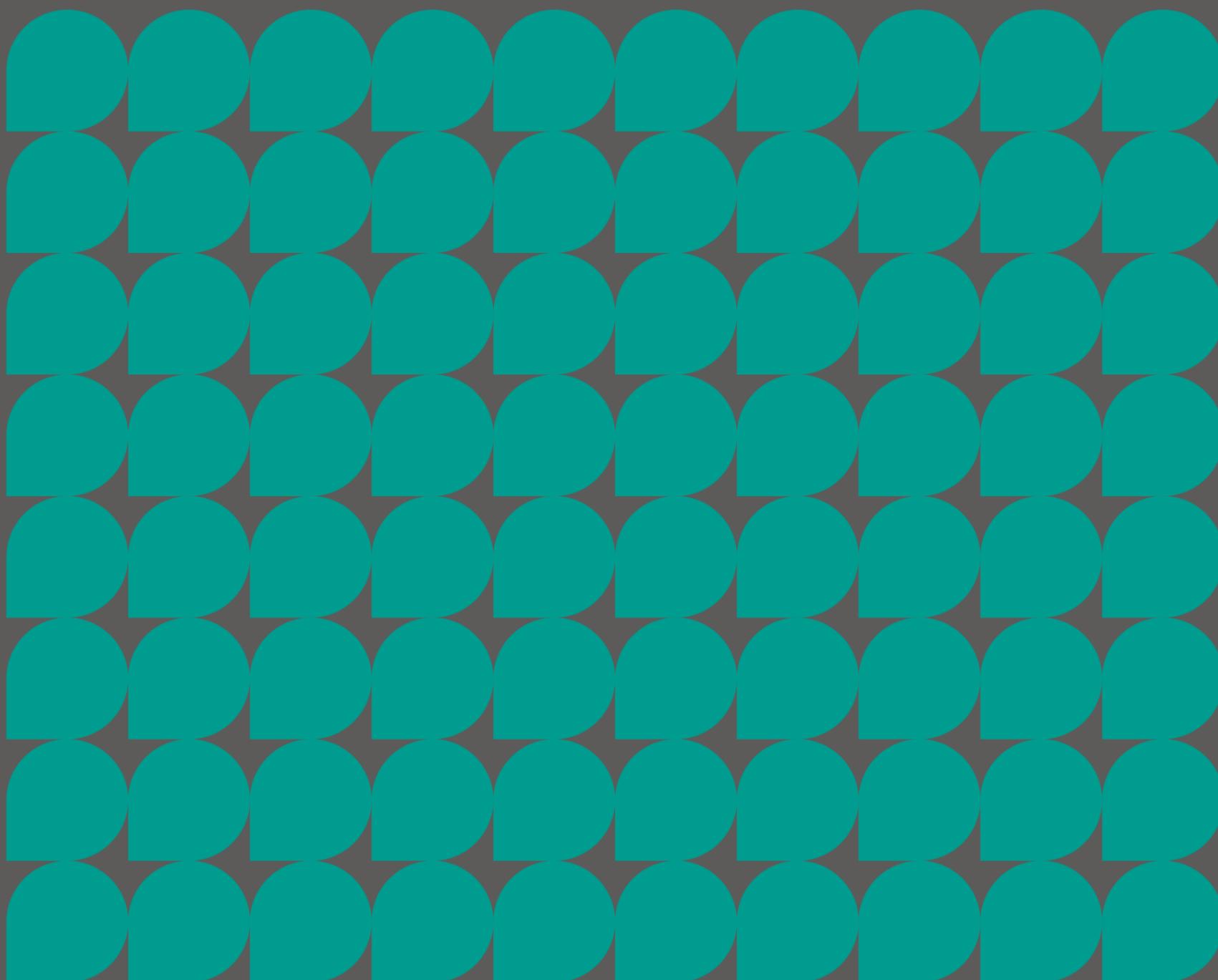


Places for Everyone

Allocations: Trafford Issues Summary

February 2022



Chapter 11 – Allocations (Trafford)

A summary of the issues raised in relation to the policies within PfE 2021 Chapter 11 and the relevant respondents to PfE 2021 is set out below:

PfE 2021 Policy JP Allocation 33 New Carrington

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle / scale of development		
JPA 33.1	Support the allocation and policy wording at New Carrington. It will contribute to meeting the housing land supply.	Support noted.	Redrow Homes Ltd P&D Northern Steels Executive Pension Fund Rahmatullah Javed HIMOR Carrington Ltd United Utilities Property Services
JPA 33.2	Substantial part of allocation has already been found sound in the Core Strategy. Exceptional circumstances exist for release of Green Belt. Significant opportunities for strong linkages between communities. Excellent location for business.	Support noted.	HIMOR Carrington Ltd
JPA 33.3	Support a coordinated approach to the phasing of development in accordance with infrastructure across the site. The criteria must make clear that this is the infrastructure necessary to enable the development sought. This will avoid frustrating delivery of sites which can come forward in the short term whilst wider infrastructure is brought forward which they do not require. Alternative wording has been provided.	Policy JP-A 33 states that development will be phased alongside the delivery of infrastructure. It is essential that on a large site, like New Carrington, where significant infrastructure is required, that all development parcels make a proportionate contribution to infrastructure delivery. Such an approach aims to avoid a single or a small group of landowners being required to un-proportionately contribute towards and/or deliver infrastructure for the site. This will also facilitate the delivery of some parcels early in the plan period and unlock delivery of later phases of development. An 'equalisation mechanism' will be set out in the future Masterplan/SPD.	United Utilities Property Services Redrow Homes Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>See also JPA33 New Carrington Allocation Topic Paper [10.09.07] – section 27 ‘Phasing’ and section 28 ‘Indicative Masterplanning’ which explains how phasing of the development and infrastructure will be coordinated and delivered.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	
JPA 33.4	The proposed housing is not needed and the scale of the site, across three different communities will lead to a loss of local identity.	<p>The site is needed to meet housing needs and has been proposed for allocation in line with the Growth and Spatial Options Paper [02.01.10] and the Site Selection Background Paper [03.04.01]. See JPA33 New Carrington Allocation Topic Paper [10.09.07] section 5 Site Selection.</p> <p>Policy JP-A 33 also requires new development to be fully integrated with the existing communities of Carrington, Partington and Sale West, enhancing the quality of places and their local character. See also JPA33 New Carrington Allocation Topic Paper [10.09.07] and New Carrington Masterplan. [10.09.06] for information on the overarching principles for how the design and layout of the development will integrate into existing communities.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	CPRE Friends of Carrington Moss Lorraine Eagling
JPA 33.5	More detail on the impact of development is needed, including impact on existing communities.	<p>Policy JP-A 33 requires new development to be place-led, respect local character, create connected communities and deliver inclusive characterful design.</p> <p>The proposed allocation has been subject to an Integrated Assessment which included the impact of the development upon existing communities [02.01.01 - 02.01.06]. See JPA33 New Carrington Allocation Topic Paper [10.09.07]. This assessment concluded that the impact on existing communities would be acceptable.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Friends of Carrington Moss
JPA 33.6	Disagree development will have a regenerative impact.	The proposals will have a regenerative impact through providing local jobs and much needed housing. The development will also provide improved services and infrastructure to the existing communities at Carrington,	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Partington and Sale West through, for example improved public transport and active travel connections, as well as improved social infrastructure. The Plan as proposed is therefore considered sound and no change is necessary.	
JPA 33.7	Allocation is not compliant with PfE objectives and policies. Site is considered strategically important when aim is to increase competitiveness of the North.	<p>PfE 2020, Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The New Carrington allocation makes a significant contribution to the Trafford housing and employment land supply, ensuring that the competitiveness of the southern areas is sustained.</p> <p>The Site Selection Background Paper also [03.04.01] details the process of assessing sites and identifying those that meet the overall Vision and Objectives of the Plan. New Carrington meets Criteria 1, 2, 3, 5, 6 and 7 of the PfE Site Selection methodology. The allocation therefore meets the overarching PfE plan objectives.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Friends of Carrington Moss
JPA 33.8	Incorrect that the allocation will provide improved transport, social and green infrastructure. Benefits are overstated and loss of Green Belt and biodiversity is understated.	<p>The New Carrington allocation will deliver a range of benefits in relation to transport, social and green infrastructure.</p> <p>Policy JP-A 33 requires development to deliver improvements to transport infrastructure – including active travel, public transport and highways, as well as improved social infrastructure provision, including health and education provision. A proportion of the site will remain undeveloped and there is an opportunity to deliver significant green infrastructure improvements alongside development.</p> <p>See New Carrington Allocation topic paper [10.09.07].</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Friends of Carrington Moss
JPA 33.9	HIMOR is promoting a larger quantum of development through an alternative masterplan, to address what is considered to be shortfalls in housing and employment land supply.	Trafford has identified sufficient housing and employment land to meet the requirements in PfE.	HIMOR Carrington Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>The PfE Spatial Strategy seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The housing targets for Trafford are in line with the Spatial Strategy and the land supply is sufficient to meet them. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]. The development quantum at New Carrington and the expected delivery rate in the plan period is set out in the JP A 33 New Carrington Allocation Topic Paper [10.09.07] and the New Carrington Masterplan [10.09.06]. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03]. The Plan as proposed is therefore considered sound and no change is necessary.</p>	
	Delivery		
JPA 33.10	Concerns over the deliverability of the allocation.	<p>The PfE New Carrington Masterplan considered the likely delivery rates for a site of this scale and the figures included in PfE are considered to be realistic and deliverable, and in line with industry best practice. See JPA33 New Carrington Allocation Topic Paper [10.09.07] Section E 'Deliverability' and New Carrington Masterplan [10.09.06] Section 5.8 'Development Phasing'.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	United Utilities Property Services P&D Northern Steels Executive Pension Fund
JPA 33.11	Concern that development will not be delivered in the identified timescale because of lack of residential character of the area and land contamination. Additional sites may need to be allocated.	<p>The delivery rates for New Carrington are considered to be realistic. The PfE New Carrington Masterplan considered the likely delivery rates for a site of this scale and the figures included in PfE are considered to be realistic and deliverable, and in line with industry best practice. In addition, the level of remediation and infrastructure required to support development have been taken into account in the overall development phasing. This is reflected in the increased delivery rates for the latter years of the plan period. See New Carrington Masterplan [10.09.06] Section 5.8 'Development Phasing'.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Crossways Commercial Estates Ltd P&D Northern Steels Executive Pension Fund Landowners of Holme Valley

