

## Response ID ANON-PHZX-4FVW-G

Submitted to Draft Trafford Local Plan - Site Allocations and Designations - September 2025

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Prefer not to say

### Introduction - Strategic Infrastructure

01-01 What infrastructure improvements (e.g., transport, schools, healthcare) do you think are needed to support the proposed allocations?

Please write your response here::

The Site Selection section (which specifically excludes all areas related to PfE allocations) is inconsistent with this infrastructure section, which does include some elements of the transport infrastructure for New Carrington. There is no mention, however, of the needs of horse riders. In particular, the surfacing of active travel routes in the New Carrington area must accommodate the needs of over 1,000 horses stabled on and around Carrington Moss.

Given this is a plan that will take us to 2042, why is there not even an aspiration setting out how sustainable freight transport will be considered during the plan period (particularly for the New Carrington area)? This should be a priority to support carbon neutrality, to reduce traffic accidents (particularly because of the number of HGVs carrying hazardous materials), to reduce air, noise, light, vibration, dust and water pollution and to meet NPPF requirements. Repeated requests from communities on this topic have not been progressed, so the local plan should set out how this PfE allocation area will be improved during the plan period, including via a shift of freight transport to more sustainable options.

Furthermore, given that a metrolink extension is proposed for the North locality, along with the reopening of a railway station, why are these not also being proposed for New Carrington? They have been requested by communities for at least a decade, yet are totally disregarded in this plan. This highlights a shocking level of inequity in Trafford, with Partington residents, in particular, being excluded from sustainable transport improvements that would bring significant benefits.

The proposals for the South locality also signal improvements to rail and metrolink, with the rail services particularly benefiting citizens who do not live in Trafford. It is time ALL Trafford residents were considered with the same priority! It is insufficient to propose only active travel and car dependency in areas where there is low car ownership.

There is no mention in this plan of improving school bus services during the plan period to reduce car dependency, carbon emissions and pollutions.

The green and blue infrastructure does not identify a single new SBI or SSSI to be designated during the plan period, despite Trafford's enhanced biodiversity duty and the implementation of the LNRS. The infrastructure list should identify the existing SBIs/SSSIs and outline which will be enhanced.

Improvements and enhancements to The Greater Manchester Wetlands Nature Improvement Area should include reference to Trafford's peat mosses and plans for their restoration in accordance with the Climate Change Committee recommendations. The site selection process should be revisited to allow assessment of call for sites nominations for non-development uses within the PfE allocation areas. Other natural capital enhancements should also be mentioned (such as how Trafford will expand and strengthen local food security and reduce food miles through increased local production and growing the local rural economy).

The Water Infrastructure should highlight how increased flood risk will be addressed, especially given that the borough's most capable flood prevention regime (Carrington Moss) is being disposed of for development (it is likely to be completely destroyed by the proposed new roads)! There are significant concerns, particularly in Sale West, about future flooding of existing homes due to the loss of land that captures and stores huge amounts of surface water flooding. This is not being covered in the New Carrington Masterplan discussions, despite repeated representations from communities.

There is insufficient health and education infrastructure to meet the needs of the expanded populations. There is no mention of the hydrogen pipeline or the River Bollin abstraction proposals.

There does not seem to be a question relating to the Policies Map but, as with the previous version, there are a number of omissions, including:

- Trafford's peat mosses
- Transpennine Trail
- Existing active travel routes
- Location of hazardous businesses (COMAH zones)
- Location of contaminated sites
- we cannot see any area safeguarded for flood management between Sale/Carrington and Flixton/Urmston, despite the regular flooding that occurs here.

The NPPF (192) requires plans to:

- identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

We cannot see where this has been done for this local plan?

## Introduction - A1: Allocation Design Principles

### 01-02 Do you support the proposed Allocation Design Principles?

Please write your response here::

Whilst we do not disagree with any of the principles set out at this section, we are astounded that they do not begin with the premise that all development MUST be sustainable (including provision of sustainable passenger and freight transport, no development on irreplaceable or priority habitats (or conservation areas), no development on BMV agricultural land, etc).

