and
 - Any adopted Neighbourhood Plans. This currently includes the Altrincham Town Centre Neighbourhood Business Plan (made November 2017).



- 1.8 Places for Everyone (PfE) is a long-term plan of nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). It sets out the number of new homes required, where businesses will locate, identifies strategic allocations and the infrastructure needed to support development.
- 1.9 PfE sets the high-level strategy and policies and therefore must be read alongside the draft Trafford Local Plan. In some cases, the PfE policies provide guidance and requirements on a particular issue that the draft Trafford Local Plan does not cover. The PfE has been subject to a separate IA process and this IA covers issues related to Trafford that the draft Local Plan addresses. In the assessment of policies, this IA acknowledges where issues have not been addressed by the Local Plan but have been addressed by the PfE.



2.0 The IA Process

- 2.1 The IA will include four separate but complementary assessments to inform the development of the draft Trafford Local Plan 2025. These are:
 - Sustainability Appraisal (SA) assesses effects of the Local Plan across a range of environmental, social and economic issues.
 - Health Impact Assessment (HIA) assesses effects of the Local Plan on the health and well-being of the population and its ability to access health-related facilities and services. This also addresses equalities issues and has some overlap with Equalities Impact Assessment.
 - Equalities Impact Assessment (EqIA) assesses effects of the Local Plan in terms of equalities issues, with particular focus on disadvantaged or excluded groups of people. EqIA helps identify where we can best promote equality of opportunity.
 - Climate Change Risk Assessment (CCRA) assess the effects of the Local Plan in terms of avoiding, mitigating or minimising the impacts of climate change locally.
- 2.2 Not forming part of the IA, or this report, a Habitats Regulations Assessment (HRA) will also be conducted separately. The HRA first assesses the potential for the Local Plan to have likely significant effects upon European nature conservation sites, and where that potential exists, ensure the Local Plan will not have adverse impact on those sites.
- 2.3 Following this IA of the draft Local Plan, any further versions of the Local Plan also will be subject to IA.
- 2.4 The Scoping Report and Addendum set an assessment framework for the IA of the Local Plan policies and allocations. The assessment framework has 16 objectives and each objective includes a set of assessment criteria. The objectives and criteria relate to social, environmental and economic sustainability.
- 2.5 Specific objectives have been prepared to assess the Local Plan for the EqIA and HIA. Objective 2 relates to equality and deprivation for the EqIA and objective 3 relates to health for the HIA. The CCRA assesses the Local Plan as a whole rather than being attached to a specific objective. The IA assessment framework setting out the IA objectives is included in Appendix A.
- 2.6 The results of the EqIA and HIA are summarised in their own sections below. The EqIA includes an assessment of potential impacts of policies upon different equality target groups, which is included in Appendix B.



2.7 The assessment of the effects of Local Plan polices used a matrix, where each policy was analysed against each of the IA objectives and associated assessment criteria. Each policy was scored using the symbols below with positive effects coloured in dark and light green and negative effects coloured in red and orange. Neutral and unknown effects were not coloured.

Table 1 Symbols and Definitions for IA Framework

Symbol	Definition
++	Major positive effect
+	Positive effect
N	Neutral effect
-	Minor negative effect
	Major negative effect
U	Unknown at this stage

2.8 Factors considered to determine the strength of a predicted potential effect are listed below.

Table 2 Details Considered in the IA

Issues for consideration	Details						
Type of Effect	Positive or Negative						
	Direct or Indirect						
	Cumulative						
	Temporary or Permanent						
Magnitude and Spatial Extent	Where will it impact?						
	Will it be within Trafford boundary or outside it?						
	Will it cause trans-boundary issues and impact on adjacent areas or regionally (GM) or nationally?						
	What is the geographical area and size or population likely to be affected?						
Who it will affect, key groups or	Old and young people						
communities to be considered include	Socio economic groups (variable)						
	Women and men						
	Asylum seekers and refugees						
	Black and ethnic minority people (including Gypsy and Traveller communities)						



Issues for consideration	Details
	Disabled people
	Faith communities
	Lesbian, gay, bisexual and transgender people
Vulnerability of Receptor	Sensitivity of receptors
	Special natural characteristics/areas or cultural heritage
	Protected areas
	Relative importance of the site, whether it is a nationally or internationally important feature or of local significance
Timing and Duration of the Effect	Short-term: 0-4 years
	Medium-term: 5-9 years
	Long-term: 10+ years

2.9 The assessment also considers opportunities to mitigate any negative effects or maximise those that were positive. The IA considers whether there are any measures that could be taken to better support the principles of sustainable development or to mitigate any adverse impacts of any proposal.



3.0 Local Plan Strategy

- 3.1 The Strategy section of the draft Local Plan sets the spatial strategy for planned growth and development within Trafford.
- 3.2 Places for Everyone sets the spatial strategy for the nine PfE districts, including Trafford. The Local Plan strategy draws directly down from the PfE spatial strategy and provides the detailed, locally specific policies for Trafford. The Local Plan will sit alongside PfE as part of the adopted Trafford Development Plan.
- 3.3 A series of growth and spatial options were identified and assessed as part of the preparation of PfE¹. The PfE Spatial Strategy seeks to deliver significant jobs and housing in the 'Core Growth Area' and inner area regeneration in the 'Inner Areas'. It also seeks to boost the competitiveness of the north and sustain the competitiveness of the south. This approach is reflected in the Trafford Local Plan policies. The PfE Spatial Strategy and associated evidence base, was found to be an appropriate and sound approach as part of the PfE examination.
- 3.4 The Local Plan is based on the strategic PfE policies, including housing and employment requirements, and it is therefore consistent with the Spatial Strategy. The identification of further strategic options would likely result in a conflict with the PfE strategy and strategic policies, and they therefore would not be 'reasonable alternatives'. Options around how the housing and employment land requirements could be delivered may exist and this will be considered as part of the next stage of the Local Plan which will focus on allocations. The PfE Spatial Strategy directs development to the most sustainable locations and considerable work was undertaken as part of the preparation of PfE to optimise the housing land supply and ensure the most efficient use of the sites.

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¹ PfE Growth and Spatial Options Paper (2021) - https://www.greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/02%20Strategic%20Environmental%20Assessment/02.01.
https://www.greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/02%20Strategic%20Environmental%20Assessment/02.01.
https://www.greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/02%20Strategic%20Environmental%20Assessment/02.01.
https://www.greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20Options%20Paper.pdf

Integrated Assessment of the Growth and Spatial Options Paper - <a href="https://www.greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/02%20Strategic%20Environmental%20Assessment/02.01.08%20Integrated%20Assessment%20of%20the%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/02%20Strategic%20Environmental%20Assessment/02.01.08%20Integrated%20Assessment%20of%20the%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/02%20Strategic%20Environmental%20Assessment/02.01.08%20Integrated%20Assessment%20of%20the%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/02%20Strategic%20Environmental%20Assessment/02.01.08%20Integrated%20Assessment%20of%20the%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/02%20Strategic%20Environmental%20Assessment%20of%20the%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/02%20Strategic%20Environmental%20Assessment%20of%20the%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/02%20Strategic%20Environmental%20Assessment%20of%20the%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20-ca.gov.uk/GMCAFiles/PFE/Supporting%20GMSF%20CMS

^{%20}Growth%20and%20Spatial%20Options%20(2020)%20(Accessible%20version).pdf https://www.greatermanchester-

ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/02%20Strategic%20Environmental%20Assessment/02.01.09%20Integrated%20Assessment%20of%20the%20PfE%20-

^{%20}Growth%20and%20Spatial%20Options%20and%20Reasonable%20Alernatives%20Addendum.pdf



4.0 Assessment of Strategic Objectives

- 4.1 The Draft Local Plan sets out Strategic Objectives that link to the Local Plan Vision and are based on the three roles for the planning system set out in the NPPF social, economic and environmental sustainability. These objectives help to inform the Strategic Policies. The Strategic Objectives are:
 - SO1 Deliver the homes that Trafford needs
 - SO2 Make Trafford healthy, accessible and equal for all
 - SO3 Ensure Trafford's resilience and carbon neutrality
 - SO4 Sustain Trafford's economic growth
 - SO5 Champion Trafford's workforce and young people
 - SO6 Support vibrant town and designated centres
 - SO7 Protect and improve the natural environment and connect green assets
 - SO8 Sustainable movement
 - SO9 Support cultural and leisure assets
 - S10 Design, heritage and placemaking
- 4.2 The Strategic Objectives have been assessed against each of the IA Objectives in the matrix below. The IA objectives (see Appendix A) are listed along the top of the table and the Strategic Objectives are listed along the left side of the table. Given their high-level nature, it would not be effective to subject them to a full detailed IA.

Table 3 IA of Strategic Objectives - IA Objectives along top row and Local Plan Strategic Objectives in the first column

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
SO1	++	++	+	+	N	N	U	N	U	U	U	U	U	U	U	U
SO2	++	++	++	+	N	+	N	N	N	N	N	N	N	N	N	N
SO3	Ν	Z	+	N	Z	Z	Z	N	+	+	+	++	+	++	++	++
SO4	+	++	+	++	N	N	U	N	U	U	U	U	U	U	U	U
SO5	N	++	+	++	N	N	N	N	N	N	N	N	N	N	N	N
SO6	+	+	+	++	+	++	N	N	+	N	U	U	N	+	N	N



	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
SO7	U	+	++	U	+	+	+	N	+	+	+	++	N	+	+	+
SO8	+	+	+	++	++	++	N	N	++	+	N	+	N	+	N	+
SO9	N	N	+	+	N	N	U	U	N	N	N	N	N	N	N	N
SO10	U	+	+	U	N	N	++	++	N	N	N	N	N	N	N	+

4.3 No negative scores were identified by the assessment of the Strategic Objectives. There were 'Unknown' effects identified where there is potential for positive, negative or neutral effects, or in combination. This outcome tends to be related to objectives related to housing and economic growth when considered against environmental objectives. The assessment above is useful in identifying cases where direction may be required in the Local Plan policies to avoid, minimise or mitigate adverse effects and to enhance positive effects.



5.0 Integrated Assessment Outcomes for Each Local Plan Policy

The full Integrated Assessment of the draft Local Plan policies is set out in Appendix C, which shows how each policy was assessed against each of the IA objectives. A summary of the IA outcomes according to each Local Plan policy is provided below. The IA acknowledges where issues have not been addressed by the Local Plan but have been addressed by the PfE. The summary also discusses the potential for alternative approaches where they may exist.

Vision for Trafford

- The Vision for Trafford scores very positively for sustainability across almost all the IA objectives. The Vision includes positive scores for addressing climate change emissions, enhancing biodiversity, sustainable transport, access to community facilities, meeting housing needs, economic growth, healthy lives, conserving heritage and local character.
- 5.3 The Vision sets out what the Local Plan policies should aim to achieve for Trafford in the future. The Vision is important in giving overarching direction to the Local Plan and maximising potential for positive effects on sustainability. It would not be a reasonable approach to remove the Vision.

Strategy

Policy ST1: Core Growth Area (Trafford)

- The policy sets out how PfE Policy JP-Strat 1: Core Growth Area will be applied in Trafford. There would be a strong positive effect on economic growth by promoting employment led development within the Core Growth Area. The policy also promotes supporting residential and ancillary uses, having a positive effect on meeting housing needs and access to community facilities.
- 5.5 Further development in the Core Growth Area has potential for negative environmental effects but the other Local Plan policies and PfE polices include measures to avoid or mitigate potential negative effects.
- Inclusion of this policy is the most reasonable approach because the Local Plan must be in accordance with the strategy set by PfE. The policy sets out how the strategy should be applied at a local level.