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.12	Development that can be delivered in the short term should not be restricted from proceeding provided that it can be demonstrated that this would not prejudice the delivery of the wider development.	The PfE New Carrington Masterplan sets out a high level development phasing schedule for the whole site. It will be important that development of the New Carrington site comes forward in a coordinated way, alongside infrastructure delivery. Each development parcel must therefore make a proportionate contribution to the overall infrastructure requirements for the site – see Row JPA 33.3. See New Carrington Masterplan [10.09.06]. The Plan as proposed is therefore considered sound and no change is necessary.	United Utilities Property Services
	Policy detail		
JPA 33.13	The scope of the 54 policy criteria is totally unnecessary for a strategic level document which should focus on high level matters, leaving matters of detail to other parts of the Development Plan.	The scope of criteria in Policy JP-A 33 is necessary to deliver a sustainable development that contributes to the housing and employment land supply. The New Carrington site is of a significant scale and therefore a comprehensive policy is needed to guide the development. The Plan as proposed is therefore considered sound and no change is necessary.	United Utilities Property Services
JPA 33.14	Inconsistent development residential and employment development figures are used throughout different document.	Comment noted. Minor typographical/ referencing errors. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
	Housing		
JPA 33.15	Redrow Homes will deliver accessible high quality homes integrated with the existing community. Land at Warburton Lane should remain as an allocation. Natural constraints may prevent full integration to the north.	Integrating the land at Warburton Lane with existing development to the north is a key policy requirement of JP-A 33 and will be critical to the delivery of integrated and sustainable development in this area. This approach is supported by the evidence for the allocation - see the New Carrington Masterplan [10.09.06] Section 5. In addition, Policy JP-P 1 requires development to respect the character and identity of the locality in terms of design, size, scaling and materials used. The Plan as proposed is therefore considered sound and no change is necessary.	Redrow Homes Ltd
JPA 33.16	Object to the provision that proposals for a range of house types across the whole of the allocation need to be in accordance with a masterplan or SPD. Alternative wording has been provided.	This is required to ensure that development comes forward in a sustainable and coordinated manner across the New Carrington site and in accordance with policies elsewhere in the Plan, e.g. JP-H 3.	Redrow Homes Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The Plan as proposed is therefore considered sound and no change is necessary.	
JPA 33.17	There is a need for more affordable housing to be provided which meets a range of housing needs.	Policy JP-A 33 requires development to provide a minimum of 15% affordable housing across New Carrington. It is considered that some areas within the allocation could deliver in excess of this and further information will be provided as part of a future Masterplan / the Trafford Local Plan. Policy JP-A 33 also requires development to deliver a range of house types, sizes, layouts and tenures through a place-led approach based on each of the Character Areas and further detail will be set out in the future New Carrington Masterplan / SPD and the Trafford Local Plan. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07] . The Plan as proposed is therefore considered sound and no change is necessary.	Vicky Harper Dennis Latham
JPA 33.18	Committed to providing as much affordable housing on site as is possible.	Comment noted.	HIMOR Carrington Ltd
JPA 33.19	Viability work on affordable housing is not informed by detailed evidence. The policy should provide sufficient flexibility for viability due to changing circumstances. Alternative wording provided by HIMOR and Redrow on affordable housing so there is a 15% affordable housing target, whilst providing flexibility for viability to be considered.	A Strategic Viability Assessment has been undertaken for the whole of PfE, including the allocations (see [03.01.01 – 03.01.04]). This has demonstrated that a minimum 15% affordable housing contribution and an uplift in market values is viable at New Carrington. See JPA33 New Carrington Allocation Topic Paper [10.09.07] section Viability. In addition and in line with the NPPF, it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF paragraph 58 provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The Plan as proposed is therefore considered sound and no change is necessary.	Redrow Homes Ltd HIMOR Carrington Ltd United Utilities Property Services
JPA 33.20	Clarify how the 15% affordable housing is expected to be delivered.	The PfE Viability Assessment [03.01.01] demonstrates that New Carrington is viable with a 15% affordable housing contribution and an uplift in market values See JP-A 33 New Carrington Allocation Topic Paper [10.09.07] , Viability section.	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>Affordable housing will be provided via a number of mechanisms in line with Policy JP –H2 and national policy.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	
JPA 33.21	Concerns in relation to policy stating that the New Carrington Masterplan / SPD and the Trafford Local Plan will provide additional guidance on appropriate affordable housing.	Policy JP-A 33 sets a requirement for a minimum 15% affordable housing requirement across the site. The policy also states that, considering the scale of the site, regard should be had to the distinct character areas. Parts of the site will be able to deliver in excess of 15% and therefore further guidance will be provided in the Trafford Local Plan. The Plan as proposed is therefore considered sound and no change is necessary.	HIMOR Carrington Ltd United Utilities Property Services
JPA 33.22	The additional development land identified in the alternative HIMOR Masterplan would potentially enhance viability across the allocation and increase the delivery of affordable housing.	<p>The New Carrington allocation boundary and development area set out in Policy JP-A 33 is justified and provides a balanced approach to meeting development needs, whilst protecting Green Belt / green spaces, where possible. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07] and New Carrington Masterplan [10.09.06].</p> <p>A Strategic Viability Assessment has been undertaken for the whole of PfE, including the allocations (see [03.01.01 – 03.01.04]). This has demonstrated that a minimum 15% affordable housing contribution and an uplift in market values is viable at New Carrington</p> <p>In addition and in line with the NPPF, it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	HIMOR Carrington Ltd
JPA 33.23	The overall quantum of residential development should be higher	The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]. Sufficient land has been identified at New Carrington to enable Trafford to meeting its housing and employment targets set out in PfE, alongside the existing land supply and other allocation.	United Utilities Property Services Redrow Homes Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>The proposed quantum of development at New Carrington has been fully justified. The New Carrington Masterplan reviewed the site constraints and identified indicative development parcels and strategic green spaces / Green Belt across the site. The Masterplan has therefore helped to inform the overall development quantum for New Carrington. See JPA33 New Carrington Allocation Topic Paper [10.09.07] and New Carrington Masterplan [10.09.06].</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	
JPA 33.24	<p>The policy should not state specific densities across the site – particularly in relation to Sale West and Warburton Lane. Policy should allow for greater flexibility.</p> <p>HIMOR and Redrow have provided alternative policy wording on densities.</p>	<p>The residential development densities set out in Policy JP-A 33 ensure that development will make the most efficient use of land - see NPPF, para 124. The densities reflect the existing character and environmental constraints of these areas.</p> <p>All densities are an average and represent a minimum in line with Policy JP-H 4. Densities will need to reflect constraints specific to each development parcel. See the New Carrington Masterplan [10.09.06] and New Carrington Allocation Topic Paper [10.09.07].</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	<p>United Utilities Property Services HIMOR Carrington Ltd Redrow Homes Ltd</p>
JPA 33.25	<p>The housing quantum figure should represent a minimum figure in order to align with NPPF paragraph 60.</p>	<p>The figure in JP-A 33 is expressed as “around” to indicate an approximate number considered deliverable to meet development needs. Additionally, chapters 6 and 7 clearly set minimum targets for employment and housing development. The Plan should be read as a whole.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	<p>Redrow Homes Ltd</p>
	<p>Employment and Economy</p>		
JPA 33.26	<p>The proposed employment development for industry and warehousing will not generate sufficient and varied jobs for residents in the local area. The development will mostly employ people from outside the area and increase car usage.</p> <p>Evidence needed to demonstrate that new jobs will be accessible for local people.</p>	<p>The New Carrington site will provide employment opportunities for local people, as well as from a wider area considering the sites sub-regional scale.</p> <p>As detailed in Chapter 6, the employment land offer will provide a range of employment opportunities, including warehousing and logistics which will</p>	<p>Friends of Carrington Moss Lorraine Eagling</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>help achieve the Local Industrial Strategy, further details can be found in the Employment Topic Paper [05.01.04].</p> <p>The New Carrington allocation will also be supported by a range of sustainable transport schemes – see New Carrington Locality Assessment [09.01.15] and [09.01.27], which will improve access to the employment opportunities at New Carrington.</p> <p>Policy JP-P5 also seeks significant enhancements in education, skill and knowledge across GM which will enable residents to access a greater range of job opportunities.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	
JPA 33.27	New Carrington cannot meet the demand for larger industrial and logistics warehousing units and cannot meet short term demand for employment floorspace due to reliance on delivery of Carrington Relief Road (CRR). Further consideration should be given to the allocation of additional employment land.	<p>The PfE as a whole will meet the employment floorspace requirement - see Employment Topic Paper [05.01.04]. It is not necessary to identify additional employment land within PfE.</p> <p>The Carrington Relief Road scheme will support the New Carrington allocation - a consultation was held on route options in 2021 and a planning application is expected in 2023. Trafford Council continues to work with stakeholders to bring forward the Carrington Relief Road.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Morland Capital Partners No1 Ltd
JPA 33.28	Employment land which has planning approval should not be considered within the allocation.	<p>The overall employment floorspace figures for the allocation must include floorspace with planning approval so that the total amount of floorspace is accurately reflected and planned for.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Friends of Carrington Moss
JPA 33.29	Consider maximum safe level of air pollutants when determining location of employment.	<p>Policy JP-A 33, in relation to employment uses, requires the incorporation of appropriate air quality mitigation in relation to existing and new businesses, facilities and employment uses.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.30	Development would reduce rural job opportunities. Evidence needed on the impact on rural businesses.	The New Carrington allocation has been subject to the PfE Integrated Assessment [02.01.02], which considered the impact on different areas – including rural. Taking into consideration the range of evidence available, it is considered that on balance the impact upon the rural economy and businesses is justified and proportionate to meet the overall development and economic needs of GM and Trafford. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
JPA 33.31	Policy Criterion 5 on house types needs to ensure compatible uses are located adjacent to existing employment sites (e.g. not noise sensitive uses).	Policy JP-A 33, in relation to employment uses, requires the incorporation of appropriate noise and air quality mitigation in relation to existing and new businesses, facilities and employment uses. Further information is in JPA33 New Carrington Allocation Topic Paper [10.09.07]. Noise assessments will be required to be submitted as part of the planning application process. The assessment should consider the nature and extent of noise (and vibration if applicable) generated by the proposed development and its impact(s) upon existing noise sensitive uses and receptors. The Plan as proposed is therefore considered sound and no change is necessary.	Air Products
JPA 33.32	The area designated for employment use could be further maximised to accommodate additional employment land, such as land at Manchester Road which could meet the shortfall identified in the B8 supply	Enough land has been identified to meet the employment land needs and it has been distributed in line with the spatial strategy. Insufficient evidence exists to demonstrate that additional deliverable land exists within the wider area of Carrington. The Plan as proposed is therefore considered sound and no change is necessary.	Peel Land and Property Group Management Limited
	Green Belt		
JPA 33.33	Significant objection to the loss of Green Belt land, other land should be developed instead.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt	Daniel McCann Dennis Latham CPRE Roy Chapman