The definition in the NPPF suggests that sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The opening principle in allocation design should support the achievement of that objective.

## Introduction - A2: A56 Broad Development Location

01-03 Do you support the proposed broad location? Please explain your reasons.

Please write your response here::

Yes we support this broad location but the policy lacks ambition. The minimum density should be much higher. Given this is an extremely sustainable location, on site car parking should be limited to disabled and deliveries only. Secure, multi-storey car parking for other users should be chargeable (to reduce car dependency) in a nearby location. Secure cycle parking should be available on the ground floors onsite.

Roof spaces should be used for solar and greenery.

Given the excellent transport links, there should be a high proportion of genuinely affordable/social housing.

Plans should include traffic calming schemes to reduce the attraction of the A56 route and encourage more use of public transport/active travel. This would also reduce air, noise, light, vibration, dust and water pollution and carbon emissions and make the area more attractive for residents. HGVs should also be discouraged from using this route, except for access.

## Trafford North - AN1: Wharfside

02-01 Do you support this proposed allocation?

Not Answered

02-02 Do you support the proposed use, amount and phasing of development? Are there any other specific issues or local features that should be considered for the site?

Please write your response here::

We note that this allocation proposes a new bridge over the Manchester Ship Canal.

This is the sort of initiative that should have been proposed in New Carrington but is totally missing from the current plans, is not being proposed in the New Carrington Masterplan and is not proposed in this local plan. This means that existing and new residents in the New Carrington area are stuck with outdated, unsustainable, inadequate transport solutions, with zero more sustainable solutions even being considered during this plan period! The developments at New Carrington will also lead to huge increases in air, noise, light, vibration, dust and water pollution, due to the lack of sustainable transport options and initiatives such as this to direct (particularly HGV) traffic away from residential areas.

This is another example of the inequity generated by the decision to exclude enhancements to the PFE allocations for the whole of this plan period.

## Trafford North - AN2: Civic Quarter

02-03 Do you support this proposed allocation?

Not Answered

02-04 Do you support the proposed use, amount and phasing of development? Are there any other specific issues or local features that should be considered for the site?

Please write your response here::

## Trafford South - AS13: Land at Rose Cottage, Broadheath

03-10 Do you support the proposed allocation?

No

03-11 Do you support the proposed use, amount and phasing of development? Are there any other specific issues or local features that should be considered for the site?

Please write your response here::

We believe this site should be subject to a specific consultation with impacted local communities, not hidden within this Local Plan consultation.

The site selection constraints assessment does not suggest this is an ideal site for the purpose for which it is being proposed.

## Trafford South - AS12: Land at Dairyhouse Lane, Broadheath

03-12 Do you support this proposed allocation?

No

03-13 Do you support the proposed use, amount and phasing of development? Are there any other specific issues or local features that should be considered for the site?

Please write your response here::

NPPF paragraph 188 states that plans should allocate land with the least environmental or amenity value. We do not believe this site meets that criteria.

The Site Selection Assessments (Appendix 4) confirms (stage 2 planning constraints) that, for example, 98.1% of site SSEL-192 is within a Priority Habitat, that 35.1% of the site is within a LNRS Opportunity Area for Nature Recovery and that 80.5% of the site is within Agricultural Land Grade 1, 2 or 3. Some of these figures are higher for SSEL-231 and SSEL-311.

This development would require felling an entire ecology-rich woodland for a very small warehousing development. This is not in alignment with PFE policies and the losses will not generate sufficient compensating benefits for Trafford communities.

We note that criterion E mentions that the development would need to provide tree planting in accordance with Local Plan Policies GI2, GI6 and GI7. Given the nature of the site, why does it not also mention the PFE policy JPG7, criterion 12, which requires tree replacement on the basis of two new trees for each tree lost to development?