Policy ST2: Inner Areas (Trafford)

- 5.7 The policy sets out how PfE Policy JP-Strat 5: Inner Areas will be applied in Trafford. The policy supports residential development that is integrated with existing communities and facilitates regeneration. This would bring positive effects on meeting housing needs, reducing levels of deprivation, improving health and economic growth.
- 5.8 Further development in the Inner Area has potential for negative environmental effects but the other Local Plan policies and PfE polices include measure to avoid or mitigate potential negative effects.
- 5.9 Inclusion of this policy is the most reasonable approach because the Local Plan must be in accordance with the strategy set by PfE; the policy sets out how the strategy should be applied at a local level.

Policy ST3: Southern Area (Trafford)

- 5.10 The policy sets out how PfE Policy JP-Strat 9: Southern Areas will be applied in Trafford. The policy supports protecting economic competitiveness, protecting local character, using previously developed land, promoting town centres and social infrastructure. This would have positive effects on reducing deprivation, supporting economic growth, providing community facilities and land resources. There would also be positive effects on protecting local character and heritage.
- 5.11 Inclusion of this policy is the most reasonable approach because the Local Plan must be in accordance with the strategy set by PfE; the policy sets out how the strategy should be applied at a local level.

Policy ST4: Sustainable Development

- 5.12 This is an overarching policy setting out support for the presumption in favour of sustainable development and that planning permission will be granted for proposals that accord with the Development Plan. The policy sets out an overall positive approach that would have positive effects on all environmental, economic and social objectives.
- 5.13 The policy accords with the National Planning Policy Framework and no reasonable alternative is possible.

Policy ST5: Climate Change

This is an overarching policy setting out support for contributing towards net zero ambitions and mitigating against the impacts of climate change. This policy will have positive effects on health, water resources, reducing greenhouse gases, flood risk and mitigating effects of climate change. There would be no negative effects.



5.15 There are no reasonable alternatives to this policy.

Renewable Technologies and Methods

Policy RT1: Carbon and Energy (includes Policies RT1N, RT1S, RT1C and RT1W)

- The policy says that all development should seek to reduce carbon emissions and requires development proposals to demonstrate how the design of the scheme has responded to a set of priorities for reducing carbon emissions according to each Trafford Locality. The policy will have a strong positive effect on the IA objective of reducing carbon emissions. It also will have positive effects on air quality, reducing flood risk and the effects of climate change. The effects on local character and heritage are unknown but other policies in PfE and the Local Plan exist to protect against negative effects.
- 5.17 The policy applies PfE on a local level and there is no reasonable alternative to this policy.

Policy RT2: Decentralised Energy Generation (includes Policies RT2N, RT2S, RT2C and RT2W)

- 5.18 The policy requires all major development within Heat and Energy Network Opportunity Areas to assess the feasibility of connecting to an existing decentralised energy network. The likely effect of this policy is to increase the amount of development connected to a decentralised energy network which would have positive effects on air quality, reducing carbon emissions, reducing flood risk and reducing the effects of climate change.
- 5.19 The policy applies PfE on a local level and there is no reasonable alternative to this policy.

Policy RT3: Overheating and Urban Heat Island

- The policy requires new development to minimise overheating risks and reduce reliance on active cooling systems. The policy will have positive effects on health, air quality, reducing carbon emissions, reducing flood risk and a strong positive effect on resilience against the effects of climate change.
- 5.21 The policy sets specific requirements for addressing climate change and there is no reasonable alternative.

Policy RT4: Sustainable Retrofitting

5.22 The policy supports retrofitting for energy efficient improvements or adaption to climate change. This would have a positive effect on reducing greenhouse gas emissions and mitigating the effects of climate change. There also will be positive



- effect on the resilience of the housing stock and reducing fuel poverty. The policy includes protection of heritage assets from harm caused by retrofitting, thereby supporting IA objectives relating to local character and heritage assets.
- 5.23 A potential negative effect is that, by requiring full justification for demolition followed by reconstruction and diverting at least 85% of waste from landfill, the policy may place constraints on encouraging the redevelopment of derelict buildings. It is recommended to include how demolition and reconstruction could be allowed, such as the provision of improved energy efficient housing.

Policy RT5: Circular Economy

- 5.24 The policy says all development should use resources efficiently, follow circular economy principles and aim to achieve net zero waste. This would have a major positive effect on supporting the sustainable use of resources and moving up the waste hierarchy. There would be positive effects on reducing deprivation, equality of opportunity, reducing the need to travel, reducing greenhouse gas emissions, reducing flood risk and reducing the effects of climate change.
- 5.25 The policy sets specific requirements for addressing climate change and there is no reasonable alternative.

Residential Development

Policy R1: Housing Delivery

- 5.26 The policy sets out the scale and phasing of new housing in Trafford to meet housing requirements set by the PfE with additional requirements for the extended Local Plan period to 2042. It also supports housing on previously developed land with highest densities in the most sustainable locations. The release of land for new homes would be subject to capacity of the urban area, infrastructure capacity and protection of the environment.
- 5.27 The policy would have a major positive effect on meeting housing needs. The delivery of housing in sustainable locations would have positive effects on reducing deprivation, access to healthcare, reducing the need to travel and access to social infrastructure. New housing will facilitate economic growth.
- 5.28 There is potential for negative effect on air quality, land resources, waste management and carbon emissions. These negative effects can be mitigated by applying other policies in the Local Plan and PfE, such as policies on sustainable transport, green infrastructure and energy efficiency. The potential effects on water resources and biodiversity are unknown and will depend on the specific design and locations of the residential developments.



5.29 It is suggested that the policy could specifically mention that best and most versatile agricultural land should be protected from inappropriate development.
 Consideration could also be given to avoid risk of soil contamination during construction phase.

Policy R2: Protecting Existing Homes

- 5.30 The policy resists the net loss of housing and the amalgamation of existing self-contained homes. This will have positive effects on meeting housing needs, reducing deprivation and supporting employment opportunities. By reducing the need for new land to meeting housing requirements, this would reduce environmental impacts on such things as biodiversity, greenhouse gas emissions and land resources.
- 5.31 There is potential for a negative effect by preventing changes of use from residential to social infrastructure, such as healthcare services. It is recommended to include a provision to support changes of use to social infrastructure where need is demonstrated.

Policy R3: Affordable and Social Housing (including Policies R3N, R3S, R3C, R3W)

- 5.32 The policy sets affordable housing requirements according to Trafford Locality. It also addresses the tenure and size of affordable housing. There would be a major positive effect on meeting housing needs, equality of opportunity and reducing deprivation. Meeting housing needs also will have a positive effect on health.
- 5.33 There are no reasonable alternatives. The policy is the most sustainable approach and responds to available evidence.

Policy R4: Size and Type of New Homes (including Policy R4N)

- 5.34 The policy sets how residential development should deliver a range and mix of dwelling sizes and types. There would be a major positive effect on meeting housing needs, equality of opportunity and reducing deprivation. Meeting housing needs will also have a positive effect on health.
- 5.35 There are no reasonable alternatives. The policy is the most sustainable approach and responds to available evidence.

Policy R5: Housing Density

5.36 The policy sets how PfE Policy JP-H4: Density of New Housing, will be delivered locally in Trafford by defining the town centres and other designated centres. Supporting higher density of housing within designated centres will have positive effects on housing need, reducing deprivation, access to community facilities, economic growth and reducing the need to travel. Focusing higher density in



designated centres will reduce the amount of new housing sites, which will have a positive effect on environmental objectives such a biodiversity and land resources. The higher density of housing may have an impact on local character but the type of impact would depend on the design of the housing.

5.37 This policy applies a PfE policy on a local level and there is no reasonable alternative.

Policy R6: Older Persons Accommodation

- 5.38 The policy seeks to meet the housing needs of older people. The policy would have major positive effects on meeting housing needs, equality of opportunity and reducing deprivation. There would be a positive effect on health and wellbeing.
- 5.39 There are no reasonable alternatives. The policy is the most sustainable approach and responds to available evidence.

Policy R7: Adaptable and Accessible Housing

- 5.40 The policy requires all new dwellings to be built to the 'accessible and adaptable' standard. The policy would have major positive effects on meeting housing needs, equality of opportunity and reducing deprivation. There would be a positive effect on health and wellbeing.
- 5.41 There are no reasonable alternatives. The policy is the most sustainable approach and responds to available evidence.

Policy R8: Homes for Children and Care Experienced Young People

- The policy supports residential development for looked after children and care experienced young people. The policy would have major positive effects on meeting housing needs, equality of opportunity and reducing deprivation. There would be a positive effect on health and wellbeing.
- 5.43 There are no reasonable alternatives. The policy is the most sustainable approach and responds to available evidence.

Policy R9: Other Types of Homes

- The policy requires co-living schemes and sets out requirements on student accommodation. The policy would have major positive effects on meeting housing needs, equality of opportunity and reducing deprivation. There would be a positive effect on health and wellbeing.
- 5.45 There are no reasonable alternatives. The policy is the most sustainable approach and responds to available evidence.



Policy R10: Gypsies, Travellers and Travelling Showpeople Accommodation

- The policy seeks to ensure sufficient pitches to meets the identified need for Gypsies, Travellers and Travelling Showpeople. It also sets out the characteristics that proposals should demonstrate for the proposed site. The policy would have major positive effects on meeting housing needs, equality of opportunity and reducing deprivation and a positive effect on health and wellbeing. The requirements for proposed sites would have a positive effect on factors such as reducing the need to travel, access to community facilities, local character and air quality.
- 5.47 There are no reasonable alternatives. The policy is the most sustainable approach and responds to available evidence.

Policy R11: Self-Build and Custom Housing

- 5.48 The policy supports custom housebuilding. The policy would have major positive effects on meeting housing needs, equality of opportunity and reducing deprivation. There would be a positive effect on health and wellbeing.
- 5.49 There are no reasonable alternatives. The policy is the most sustainable approach and responds to available evidence.

Economy and Jobs

Policy EJ1: Employment Land Requirements

- The policy sets out the scale and distribution of new employment development in Trafford to meet housing requirements set by the PfE with additional requirements for the extended Local Plan period to 2042. The release of land for employment would be subject to capacity of the urban area, infrastructure capacity and protection of the environment. The policy supports higher density development in the most sustainable locations.
- 5.51 The policy would have a major positive effect on economic growth. There would be positive effects on housing need, reducing deprivation, health, sustainable transport, land resources and flood risk.
- 5.52 The effect on local character and heritage is unknown. PfE and Local Plan policies can be applied to ensure character of the surrounding area is considered and appropriately protected or enhanced.
- 5.53 There is potential for negative effect on air quality because of increased industrial activity and traffic. It should be ensured PfE and Local Plan polices to tackle air quality are applied. There is potential for negative effect on greenhouse gas



emissions. The Plan should ensure PfE and Local Plan policies on sustainable transport, the decarbonisation of industrial processes and effective implementation of energy performance standards are applied.

Policy EJ2: Trafford Park

- The policy protects the employment function of Trafford Park. The policy supports sustainable transport, community facilities, improvements to public realm, decarbonisation, heat network opportunities and urban greening. The policy would have a major positive effect on economic growth. There would also be positive effects on housing need, reducing deprivation, health, sustainable transport and community facilities. The support for urban greening would have a positive effect on biodiversity and flood risk. The decarbonisation of Trafford Park will have a positive effect on greenhouse gas emissions in the long term.
- 5.55 The increase of industrial activity and number of HGV trips would have a negative effect on air quality. The policy's support for sustainable transport and urban greening will help mitigate this effect. For further mitigation, 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.

Policy EJ3: Industry and Warehousing (including Policies EJ3N, EJ3S and EJC)

- 5.56 The policy supports industry and warehousing in specific locations. The policy would have a major positive effect on economic growth. There also would be positive effects on housing need, reducing deprivation, health, sustainable transport and community facilities. The support for development in greenfield locations has potential for negative effect on landscape, air quality, land resources, biodiversity and greenhouse gas emissions.
- 5.57 For mitigation, it should be ensured that other policies in PfE and the Local Plan on landscape, densities on previously developed land and protecting biodiversity are applied. 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.