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04], the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03]. The need to deliver the long-term positive outcomes of the Greater Manchester Strategy is considered to amount to exceptional circumstances which justify altering the boundaries of the Green Belt. The case for exceptional circumstances is explained further in the Green Belt Topic Paper and Case for Exceptional Circumstances (July 2021) [07.01.25]. The Plan as proposed is therefore considered sound and no change is necessary.</p>	<p>Friends of Carrington Moss Susan Theodossiadis Gareth Rennie Paul Roebuck Hannah Nightingale Thomas Shrubsole Grenville Jones</p>
JPA 33.34	<p>The proposed loss of green space will have a negative impact on health and wellbeing.</p>	<p>Policy JP-A 33 requires development to provide significant areas of open and accessible green space throughout the allocation as part of the wider strategic green infrastructure network. The policy also requires improvements to the land which will remain in the Green Belt – see GM Green Belt Study-Beneficial Use-Appendix I Trafford [07.01.20] Policies JP-G 6 and JP P- 7 state that a network of high quality and accessible green spaces, sports and recreation facilities will be protected and enhanced across GM. More detailed policies on green spaces for specific areas will be set out in District Local Plans. The Plan as proposed is therefore considered sound and no change is necessary.</p>	<p>Friends of Carrington Moss Susan Theodossiadis</p>
JPA 33.35	<p>Land at Warburton should revert back to Green Belt.</p>	<p>The land at Warburton Lane is currently identified as Other Protected Open Land (safeguarded for future development) in Policy R4.7 of the Trafford Core Strategy 2012 and has never been designated as Green Belt. The PfE removes the protected open land designation and proposes it for development within the New Carrington allocation. This land is sequentially preferable to land which is currently Green Belt and it has therefore been identified for development. See Site Selection Background Paper [03.04.01] and the New Carrington Masterplan [10.09.06]. The Plan as proposed is therefore considered sound and no change is necessary.</p>	<p>Lorraine Eagling Edward Beckmann Friends of Carrington Moss</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.36	Remaining Green Belt corridor will not all be accessible and habitats will be impacted by pollution.	Policy JP-A 33 requires development to provide significant areas of open and accessible green space throughout the allocation as part of the wider strategic green infrastructure network. The policy also requires development to protect and enhance natural environment assets and deliver a net gain in biodiversity. In addition the policies in Chapter 8 'Greener Places' will also apply to the New Carrington allocation. The plan should be read as a whole. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
JPA 33.37	Revise Green Belt harm assessment to include harm by new roads and losses to heritage, rural economy, natural capital and biodiversity.	The GM Green Belt study has been prepared using a robust methodology – see GM Green Belt Assessment [07.01.04] and Green Belt Study – assessment of proposed 2020 GMSF Allocations [07.01.10] which concluded that the released of the New Carrington site for development was acceptable. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
JPA 33.38	Support for removal of land from Green Belt. A significant part of site is previously developed land and is in highly accessible location. Allocation will provide compensatory improvements to the Green Belt. There are no alternative sites that could be released that make a lower level of contribution to the Green Belt purposes, whilst also achieving the significant benefits of the site.	Comment noted	HIMOR Carrington Ltd
JPA 33.39	Based on the 2020 updates to the Greater Manchester Green Belt Assessment, consider that the overall contribution that the parcels make to the Green Belt purposes have been over-stated due to a number of flaws in the assessment.	The PfE Green Belt Assessment [07.01.04] and Green Belt Study – assessment of proposed 2020 GMSF Allocations [07.01.10] , including the 2020 update, are considered to be robust and in accordance with the assessment methodology. The Plan as proposed is therefore considered sound and no change is necessary.	HIMOR Carrington Ltd
	Changes to Green Belt boundaries:		
JPA 33.40	The Green Belt boundaries proposed for New Carrington do not accord with the evidence base and would retain land with the Green Belt which is unnecessary to keep permanently open. There are clear alternative boundaries	The New Carrington Green Belt boundaries have been informed by a range of evidence, including the GM Green Belt Assessment [07.01.04] and Green Belt Study – assessment of proposed 2020 GMSF Allocations	HIMOR Carrington Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>available for the Green Belt based upon physical features that are readily recognizable, likely to be permanent and which better utilise existing Green Infrastructure assets that relate to the site-specific landscape character conditions on site.</p> <p>HIMOR considers the allocation and Green Belt should be amended through the extension of CE3A and addition of CE3B, extension to PR4D, extension to SR2A, extension to SR2B, and the re-alignment of SR2A and SR2D (western boundary) of the Carrington Masterplan (see HIMOR representation for plans showing parcel reference numbers).</p>	<p>[07.01.10]. The boundaries identified follow, where possible, existing physical features to ensure they are defensible in the long term.</p> <p>See JPA33 New Carrington Allocation Topic Paper [10.09.07].</p> <p>Trafford has identified sufficient land to meet the housing and employment requirements set out in PfE over the plan period using sites in the existing urban area and the allocations, it is therefore not necessary to identify additional land. See Housing Topic Paper [06.01.03] and the Employment Land Topic Paper [05.01.04].</p> <p>Expansion of the proposed allocation is consequently neither necessary nor justified.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	
JPA 33.41	<p>Remove additional land within the New Carrington allocation from the Green Belt for development. Specific sites have been put forward for development which are currently proposed to stay in the Green Belt.</p>	<p>No change required. The alternative sites/land suggested, although within the New Carrington allocation boundary, have been excluded from the development parcels. This is land which should remain open and it is therefore not proposed for development.</p> <p>The PfE Green Belt Assessment [07.01.04] and Green Belt Study – assessment of proposed 2020 GMSF Allocations [07.01.10], as well as the New Carrington Masterplan [10.09.06] have informed the development parcels identified within the New Carrington allocation. Sufficient land has been identified across Trafford to meet the PfE housing requirement and therefore no additional land is required.</p> <p>See Green Belt Topic Paper [07.01.25] and JPA33 New Carrington Allocation Topic Paper [10.09.07] section Green Belt Assessment which justifies the proposed Green Belt boundaries for the allocation.</p> <p>Expansion of the proposed allocation is consequently neither necessary nor justified.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	<p>Craig Wilkinson United Utilities Property Services HIMOR Carrington Ltd</p>
JPA 33.42	<p>United Utilities development land could deliver circa 420 dwellings. It performs better than other parts in Green Belt terms and there is no basis for limiting the extent of the allocation of United Utilities land on the basis of preventing</p>	<p>Trafford has identified sufficient land to meet the housing and employment requirements set out in PfE over the plan period using sites in the existing urban area and the allocations. It is therefore not necessary to identify</p>	<p>United Utilities Property Services</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	coalescence of settlements. Allocation should extend to the west beyond the pylons and the wastewater treatment works form strong boundary.	<p>additional land. See Housing Topic Paper [06.01.03] and the Employment Land Topic Paper [05.01.04].</p> <p>In addition, the New Carrington Green Belt boundaries have been informed by both the GM Green Belt Assessment [07.01.04] and Green Belt Study – assessment of proposed 2020 GMSF Allocations [07.01.10]. The boundaries identified follow, where possible, existing physical features to ensure they are defensible in the long term. See also JPA33 New Carrington Allocation Topic Paper [10.09.07].</p> <p>Expansion of the proposed allocation is consequently neither necessary nor justified.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	
JPA 33.43	Disagrees with criterion 25 of the Green Belt policy. As this allocation removes land from the Green Belt and therefore Green Belt should not be re-instated. Criterion 25 should be removed.	<p>Criterion 25 of Policy JP-A 33 is referring to Green Belt land that is proposed to be retained within the New Carrington allocation boundary. The criterion is not referring to re-instating Green Belt.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Redrow Homes Ltd
	Brownfield		
JPA 33.44	Support for brownfield development within the New Carrington allocation.	Support noted.	Paul Roebuck
JPA 33.45	Housing should be delivered on the brownfield land only, this would negate the need for Green Belt release.	<p>The PfE sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs (see JP-S 1 'Sustainable Development'). Much of the brownfield land at Carrington is restricted by HSE COMAH zones and residential uses would not be appropriate in these areas (see JPA33 New Carrington Allocation Topic Paper [10.09.07], section 13.3 Hazardous Installations).</p> <p>Given the above and the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Dennis Latham Susan Theodossiadis Gareth Rennie Deborah Rhodes Alan Meredith

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.46	Balance must be struck between delivering development that improves housing provision within key areas and enabling brownfield and regeneration sites to come forward, where onerous abnormal costs exist, or land values are limited.	Both the PfE plan as a whole and the proposed New Carrington allocation strike this balance by proposing significant development on brownfield land. The New Carrington allocation includes a significant area of brownfield land which is allocated for employment uses. The Plan as proposed is therefore considered sound and no change is necessary.	Greater Manchester Housing Providers
JPA 33.47	References to the regeneration of brownfield sites are incorrect as these brownfield sites already have planning approval.	Sites with planning permission have been included in the housing and employment land supply – see Housing Topic Paper [06.01.03] and Employment Topic Paper [05.01.04] . Some of the brownfield land at New Carrington has planning permission, such as the Carrington Village development, however much of the brownfield land does not have planning permission and is proposed for employment uses in PfE. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
	Transport – Highways		
JPA 33.48	Significant concern about existing congestion issues on the road network and the likely impact of increased traffic from the development.	Policy JP-A 33 states that development will need to be supported by major investment in transport infrastructure. This includes the strategic Carrington Relief Road link which will ease congestion on the existing A6144, as well as various junction upgrades on the surrounding road network. Further detail is in the New Carrington Transport Locality Assessment [09.01.15] and [09.01.27] and JP-A 33 New Carrington Allocation Topic Paper [10.09.07] . In addition, the Local Authorities and Transport for Greater Manchester (TfGM) have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and the GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss Gareth Rennie Paul Roebuck Hannah Nightingale Alan Meredith