## Trafford West - Proposed Open Spaces Designations

05-08 Do you have any comments on the proposed open space designations? (please specify which open space your comments relate to – if relevant)

Please write your response here::

We note that our call for sites submission has been rejected due to the land being within the New Carrington allocation area. We disagree. New Carrington Natural Capital Assets should not be disadvantaged throughout this plan period, especially given the New Carrington Masterplan focus on developer priorities.

We believe our call for sites submission should be reconsidered and included within the local plan because peatland restoration has not been covered in the New Carrington Masterplan process. Trafford should be protecting those parts of Carrington Moss that have not yet been approved for development (19.9 hectares of the 335 hectare peat moss has already been approved), especially as this has been requested by Trafford communities since 2018 (in that Local Plan consultation), in other consultation responses and in meetings with Trafford. The mossland, which is considered to be irreplaceable by Natural England, should be preserved and restored in accordance with the Climate Change Committee's recommendations.

Inconsistently, other (natural and semi-natural) green space in the New Carrington area is included in the open space designations (such as Dainewell Woods, which are spread out in various locations across the New Carrington landscape).

Please explain why Manchester United's training ground is not included in the list but Sale Rugby training ground is? Both of these sites are within the New Carrington Allocation area.

A list of the SBIs and SSSIs in the area should be included within the Open Space Designations List for protection from development, for clarity and for completeness.

## Integrated Assessment (IA) of the Draft Local Plan

IA-01 Do you have any comments to make on the Sustainability Appraisal and its associated appendices?

Please write your response here::

Please see the comments in our submission to the previous consultation. It is not a benefit to any Trafford community for the IA to be overly positive rather than addressing the shortfalls within the plan proposals. This is an essential assessment, honesty and transparency is crucial. Communities must be confident that development schemes will be sustainable, will provide equity and will not reduce health and wellbeing (through, for example, increased air, noise, light, vibration, dust and water pollution).

The IA is a fundamental test of sustainability and, whilst it has clearly gone through the plan in some detail, it has not identified gaps, inconsistencies or inadequate policies. We believe there is a need for a further review as:

1. policies related to the PFE allocation areas are incomplete - the fact that sites were allocated in PFE does not mean they do not need any further enhancement during the period to 2042. No Trafford communities should be disadvantaged due to the lack of consideration of their areas in this plan. There should be an assessment of the gaps in the Places for Everyone allocation policies that need to be addressed within this plan period, such as those mentioned elsewhere in our response to introduce sustainable passenger and freight transport improvements for New Carrington.
2. the lack of mapping in accordance with NPPF 192 - Trafford appears to have no aspirations to designate any further sites of biological importance or sites of special scientific interest in the period to 2042, despite their enhanced biodiversity duty and the implementation of the LNRS
3. the lack of allocation of irreplaceable habitats for restoration in accordance with the recommendations of the Climate Change Committee and Natural England's assessment of Carrington Moss, for example, as a 335 hectare irreplaceable habitat
4. the IA has not identified the potential risk of the lack of a Green/Grey Belt review - confirmation should be set out in the plan that Trafford's Green Belt is Green Belt and not Grey Belt.

Paragraph 3.8 of the Plain English document suggests that "Policies supporting sustainable transport modes will help ensure that communities are well

connected and residents have improved access to community facilities and employment opportunities, thereby promoting equality of opportunity and social inclusion". This is not the case for existing and new communities at New Carrington because there are no proposals in this plan, PfE or the New Carrington Masterplan to introduce trams, trains, or sustainable freight transport to the area. Yet other parts of Trafford benefit from such services. This means Partington, for example, where there is a particularly low proportion of car ownership, will continue to be disconnected and will not have the access to the employment opportunities and amenities enjoyed by Trafford residents in other parts of the borough.

Paragraph 3.36 (Plain English) suggests that the developments will not be sustainable, there is no expectation that the requirements of the Greater Manchester Transport Strategy will be met ("zero net growth in motor vehicle traffic between 2017 and 2040"). A focus on reducing car and HGV dependency in this local plan would result in fewer emissions and less pollution, rather than an increase in traffic. The IA should have strengthened the statement at 3.37 and identified that the plan needs more focus on modal shift, rather than accepting that development means a cumulative increase in pollutants that will effect (among other things) air quality.