Policy EJ4: Offices (including Policies EJ4N, EJ4S and EJ4C)

5.58 The policy supports office development in specific locations including town centres. Office uses in other locations must be in the most accessible locations. Office buildings should be pedestrian friendly, have direct access to public transport hubs and support cycling needs. The policy would have a major positive effect on economic growth. There also would be positive effects on housing need, reducing deprivation, health, sustainable transport and community facilities. Resisting the



loss of employment sites will help reduce the need for new employment developments, which would have positive effects on a range of environmental objectives such as air quality, land resources, water resources, biodiversity and greenhouse gas emissions.

5.59 There could be a slight negative effect on access to community infrastructure by resisting changes of use from employment to social infrastructure uses such as shops and healthcare services. For mitigation, a provision should be included to support a change of use to social infrastructure where it is demonstrated to be needed.

Policy EJ5: Safeguarding Trafford's Employment Land

- The policy protects existing employment land from non-employment uses. The policy will have a major positive effect on economic growth. It will have a positive effect on housing need by providing employment for future residents. There will also be positive effects on reducing deprivation and health. Resisting the loss of employment sites will help reduce the need for new employment developments, which would have positive effects on a range of environmental objectives such as air quality, land resources, water resources, biodiversity and greenhouse gas emissions.
- There could be a slight negative effect on access to community infrastructure by resisting changes of use from employment to social infrastructure uses such as shops and healthcare services. Mitigation could include a provision to support a change of use to social infrastructure where it is demonstrated to be needed.

Policy EJ6: Data and Energy Storage

- This policy sets out that data and energy storage facilities should use former industrial brownfield sites, have existing infrastructure, consider contributing to heat networks, be in sustainable locations and not constrain key strategic sites. There would be a strong positive effect on economic growth. The impacts of the policy are not significant enough to have effects on other IA objectives.
- 5.63 The policy is sustainable and there are no reasonable alternatives.

Policy EJ7: Rural Economy

The policy supports rural development to ensure the long-term economic viability of Trafford's agriculture; and the vitality of its rural communities. There are requirements set for farm buildings and farm diversification proposals. The policy would have a positive effect on economic growth, sustainable transport, landscape and heritage.



5.65 The policy is sustainable and there are no reasonable alternatives.

Transport, Movement and Connectivity

Policy TM1: Walking, Wheeling and Cycling (including Policies TM1N, TM1S, TM1C and TM1W)

- 5.66 The policy supports making walking, wheeling and cycling easy and safe choices for shorter trips. A series of locally specific interventions are listed. It is set out how new developments can support active travel. There would be major positive effects on health, sustainable transport and community facilities. There would be positive effects on deprivation, social inclusion, economic growth, air quality and greenhouse gas emissions.
- 5.67 The policy is sustainable and there are no reasonable alternatives.

Policy TM2: Public Transport

- 5.68 The policy supports the delivery of a high-quality public transport network and sets out the approach to supporting travel by bus, Metrolink, rail and tram-train. There would be major positive effects on health, sustainable transport and community facilities. There would be positive effects on deprivation, social inclusion, economic growth, air quality and greenhouse gas emissions.
- 5.69 There is a possibility that new public transport infrastructure could come forward in areas of biodiversity sensitivity and have negative effect on soils; existing policies in the PfE and draft Local Plan should be applied to avoid harm.

Policy TM3: Car Clubs

- 5.70 The policy supports car club provision. There would be positive effects on deprivation, social inclusion, health, economic growth, reliance on private vehicles, access to community facilities, air quality and greenhouse gas emissions.
- 5.71 The policy is sustainable and there are no reasonable alternatives.

Policy TM4: Mobility Hubs

- 5.72 The policy supports the establishment of mobility hubs in sustainable locations. There would be positive effects on deprivation, social inclusion, health, economic growth, reliance on private vehicles, access to community facilities, air quality and greenhouse gas emissions.
- 5.73 The policy is sustainable and there are no reasonable alternatives.



Policy TM5: Local Highway Network

- 5.74 The policy supports maintenance and improvement of the highway network. The policy safeguards the Carrington Relief Road and seeks improvements to the Western Gateway Infrastructure Scheme. Proposals which help overcome barriers to the Local Highway Network for non-vehicular users are supported. There would be positive effects on housing delivery, economic growth, reducing reliance on private motor vehicles and improving access to community infrastructure.
- 5.75 However, the Carrington Relief Road and Western Gateway Infrastructure Scheme have potential for negative environmental effects such as landscape, heritage, air quality, land resources, water resources, biodiversity, air quality and flood risk. It is acknowledged that PfE and other Local Plan policies have a range of policies to mitigate these effects; it should be ensured that these are applied to the proposed schemes.
- 5.76 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.

Policy TM6: The A56 (including Policies TM6N, TM6C and TM6S)

- 5.77 The policy supports improving active travel and public transport along the A56. Specific infrastructure that is supported is set out according to the Trafford Localities. There would be major positive effects on health, sustainable transport and community facilities. There would be positive effects on deprivation, social inclusion, economic growth, air quality and greenhouse gas emissions.
- 5.78 The policy is sustainable and there are no reasonable alternatives.

Policy TM7: Freight

- 5.79 The policy supports a sustainable distribution system that reduces freight on roads. The Council will seek to manage the movement of lorries to minimise the damaging effect they have. There would be positive effects on health, economic growth, sustainable transport, air quality and reducing greenhouse emissions.
- 5.80 The policy is sustainable and there are no reasonable alternatives.

Policy TM8: Manchester Ship Canal

5.81 The policy supports the increased use of the Manchester Ship Canal as an efficient and sustainable transport route. New active travel crossings across the canal will be supported. There would be major positive effects on sustainable transport and



- community facilities. There would be positive effects on deprivation, social inclusion, health, economic growth, air quality and greenhouse gas emissions.
- 5.82 The policy is sustainable and there are no reasonable alternatives.

Policy TM9: Potential Future Rail Route

- 5.83 The policy supports the provision of a future rail route which runs to the west of the M56, connecting the Manchester Airport area to the City Centre, via a tunnel. This includes a new rail station to the west of the M56 and Manchester Airport. There would be major positive effects on economic growth and reducing greenhouse gases.
- 5.84 The new route would be on greenfield land and there is potential for negative effects on landscape, heritage, land resources, water resources and biodiversity. These negative effects could be mitigated by policies in the PfE and Local Plan.

Policy TM10: Parking Standards

- 5.85 The policy supports the provision of sufficient provision for off-street parking, including for cycles, and for electric vehicle charging points. There would be positive effects on health, sustainable transport, access to community facilities, air quality and reduction of greenhouse gases.
- 5.86 The policy is sustainable and there are no reasonable alternatives.

Policy TM11: Lorry Management

- 5.87 The policy sets out what proposals for lorry management schemes must consider, including avoiding detrimental effects to amenity, the environment and safety. The policy would have positive effects on economic growth, improving air quality and reducing greenhouse gas emissions.
- 5.88 The policy is sustainable and there are no reasonable alternatives.

Policy TM12: Park and Ride

- The policy supports improvements and upgrades to existing park and ride facilities. New park and ride facilities are supported where they are associated with rail, Metrolink, Tram-Train and/or bus routes. Effects on the environment and local community will be considered.
- 5.90 There would be major positive effects on access to community facilities. There would be positive effects on deprivation, social inclusion, economic growth, air quality and greenhouse gas emissions.



5.91 If new park and ride facilities are on greenfield land there is potential for negative effects on landscape, heritage, land resources, water resources and biodiversity.

These negative effects could be mitigated against by policies in the PfE and Local Plan.

Policy TM13: Crowd Movement and Routes

- 5.92 The policy requires any new development which will generate crowd movement, or new development which would be in vicinity of a development generating crowd movement, must ensure the safeguarding of routes which crowds are able to move safely and comfortably. Proposals which adversely impact on the ability of crowds to move safely and comfortably to and from a venue will be refused. The policy will have a positive effect on economic growth and sustainable transport.
- 5.93 The policy is sustainable and there are no reasonable alternatives.

Town Centres and Retail

Policy TC1: Hierarchy of Centres

- 5.94 The policy sets the retail hierarchy in Trafford. Loss of retail units for non-commercial, business and service uses will be supported only in exceptional circumstances. There would be positive effects on economic growth, sustainable transport, access to community facilities, air quality and reducing greenhouse gas emissions.
- 5.95 The policy is sustainable and there are no reasonable alternatives.

Policy TC2: Role and Function of Centres

- 5.96 The policy supports the maintenance and enhancement of designated centres and supports residential development within town centres where it meets requirements. There would be major positive effect on economic growth. There will be positive effects on meeting housing needs, reducing need to travel, access to community facilities, local character, heritage assets, air quality and reducing greenhouse gas emissions.
- 5.97 The policy is sustainable and there are no reasonable alternatives.

Policy TC3 Out of Centre Retail and Leisure

5.98 The policy resists out of centre development for main town centre uses. There would be major positive effect on economic growth. There will be positive effects on meeting housing needs, reducing need to travel, access to community facilities, local character, heritage assets, air quality and reducing greenhouse gas emissions.



5.99 The policy is sustainable and there are no reasonable alternatives.

Green Infrastructure and Natural Environment

Policy GI1: Landscape Character Areas

- 5.100 The policy supports development which protects or enhances he landscape character, biodiversity, geodiversity and conservation value of its natural and landscape assets. This would have a major positive effect on landscape character. There would be positive effects on heritage and biodiversity.
- 5.101 The policy is sustainable and there are no reasonable alternatives.

Policy GI2: Green Infrastructure Network

- 5.102 The policy supports the protection and enhancement of green infrastructure. Development proposals would not be permitted, which adversely impact upon any of the services and benefits of green infrastructure. This would have major positive effect on landscape character and water resources. There would be positive effects on health, sustainable transport, access to community infrastructure, heritage, air quality, land resources, biodiversity, reducing greenhouse gas emissions, flood risk and resilience to effects of climate change.
- 5.103 The policy is sustainable and there are no reasonable alternatives.

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

- 5.104 The policy says development proposals within the Great Manchester Wetlands NIA must have regard to the objectives and priorities of the area to deliver enhanced ecosystem services. Proposals for wetland improvement and restoration will be supported. This would have major positive effect on supporting biodiversity, landscape character, water resources. This would have positive effects on health, active travel, heritage, air quality, land resources, reducing greenhouse gas emissions, reducing flood risk and resilience to climate change.
- 5.105 The policy is sustainable and there are no reasonable alternatives.

Policy GI4: Mersey Valley (including Policies GI4, GIC and GIW)

5.106 The policy supports the protection and enhancement of the Mersey Valley's strategic role within Trafford's natural environment and sets specific opportunities to improve access and recreation offer at Trafford's Localities. The policy would have major positive effects on water quality and positive effects on health, sustainable travel, access to community facilities, landscape character, heritage, air quality, land resources, biodiversity, reducing greenhouse gas emissions, reducing flood risk and resilience to climate change.



5.107 The policy is sustainable and there are no reasonable alternatives.

Policy GI5: Green Infrastructure Opportunity Areas (including Policies GI5, GI5S, GI5C and GI5W)

- 5.108 The policy identifies Green Infrastructure Opportunity Areas for each Trafford Locality and says development within them must demonstrate how they will support local character, habitats and informal recreation. This would have positive effects on healthy lifestyles, active travel, access to community facilities, landscape character, heritage, air quality, biodiversity, reducing greenhouse gas emissions, reducing flood risk and resilience to climate change.
- 5.109 The policy is sustainable and there are no reasonable alternatives.

Policy GI6: Green Infrastructure in New Developments

- 5.110 The policy says all development proposals must demonstrate how they will contribute to the protection, enhancement and expansion of the Green Infrastructure network. This would have a major positive effect on landscape character. This would have positive effects on health, active travel, access to community facilities, heritage, air quality, land resources, water quality, biodiversity, reducing greenhouse gas emissions, reducing flood risk and resilience to climate change.
- 5.111 The policy is sustainable and there are no reasonable alternatives.