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.49	Significant concern about the proposed Carrington Relief Road and the lack of consultation on this proposal.	The Carrington Relief Road is a longstanding proposal for the Carrington area, which has been identified in previous Trafford Local Plan documents, including the Core Strategy 2012. The route is identified as an infrastructure requirement in Policy JP-A 33 New Carrington and the New Carrington Locality Assessment [09.01.15] and [09.01.27] . Although outside of PfE, a consultation was held on route options in 2021 and a planning application is expected in 2023. The Plan as proposed is therefore considered sound and no change is necessary.	Daniel McCann Roy Chapman Friends of Carrington Moss William Bowdren Hannah Nightingale CPRE
JPA 33.50	Alternatives to the Carrington Relief Road have not been explored including a bridge over the Manchester Ship Canal or a wharf, and use of new rail links. New roads will fracture the area and make it inaccessible.	The New Carrington Locality Assessment [09.01.15] / [09.01.27] assesses the transport infrastructure requirements to support the allocation – including highways, public transport and active travel. A range of transport measures are proposed and the design of these schemes will need to be integrated with the development proposals to ensure the area is accessible. The Carrington Relief Road is a longstanding proposal for the Carrington area and is needed to support development which is coming forward now. Whilst the role that a future bridge could play in improving accessibility is recognised – the progression of a bridge (which is a very significant infrastructure project) will require very extensive feasibility and planning work. Accordingly this is not considered to be an alternative to progressing the Carrington Relief Road. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
JPA 33.51	The delivery of the Carrington Relief Road (CRR) would bring about a range of wider benefits, not just to Carrington, and the allocation is a mechanism by which the CRR will be delivered.	Support noted.	HIMOR Carrington Ltd
JPA 33.52	Not sufficient evidence to confirm proposed highway network improvements to mitigate increased vehicle numbers are what is required. The transport evidence does not identify in sufficient detail, the nature, scale and timing of the infrastructure requirements at the SRN; or what future assessments and studies that will be required to determine any such infrastructure requirements. Likely significant traffic impact on individual and	The Transport Locality Assessments – for New Carrington [09.01.15] and [09.01.27] provide detailed information on the nature, scale and timing of infrastructure requirements on the SRN. With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than	National Highways

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	cumulative basis on the SRN, particularly M60 J8 and the M60 south-west corridor.	<p>indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and Transport for Greater Manchester (TfGM) have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02]. We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	
JPA 33.53	The baseline assessment in the New Carrington Locality Assessment should exclude the Carrington Relief Road.	<p>The Carrington Relief Road is needed to support both the development identified in Policy SL5 in the Trafford Core Strategy 2012, which is already coming forward, as well as the additional PfE development at New Carrington. The road has therefore been included in the ‘reference’ case for the New Carrington Locality Assessment [09.01.15] and [09.01.27].</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	HIMOR Carrington Ltd
JPA 33.54	Some support for new link roads to relieve existing congestion.	Support noted.	William Bowdren
JPA 33.55	Broadly support the approach to transport set out between criteria 14 and 20. The surrounding road network can accommodate the delivery of United Utilities’ development land in its entirety off the existing access.	<p>Support noted.</p> <p>A detailed Transport Assessment will be required for all development areas within the New Carrington allocation to establish what transport infrastructure will be required to support the development.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	United Utilities Property Services

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.56	Many respondents noted the limited information about the transport infrastructure needed to deliver the New Carrington site. More information needed on traffic calculations. Additional traffic has been underestimated. No consideration of traffic from outside the area. Unclear whether employment traffic numbers include HGVs and how numbers have been calculated.	It is considered that a proportionate evidence base has been provided to support the policy, it can be found here: Existing Land Supply Technical Note and addendum [09.01.05 / 09.01.06] New Carrington Locality Assessment [09.01.15] / [09.01.27] . New Carrington Allocation Topic Paper [10.09.06] Policy JP-A 33 includes a number of requirements in relation to transport infrastructure delivery – see policy criteria 14-20. In addition, the reports state that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The Plan as proposed is therefore considered sound and no change is necessary.	Roy Chapman Friends of Carrington Moss Vicky Harper
JPA 33.57	Need to understand the impact the New Carrington development will have on the M60, Junction 8	The impact of the New Carrington allocation on the surrounding road network, including M60 J8, is set out in the New Carrington Locality Assessment [09.01.15] / [09.01.27] . The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
JPA 33.58	Considers it inappropriate to provide a list of mitigation measures for improvements to the Strategic Primary and Local Road Networks as these have been established using a high-level strategic traffic model.	The transport mitigation measures identified in JP-A 33 are the key improvements which will be required to support the allocation, but the list is not exhaustive. Further more detailed Transport Assessments will identify further measures which are needed. The schemes were identified in the New Carrington Locality Assessment [09.01.15] / [09.01.27] . The Plan as proposed is therefore considered sound and no change is necessary.	Redrow Homes Ltd HIMOR Carrington Ltd
JPA 33.59	Disagree with wording of policy that all new developments will have a significant role to play in delivering a sustainable and integrated transport network. Each development should be assessed on a case by case basis and the cost of transport infrastructure should be borne by the parcels in which they are required to support. Alternative wording has been provided.	Policy JP-A 33 states that development will be phased alongside the delivery of infrastructure. It is essential that on a large site, like New Carrington, where significant infrastructure is required that all development parcels make a proportionate contribution to infrastructure delivery (see Row JPA 33.3). The policy therefore requires an ‘equalisation mechanism’	Redrow Homes Ltd United Utilities Property Services

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		<p>which will be set out in the future masterplan/SPD. See New Carrington Topic Paper [10.09.06].</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	
JPA 33.60	The policy should be re-worded to ensure development can come forward before the implementation of the Carrington Relief Road, it is not reliant upon it and is not required to pay a financial contribution. Alternative wording has been provided.	<p>The Carrington Relief Road is a longstanding proposal for the Carrington area, which has been identified in previous Trafford Local Plan documents, including the Core Strategy 2012.</p> <p>The Carrington Relief Road is identified as an infrastructure requirement in Policy JP-A 33 New Carrington and the New Carrington Locality Assessment [09.01.15] and [09.01.27].</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Redrow Homes Ltd
JPA 33.61	A higher quantum of development promoted by HIMOR could be accommodated on the local highways network.	<p>The New Carrington Locality Assessment [09.01.15] / [09.01.27] has tested the development quantum set out in Policy JP-A 33 and identified the high level transport interventions required to support the development. A higher quantum of development is not needed and as such is not proposed. It has therefore not been tested in the transport evidence. As stated in Row JPA 33.9 it is not necessary to increase the quantum of development at New Carrington.</p> <p>Expansion of the proposed allocation to deliver a higher quantum of development is consequently neither necessary nor justified.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	HIMOR Carrington Ltd
	Public Transport		
JPA 33.62	Existing public transport and highway network is limited and the cost of many services is prohibitive to current residents using the network.	<p>The delivery of new and improved public transport and active travel infrastructure is integral to the success of the New Carrington allocation enabling modal shift from car travel to sustainable travel modes. Various transport interventions have been identified in the New Carrington Locality Assessment [09.01.15] / [09.01.27] which will need to be delivered alongside the development.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is</p>	<p>Friends of Carrington Moss Gareth Rennie Paul Roebuck Lorraine Eagling</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . The Plan as proposed is therefore considered sound and no change is necessary.	
JPA 33.63	Support for improved public transport infrastructure and cycling and walking routes.	Comment noted.	Roy Chapman
	HS2:		
JPA 33.64	Safeguarded areas for HS2 should be reflected in policy wording and associated maps. Reference the proximity of the proposed HS2 viaduct over the Manchester Ship Canal. The vertical alignment of the viaduct will likely constrain the proximity of some elements of the housing proposed.	The proposed HS2 Golborne Link has been taken into account in the New Carrington Masterplan [10.09.06] and the safeguarded area has been excluded from the development parcel. The representation of the HS2 route in Policy JP-A 33 reflects the status of the proposal at the PfE Regulation 19 stage. The Plan as proposed is therefore considered sound and no change is necessary.	High Speed Two
	Active Travel:		
JPA 33.65	Utilise the route of the disused Partington railway line and the former north-south railway line and sidings through the site as a strategic sustainable transport corridor.	Policy JP-A 33 requires the delivery of a network of cycling and walking routes across the site and the former north-south railway line could form part of this network. This will be explored as part of future Masterplanning. The Plan as proposed is therefore considered sound and no change is necessary.	Burford Carrington Limited
JPA 33.66	Policy does not include connectivity to the Trans Pennine Trail or improvements to the existing route.	Policy JP-A 33 criterion 15 states that development will be required to deliver a network of safe cycling and walking routes and improve the Trans Pennine Trail. The Plan as proposed is therefore considered sound and no change is necessary.	Trans Pennine Trail
JPA 33.67	Active travel routes next to Carrington Relief Road will be unhealthy and dangerous.	New active travel routes will be developed in line with best practice and national guidance. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.68	Policy refers to Carrington Greenway, but in other documents referred to as Trafford Greenway. The Carrington Greenway is not necessary to make the development acceptable in planning terms and should be deleted. There would be alternative options available that provide better, more direct linkages between key destinations.	The Trafford / Carrington Greenway has been identified in various documents, including the New Carrington Masterplan [10.09.06] . The route will provide an important east/west link through the site and also a link to Irlam in Salford – crossing the Ship Canal, a key movement barrier. The route is also identified in the GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . The Plan as proposed is therefore considered sound and no change is necessary.	HIMOR Carrington Ltd
	Freight		
JPA 33.69	No plans for sustainable freight set out in the document.	Sustainable freight is supported within other policies of the PfE, such as Policy JP-C 6 Freight and Logistics. The plan should be read as a whole. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
JPA 33.70	No proposals connected to proximity of Port Salford even though Port Salford is used to justify the allocation.	The New Carrington site meets a number of the PfE Site Selection criteria – one of which relates to the strategic Port Salford area. The site meets criteria 1, 2, 3, 5, 6 and 7 of the PfE Site Selection methodology (see Site Selection Background Paper [03.04.01] . Policy JP-Strat 4 and Policy JP-A 29 Port Salford Extension relate specifically to Port Salford. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
	Physical Infrastructure and utilities		
JPA 33.71	The avoidance of any adverse impact on the strategically important electricity network is critical.	Impact on the strategically important electricity network will be considered further as part of the more detailed masterplanning stage. Appropriate easements will also need to be considered as part of any future planning applications. Details can be found on section 14 (Other constraints) of the JPA33 New Carrington Allocation Topic Paper [10.09.07] . The Plan as proposed is therefore considered sound and no change is necessary.	Lorraine Eagling S Edwards
JPA 33.72	Any new development will need to take account of the effect on existing water supply and wastewater infrastructure including wastewater treatment works. Additionally, housing standards for water consumption. Infrastructure relating	Water efficiency measures in new developments will be a matter for district Local Plans to determine. This approach is considered consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning	United Utilities Group PLC