Robust monitoring of the local plan is welcomed (paragraph 4.1).

In relation to Appendix 4b, paragraph 3.2 is headed "Infrastructure Requirements: Carbon and Energy Infrastructure". What is the carbon infrastructure? Despite the claim in this paragraph, as it stands, the policy does not appear to address issues that will have a positive effect on air quality, reducing carbon emissions, reducing flood risk and resilience to climate change.

We are concerned, given the level of development, that there is insufficient capacity in our education and health services to meet the needs of existing and new communities. Yet this is not highlighted.

Paragraph 3.10 states "There would be a positive effect on social inclusion and deprivation, economic growth, air quality and reducing greenhouse gas emissions". No such positive effects will be possible for New Carrington and its surrounding communities, whose needs have been excluded from this plan.

Paragraph 3.20 suggests that the allocation design principles champion the use of sustainable transport modes for all, availability for residents to use access travel to meet their needs, conservation of the historic environment, air quality, biodiversity, reducing greenhouse gas emissions and resilience to the effects of climate change. How did the IA come to this conclusion? None of this is mentioned in the principles, nor is there an overarching principle that all development is expected to be sustainable and in accordance with the NPPF paragraph 7 objective.

Paragraph 3.272 is a clear example of inappropriate exaggeration. It states that this very small employment development will have "major positive effects on economic growth and job creation". The paragraph goes on to mention that there "would be positive effects on housing provision in appropriate locations to accommodate the needs of residents, reducing deprivation, supporting improved health and wellbeing, ensuring access to sustainable transport and utilities and ensuring climate change resilience". Trafford should explain how this paragraph relates to this development! The actual major impact of this development is the complete loss of ecologically and biodiversity rich woodland priority habitat. Yet, this is glossed over in paragraph 3.273 with the recommendation of compensation "for woodland loss". This sort of assessment reduces confidence in the whole IA process.

Please review the tables at Appendix C. It is unreasonable to suggest that there is no significant link between policies on Education Infrastructure, Health and Social Care Infrastructure, and Transport Infrastructure and housing, for example. Clearly it is the provision of new homes (and employment development) that will drive additional infrastructure need. In addition, to say there is no significant link between Transport Infrastructure and biodiversity is also illogical. Transport infrastructure can be very damaging to the environment and nature, including as a consequence of increased pollution, road-kill and road-run-off. These are just a couple of examples, there are many more assessments which do not make sense.

Like paragraph 3.272 mentioned above, the assessment of AS12 (page 604) totally eradicates all confidence in the IA and its veracity. It states that this development would have a "major positive effect on economic growth and job creation". How??? It is just 1.2 hectares in size and Trafford is proposing to completely destroy a woodland to enable the scheme! The table also suggests that the short term impacts are assessed as a ++, yet the comments confirm that the allocation is not expected to come forward for delivery until between 2035-2042. This is a clear demonstration that the IA should be totally reviewed.

Paragraph 3.55 suggests that "An assessment of each protected open space is not needed because their effects have been covered by the assessment of the two overarching policies". We disagree, the IA does not highlight that, without an assessment of the environmental, climate mitigation and biodiversity benefits of each site, they will remain vulnerable to developer challenge.

IA-02 Do you have any comments to make on the Health Impact Assessment?

Please write your response here::

Please see the comments in our response to the previous consultation.

This documentation, once again, suggests that IA objective 3 fulfils the Health Impact Assessment component on the Integrated Assessment. We disagree. We believe there is insufficient evidence about access to education, healthcare, open space, active travel, sustainable transport and the potential for modal shift. There is no reference at all to light pollution (which will impact both human and wildlife populations).

IA-03 Do you have any comments to make on the Equalities Impact Assessment?