Policy GI7: Trees, Woodland and Hedgerow

- 5.112 The policy says trees, woodlands and hedgerow will be protected and enhanced. This policy will have positive effects on health, active travel, landscape character, heritage, air quality, water quality, biodiversity, reducing greenhouse gas emissions, reducing flood risk and resilience to climate change.
- 5.113 The policy is sustainable and there are no reasonable alternatives.

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

5.114 This policy says development proposals must demonstrate a clear commitment to the protection and enhancement of Trafford's locally designated sites and natural environment assets. Development proposals must protect and enhance the landscape character, biodiversity, geodiversity and conservation value of its natural environment assets, having regard not only to its immediate location but its surroundings and context. Development proposals must contribute positively to habitat connectivity and nature recovery networks. This would have a major positive effect on biodiversity. This would have positive effects on health, active travel,



- landscape character, heritage, air quality, water quality, reducing greenhouse gas emissions, reducing flood risk and resilience to climate change.
- 5.115 The policy is sustainable and there are no reasonable alternatives.
 - Policy GI9 Biodiversity Opportunity Areas (including Policies GI9, GI9S, GI9C and GI9W)
- 5.116 This policy supports biodiversity and habitat improvements within Biodiversity Opportunity Areas, which are listed according to Trafford Locality. This would have a major positive effect on biodiversity. This would have positive effects on health, active travel, landscape character, heritage, air quality, water quality, reducing greenhouse gas emissions, reducing flood risk and resilience to climate change.
- 5.117 The policy is sustainable and there are no reasonable alternatives.
 - Policy GI10: Building Biodiversity into New Developments
- 5.118 The policy says all development proposals should seek to enhance biodiversity beyond the minimum mitigation requirements, where appropriate and practical. All new development will be expected to incorporate measures to support biodiversity where appropriate and practical. This would have a major positive effect on biodiversity. This would have positive effects on health, active travel, landscape character, heritage, air quality, water quality, reducing greenhouse gas emissions, reducing flood risk and resilience to climate change.
- 5.119 The policy is sustainable and there are no reasonable alternatives.

Open Space, Sport and Recreation

Policy OS1: Open Space (including Policies OS1N, OS1S, OS1C, OS1W)

- 5.120 The policy says the Council will provide, protect and enhance open spaces. Major developments are required to ensure access to high quality open space in accordance with a set of standards. Residential development over 50 homes will be required to provide new accessible public open space. Where open space provision will be focused is set out according to the Trafford Localities. This would have a major positive effect on access to community facilities. This would have positive effects on equality of access to open spaces, health, active travel, landscape character, heritage, air quality, land resources, water quality, biodiversity, reducing flood risk and resilience to climate change.
- 5.121 The policy is sustainable and there are no reasonable alternatives.



Policy OS2: Outdoor Sports and Recreation Facilities and Provision

- 5.122 The policy supports the provision, protection and enhancement of outdoor sport and recreation facilities. This would have a major positive effect on health and access to community facilities. This would have positive effects on equality of access to outdoor and sport facilities, access to community facilities reducing the need to travel, biodiversity, flood risk and resilience to climate change.
- 5.123 The policy is sustainable and there are no reasonable alternatives.

Policy OS3: Indoor Sports and Recreation Provision

- 5.124 The policy supports the provision, protection and enhancement of indoor sport and recreation facilities. This would have a major positive effect on health and access to community facilities. This would have positive effects on equality of access to outdoor and sport facilities, access to community facilities and reducing the need to travel.
- 5.125 The policy is sustainable and there are no reasonable alternatives.

Policy OS4: Loss of Sport and Recreation Land or Facilities

- 5.126 This policy resists the loss of sport and recreation land or facilities. Loss of these facilities will be permitted only under specific circumstances. This would have a major positive effect on health and access to community facilities. This would have positive effects on equality of access to outdoor and sport facilities, access to community facilities reducing the need to travel, biodiversity, flood risk and resilience to climate change.
- 5.127 The policy is sustainable and there are no reasonable alternatives.

Policy OS5: Allotments and Growing Spaces

- 5.128 This policy supports maintaining and protecting an adequate supply of allotment provision to meet existing and future needs, wherever possible. Major residential development over 50 homes must provide opportunities to incorporate food growing areas. This would have positive effect on major positive effect on community facilities. This would have positive effect on equality of access, health, local character, land resources and resilience to climate change.
- 5.129 The policy is sustainable and there are no reasonable alternatives.

Policy OS6: Cemeteries and Burial Grounds

5.130 The policy protects existing cemeteries and burial grounds and supports new burial space outside of flood zones and groundwater protection zones. Opportunities to



enhance the biodiversity value of cemeteries and burial spaces will be supported. This would have a positive effect on equality of access, health, community facilities, local character, heritage setting, air quality and biodiversity.

5.131 The policy is sustainable and there are no reasonable alternatives.

Water, Flooding and Drainage

Policy WA1: Managing Flood Risk

- 5.132 The policy manages development in areas at risk of flooding, where necessary requiring a sequential approach and application of the exception test. Applicants are required to undertake a Flood Risk Assessment where necessary. Development must incorporate flood mitigation and management measures appropriate to the use and location. This would have major positive effect on reducing flood risk. There would be positive effects on local character, water resources, biodiversity and resilience to climate change.
- 5.133 The policy is sustainable and there are no reasonable alternatives.

Policy WA2: Sustainable Drainage - Surface and Foul Water

- 5.134 The policy says surface water must be discharged in the order of the surface water hierarchy. Proposals must be designed to maximise the retention of surface water on site and minimise discharge off site. This would have major positive effect on water resources and reducing flood risk. There would be positive effect on landscape, biodiversity and resilience to climate change.
- 5.135 The policy is sustainable and there are no reasonable alternatives.

Policy WA3: Flood Storage Areas

- 5.136 The policy safeguards strategic areas of flood management from development. This would have major positive effect on reducing flood risk and positive effect on improving air quality, biodiversity and resilience to climate change.
- 5.137 The policy is sustainable and there are no reasonable alternatives.

Policy WA4: Water Efficiency

- 5.138 The policy requires development to incorporate water efficiency measures and sets standards they must meet. This would have a major positive effect on water resources and a positive effect on improving air quality and resilience to climate change.
- 5.139 The policy is sustainable and there are no reasonable alternatives.



Community and Social Infrastructure

Policy CT1: Protecting Existing Community and Social Facilities

- 5.140 The policy protects existing community and social facilities. This would have a major positive effect on community facilities. There would be a major positive effect on community facilities. There would be positive effects on equality of access, health, reducing need to travel and air quality.
- 5.141 The policy is sustainable and there are no reasonable alternatives.

Policy CT2: Loss of Community Facilities

- 5.142 This policy protects against the loss of existing community facilities and local services. There would be a major positive effect on community facilities. There would be positive effects on equality of access, health, reducing need to travel and air quality.
- 5.143 The policy is sustainable and there are no reasonable alternatives.

Policy CT3: New Community and Social Facilities

- 5.144 The policy supports the provision of new and expansion of existing social and community uses. Proposals will be supported in sustainable locations and major residential development would be required to provide on-site community facilities. This would have a major positive effect on provision of community facilities. There would be positive effects on There would be positive effects on equality of access, health, reducing need to travel and air quality.
- 5.145 The policy is sustainable and there are no reasonable alternatives.

Policy CT4: Fast Food

- 5.146 The policy limits hot food takeaways close to schools and in designated centres. This would have positive effects on health and town centres.
- 5.147 The policy is sustainable and there are no reasonable alternatives.

Policy CT5: Social Value in New Development

- 5.148 The policy requires all major development to enter into local labour and training agreements through planning obligations. This would have a positive effect on reducing deprivation, health and a sufficient labour force.
- 5.149 The policy is sustainable and there are no reasonable alternatives.



Built Environment

Policy BE1: Design

- 5.150 The policy says development must be of a high standard of design and construction and make a positive contribution to character and distinctiveness. Criteria are set out on how to achieve a high standard of design. The policy supports sustainable development, multi-functional green spaces and safe and inclusive design. This would have a major positive effect on local character. There would be positive effects on housing quality, equality of opportunity, health, access to community facilities, sustainable travel, heritage, biodiversity, reducing greenhouse gas emissions and resilience to climate change.
- 5.151 The policy is sustainable and there are no reasonable alternatives.

Policy BE2: Tall Buildings

- 5.152 The policy sets out sustainable locations considered suitable for tall buildings and that tall buildings should have positive impact on surrounding neighbourhood and not have adverse impacts on amenity. This would have positive effects on housing quality, health, sustainable transport, access to community facilities, local character, heritage, air quality and reducing greenhouse gas emissions.
- 5.153 The policy is sustainable and there are no reasonable alternatives.

Policy BE3: Elevated Green Spaces

- 5.154 The policy supports elevated green spaces such as green walls, green roofs and elevated amenity spaces. Support will be given for them to be incorporated within the development proposal's Biodiversity Net Gain provision requirement. This would have positive effect on health, local character, heritage, air quality, water quality, biodiversity, reducing greenhouse gases, reducing flood risk and resilience to climate change.
- 5.155 The policy is sustainable and there are no reasonable alternatives.

Policy BE4: Advertisements and Signage

- 5.156 The policy requires advertisements and signage to be suitably located, well designed and responsibly managed. This would have positive effect on local character and heritage.
- 5.157 The policy is sustainable and there are no reasonable alternatives.



Policy BE5: Heritage Assets

- 5.158 The policy supports proposals which sustain and enhance heritage assets. All proposals affecting a heritage asset are required to justify why the impacts are acceptable. This would have major positive effects on local character and heritage. This would have positive effects on tourism and resources.
- 5.159 The policy is sustainable and there are no reasonable alternatives.

Policy BE6: Designated Heritage Assets

- 5.160 This policy protects designated heritage assets. This would have major positive effects on local character and heritage. This would have positive effects on tourism and resources.
- 5.161 The policy is sustainable and there are no reasonable alternatives.

Policy BE7: Non-designated Heritage Assets

- 5.162 The policy says a balanced consideration will be applied to proposals which may impact non-designated heritage assets. Proposals will be supported where the benefits of the scheme are considered to outweigh the scale of any harm or loss. This would have major positive effects on local character and heritage. This would have positive effects on tourism and resources.
- 5.163 The policy is sustainable and there are no reasonable alternatives.

Policy BE8: Noise and Vibration

- 5.164 The policy says development which has the potential to generate unacceptable levels of noise and/or vibration impact(s) on local residential amenity (taking into account appropriate mitigation) will not be supported. This would have positive effect on health, local character and heritage.
- 5.165 The policy is sustainable and there are no reasonable alternatives.

Policy BE9: Land Contamination and Remediation

- 5.166 The policy requires a Contaminated Land Assessment for proposals on sites which may contain, or there is reason to suspect may contain, contaminated land.

 Development which would have potential to result in unacceptable impacts on the groundwater environment, human health, buildings and/or the wider environment (taking into account appropriate mitigation) will be resisted. This would have positive effects on health, land resources and water resources.
- 5.167 The policy is sustainable and there are no reasonable alternatives.



Policy BE10: Digital Connectivity

- 5.168 The policy supports the expansion of digital infrastructure to meet the needs of businesses and communities. The policy would have major positive effect on economic growth and promoting utilities digital infrastructure to enable the anticipated scale and distribution of development.
- 5.169 The policy is sustainable and there are no reasonable alternatives.

Culture, Tourism and Leisure

Policy CL1: Protecting and Supporting Existing Cultural, Leisure and Tourism Assets (Including Policy CL1N)

- 5.170 The policy supports protecting and enhancing Trafford's existing cultural, leisure and tourism assets, including through the provision of appropriate ancillary development. A mixed-use development is supported at Manchester United Football Stadium and Wharfside and the requirements are set out of development that will be supported. There would be a major positive effect on economic growth. There would be positive effects on equality of access, sustainable transport, access to community facilities, local character and heritage, air quality and reducing greenhouse gas emissions.
- 5.171 The policy is sustainable and there are no reasonable alternatives.