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	to water should be addressed in the evidence base, of which there is none currently. Alternative wording has been provided.	authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development'. The Plan as proposed is therefore considered sound and no change is necessary.	
JPA 33.73	There should be a comprehensive site wide foul and surface water drainage strategy. This would identify the needs of different phases and interrelationships between them.	Policy JP-A 33 has detail in relation to foul and surface water management requirements. A site-wide foul and surface water strategy, incorporating Sustainable Drainage Systems (SuDS) and flood alleviation measures is required for the site. See New Carrington Allocation Topic Paper [10.09.07] , Section 13. The Plan as proposed is therefore considered sound and no change is necessary.	United Utilities Group PLC United Utilities Property Services
JPA 33.74	The utilities, environmental protection and climate policies (45, 46, 47 and 48) duplicate other policies within the plan.	New Carrington is a strategically important allocation for Greater Manchester, and is a significant opportunity to deliver a site for substantial housing and employment development. Given the scale of the development proposed, it is important the key policy principles including utilities, environmental protection and climate change are embedded within the allocation policy. The plan should be read a whole. The Plan as proposed is therefore considered sound and no change is necessary.	HIMOR Carrington Ltd
	Social Infrastructure - Health		
JPA 33.75	Concern that health care facilities in the area are already overstretched and that new provision would be required to support the development	Policy JP-A 33 requires development to support new and improved health facilities for the community. In line with Policies, JP-G6, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including, where appropriate, medical facilities. See New Carrington Allocation Topic Paper [10.09.07] Section 25 (Health). The Plan as proposed is therefore considered sound and no change is necessary.	CPRE Hannah Nightingale Friends of Carrington Moss
JPA 33.76	The policy needs to be sufficiently flexible to allow for the eventuality that there is no requirement for any new or extended health facilities to be provided for parts of the allocation. Alternative wording has been provided.	Having regard to relevant evidence, Policy JP-A 33 requires development to support new and improved health facilities for the community. See New Carrington Allocation Topic Paper [10.09.07] , Section 25 (Health).	HIMOR Carrington Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Development across the New Carrington site will be expected to contribute to the provision of infrastructure, including health facilities. The policy therefore requires an 'equalisation mechanism' which will be set out in the future masterplan/SPD. The Plan as proposed is therefore considered sound and no change is necessary.	
	Social Infrastructure - Schools		
JPA 33.77	Many schools are already oversubscribed and development will bring additional pressure on them. There will not be a sufficient number of school places for new housing in the allocation. More information is required.	Policy JP-A 33 requires development to provide and contribute towards the provision of new school places. This reflects Policies, JP-G6, JP-P1 and JP- D2 which state that new development must be supported by the necessary infrastructure, including where appropriate schools. See New Carrington Allocation Topic Paper [10.09.07], Section 24 (Education). The Plan as proposed is therefore considered sound and no change is necessary.	CPRE Deborah Rhodes Hannah Nightingale Lorraine Eagling Friends of Carrington Moss
JPA 33.78	School at Carrington Spur will suffer air and noise pollution.	Development will incorporate appropriate air quality and noise mitigations particularly along major transport corridors and a full air quality and noise assessments will need to be submitted as part of the planning application process. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
JPA 33.79	Criteria 23 and 24 around schools and health should be amended to reflect just housing development and not employment.	Policies JP-P 5 and JP-P 6 are clear that school and health provision are linked to residential development and therefore no change is needed. The plan should be read as a whole. The Plan is therefore considered sound.	Peel Land and Property Group Management Limited
JPA 33.80	Contributions to school and healthcare services should only be required if it can be evidenced that it is necessary to support the delivery of the development land.	Having regard to relevant evidence, Policy JP-A 33 requires development to provide and contribute towards the provision of new school places. See New Carrington Allocation Topic Paper [10.09.07], Section 24 (Education). Development across the New Carrington site will be expected to contribute to the provision of infrastructure, including school places. The Plan as proposed is therefore considered sound and no change is necessary.	United Utilities Property Services

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.81	Criteria for developer contributions towards education provision and healthcare facilities must include reference to viability to be consistent with NPPF and PPG policy. Alternative wording has been provided.	A strategic viability assessment, [see 03.01.01 – 03.01.04 .] has been published alongside the PfE Plan. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The Plan as proposed is therefore considered sound and no change is necessary.	Redrow Homes Ltd
	Community facilities		
JPA 33.82	No mention of the need for new public houses in the policy.	Policy JP-A 33 refers to the provision of community facilities as part of the allocation which includes public houses. The Plan as proposed is therefore considered sound and no change is necessary.	Trafford & Hulme CAMRA
JPA 33.83	Broadly support the approach to delivering new community facilities.	Comment noted.	United Utilities Property Services
JPA 33.84	There should be no requirement for a new neighbourhood centre at Sale West.	The new neighbourhood centre at Sale West will provide an important hub for community services and facilities. It will enhance the overall regeneration benefits of the scheme, integrating with the existing community. See New Carrington Allocation Topic Paper 10.09.07 , Section 28 (Indicative Masterplanning, para. 28.4). The Plan as proposed is therefore considered sound and no change is necessary.	United Utilities Property Services
JPA 33.85	New local centre at East Partington will damage existing shops.	The additional development within the New Carrington allocation will support a new local centre in the Partington East area, without impacting the existing Partington local centre. The new local centre at Partington East will act as an attractive, mixed use community hub for the whole development, as well as existing communities. See New Carrington Allocation Topic Paper (10.09.07), Section 28 (Indicative Masterplanning, para. 28.4). The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.86	Do not object to a new local centre being provided. However, the specific quantum of retail floorspace (2,500 sqm) should be deleted given the proximity to the existing Partington Centre.	The additional development within the New Carrington allocation will support a new local centre in the Partington East area, without impacting the existing Partington local centre. Providing a new local centre with convenience shopping facilities and services in the region of 2,500 sqm of retail floorspace, within the East Partington development area, will provide a scale to serve the needs of the new community and improve the sustainability of the wider Partington and Carrington area. The size of the centre provided in Policy JP-A 33 is approximate – no change is required. See New Carrington Allocation Topic Paper [10.09.07], Section 28 (Indicative Masterplanning, para. 28.4). The Plan as proposed is therefore considered sound and no change is necessary.	HIMOR Carrington Ltd
	Environment		
JPA 33.87	Significant concern about the loss of wildlife habitats.	The New Carrington allocation comprises a range of different habitats and neither the SSSI nor the SBIs are within the proposed development parcels. Development which impacts protected sites should be avoided and any impacts which do occur will need to be suitably mitigated. The areas of designated ancient woodland as well as wildlife corridors will be retained and enhanced. Policy JP-A 33 requires development to protect and enhance natural environment assets and to deliver a net gain in biodiversity. In addition, Policies in the 'Greener Places' chapter include various requirements relating to the Green Infrastructure network and biodiversity net-gain. Further detailed ecological assessments will also be required to support future planning applications. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07] section 19 Ecological/Biodiversity Assessment. The Plan as proposed is therefore considered sound and no change is necessary.	Grenville Jones Daniel McCann Dennis Latham CPRE The Wildlife Trusts Friends of Carrington Moss William Bowdren Deborah Rhodes Edward Beckmann Alan Meredith Thomas Shrubsole Vicky Harper Greater Manchester Bird Recording Group
JPA 33.88	Retain, create and enhance wildlife corridors and steppingstone habitats within the development areas.	Comment noted.	Burford Carrington Limited
JPA 33.89	Support that environmental assets will be protected.	Comment noted.	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.90	Many of the birds which breed and winter on this area of Carrington Moss, including Grey Partridge, Lapwing, Linnet, Skylark, Willow Tit and Yellowhammer, are Species of Principal Importance under the Natural Environment and Rural Communities Act 2006.	The New Carrington allocation was subject to the PfE Integrated Assessment and the JP-A 33 policy mitigations in relation to biodiversity were scored positively. There are a number of wildlife corridors within and adjacent to the allocation, including the River Mersey, Manchester Ship Canal, Sinderland Brook and the disused railway line. These corridors will be retained and enhanced, and new corridors identified alongside the development. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07], Section 19 Ecological/Biodiversity Assessment. The Plan as proposed is therefore considered sound and no change is necessary.	Greater Manchester Bird Recording Group
JPA 33.91	Wetland at Carrington Moss SBI should be extended on to the agricultural land to the south and the whole area should be managed as a nature reserve.	The SBI designation process is not determined through the PfE process. The Greater Manchester Ecology Unit identifies, surveys and designates Sites of Biological Importance in Greater Manchester. The Wetland and Carrington Moss SBI designation reflects the evidence base. The Plan as proposed is therefore considered sound and no change is necessary.	Greater Manchester Bird Recording Group
JPA 33.92	Development could undermine the viability of the Great Manchester Wetlands Nature Recovery network. An alternative site in an area of low ecological value should be found.	The New Carrington site has been identified through the PfE Site Selection [03.04.01] process and will make an important contribution to meeting the overall Trafford housing target. Policy JP-A 33, as well as other PfE policies, will ensure that impact on the Great Manchester Wetlands Nature Improvement Area (NIA) is minimised. Significant areas within the New Carrington allocation will remain open and their biodiversity value will be improved, Policy JP-A 33 criterion 33 supports the creation of wetland areas within the site. The site is also identified in Policy JP-G 2 as a Green Infrastructure Opportunity Area. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07], Section 19 Ecological/Biodiversity Assessment. The Plan as proposed is therefore considered sound and no change is necessary.	Greater Manchester Bird Recording Group