Please write your response here::

Please see the comments in our response to the previous consultation. In addition, paragraph 1.2 states that "public bodies must also consider socio-economic disadvantage when making strategic decisions". The IA should have recommended that this plan should reconsider the wholesale rejection of all call for site submissions related to the PfE allocations, particularly those that relate to requests for allocation of a site for non-development

purposes. As a consequence of this policy, there has been no assessment of the equalities impact of the proposals, which means that Partington and Sale West, in particular, have been severely disadvantaged.

Furthermore, paragraph 2.3 suggests that no negative impacts on the protected groups have been identified. This is rather astounding given the level of development, the numerous health and wellbeing impacts, and the extensive plan period (in addition to the lack of equity between communities impacted by the PfE allocations and those impacted by the allocations set out in this plan).

IA-04 Do you have any comments on the IA Scoping Report Addendum?

Please write your response here::

We welcome the additions in Appendix B and believe the IA should highlight that Trafford is not proposing any objectives within the Local Plan to protect, restore and manage peatland to help mitigate climate change and sequester carbon. This should be a key environmental policy within the Local Plan and Trafford should identify the specific sites for restoration in accordance with PfE policy JPG8 and New Carrington policy criteria 24 and 25.

## IA: Climate Change Risk Assessment

IA-05 Do you have any comments to make on the Climate Change Risk Assessment that forms part of the IA?

Please write your response here::

Please see our comments in the previous consultation.

As there is no assessment of the call for sites submissions for PfE allocation areas, the benefits of the restoration of Trafford's peat mosses have not been included. All the eco system service benefits of restoring Carrington Moss should have been identified in this document.

## Habitat Regulations Assessment (HRA) of Draft Local Plan

HRA-01 Do you have any comments on the Habitats Regulations Assessment (HRA) of Draft Local Plan?

Please write your response here::

Please see our comments from the previous consultation.

## Site Selection Methodology

SS-01 Do you have any comments on the proposed Site Selection Methodology?

Please write your response here::

We disagree with the decision that sites within the PfE allocation areas should be automatically excluded from this plan. As mentioned above, the New Carrington area, requires a number of improvements, which are not set out in the Masterplan, including the introduction of more sustainable passenger and freight transport. We believe our call for sites submission should reviewed and the areas of the peat moss that have not been approved for development (335 hectares, minus the 19.9 hectares approved) should be designated for preservation and restored in accordance with the Climate Change Committee recommendations. We have no evidence that such a request will be covered within the New Carrington Masterplan. Exclusion within the local plan leaves this irreplaceable habitat unacceptably unprotected for the whole of the plan period.

Whilst we are in broad agreement with the site selection assessment proforma, we strongly believe the site selection process should include an assessment of compliance with NPPF paragraph 188 (plans should allocate land with the least environmental or amenity value). We do not understand why irreplaceable habitats are limited to ancient woodland and we cannot see an assessment of the expected carbon emissions implications (given Trafford's net zero target) or of air, noise, light, vibration, dust and water pollution to be caused by the development. Proximity to AQMAs is not a proxy for such assessments.

In relation to Appendix 4, Planning Constraints, the Stage 1 criteria should include a second criterion where responses suggest a site is within the Green Belt. This should ask whether the site could be considered to be Grey Belt. This is important as it is already acknowledged that the Green Belt site at Wild Fowl Farm has a planning application approved, despite being on Green Belt, due to a planning inspectorate decision to reclassify the land as Grey Belt. Trafford should minimise future similar decisions by determining whether any of the land currently designated as Green Belt could be reclassified as Grey Belt within the local plan. Any Green Belt review should also consider whether any land should be designated as a Green Belt Addition.

It is good to see Sustainable Transport Accessibility as one of the Stage 2 criteria, we assume this includes sustainable freight transport options. It is surprising though that a site (such as SSEL-192) that has 0% of land within the Site Selection good transport accessibility area is selected for development, particularly given the ecological and biodiversity losses that would have to be incurred.

Where is the assessment of sites being proposed for non-development uses? There should be an assessment of the benefits such sites will bring to, for example, climate mitigation, nature's recovery and future food security.