Policy CL2: New Culture, Leisure and Tourism Developments (Including Policy CL2N)

- 5.172 The policy supports enhancement and expansion of culture, leisure and tourism offer. Requirements are set out for new cultural, leisure and/or tourism development within the Trafford Centre Rectangle. There would be major positive effect on economic growth. There would be positive effects on sustainable transport, access to community facilities, local character and heritage, air quality.
- 5.173 The policy is sustainable and there are no reasonable alternatives.

Infrastructure and Planning Obligations

Policy IP1: Infrastructure Delivery and Planning Obligations (including Policy IP1N)

5.174 The policy supports ensuring that sufficient supporting infrastructure is delivered to support the levels and types of growth identified. The Council will require that there is adequate infrastructure to serve developments, using planning contributions and working with infrastructure providers and stakeholders to identify requirements. The policy will have a positive effect on housing delivery, reducing deprivation, health, economic growth, sustainable transport, community facilities, heritage, air quality,



- biodiversity, waste, reducing greenhouse gas emissions, reducing flood risk and resilience to climate change.
- 5.175 The policy is sustainable and there are no reasonable alternatives.
 - Policy IP2: Managing and Monitoring Planning Obligations
- 5.176 The policy requires planning obligation fees to ensure available resources to support the effective monitoring and reporting of planning obligations. This will help deliver needed infrastructure. The policy will have positive effect on housing delivery, reducing deprivation, health, economic growth, sustainable transport, community facilities, heritage, air quality, biodiversity, waste, reducing greenhouse gas emissions, reducing flood risk and resilience to climate change.
- 5.177 The policy is sustainable and there are no reasonable alternatives.



6.0 Integrated Assessment Outcomes for Each Objective

- The full Integrated Assessment of the draft Local Plan policies is set out in Appendix C, which shows how each policy was assessed against each of the IA objectives. The IA acknowledges where issues have not been addressed by the Local Plan but have been addressed by the PfE. A summary of the IA outcomes according to each IA objective is provided below.
 - 1. Provide housing of an appropriate mix of sizes, types, tenures in locations to meet identified local needs including accommodating specific groups and reduce disparity.
- The draft Local Plan contributes positively to this objective by setting a minimum of 22,443 net additional dwellings to be delivered in Trafford in the plan period up to 2042. Proposals which result in the net loss of housing are not supported.
- 6.3 Requirements are given on providing an appropriate mix of sizes, types and tenures to meet identified needs. This includes requirements for affordable and social housing across each Trafford Locality. Policy supports new residential developments delivering a range and mix of dwelling sizes.
- There are several policies on meeting the housing needs of specific groups such as older persons, children, care leavers, gypsies, travellers and travelling showpeople.

 These policies will contribute towards accommodating specific groups and reduce disparity.
- 6.5 Policies on employment land, transport infrastructure and planning obligations will have a positive effect on housing delivery by providing the jobs and infrastructure to support additional residents at new housing developments.
 - 2. Promote equality of opportunity and reduce levels of deprivation and disparity
- This IA Objective fulfils the Equality Impact Assessment component on the Integrated Assessment.
- The Strategy will have a positive effect on equality and regeneration by supporting development which enhances the area and facilitates regeneration in the Inner Areas (Trafford).
- Providing an appropriate mix of sizes, types and tenures to meet identified needs including affordable housing will have a positive effect on equality and deprivation. Policies on meeting the housing needs of specific groups will have a major positive effect on equality and deprivation.



- 6.9 Employment policies will have a positive effect by boosting employment opportunities across the population. Supporting a Circular Economy will promote green jobs for local people.
- 6.10 Policies on sustainable transport and active travel will help ensure communities are well connected and residents have improved access to community facilities. This will promote social inclusion, which is particularly important in areas of deprivation where car ownership is likely to be lower. There will be a positive effect on IA objective 2.
- 6.11 Policies on open space, sports facilities and recreation facilities will contribute towards ensure equality of access to such facilities.
- 6.12 Ensuring buildings and spaces are designed to be inclusive to different users through reducing physical barriers and creating opportunities for community activity will have a positive effect on equality of opportunity and reducing deprivation.
 - 3. Support improved health and wellbeing of the population and reduce health inequalities
- 6.13 This IA Objective fulfils the Health Impact Assessment component on the Integrated Assessment.
- 6.14 Providing an appropriate mix of sizes, types and tenures to meet identified needs including affordable housing will have a positive effect on health. Provision of adaptable and accessible housing has a major positive effect.
- 6.15 The provision of employment land will provide greater employment opportunities, which will help reduce unemployment and deprivation. Unemployment and deprivation can cause negative effects on health and wellbeing; reducing them is likely to have a positive effect on health.
- 6.16 Policies supporting sustainable transport, green infrastructure, natural assets and open space will encourage more active travel and active lifestyles, thereby having a positive effect on health. Promoting sustainable travel will likely have a positive effect on air quality, having a further positive effect on health.
- 6.17 The protection of community facilities will include protecting health and social care facilities. Protecting these facilities and providing sustainable transport links to better access these facilities will have positive effects. Locating development in sustainable locations also will give people better access to healthcare facilities.
- 6.18 Policies which minimise overheating and promote energy efficiency will have positive effects on health.



4. Ensure sustainable economic growth and job creation

- 6.19 The draft Local Plan contributes positively to this objective by setting a total of 736,308 sqm employment land to be delivered in Trafford within the plan period up to 2042. Policies set out where employment uses will be supported and protected in Trafford. Current employment uses are protected from being lost to other development. Employment policies will have a major positive effect on sustainable economic growth and job creation.
- 6.20 The Strategy will positively contribute to the objective by supporting economic-led development within the Core Growth Area and protecting against development compromising the economic competitiveness of the Southern Area (Trafford).
- 6.21 New housing developments facilitate economic growth and some job creation, particularly during construction. Sufficient housing is required to support a strong economy in the area through, for example, providing employees and a community to spend in local retail, services and facilities. Policies supporting the delivery of housing have a positive effect on economic growth.
- 6.22 Improved transport connections can help enable significant economic growth and make the economy more resilient by improving connectivity within Trafford and Greater Manchester.
- 6.23 The support for the viability and vitality of town centres will have a major positive effect.
- The protection and enhancement of Trafford's cultural and tourism assets will have a major positive effect on contribution towards economic growth. Specifically, the support for mixed use development at Manchester United Football Stadium and Wharfside will have a major positive effect.
 - <u>5. Ensure that there is sufficient coverage and capacity of sustainable transport and utilities to support growth and development</u>
- 6.25 Housing and employment development is supported at higher densities in the most sustainable locations close to public transport and active travel links. This will have a positive effect on reducing the need to travel.
- 6.26 The Transport policies will have a direct major effect on the objective by supporting public transport infrastructure and promoting active travel.
- 6.27 Policies supporting green infrastructure and natural assets will provide better infrastructure and environment to encourage people to use active travel.



- The protection of community infrastructure and town centres will reduce the need to travel, thereby having a positive effect.
 - 6. Improve the accessibility of the borough by equitable means to community facilities, services and other needs
- 6.29 Housing and employment development is supported at higher densities in the most sustainable locations close to public transport and active travel links. This will have a positive effect on access to community facilities.
- 6.30 Support for sustainable transport and green infrastructure will improve transport connections for people to access community facilities.
- 6.31 The protection and enhancement of town centres, open space and recreation facilities will directly protect and enhance community facilities themselves.
- 6.32 Policies on the protection of community facilities will have a direct major positive effect on the objective.
 - 7. Conserve and enhance landscape, townscape, and the character of the borough
- 6.33 Requiring development to have a high standard of design and make a positive contribution to the character of the borough will have a direct major positive effect. Other Design policies will have a positive effect on the objective, including policies on the protection of the historic environment, which is an important contributor to local character.
- 6.34 The protection and enhancement of green infrastructure, natural environment assets and open space has a major positive effect in conserving the landscape and townscape character.
- 6.35 The support for employment development, highway infrastructure and a new railway route on areas of greenfield land has potential for significant impact on landscape character. However, there are policies in the PfE and draft Local Plan on protecting landscape character that would mitigate any negative impacts.
- 6.36 There are unknown effects from policies on housing density, energy and employment development. The impact of a scheme will depend on the site's location and design.
 - 8. Conserve and enhance the historic environment
- 6.37 Policies on the conservation and enhancement of heritage assets will have a direct major positive effect on the objective.



- 6.38 Requiring development to have a high standard of design and make a positive contribution to the character of the borough will have a positive effect on the historic environment where relevant.
- 6.39 Green infrastructure, natural environment assets and open space can contribute positively to the historic environment where relevant. Policies to protect and enhance these have been scored as having a positive effect for this objective.
- 6.40 The support for new highway infrastructure and a new rail route has potential for some negative effects but this will depend on the detailed design and mitigation measures.
- 6.41 There are unknown effects from policies on housing density, energy and employment development. The impact of a scheme will depend on the site's location and design.

9. Improve air quality

- The policies helping to achieve carbon neutrality by 2038 will have a positive effect in the longer term.
- 6.43 Supporting active travel, public transport and reducing the need to travel by developing sustainable locations will help reduce the amount of road traffic. This will reduce harmful emissions and have a positive impact on air quality, especially within the Air Quality Management Areas.
- 6.44 The protection and enhancement of green infrastructure and natural assets will encourage and support people to use active travel. Policies protecting and enhancing town centres and community facilities will improve access to services and reduce the need to travel. These policies will have a positive effect.
- The quantity of new residential and employment development would be expected to have a detrimental impact on air quality to some extent by the likely increase of traffic on roads and industrial activity.
 - 10. To conserve and protect land and soils, whilst reducing land contamination
- The provision of new residential and employment development could result in a net loss of greenfield land, including ecologically important soils. However, the protection of existing housing and employment land, developing brownfield land and locating higher density development in the most sustainable locations will have a positive effect by using land resources efficiently. This will reduce the pressure to build on greenfield land.
- 6.47 The expansion of highway infrastructure could have a negative impact through development on greenfield land. Additional clarification is recommended on how the



policy would seek to reduce the impact on soils and land contamination through the development of the new transport routes. The protection and enhancement of green infrastructure and natural environment assets will help protect special geological sites.

- 6.48 The expansion of public transport routes could have a negative impact on the soils and potential land contamination through development on sites that are currently undeveloped. However new public transport routes would also be delivered as part of a wider development and would constitute only a small proportion of development land. The full effect is unknown.
- 6.49 Policy on land contamination and remediation will reduce the number of sites developed on contaminated land or reduce the harm development will have when taking place on contaminated land. If solutions cannot be found, then developments will be encouraged on other sites. However, this policy does not state where and therefore does not protect agricultural land or encourage development on derelict land.