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.93	Much of the former refinery land is Priority Habitat, Open Mosaic habitat and Habitat of Principal Importance for Conservation in England. This area should be considered for SBI designation and excluded from the allocation.	<p>Policy JP-A 33 requires development to protect and enhance natural environmental assets and the site will be required to deliver a net gain in biodiversity. Detailed ecological surveys will also be required to support future planning applications on the site.</p> <p>See JP-A 33 New Carrington Allocation Topic Paper [10.09.07] Section 19 Ecological/Biodiversity Assessment.</p> <p>The New Carrington Masterplan [10.09.06] reflects the latest information in relation to designated sites.</p> <p>The SBI designation process is not determined through the PfE process. The Greater Manchester Ecology Unit identifies, surveys and designates Sites of Biological Importance in Greater Manchester.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	CPRE The Wildlife Trusts
JPA 33.94	Exclude the eight SBIs and potential priority habitats from the allocation.	<p>The New Carrington allocation comprises a range of different habitats, however the designated SBIs have been excluded from the indicative development parcels identified in the New Carrington Masterplan [10.09.06], therefore no change is required. Development which impacts protected sites should be avoided and any impacts which do occur will need to be suitably mitigated. Policy JP-A 33 requires development to protect and enhance natural environment assets and to deliver a net gain in biodiversity. Further detailed ecological assessments will be required to support future planning applications. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07] section 19 Ecological/Biodiversity Assessment.</p> <p>Specific policy relating to SBIs is also set out at a district level in the Local Plan.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	The Wildlife Trusts
JPA 33.95	Development could result in significant deterioration of two areas of ancient woodland.	The areas of designated ancient woodland within the allocation are not within the indicative development parcels and they will be retained and enhanced. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07] section 19 Ecological/Biodiversity Assessment.	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The Plan as proposed is therefore considered sound and no change is necessary.	
JPA 33.96	Securing biodiversity net gain of 10% may not be possible due to the current high value of the site, particularly depending on the extent of the remaining peat deposits.	The New Carrington allocation includes significant areas of green infrastructure within the allocation boundary, including areas of land retained in the Green Belt. There is therefore significant scope to achieve biodiversity net gain within the site. Policy JP-G1 identifies New Carrington as a green infrastructure opportunity area, which has particular potential for delivering improvements to the green infrastructure network. The Plan as proposed is therefore considered sound and no change is necessary.	The Wildlife Trusts
JPA 33.97	Measures will be required to avoid and mitigate the impacts on important species.	Policy JP-A 33 requires development to protect and enhance natural environment assets and to deliver a net gain in biodiversity. Further detailed ecological assessments will be required to support future planning applications. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07] section 19 Ecological/Biodiversity Assessment. The Plan as proposed is therefore considered sound and no change is necessary.	The Wildlife Trusts
JPA 33.98	Broadly support the general approach to protecting and enhancing the natural environment.	Comment noted.	United Utilities Property Services
JPA 33.99	Development land has few ecological assets. Limit requirement for HRA to areas subject to undue ecological constraints.	Policy JP-A 33 requires a project specific Habitats Regulation Assessment for all development proposals of over 50 units / 1,000sqm floorspace, as the site has the potential to result in increased traffic on the M62 motorway by 2040. Whilst it is recognised that New Carrington does not have direct connectivity to the M62 a precautionary approach has been taken considering the scale of this allocation. The M62 passes close to designated European sites known to be susceptible to traffic pollution. The HRA supporting PfE has been prepared in line with regulations. The Plan as proposed is therefore considered sound and no change is necessary.	United Utilities Property Services Redrow Homes Ltd
JPA 33.100	Having regard to the overall mitigation package across HIMOR's landholdings at Carrington, a 10% biodiversity net gain can comfortably be achieved across	Comment noted.	HIMOR Carrington Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	the site with the development of the additional parcels, through retention and enhancement of other important ecological assets and the creation of new habitats.		
JPA 33.101	The criteria around Biodiversity Net Gain should take into consideration each site's physical and natural features and assess each site on a case by case basis allowing for offsite mitigation if required. BNG also places additional financial burdens on developments which needs to be acknowledged as part of a viability review. Alternative wording has been provided.	Biodiversity Net Gain is a statutory national requirement set out in the Environment Act 2021. The PfE Strategic Viability Assessment [03.03.01] took account of the costs associated with biodiversity net gain (see para 11, pg 4). In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The Plan as proposed is therefore considered sound and no change is necessary.	Redrow Homes Ltd
JPA 33.102	Criteria 34 on BNG is already a requirement of Policy JP-G 9 and so should be removed.	The allocation will be required to deliver a clear and measurable net gain in biodiversity. Appropriate assessment will be carried out through the planning application process. Details can be found on section 19 (Ecological/Biodiversity Assessment, para. 19.8) of the JPA33 New Carrington Allocation Topic Paper [10.09.07]. Biodiversity net gain is also a requirement of Policy JP-G9 and the allocation policy is consistent with this. The plan should be read as a whole. The Plan as proposed is therefore considered sound and no change is necessary.	Peel Land and Property Group Management Limited
JPA 33.103	Significant objection to the loss of mossland, respondents considered that this should be retained for its biodiversity value and as a carbon store. The exact area of peat that remains needs to be established to understand the potential impacts on the climate.	The proposed New Carrington allocation will provide family and affordable homes in a strategically important location which could deliver significant regeneration benefits to the area. The harmful impacts of this development are considered to be offset by the provision of a significant area of green space within the allocation – this relates to both the Green Belt through the centre of the site, as well as the strategic green spaces at Sale West. Policy JP-A 33 (criterion 33) requires the restoration and creation of wetland areas within the site.	Grenville Jones Susan Sollazzi CPRE The Wildlife Trusts Woodford Neighbourhood Forum Friends of Carrington Moss Lorraine Eagling

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>Further work will be required to assess the depth and extent of any peat within the site, to ensure that the most valuable areas are retained as part of the wider green infrastructure strategy. The findings of this will then inform the detailed Masterplan.</p> <p>Trafford Council will continue to work with partners including the Lancashire Wildlife Trust and Natural England to look at opportunities at New Carrington in relation to the GM Wetlands Nature Improvement Area.</p> <p>Policy JP-G4 outlines the importance of mossland for their habitats and wider landscape. There is a strong emphasis in the Plan on their retention and improvement.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	<p>Edward Beckmann Alan Meredith Thomas Shrubsole Greater Manchester Bird Recording Group Steven Bowater Natural England</p>
	Green Infrastructure		
JPA 33.104	Concern about the loss of green infrastructure	<p>Policy JP-A 33 requires significant areas of open and accessible green space to be provided throughout the allocation, as well as the retention and enhancement of wildlife corridors and stepping stone habitats.</p> <p>The policies in Chapter 8 'Greener GM' will also apply to the New Carrington site, which include requirements relating to green infrastructure.</p> <p>The New Carrington Masterplan [10.09.06], Section 4.3 also sets out the location and extent of strategic open spaces proposed and helps to illustrate the contextual relationship between open space, development and the existing communities.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	<p>Daniel McCann Friends of Carrington Moss William Bowdren Vicky Harper</p>
JPA 33.105	Identification of significant Green Infrastructure within the development land is disproportionate and unjustified.	<p>Policy JP-A 33 identifies Strategic Green Spaces within the allocation – see PfE picture 11.48. These areas reflects the existing woodland and network of formal and informal footpaths through these areas. The areas identified will ensure a balance between new development, as well as the retention of existing green spaces.</p> <p>See Section 4.3 'Green Infrastructure' of the New Carrington Masterplan [10.09.06]. This sets out the indicative location and extent of the proposed</p>	<p>United Utilities Property Services</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>strategic green spaces and illustrates the contextual relationship between open space, development and existing communities.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	
JPA 33.106	<p>More green corridors should be shown within the development area which protect existing infrastructure and enhance the area. Green edges to the existing developed areas should be retained.</p> <p>The green areas shown in the New Carrington Masterplan should be shown on the New Carrington Policy Plan in PfE.</p>	<p>Policy JP-A 33 requires significant areas of open and accessible green space to be provided throughout the allocation, as well as the retention and enhancement of wildlife corridors and stepping stone habitats. It would be inappropriate to show all green infrastructure / green spaces on the PfE New Carrington Policy Map (Picture 11.48) as this is a high level plan. Further detail relating to green infrastructure will be required at the planning application stage.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	S Edwards
JPA 33.107	Broadly support the general approach to delivering green infrastructure.	Comment noted.	United Utilities Property Services
JPA 33.108	Allocation conflicts with JP-G2 as part of site is within PfE Green Infrastructure network.	<p>Policy JP-G2 identifies New Carrington as a Green Infrastructure Opportunity Area and it has the potential to deliver significant improvements to the green infrastructure network, This will be achieved alongside the development, noting the significant 'open' areas which will remain undeveloped within the New Carrington allocation. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07] Section 16 (Green Infrastructure).</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	The Wildlife Trusts
JPA 33.109	No indication of how the quality of the green infrastructure will be measured.	<p>Policy JP-A 33 alongside policies in Chapter 8 'Greener GM' sets the high level requirements in relation to green infrastructure. Further detail will be provided in the Trafford Local Plan, as well as at detailed planning application stage.</p> <p>Monitoring processes will relate to the Local Plan monitoring framework.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.110	Support that New Carrington has been identified as a Green Infrastructure Opportunity Area.	Comment noted.	Friends of Carrington Moss
JPA 33.111	Green Infrastructure area along the Manchester Ship Canal in the Masterplan is not appropriately justified – it should be employment use.	<p>Policy JP-A 33 seeks to protect and enhance the habitats and corridors along the Manchester Ship Canal which includes the land interest of Peel Land & Property. Including further detail would not be appropriate for a strategic plan and therefore no change is required.</p> <p>The New Carrington Masterplan shows an indicative green infrastructure corridor along the Manchester Ship Canal [10.09.06].</p> <p>The land adjacent to the Manchester Ship Canal is identified on the JP-A 33 Policy Plan (Picture 11.48) as ‘Local Plan’ and it will therefore be reviewed as part of the Local Plan process. The site is not currently in the Green Belt.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Peel Land and Property Group Management Limited
JPA 33.112	Give clear indication of how all aspects of development will be delivered including green infrastructure and ecosystem services.	<p>As set out in Policy JP-A 33 a more detailed development and infrastructure phasing plan will be required as part of the Masterplan / SPD. This will indicate how aspects of the development will be delivered including green infrastructure and ecosystem services.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Friends of Carrington Moss
	Open space		
JPA 33.113	More weight needs to be given to the impact of development on existing sport and recreation facilities.	<p>Policy JP-A 33 requires development to provide a range of types and sizes of open space in accordance with Trafford Council’s open space and outdoor sport policies. Any impact on existing sport and recreation facilities will be assessed as part of the Masterplan/ SPD and future planning applications. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07] section 17 (Recreation).</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Friends of Carrington Moss
JPA 33.114	Public open space and green infrastructure provision will be incorporated into residential development on the Warburton Lane site.	Comment noted.	Redrow Homes Ltd
	Landscape:		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.115	Concern about the landscape impact of the development. Much of the site is currently open countryside.	The New Carrington Masterplan [10.09.06] has identified a number of proposals for the protection and enhancement of landscape character in the allocation, taking into account the Greater Manchester Landscape Character and Sensitivity Assessment 2018. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07] , Section 18 Landscape. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss Edward Beckmann Lorraine Eagling
JPA 33.116	Support that local landscape character will be conserved and enhanced.	Comment noted.	Friends of Carrington Moss
JPA 33.117	Objects to the extent to which 'substantial' landscape buffers can be provided, consider that this is a matter for detailed design. Alternative wording has been provided.	Policy JP-A 33 requires appropriate landscape buffers across the site and a substantial landscape buffer along the southern boundary of the Warburton Lane development parcels, to mitigate the impact on the rural landscape to the south. The detail will be determined in the Masterplan/ SPD and/or through planning applications. See New Carrington Topic Paper [10.09.07] , Section 28.10 on the Warburton Lane Character Area. The Plan as proposed is therefore considered sound and no change is necessary.	Redrow Homes Ltd
JPA 33.118	More detail needed on how tree belts and the rides will be impacted.	Policy JP-A 33 requires development to retain important landscape features – including the rides and tree belts. The New Carrington Masterplan [10.09.06] identifies the rides and existing tree belts as key features which should be retained, where possible Further details will be set out in the future masterplan /SPD and as part of future planning applications. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
JPA 33.119	Object to references made to Warburton Deer Park in Criterion 38 on landscape character. Alternative wording has been provided.	The reference to Warburton Deer Park in the policy reflects the evidence base – see JPA33 Historic Environment Assessment [10.09.01] . Development is required to conserve and enhance local landscape character include the setting of Warburton Deer Park.	Redrow Homes Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The Plan as proposed is therefore considered sound and no change is necessary.	
	COMAH zones		
JPA 33.120	Negligent to increase numbers who might need to be evacuated from hazardous installations.	The HSE COMAH zones have been taken into account in the New Carrington Masterplan and this has informed the proposed uses and development quantum for these areas. Residential development has not been identified in areas where this would be an inappropriate use. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07] – section Hazardous Installations 13.3-13.5. The HSE has also been consulted on the New Carrington development site and will continue to be involved in future Masterplanning / planning applications. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
	Agricultural land		
JPA 33.121	Object to loss of agricultural land.	The PfE seeks to make the most efficient use of land and thereby minimise the amount of land outside of the existing urban area which is needed for development. Policy JP-G9, paragraph 8.53 recognises that while development would ordinarily be directed away from valuable soils, given the overall scale of development that needs to be accommodated, a limited amount of development on higher grade agricultural land is necessary. The plan should be read as a whole. The Plan as proposed is therefore considered sound and no change is necessary.	Daniel McCann William Bowdren
JPA 33.122	Significant impact on stabling and livery services.	Any impact on stabling and livery services will be considered as part of the Masterplan/ SPD and through specific planning applications. The exclusion of these areas from the development parcel areas will not impact on the delivery of the overall site. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
	Climate Change		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.123	Development shall add to global warming and it goes against the declaration of a climate emergency and aim to be carbon neutral. Further information is required on how development has been assessed to take this into account.	<p>The PfE Integrated Assessment (IA) document reviewed how the proposed allocations could impact upon the environment, economy, local communities, equality and public health against IA objectives and various mitigations / policy requirements have been included in Policy JP-A 33. See PfE Integrated Assessment [02.01.02].</p> <p>Trafford Council's Validation Planning Checklist June 2021 requires applications for major development to submit a Carbon Budget Statement outlining outline the measures to be implemented by developers to ensure the development proposed reduces gross CO2 emissions.</p> <p>Further assessments and evidence pertaining to climate change and new development will be set out in Trafford's Local Plan.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Grenville Jones Daniel McCann Mark Priestner Friends of Carrington Moss Paul Roebuck Michael Reeve Hannah Nightingale Woodford Neighbourhood Forum
JPA 33.124	Measures relating to renewable energy should be delivered subject to viability considerations.	<p>Policy JP-S 2 'Carbon and Energy' seeks to deliver a carbon neutral Greater Manchester no later than 2038 and the allocations will be expected to play a key role in this. The carbon neutral target will be achieved through a range of measures, including renewable energy,</p> <p>The proposed modification is not considered necessary. A strategic viability assessment, [03.01.01] has been published alongside the PfE Plan. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	United Utilities Property Services Redrow Homes Ltd
JPA 33.125	Broadly welcome the approach to utilities, environmental protection and climate change.	Comment noted.	United Utilities Property Services
JPA 33.126	HIMOR is fully committed to ensuring that the proposed development of New Carrington is a net zero development (or close to net-zero as is possible) and content for it to remain as part of the site-specific policy.	Comment noted.	HIMOR Carrington Ltd
JPA 33.127	The requirement to provide this infrastructure including electric vehicle charging points is not allowed for in the PfE site specific viability appraisal and	Allowing provision for electric vehicle charge points is a requirement of the NPPF (para 112) and this is also identified in JP-A 33. A strategic viability	Redrow Homes Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	it is thus not justified in evidence as being deliverable. Criteria 48 should be removed.	assessment, [03.01.01 – 03.01.04] has been published alongside the PfE Plan which has taken into account the cost of electric charge points. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The Plan as proposed is therefore considered sound and no change is necessary.	
	Air Quality		
JPA 33.128	Development, including the proposed new roads, will have a negative impact on air quality.	Policy JP-S 6 sets out a comprehensive range of measures to support improvements in air quality and any development at New Carrington will need to be in accordance with this policy. The Integrated Assessment [02.01.02] for the New Carrington site indicated that impacts on air quality could be mitigated through various measures, including minimising the number of trips by private car, provision of green infrastructure and incentivising electric vehicles – these have been taken into account in Policy JP-A 33. Policy JP-A 33 also requires appropriate air quality mitigation, particularly along major transport corridors and a full air quality assessment will need to be submitted as part of the planning application process. The Plan as proposed is therefore considered sound and no change is necessary.	Grenville Jones Daniel McCann Friends of Carrington Moss Vicky Harper
JPA 33.129	Provide evidence there will be no impact on existing sports people from increased air and noise pollution.	Policy JP-A 33 requires appropriate air quality mitigation, particularly along major transport corridors. Additionally, development will be required to incorporate noise mitigation particularly along major transport corridors, including the proposed HS2 route, and in relation to existing and new employment uses. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07] section 22 (Air Quality) and section 23 (Noise). The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
	Flood risk		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.130	Carrington Moss floods on a regular basis and helps to prevent flooding of the surrounding area. An assessment of flood risk is needed	<p>The PfE is supported by a Strategic Flood Risk Assessment – see [04.02.01], which informed the proposed allocation and identification of development parcels within the Masterplan.</p> <p>Policy JP-A 33 also requires development to mitigate flood risk and surface water management through the design and layout of development and in accordance with a comprehensive drainage strategy. See JPA33 New Carrington Allocation Topic Paper [10.09.07], section 11 (Flood Risk and Drainage). Site specific flood risk assessment(s) will be required as part of any planning application as subject to the provisions of footnote 55 of the NPPF.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Grenville Jones Susan Sollazzi Friends of Carrington Moss Deborah Rhodes Vicky Harper Hannah Nightingale
JPA 33.131	Policy should include additional wording to ensure that sustainable drainage systems are fully incorporated into the development. An assessment should also be undertaken of the site topography.	<p>A Strategic Flood Risk Assessment has been undertaken [04.02.01] across the plan, identifying the allocation as less vulnerable to flood risk and the need for a site specific Flood Risk Assessment [04.02.12] at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to Flood Risk. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	United Utilities Group PLC
JPA 33.132	Flood risk criteria (49 – 51) should include reference that the precise and most appropriate nature of the mitigation required should only be decided once the relevant technical work has been carried out.	<p>A Strategic Flood Risk Assessment has been undertaken [04.02.01] across the plan, identifying the allocation as less vulnerable to flood risk and the need for a site specific Flood Risk Assessment [04.02.12] at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to Flood Risk.</p> <p>The development of the New Carrington allocation will be required to address flood risk and water management through the design and layout of development and in accordance with a comprehensive drainage strategy – Policy JP-A 33 provides the high level framework for this further work.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	Redrow Homes Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Heritage		
JPA 33.133	Object to the development of the deer park, south of Red Brook. Development here would harm the setting of heritage assets and ancient woodland.	Policy JP-A 33 highlights the specific constraints on the land to the west of Warburton Lane and requires development to be integrated with the historic landscape. Further information on Warburton Deer Park is in the New Carrington Historic Environment Assessment [10.09.01] and the New Carrington Allocation Topic Paper [10.09.07]. The Plan as proposed is therefore considered sound and no change is necessary.	Hannah Nightingale Edward Beckmann Friends of Carrington Moss
JPA 33.134	Further clarity needed on the New Carrington Historic Environment Assessment on what the archaeological impact each sensitivity category has to each parcel of land and how this will translate into practical requirements.	The New Carrington Historic Environment Assessment (2020) assessed the nature of the historic landscape, archaeology and built heritage of the allocation [10.09.01]. The assessment has been used to inform the New Carrington Masterplan and Policy JP-A 33. Further Heritage and Archaeology Impact Assessments will be required for any future planning application. The evidence is considered to be robust and proportionate for a strategic plan. The Historic Environment Assessment was carried out in accordance with a standard method and in consultation with Historic England. The Plan as proposed is therefore considered sound and no change is necessary.	United Utilities Property Services
JPA 33.135	Pleased that the sensitivity and heritage value of the sites within the Allocation has been recognised.	Comment noted.	Friends of Carrington Moss
JPA 33.136	The policy should remove any reference to specific evaluation techniques of archaeological features, as these are demonstrated as inappropriate. Alternative wording has been provided.	The Historic Environment policy requirements in JP-A 33 reflect the New Carrington Historic Environment Assessment (2020) [10.09.01], and they are considered to be appropriate and reflective of the sensitivities identified as part of this assessment. The Plan as proposed is therefore considered sound and no change is necessary.	HIMOR Carrington Ltd
JPA 33.137	Support the historic environment .The development west of Warburton Lane will integrate into and reflect the character of the historic landscape character.	Comment noted.	Redrow Homes Ltd
	Pollution		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 33.138	Significant concern that the development will cause increased noise and light pollution.	Policy JP-A 33 requires development to incorporate appropriate noise mitigation particularly along major transport corridors, including the proposed HS2 route, and in relation to existing and new uses. A noise and light assessment will be required to be submitted as part of the planning application process. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
JPA 33.139	Land contamination criteria are supported.	Comment noted.	Redrow Homes Ltd
	Infrastructure contributions		
JPA 33.140	The policy wording on infrastructure delivery should be amended so that each site is assessed on a site specific basis and is not proportionate. Contributions for each parcel should only be sought when they are required to make the development of that parcel acceptable in planning terms. Alternative wording has been provided.	It is essential that on a large site, like New Carrington, where significant infrastructure is required, that all development parcels make a proportionate contribution to infrastructure delivery. The policy therefore requires an 'equalisation mechanism' (see row JPA 33.3). The Plan as proposed is therefore considered sound and no change is necessary.	Redrow Homes Ltd United Utilities Property Services
JPA 33.141	Criteria 12 on the phasing of infrastructure wording is too vague.	Policy JP-A 33 is part of a strategic plan and sets the high level policy for New Carrington. It would be inappropriate to include specific detail on infrastructure phasing and further detail will be provided in the Masterplan / SPD. The Plan as proposed is therefore considered sound and no change is necessary.	Peel Land and Property Group Management Limited
JPA 33.142	Criterion 13 must have infrastructure costs clearly considered to ensure developers understand the mechanism for securing these contributions – it should not be deferred to the masterplan/SPD.	Policy JP-A 33 is part of a strategic plan and sets the high level policy for New Carrington. It would be inappropriate to include specific detail on an equalisation mechanism in the policy. Further detail will be provided in the Masterplan / SPD The Plan as proposed is therefore considered sound and no change is necessary.	Peel Land and Property Group Management Limited
	Masterplan		
JPA 33.143	Policy JP-A 33 Criterion 5 refers to the Masterplan but this is yet to be adopted, so edit the Criterion or remove it. Council preparing an SPD should not be prerequisite to development coming forward.	Policy JP-A 33 requires a Masterplan to be prepared in advance of the site coming forward for development. The successful development of the site will require a coordinated approach between all landowners and developers	United Utilities Property Services