11. Protect and improve the quality and availability of water resources

- 6.50 Policies on water efficiency and sustainable drainage will have direct major positive effects on the objective. The support for green infrastructure and open space will play an important role in sustaining water quality and therefore also has a positive effect.
- 6.51 Policy on land contamination and remediation will reduce the risk of water contamination from potential developments on contaminated sites as developers will be required to provide risk assessments and find approved solutions to reduce risk.
- Residential development could be expected to result in the loss or reduction in natural water storage capacity and demand on water resources. However, development schemes can be an opportunity to improve drainage systems and/or install new infrastructure that are beneficial to the wider area. At this point, the potential effect is unknown.
- 6.53 Major new transport infrastructure has potential for increasing surface runoff to water bodes and contribute to pollution. Mitigation is required for this potential adverse effect.
 - 12. Conserve and enhance biodiversity and promote nature conservation
- The protection and enhancement of natural environmental assets, Biodiversity Opportunity Areas, and incorporating support for biodiversity in new development



- will have a directly positive effect on this objective. Support for open space has potential for a positive effect.
- 6.55 It is likely that some residential and employment development will be delivered on land that has potential for negative effects on biodiversity. However, development offers the opportunity for Biodiversity Net Gain and the policies seek to concentre higher density development in the most sustainable locations away from ecologically sensitive areas. Therefore, the potential effect is unknown at this point.
- 6.56 Major new transport infrastructure has potential for negative effects on biodiversity, so mitigation will be required.
 - 13. Promote sustainable consumption of resources and support the implementation of the waste hierarchy
- 6.57 Policy RT5: Circular Economy supports the sustainable use of resources and moving up the waste hierarchy: this has a direct major positive effect.
- 6.58 The provision of new dwellings would be likely to have a negative effect on the waste generated within the borough.
 - 14. Reduce per capita greenhouse gas emissions
- 6.59 Policies supporting Trafford's Council commitment to be carbon neutral by 2038 through sustainable energy supply and energy efficient buildings will have a positive effect on reducing greenhouse gas emissions.
- 6.60 Concentrating higher density residential and employment development in sustainable locations; supporting town centres and community facilities; and support for sustainable modes of transport will reduce greenhouse gas emissions from road traffic.
- 6.61 Support for green infrastructure and natural environment assets including wetlands will have a positive effect.
 - 15. Reduce the consequence of flooding
- There are detailed requirements for flood risk assessments, flood risk mitigation, sustainable drainage and safeguarding of strategic areas for flood management. These would have major positive effect.
- 6.63 Policies supporting reducing greenhouse gas emissions will contribute to reducing flood risk although it is acknowledged that global emissions will also have to be reduced.



- 6.64 Concentrating higher density residential and employment development in sustainable locations in locations at lowest risk of flooding will have a positive effect.
- 6.65 The support for green infrastructure has a positive link with water management. Specifically, polices on the Great Manchester Wetland Nature Improvement Area and Mersey Valley support reducing or mitigating flood risk.
- 6.66 New highway infrastructure has potential to increase run-off rates and increase flood risk.
 - 16. Ensure communities, developments and infrastructure are resilient to the other effects of expected climate change
- 6.67 The minimisation of overheating risks; incorporation of effective cooling methods in design of buildings; and integration of green infrastructure to provide cooling will help ensure resilience against the effects of climate change. The support for protection and enhancement of green infrastructure and natural assets also will have a positive effect by providing urban cooling and reducing flood risk.
- 6.68 Policies directly supporting reduction of flood risk and sustainable drainage will build resilience for increased rainfall expected from climate change.
- 6.69 Policies supporting reducing greenhouse gas emissions will contribute towards reducing the effects of climate change although it is acknowledged that global emissions will also have to be reduced.



7.0 Monitoring the Local Plan

- 7.1 Indicators are being developed to ensure robust monitoring of the Local Plan. The monitoring will be integrated with the IA and monitoring indicators will include significant social, environmental and economic effects.
- 7.2 Monitoring indicators should assess whether:
 - The IA's predictions of sustainability effects are accurate.
 - The Local plan is contributing to the achievement of the IA objectives.
 - How mitigation measures are performing.
 - If there are any adverse effects and whether these are within acceptable limits or remedial action is needed.
- 7.3 PfE already has a monitoring framework and the Local Plan monitoring framework will only include indicators relevant to the delivery and effects of the Local Plan policies.



Appendix A: Integrated Assessment Objectives and Assessment Criteria



Table 4 IA Objective 1 and Assessment Criteria

Objective IA Topic	Provide housing of an appropriate mix of sizes, types, tenures in locations to meet identified local needs including accommodating specific groups and reduce disparity Population, Equality and Housing
Relevant PfE IA Objectives	1
Assessment Criteria: Will the Local Plan	Ensure an appropriate mix of types, tenures and sizes of properties in order to meet current and projected local housing needs including accommodating specific groups?
	Support a reduction in the disparity of housing quality across the borough?
	Ensure housing land is well-connected with employment land, centres and green space or co- located where appropriate?
	Support improvements in the energy efficiency and resilience of the housing stock?
	Ensure the number of houses meets that of demand by meeting affordable housing needs in line with growth and income?
Assessment Criteria: Will the proposed development allocation	Ensure an appropriate mix of types, tenures and sizes of properties in order to meet current and projected housing needs including accommodating specific groups?
	Support a reduction in the disparity of housing quality across the borough?
	Ensure housing land is well-connected with employment land, centres and green space or co- located where appropriate?
	Support improvements in the energy efficiency and resilience of the housing stock?
	Ensure the number of houses meets that of demand by meeting affordable housing needs in line with growth and income?



How has this Objective been changed by the Scoping Report Addendum?

Accommodating specific groups has been added to both the Objective wording and the Assessment Criteria in response to PfE Policy JP-H3 Type, Size and Design of New Housing stating that housing provision to accommodate specific groups will be addressed through district Local Plans.



Table 5 IA Objective 2 and Assessment Criteria

Objective	Promote equality of opportunity and reduce levels of deprivation and disparity
IA Topic	Population, Equality and Housing
Relevant PfE IA Objectives	4, 5, 7, 8
Assessment Criteria: Will the Local Plan	Ensure equality of opportunity and equal access to facilities and infrastructure for all?
	 Avoid differential negative impacts based on 'protected characteristics', as defined in the Equality Act 2010?
	Ensure that the needs of different localities in the borough are equally addressed?
	 Reduce the proportion of people living in deprivation? Support reductions in poverty (including child and fuel poverty), deprivation and disparity across the domains of the Indices of Multiple Deprivation?
	Foster good relations between different people?
Assessment Criteria: Will the proposed development allocation	Ensure differential negative impacts based on 'protected characteristics', as defined in the Equality Act 2010 are avoided?
	Support regeneration in a deprived area of the borough?
	Offer affordability and opportunity?
	Be accessible by all members of the community?
	Foster good relations between different people?
How has this Objective been changed by the Scoping Report Addendum?	In the Assessment Criteria, the word Places has been replaced by localities to reflect the structure and language of the emerging Local Plan.



Table 6 IA Objective 3 and Assessment Criteria

Objective	Support improved health and wellbeing of the population and reduce health inequalities
IA Topic	Health
Relevant PfE IA Objectives	6, 7
Assessment Criteria: Will the Local Plan	 Support healthier lifestyles and improvements in determinants of health? Reduce health inequalities within Trafford and with the rest of England? Promote and improve social infrastructure and access to community services and facilities?
Assessment Criteria: Will the proposed development allocation	 Be near, or deliver, a health centre or GP service? Be near, or deliver, play space or recreational open space? Be near, or deliver, a sports facility? Have potential to affect new or existing residents through noise, dust, light or smell?
How has this Objective been changed by the Scoping Report Addendum?	■ No changes



Table 7 IA Objective 4 and Assessment Criteria

Objective	4. Ensure sustainable economic growth and job creation
IA Topic	Economy and Education
Relevant PfE IA Objectives	2, 8
Assessment Criteria: Will the Local Plan	 Recognise the increasing importance of tourism to the economy and increasing demand for tourist facilities? Support education and training to provide a suitable labour force for future growth?
	Increase the vitality and viability of Trafford's town centres?
	Meet the needs for retail, leisure, offices and other main town centre uses by allocating a range of suitable sites for main town centre uses?
	Promote the 'evening economy' within town centres and identify appropriate sites and opportunities?
	Support the increasing importance of culture and leisure uses within the town centres?
	Provide sufficient employment land in locations that are well-connected and well-served by infrastructure?
	Ensure and maintain a sufficient labour force (in terms of volume and skills)?
	Improve the qualification and skill base of residents in order to meet employers' needs?
	• Allocate high quality and attractive sites for office, industrial and warehousing uses to mirror its strengths in financial business, professional services, manufacturing and digital?
	Retain and consolidate suitable existing employment sites and areas where there is a reasonable prospect of these continuing to be used for employment purposes?
	Focus employment uses in allocated employment land, such as at Trafford Park?
	Set out criteria that development for non-employment uses on employment sites have to meet?



Assessment Criteria: Will the Local Plan	 Set out the target of level of employment land in Trafford and phasing in accordance with Places for Everyone? Allocate suitable sites of employment land (in addition to any strategic allocations coming through the PfE)? Identify whether there is a need for additional culture and tourism facilities in the borough?
Assessment Criteria: Will the proposed development allocation	 Protect and enhance the vitality and viability of existing employment areas and/or town centres? Support appropriate retail, leisure, cultural and/or employment opportunities in town centre locations? Support economic development in locations that are easily accessible by sustainable transport? Support economic development in locations that are well-connected and well-served by infrastructure? Provide a variety of employment land and mixed-use development sites over the plan period to support a varied and robust economy? Provide high quality, attractive employment sites? Contribute to growth in tourist facilities and jobs? Support education and training to provide a suitable labour force for future growth? Ensure and maintain a sufficient labour force (in terms of volume and skills)?
How has this Objective been changed by the Scoping Report Addendum?	■ No changes



Table 8 IA Objective 5 and Assessment Criteria

Objective	Ensure that there is sufficient coverage and capacity of sustainable transport and utilities to support growth and development
IA Topic	Transport
	Utilities
Relevant PfE IA Objectives	3, 9
Assessment Criteria: Will the Local Plan	Ensure that the transport network can support and enable the anticipated scale and spatial distribution of development?
	Reduce the need to travel and promote efficient patterns of movement?
	Promote a safe and sustainable public transport network that reduces reliance on private motor vehicles?
	Champion the use of sustainable modes of transport by all throughout the borough?
	Ensure infrastructure development, the business community and public transport networks are sufficiently connected, to reduce the need to travel by car?
	Link to the objectives of the 2040 Transport Strategy and consider how new development can contribute to increasing capacity and supporting new infrastructure for Train routes and the Metrolink?
	Improve transport connectivity, particularly to alleviate issues from travelling east to west across the borough?
	Ensure that utilities and digital infrastructure can support and enable the anticipated scale and spatial distribution of development?



Assessment Criteria: Will the proposed development allocation	 Be easily accessible and well served by public transport, walking and cycle routes? Allow for improved travel connectivity?
	Be connected to a transport network that can support the development alongside existing development and proposed growth?
	Be within the vicinity of, or deliver, a range of facilities and services to meet residents' needs?
	Be served by utilities and digital infrastructure that can support and enable the anticipated scale and spatial distribution of development?
How has this Objective been changed by the Scoping Report Addendum?	■ No changes



Table 9 IA Objective 6 and Assessment Criteria

Objective	6. Improve the accessibility of the borough by equitable means to community facilities, services and other needs
IA Topic	Access and Community Infrastructure
Relevant PfE IA Objectives	5, 7, 8, 9
Assessment Criteria: Will the Local Plan	Improve the availability of opportunities to residents and others to walk, cycle, horse ride and use public transport to meet their needs?
	Ensure people are adequately served by healthcare and other key facilities, regardless of socio-economic status?
	Ensure people obtain equitable access to affordable high-quality food shopping, and other fundamental needs such as chemists?
	Ensure sufficient access to educational facilities for all children?
	Promote access to, and provision of, appropriate community social infrastructure including playgrounds and sports facilities?
Assessment Criteria: Will the proposed development allocation	 Allow for access to primary and secondary schools? Be within the vicinity of, or deliver, a range of facilities and services to support potential growth?
	Be within the vicinity of, or deliver appropriate community social infrastructure including playgrounds and sports facilities?
	Provide opportunities to residents and others to walk, cycle, horse ride and use public transport to meet their needs?
How has this Objective been changed by the Scoping Report Addendum?	■ No changes



Table 10 IA Objective 7 and Assessment Criteria

Objective	7. Conserve and enhance landscape, townscape, and the character of the borough
IA Topic	Landscape and Townscape
Relevant PfE IA Objectives	16
Assessment Criteria: Will the Local Plan	Protect landscape character and improve the quality of open spaces and the public realm?
	Conserve and enhance townscape character, and the aesthetic quality of the built environment?
	Respect, maintain and strengthen local character and distinctiveness?
Assessment Criteria: Will the proposed development allocation	Have scope to develop or improve the green infrastructure network?
	Protect landscape character and improve the quality of open spaces and the public realm?
	Conserve and enhance townscape character, and the aesthetic quality of the built environment?
	Respect, maintain and strengthen local character and distinctiveness?
How has this Objective been changed by the Scoping Report Addendum?	■ No changes



Table 11 IA Objective 8 and Assessment Criteria

Objective	8. Conserve and enhance the historic environment
IA Topic	Cultural Heritage
Relevant PfE IA Objectives	16
Assessment Criteria: Will the Local Plan	Conserve and enhance the historic environment, heritage assets and their setting?
	Protect heritage assets that have been identified as being at risk?
Assessment Criteria: Will the proposed development allocation	Have potential to preserve or enhance the character, appearance or special interest of heritage assets or their settings?
	Have potential to protect heritage assets that have been identified as being at risk?
How has this Objective been changed by the Scoping Report Addendum?	An Assessment Criteria on protecting heritage assets at risk has been added in response to Places for Everyone Policy JP-P2 Heritage, which states that 'where heritage assets have been identified as being at risk, Local Plans should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use'.