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		and a Masterplan will provide a framework to achieve this. It will also consider how the development can be phased alongside infrastructure delivery. Trafford Council is committed to working with stakeholders and landowners to achieve this. The Plan as proposed is therefore considered sound and no change is necessary.	
JPA 33.144	Allocation Policy Plan should be removed as it is not an approved masterplan.	The allocation policy plan has been included as part of policy JP-A 33 to provide a spatial representation of the housing, employment, green spaces etc described in the policy. The Plan as proposed is therefore considered sound and no change is necessary.	United Utilities Property Services
	Urban design/location of development		
JPA 33.145	Broadly support the general approach to design at New Carrington.	Comment noted.	United Utilities Property Services
JPA 33.146	Development lacks integration with Parrington to the south. Red Brook would make more sense as boundary to development.	Trafford cannot meeting its housing land target using sites in the existing land supply. This land is currently identified as Other Protected Open Land (safeguarded land for future development) in Policy R4.7 of the Trafford Core Strategy and is therefore sequentially preferable to Green Belt. This is set out in the Site Selection Background Paper [03.04.01] . A key policy requirement of JP-A 33 is to ensure the integration of new development with the existing communities. Specific policy reference is made to the integration of the land to the west of Warburton Lane and it is a requirement for this land to be successfully integrated with Partington. The Plan as proposed is therefore considered sound and no change is necessary.	Mark Priestner
JPA 33.147	The extent of the remaining major hazard installations in the Carrington area combined with the very large area of re-development may mean that strict application of HSE codified methodology is inappropriate. This will need further discussion.	Comment noted. Trafford Council will continue to work with HSE on the major hazard installations in the Carrington area to ensure that development in this location can be delivered. The Plan as proposed is therefore considered sound and no change is necessary.	Health and Safety Executive
JPA 33.148	Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding should be shown on the plan.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the	Mineral Products Association

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore it is not necessary to identify them on the PfE policies map.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	
JPA 33.149	Wait until effects of the Coronavirus pandemic and Brexit are known before proposing development.	<p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	<p>Mark Priestner Friends of Carrington Moss Lorraine Eagling Alan Meredith</p>
JPA 33.150	Regeneration ambitions in other parts of GM would be impacted.	<p>Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]</p> <p>The New Carrington allocation is in accordance with the PfE Spatial Strategy.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	CPRE
JPA 33.151	Should refer to the production of the Design Guide in the supporting text rather than the policy. The Design Guide does not currently exist and the development plan should not bestow development plan status upon the Design Guide. Criteria 41: No design guide has been adopted so this criteria should be removed or amended to refer to the Masterplan.	<p>The Trafford Design Guide is currently being prepared and will be in place when the PfE is adopted. The development at New Carrington will therefore need to have regard to this, as set out in Policy JP-A 33.</p> <p>The Plan as proposed is therefore considered sound and no change is necessary.</p>	<p>HIMOR Carrington Ltd Redrow Homes Ltd Peel Land and Property Group Management Limited</p>
	Presentation		
JPA 33.152	Graphics relating to the Allocation are distorted and unrepresentative.	<p>The graphics are considered to be sufficiently clear for the purposes of a strategic plan. Further plans for the allocation are also available in the New Carrington Masterplan [10.09.06].</p>	<p>Friends of Carrington Moss</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The Plan as proposed is therefore considered sound and no change is necessary.	
JPA 33.153	Need to carefully set out facts so residents understand proposals.	A proportionate evidence base has been provided to support the PfE. In addition Topic Papers have been prepared for each thematic chapter and the allocations. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
JPA 33.154	Update documentation to accurately reflect developments within allocation.	Policy JP-A 33 accurately reflects the evidence base and latest information at the time the Regulation 19 plan was published. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
JPA 33.155	The four distinct character areas outlined in the policy are not defined and there are no specific boundaries. An OS plan identifying these areas needs to be prepared.	The distinct character areas referenced in Policy JP-A 33 are set out in the New Carrington Masterplan [10.09.06], Section 5.7. The boundaries are intended to be indicative and to cover broad areas, it would therefore be inappropriate to show them on an OS base for a strategic plan. This level of detail is more appropriate for the Trafford Local Plan and/ or the Masterplan/ SPD. The Plan as proposed is therefore considered sound and no change is necessary.	Redrow Homes Ltd
JPA 33.156	The Policy and supporting text does not clarify what is meant by the term 'Local Plan'.	The 'Local Plan' is referring to the emerging Trafford Local Plan which will reflect the PfE policies and provide more detail at a district level. The Plan as proposed is therefore considered sound and no change is necessary.	Peel Land and Property Group Management Limited
	Consultation/engagement		
JPA 33.157	The PfE consultation has not been properly publicised and there has been a lack of engagement with development of the policy.	Places for Everyone is a Development Plan Document (DPD) and it has therefore been prepared in accordance with each LPAs Statement of Community Involvement in place at the time.	Friends of Carrington Moss Lorraine Eagling Edward Beckmann
JPA 33.158	Allocation should be handled through the Local Plan process with robust consultation with residents.	Places for Everyone is a Development Plan Document (DPD) and it has therefore been prepared in accordance with the adopted Trafford Statement of Community Involvement – the same process that the Trafford Local Plan will follow.	Lorraine Eagling

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The GMSF / PfE has been subject to several consultations throughout the development of the Plan.	
JPA 33.159	There is no indication about how the community is going to be involved in the development of the masterplan.	Any future consultation on the New Carrington allocation will be in accordance with the adopted Trafford Statement of Community Involvement (SCI).	Friends of Carrington Moss
	Other		
JPA 33.160	Criteria 34, 45, 46, 47 48, 50 and 52 should be removed and left for national policy.	New Carrington is a strategically important allocation for Greater Manchester, and is a significant opportunity to deliver a site for substantial housing and employment development. Given the scale of the development proposed, it is important the key policy principles including utilities, environmental protection and climate change are embedded within the allocation. The Plan as proposed is therefore considered sound and no change is necessary.	Peel Land and Property Group Management Limited
JPA 33.161	There are alternative, more sustainable locations for housing and employment available in Trafford that would better meet the needs of Trafford residents. Site selection process was flawed because it only considered sites in the green belt, not sites in more sustainable locations in urban areas.	Alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.01.10] . The Green Belt Topic paper [07.01.25] sets out the alternatives considered prior to the release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss
JPA 33.162	Significantly reduce size of allocation area and relocate to smaller sites. The brownfield register and land supply list should be updated in collaboration with residents and a comprehensive review of available land supply should be undertaken to determine whether green belt release is justified.	Alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.01.10] . The Green Belt Topic paper [07.01.25] sets out the alternatives considered prior to the release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE. Details of the housing land supply can be found in the Housing Topic Paper 06.01.03 . Details of the employment land supply can be found in the Employment Topic Paper [05.01.04] . The Plan as proposed is therefore considered sound and no change is necessary.	Friends of Carrington Moss