Table 12 IA Objective 9 and Assessment Criteria

Objective	9. Improve air quality
IA Topic	Air Quality
Relevant PfE IA Objectives	10
Assessment Criteria: Will the Local Plan	Improve air quality in the borough, particularly in Air Quality Management Areas (AQMAs) and areas sensitive for impacts on biodiversity/flora/fauna and soil?
Assessment Criteria: Will the proposed development allocation	 Be within or adjacent to an AQMA? Have potential to have an adverse effect on air quality in the local area and areas sensitive for impacts on biodiversity/flora/fauna and soil?
How has this Objective been changed by the Scoping Report Addendum?	 Added reference to areas sensitive for impacts on biodiversity/flora/fauna and soil to assessment criterion.



Table 13 IA Objective 10 and Assessment Criteria

Objective	10. To conserve and protect land and soils, whilst reducing land contamination
IA Topic	Land, Geology, and Soils
Relevant PfE IA Objectives	17
Assessment Criteria: Will the Local Plan	Support the development of previously developed land and other sustainable locations?
	Conserve and protect geodiversity?
	Protect the best and most versatile agricultural land and soil resources from inappropriate development?
	■ Protect and enhance areas of peat?
	Encourage the redevelopment of derelict land, properties, buildings and infrastructure, returning them to appropriate uses?
	Support reductions in land contamination through the remediation and reuse of previously developed land?
Assessment Criteria: Will the proposed development allocation	Bring brownfield land or derelict buildings and infrastructure back into beneficial use?
	Avoid potential increase in levels of land contamination?
	Avoid loss of best and most versatile agricultural land (Grade 1,2 or 3a)?
	Conserve and protect geodiversity?
	Protect and enhance area of peat?
How has this Objective been changed by the Scoping Report Addendum?	Added assessment criterion on protection and enhancement of peat



Table 14 IA Objective 11 and Assessment Criteria

Objective	11. Protect and improve the quality and availability of water resources
IA Topic	Water Resources
Relevant PfE IA Objectives	14
Assessment Criteria: Will the Local Plan	Encourage compliance with the Water Framework Directive?
	Promote management practices that will protect water features from pollution and, where possible, create a net benefit by improving water quality?
	Avoid consuming greater volumes of water resources than are available to maintain a healthy environment?
Assessment Criteria: Will the proposed development allocation	 Avoid consuming greater volumes of water resources than are available to maintain a healthy environment? Be near a suitable watercourse or water body in order to assist with drainage issues? Be affected by any known drainage constraints?
	Avoid risk to the quality of any watercourse or water body?
How has this Objective been changed by the Scoping Report Addendum?	■ No changes.



Table 15 IA Objective 12 and Assessment Criteria

Objective	12. Conserve and enhance biodiversity and promote nature conservation
IA Topic	Biodiversity
Relevant PfE IA Objectives	11
Assessment Criteria: Will the Local Plan	Provide opportunities to enhance new and existing wildlife and geological sites and facilitate biodiversity net gain?
	Avoid damage to, or destruction of, designated wildlife sites, habitats and species and protected and unique geological features?
	Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not unnecessarily prejudiced?
	Support and enhance existing multifunctional green infrastructure and/or contribute towards the creation of new multifunctional green infrastructure?
	Ensure access to green infrastructure providing opportunities for recreation, amenity and tranquillity?
Assessment Criteria: Will the proposed development	Avoid potential damage to designated wildlife sites and geological sites?
allocation	Avoid fragmentation of habitats?
	Provide opportunities to enhance new and existing wildlife and geological sites?
	Be within access to wildlife sites providing opportunities for recreation, amenity and tranquillity?
How has this Objective been changed by the Scoping Report Addendum?	■ No changes.



Table 16 IA Objective 13 and Assessment Criteria

Objective	13. Promote sustainable consumption of resources and support the implementation of the waste hierarchy
IA Topic	Materials and Waste
Relevant PfE IA Objectives	18
Assessment Criteria: Will the Local Plan	Support the sustainable use of physical resources?Promote movement up the waste hierarchy?Promote reduced waste generation rates?
Assessment Criteria: Will the proposed development allocation	 Promote movement up the waste hierarchy? Help to minimise waste generation? Be within or impact on a mineral safeguarding area? Be within or impact on a mineral area of search?
How has this Objective been changed by the Scoping Report Addendum?	■ No changes



Table 17 IA Objective 14 and Assessment Criteria

Objective	14. Reduce per capita greenhouse gas emissions
IA Topic	Climate Change and Associated Risks
Relevant PfE IA Objectives	15
Assessment Criteria: Will the Local Plan	Encourage the growth of the low carbon goods and services sector will contribute to emissions reductions, create employment opportunities and economic growth?
	Improve the energy efficiency of buildings and encouraging low carbon and decentralised forms of energy generation will be key to reducing greenhouse gas emissions?
	Encourage reduction in energy use and increased energy efficiency?
	Encourage the development of low carbon and renewable energy facilities, including as part of conventional developments?
	Promote a proactive reduction in direct and indirect greenhouse gas emissions emitted across GM?
Assessment Criteria: Will the proposed development	Support the growth of the low carbon goods and services sector?
allocation	Support a reduction in energy use and increased energy efficiency?
	Help to minimise emissions of greenhouse gases?
	Promote low and zero carbon technologies and renewable sources?
How has this Objective been changed by the Scoping Report Addendum?	■ No changes



Table 18 IA Objective 15 and Assessment Criteria

Objective	15. Reduce the consequence of flooding						
IA Topic	Climate Change and Associated Risks						
Relevant PfE IA Objectives	13						
Assessment Criteria: Will the Local Plan	Restrict the development of property in areas of flood risk?						
	Ensure adequate measures are in place to manage existing flood risk?						
	Ensure that development does not increase flood risk due to increased run-off rates?						
	Ensure development is appropriately future proof to accommodate future levels of flood risk including from climate change?						
	Promote opportunities to reduce flood risk by working with nature-based solutions?						
Assessment Criteria: Will the proposed development allocation	Avoid development in an area at risk of flooding (is it partly or wholly sited in Flood Zone 3 or 2 or at risk from Surface Water Flooding)?						
	Allow for adequate measures to manage existing flood risk?						
	• Increase flood risk in this location or elsewhere?						
	Be appropriately future proofed to accommodate future levels of flood risk including from climate change?						
How has this Objective been changed by the Scoping Report Addendum?	 Added assessment criterion on promoting opportunities to reduce flood risk by working with nature-based solutions. 						



Table 19 IA Objective 16 and Assessment Criteria

Objective	16. Ensure communities, developments and infrastructure are resilient to the other effects of expected climate change
IA Topic	Climate Change and Associated Risks
Relevant PfE IA Objectives	12
Assessment Criteria: Will the Local Plan	Ensure that communities, existing and new developments and infrastructure systems are resilient to the predicted effects of climate change across the borough, besides climate change (e.g. temperature extremes, high winds)?
Assessment Criteria: Will the proposed development allocation	Ensure that communities, existing and new developments and infrastructure systems are resilient to the predicted effects of climate change across the borough, besides climate change (e.g. temperature extremes, high winds)?
How has this Objective been changed by the Scoping Report Addendum?	■ No changes



Appendix B: Equality Impact Assessment of Protected Characteristics



1.0 Introduction

- 1.1 This Equalities Impact Assessment (EqIA) sets out the anticipated effect of the draft Local Plan 2025 on protected characteristics. The EqIA makes suggestions to avoid where possible and mitigate potential negative impacts which may result from the emerging Local Plan.
- 1.2 The Equality Act 2010 places a duty on public bodies when carrying out their functions to have due regard to the need to eliminate conduct which results in inequality or discrimination based on protected characteristics; public bodies must also consider socio-economic disadvantage when making strategic decisions.
- 1.3 Trafford Council is therefore required to undertake an EqIA of its policies, plans and strategies to ensure that they eliminate conduct which result in inequality and do not discriminate against any groups or individuals with protected characteristics.
- 1.4 The Equality Act 2010 identifies nine protected characteristics:
 - Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual orientation
- 1.5 The above protected characteristics are used in a matrix to determine whether the Draft Local Plan has potential implications for protected characteristics. The matrix identifies both where proposed policies are compatible with the Equality Act 2010 and where they likely conflict with the protected characteristics.
- 1.6 Equality Impact Assessments are required to include a range of equality issues, wider issues of social inequality and deprivation should also be considered.



2.0 The EqIA Policy Assessment

- 2.1 Each proposed policy in the Draft Local Plan is subject to assessment to identify the potential impact of the policy on each group with protected characteristics. The potential impact could be positive, negative or neutral. The policies which are considered likely to result in a negative effect are further rated high, medium or low impact to allow assessment in further depth.
- 2.2 Overall, the policies put forward in the Draft Local Plan generally have a neutral impact on the nine protected characteristics, with some positive impacts delivered by considerate policy approaches. However, there are a small number of negative on impacts on people with disabilities (Policies TM10, BE2 and BE3), due to a lack of an explicit consideration of accessibility.



- Positive Impact (+): the proposal will have a positive effect on the equality group or will improve equality relationships between groups. The positive impact may be differential, with the positive impact on one group likely to be greater than on another.
- Neutral Impact (O): the proposal has no effect on equality groups.
- Negative Impact (-): the proposal could disadvantage one or more equality groups. The negative impact may be differential, with the negative impact on one group likely to be greater than on another.

Table 20 Equality Impact Assessment

Policy		Age	Disability	Gender reassignme nt	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
ST1	Core Growth Area (Trafford)	0	0	0	0	0	0	0	0	0
ST2	Inner Areas (Trafford)	0	0	0	0	0	0	0	0	0
ST3	Southern Areas (Trafford)	0	0	0	0	0	0	0	0	0
ST4	Sustainable Development	+	+	+	+	+	+	+	+	+
ST5	Climate Change	+	0	0	0	0	0	0	0	0
RT1	Carbon and Energy	0	0	0	0	0	0	0	0	0
RT1N	Carbon and Energy	0	0	0	0	0	0	0	0	0
RT1S	Carbon and Energy	0	0	0	0	0	0	0	0	0
RT1C	Carbon and Energy	0	0	0	0	0	0	0	0	0
RT1W	Carbon and Energy	0	0	0	0	0	0	0	0	0
RT2	Decentralised Energy Generation	0	0	0	0	0	0	0	0	0
RT2N	Trafford North	0	0	0	0	0	0	0	0	0
RT2S	Trafford South	0	0	0	0	0	0	0	0	0

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Policy		Age	Disability	Gender reassignme nt	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
RT2C	Trafford Central	0	0	0	0	0	0	0	0	0
RT2W	Trafford West	0	0	0	0	0	0	0	0	0
RT3	Overheating and the Urban Heat Island	+	+	0	0	0	0	0	0	0
RT4	Sustainable Retrofitting	0	0	0	0	0	0	0	0	0
RT5	Circular Economy	0	0	0	0	0	0	0	0	0
R1	Housing Delivery	0	0	0	0	0	0	0	0	0
R2	Protecting Existing Homes	0	0	0	0	0	0	0	0	0
R3	Affordable and Social Housing	+	0	0	0	0	0	0	0	0
R3N	Affordable Housing within Trafford North	+	0	0	0	0	0	0	0	0
R3S	Affordable Housing within Trafford South	+	0	0	0	0	0	0	0	0
R3C	Affordable Housing within Trafford Central	+	0	0	0	0	0	0	0	0
R3W	Affordable Housing within Trafford West	+	0	0	0	0	0	0	0	0
R4	Size and Type of New Homes	+	0	0	0	0	0	0	0	0
R4N	Size and Type of New Homes within Trafford North	0	0	0	0	0	0	0	0	0
R5	Housing Density	0	0	0	0	0	0	0	0	0



Policy		Age	Disability	Gender reassignme nt	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
R6	Older Persons Accommodation	+	+	0	0	0	0	0	0	0
R7	Adaptable and Accessible Housing	0	+	0	0	0	0	0	0	0
R8	Homes for Children and Care Experienced Young People	+	0	0	0	0	0	0	0	0
R9	Other Types of Homes	+	0	0	0	0	0	0	0	0
R10	Gypsies, Travellers and Travelling Showpeople Accommodation	0	0	0	0	0	+	0	0	0
R11	Self-Build and Custom Housing	0	0	0	0	0	0	0	0	0
EJ1	Employment Land Requirements	0	0	0	0	0	0	0	0	0
EJ2	Trafford Park	0	0	0	0	0	0	0	0	0
EJ3	Industry and Warehousing	0	0	0	0	0	0	0	0	0
EJ3N	Other Industry and Warehousing within Trafford North	0	0	0	0	0	0	0	0	0
EJ3S	Other Industry and Warehousing within Trafford South	0	0	0	0	0	0	0	0	0
EJ3C	Other Industry and Warehousing within Trafford Central	0	0	0	0	0	0	0	0	0



Policy		Age	Disability	Gender reassignme nt	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
EJ4	Offices	0	0	0	0	0	0	0	0	0
EJ4N	Other Offices within Trafford North	0	0	0	0	0	0	0	0	0
EJ4S	Other Offices within Trafford South	0	0	0	0	0	0	0	0	0
EJ4C	Other Offices within Trafford Central	0	0	0	0	0	0	0	0	0
EJ5	Safeguarding Trafford's Employment Land	0	0	0	0	0	0	0	0	0
EJ6	Data and Energy Storage	0	0	0	0	0	0	0	0	0
EJ7	Rural Economy	0	0	0	0	0	0	0	0	0
TM1	Walking, Wheeling and Cycling	0	+	0	0	0	0	0	0	0
TM1N	Walking, Wheeling and Cycling Improvements in Trafford North	0	+	0	0	0	0	0	0	0
TM1S	Walking, Wheeling and Cycling Improvements in Trafford South	0	+	0	0	0	0	0	0	0
TM1C	Walking, Wheeling and Cycling Improvements in Trafford Central	0	+	0	0	0	0	0	0	0
TM1W	Walking, Wheeling and Cycling Improvements in Trafford West	0	+	0	0	0	0	0	0	0
TM2	Public Transport	0	+	0	0	0	0	0	0	0

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Policy		Age	Disability	Gender reassignme nt	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
TM3	Car Clubs	0	0	0	0	0	0	0	0	0
TM4	Mobility Hubs	0	0	0	0	0	0	0	0	0
TM5	Local Highway Network	0	0	0	0	0	0	0	0	0
TM6	The A56	0	+	0	0	0	0	0	0	0
TM6N	The A56 in Trafford North	0	+	0	0	0	0	0	0	0
TM6C	The A56 in Trafford Central	0	+	0	0	0	0	0	0	0
TM6S	The A56 in Trafford South	0	+	0	0	0	0	0	0	0
TM7	Freight	0	0	0	0	0	0	0	0	0
TM8	Manchester Ship Canal	0	0	0	0	0	0	0	0	0
TM9	Potential Future Rail Route	0	0	0	0	0	0	0	0	0
TM10	Parking Standards	0	-	0	0	0	0	0	0	0
TM11	Lorry Management	0	0	0	0	0	0	0	0	0
TM12	Park and Ride	0	0	0	0	0	0	0	0	0
TM13	Crowd Movement and Routes	0	0	0	0	0	0	0	0	0
TC1	Hierarchy of Centres	0	0	0	0	0	0	0	0	0
TC2	Role and Function of Centres	0	0	0	0	0	0	0	0	0
TC3	Out of Centre Retail and Leisure	0	0	0	0	0	0	0	0	0
GI1	Landscape Character Areas	0	0	0	0	0	0	0	0	0
GI2	Green Infrastructure Network	0	0	0	0	0	0	0	0	0

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Policy		Age	Disability	Gender reassignme nt	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
GI3	Great Manchester Wetlands Nature Improvement Area (NIA)	0	0	0	0	0	0	0	0	0
GI4	Mersey Valley	0	+	0	0	0	0	0	0	0
GI4N	Mersey Valley in North Trafford	0	0	0	0	0	0	0	0	0
GI4C	Mersey Valley in Central Trafford	0	0	0	0	0	0	0	0	0
GI4W	Mersey Valley in West Trafford	0	0	0	0	0	0	0	0	0
GI5	Green Infrastructure Opportunity Areas	0	+	0	0	0	0	0	0	0
GI5N	Green Infrastructure Opportunity Areas in North Trafford	0	0	0	0	0	0	0	0	0
GI5S	Green Infrastructure Opportunity Areas in South Trafford	0	0	0	0	0	0	0	0	0
GI5C	Green Infrastructure Opportunity Areas in Central Trafford	0	0	0	0	0	0	0	0	0
GI5W	Green Infrastructure Opportunity Areas in West Trafford	0	0	0	0	0	0	0	0	0
GI6	Green Infrastructure in New Developments	0	0	0	0	0	0	0	0	0



Policy		Age	Disability	Gender reassignme nt	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
GI7	Trees, Woodland and Hedgerows	0	0	0	0	0	0	0	0	0
GI8	Protection of Locally Designated Sites and Natural Environment Assets	0	0	0	0	0	0	0	0	0
GI9	Biodiversity Opportunity Areas	0	0	0	0	0	0	0	0	0
GI9N	Biodiversity Opportunity Areas in Trafford North	0	0	0	0	0	0	0	0	0
GI9S	Biodiversity Opportunity Areas in Trafford South	0	0	0	0	0	0	0	0	0
GI9C	Biodiversity Opportunity Areas in Trafford Central	0	0	0	0	0	0	0	0	0
GI9W	Biodiversity Opportunity Areas in Trafford West	0	0	0	0	0	0	0	0	0
GI10	Building Biodiversity into New Developments	0	0	0	0	0	0	0	0	0
OS1	Open Space	+	+	0	0	0	0	+	0	0
OS1N	Open Space in Trafford North	0	0	0	0	0	0	0	0	0
OS1S	Open Space in Trafford South	0	0	0	0	0	0	0	0	0
OS1C	Open Space in Trafford Central	0	0	0	0	0	0	0	0	0



Policy		Age	Disability	Gender reassignme nt	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
OS1W	Open Space in Trafford West	0	0	0	0	0	0	0	0	0
OS2	Outdoor Sports and Recreation Facilities and Provision	+	+	0	0	0	0	0	0	0
OS3	Indoor Sports and Recreation Provision	+	+	0	0	0	0	0	0	0
OS4	Loss of Sport and Recreation Land or Facilities	0	0	0	0	0	0	0	0	0
OS5	Allotments and Growing Space	0	0	0	0	0	0	0	0	0
OS6	Cemeteries and Burial Grounds	0	0	0	0	0	0	+	0	0
WA1	Managing Flood Risk	0	0	0	0	0	0	0	0	0
WA2	Sustainable Drainage - Surface and Foul Water	0	0	0	0	0	0	0	0	0
WA3	Flood Storage Areas	0	0	0	0	0	0	0	0	0
WA4	Water Efficiency	0	0	0	0	0	0	0	0	0
CT1	Protecting Existing Community and Social Facilities	+	+	+	+	+	+	+	+	+
CT2	Loss of Community Facilities	0	0	0	0	0	0	0	0	0
CT3	New Community and Social Facilities	+	+	+	+	+	+	+	+	+



Policy		Age	Disability	Gender reassignme nt	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
CT4	Fast Food	+	0	0	0	0	0	0	0	0
CT5	Social Value in New Developments	0	0	0	0	0	0	0	0	0
BE1	Design	+	+	+	+	+	+	+	+	+
BE2	Tall Buildings	0	-	0	0	0	0	0	0	0
BE3	Elevated Green Spaces	0	-	0	0	0	0	0	0	0
BE4	Advertisements and Signage	0	0	0	0	0	0	0	0	0
BE5	Heritage Assets	0	0	0	0	0	0	0	0	0
BE6	Designated Heritage Assets	0	0	0	0	0	0	0	0	0
BE7	Non-designated Heritage Assets	0	0	0	0	0	0	0	0	0
BE8	Noise and Vibration	0	0	0	0	0	0	0	0	0
BE9	Land Contamination and Remediation	0	0	0	0	0	0	0	0	0
BE10	Digital Connectivity	0	0	0	0	0	0	0	0	0
CL1	Protecting and Supporting Existing Cultural, Leisure and Tourism Assets	0	0	0	0	0	0	0	0	0
CL1N	Manchester United Football Stadium and Stadium District	0	+	0	0	0	0	0	0	0
CL2	New Culture, Leisure and Tourism Developments	0	0	0	0	0	0	0	0	0

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CL2N	Trafford Centre Rectangle	0	+	0	0	0	0	0	0	0
IP1	Infrastructure Delivery and Planning Obligations	0	0	0	0	0	0	0	0	0
IP1N	Trafford North Infrastructure Contributions	0	0	0	0	0	0	0	0	0
IP2	Managing and Monitoring Planning Obligations	0	0	0	0	0	0	0	0	0



3.0 Summary

- 3.1 Most policies in the Draft Local Plan do not impact on protected characteristics. The majority of the policies which have an impact on protected characteristics are positive for all relevant groups: for example policies on Walking, Wheeling and Cycling (TM1) and Design (BE1). The policy on Climate Change (ST5) helps to reduce inequality by age, as it is young people and future generations who will most benefit from measures to mitigate and adapt to climate change.
- 3.2 However, there are a small number of negative impacts on people with disabilities (Policies TM10, BE2 and BE3), due to a lack of an explicit consideration of accessibility.
- 3.3 Policy TM10 (Parking Standards) refers to the need to provide sufficient off-street parking provision for new developments and discusses the need to provide electric vehicle charging points, cycle parking, coach parking and off-airport car parking. However, there is no explicit reference to the need to provide a given amount of parking for disabled users.
- 3.4 Policy BE2 relates to Tall Buildings. The policy provides guidance for the design of tall buildings and how they should relate to surrounding uses. However, the policy does not refer to lift access, essential to making tall buildings accessible to disabled users.
- 3.5 Policy BE3 (Elevated Green Spaces) encourages elevated green spaces such as green walls, green roofs and elevated amenity spaces. This policy should state that elevated green spaces should be made accessible to disabled users.



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Consultation Question IA1

Do you have any comments to make on the Sustainability Appraisal and its associated appendices?

Consultation Question IA2

Do you have any comments to make on the Health Impact Assessment?

Consultation Question IA3

Do you have any comments to make on the Equalities Impact Assessment?