

FOCM – Trafford Local Plan Reg 19 Response



Part A Personal Details

Title: Ms

First Name: Marj

Last Name: Powner

Job Title: Chair

Organisation: Friends of Carrington Moss

Address: 16, Christchurch Road
Sale

Post Code: M33 5JL

Contact Phone Number: 07801917375

Email Address: friendsofcarringtonmoss@gmail.com

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FOCM – Trafford Local Plan Reg 19 Response



Part B: Representation

FOCM Representation number: 1 (Integrated Assessment)

01a To which Publication Document does this representation relate?

Trafford Local Plan 2022-2039 Publication Version (July 2026)

Policies Map

Integrated Assessment Report (IA)



Habitats Regulations Assessment (HRA)

01b To which section of the Publication Document stated in question 01a does this representation relate?

Policy/ section reference All but example given is Table 20 (note that the Table numbers are different to those in the index list)

Page number 181

Paragraph number

Policies Map layer

02a. Do you consider the Local Plan is legally compliant?

Yes

No



02b. Do you consider the Local Plan is sound?

Yes

No



03a. Please give details of why you consider the Local Plan is legally compliant or not.

General:

The Integrated Assessment is inadequate, imbalanced and overly positive, and the review of previous Consultation responses has not given conscientious consideration to resident feedback, see examples in our representations. There are gaps in the policies and the evidence base, some of which is not compliant with the regulator's [Green Claims Code](#), which requires the following for all environmental data:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated.



Specific to Representation 1: (Integrated Assessment)

As we set out in our previous consultation response, there are gaps in the IA report, which does not, for example, highlight that there are no proposals for additional SBIs, SSSIs (despite Trafford's enhanced biodiversity duty) and no applications for Local Green Space (which can only be done as part of the local plan process). The IA has also not identified the potential risks related to the lack of a Green/Grey Belt review.

Whilst paragraph 3.1 (page 6) states that the "*IA acknowledges where issues have not been addressed by the Local Plan but have been addressed by the PfE*", the document does not reference any assessment of gaps within PfE that should be met within the Local Plan, including, for example, those we raised previously and that are mentioned elsewhere in our response in relation to sustainable passenger and freight transport improvements for the New Carrington allocation (proposals for such improvements **ARE** being signalled in this Plan for other parts of Trafford, leaving residents of Carrington, Partington, Sale West and Warburton severely disadvantaged once again).

For a clear example of the lack of credibility of this document, one only needs to review the assessment of the Land at Dairyhouse Lane (Allocation AS4). In summary, this is a site of 1.2 hectares, currently comprising grade 2 agricultural land, woodland and peat, with associated ecological and environmental benefits, which will be sacrificed for a maximum of 12,000 m² industrial and warehousing, with **an expected delivery date of 2040** or beyond.

This means that there will be no benefits from the delivery of this site until after the end of the Plan Period. The IA should, therefore, not be recording **ANY** benefits in the short or medium term.

The IA gives a positive assessment of 5 IA Objectives (including for the short and medium term impacts). These are questionable. IA Objective 2, for example is to Promote Equality of Opportunity and Reduce Levels of Deprivation – the assessment states that this is a Decile 8 area (10 is least deprived), given the small size of the potential development, this should have been assessed as Neutral at best. Similarly, IA Objective 5 (Ensure sufficient coverage of Sustainable Transport) also receives a positive score when the assessment states that the site is **NOT** in short walking distance of public transport. Again, the highest possible score should have been Neutral!

The assessment of IA Objective 4 (Ensure sustainable economic growth and job creation) is inconceivably given a **++ score (ultra positive) to all three time periods**. In addition to the small size of the site, there is actually no guarantee that there will be ANY local jobs (there are several examples of planning applications in the New Carrington allocation which result in no local jobs being created). Furthermore, given the environmental and ecological harms to be caused without achieving significant benefits, this allocation is not sustainable development.

When it comes to the negatives, despite the huge levels of harm to the existing natural capital assets, there are **NO** ultra negatives (--). IA Objective 12 (Conserve and enhance biodiversity and promote nature conservation) should have scored a '--' as it is confirmed that BNG will be difficult to achieve, compensation will be required, rather than mitigation. The IA does not highlight that this site does not comply with the NPPF paragraph 188 requirement to "*allocate land with the least environmental or amenity value*", or that it does not comply with several PfE Objectives (including JP-G4 and JP-G7).

Seven IA Objectives are scored as negative, so it is incomprehensible that the summary outcome is a Neutral score.

Altogether the assessment of this site suggests the IA is merely a tick box exercise, rather than an independent evaluation of the impacts of the policies in the Plan and raises huge questions about the credibility of the whole document.

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03b. Please give details of why you consider the Local Plan is sound or not.

General:

The policies and the evidence supporting the plan are incomplete and some of the assessments are weak and/or contain errors or omissions (we highlight examples in our representations). There is no Green/Grey Belt Assessment, despite a landowner indicating that it will utilise this designation in proposing its “*entire landholding as a future allocation*”. The ‘Vision’ and some of the policies are undeliverable as documented. There also appears to be bias against the rural economy, some of the borough’s natural capital assets and PfE allocation areas. The Plan allocates a site that does not comply with NPPF and PfE policies.

Specific to Representation 1: (Integrated Assessment)

The IA is unsound as it does not highlight all the risks that could materialise as a consequence of the policies and allocations within (or not in) the Plan and it does not highlight that a site has been allocated which does not comply with NPPF or PfE policy requirements (AS4).

04a. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant, in respect of any legal compliance matters you have identified at question 03a.

You will need to say why each modification will make the Local Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please write your response here:

For this specific representation: (Integrated Assessment)

The Integrated Assessment needs to be refreshed to give a more balanced and complete appraisal of the policy risks, to ensure the negative environmental and ecological effects of the plan are minimised, and to enable balanced decisions to be made that support genuinely sustainable development.

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.

04b. Please set out the modification(s) you consider necessary to make the Local Plan sound, in respect of any soundness matters you have identified at question 03b.

You will need to say why each modification will make the Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

FOCM – Trafford Local Plan Reg 19 Response



Please write your response here:

For this specific representation: (Integrated Assessment)

The IA scores should be revisited to ensure they actually reflect the impact of the policies or allocations. Gaps or omissions in policy, and the associated risks, should be highlighted.

Allocation AS4 should be removed from the plan.

05. If your representation is seeking a modification to the plan, do you wish to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)



06. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please write your response here:

FOCM – Trafford Local Plan Reg 19 Response



Part B: Representation

FOCM Representation number: 2 (Consultation Statement)

01a To which Publication Document does this representation relate?

Trafford Local Plan 2022-2039 Publication Version (July 2026)



Policies Map

Integrated Assessment Report (IA)

Habitats Regulations Assessment (HRA)

01b To which section of the Publication Document stated in question 01a does this representation relate?

Policy/ section reference Consultation Statement

Page number Various – see examples below

Paragraph number Various - see examples below

Policies Map layer

02a. Do you consider the Local Plan is legally compliant?

Yes

No



02b. Do you consider the Local Plan is sound?

Yes

No



03a. Please give details of why you consider the Local Plan is legally compliant or not.

General:

See our response to Representation 1.

Specific to Representation 2: (Consultation Statement)

Whilst the summary of responses (page 9) confirms feedback has been reviewed (paragraph 3.4), there is no evidence to show how community comments have been taken into consideration. There has been no engagement with Friends of Carrington Moss about our response. If it was considered irrelevant (paragraph 3.10), it would be helpful to understand why.

One example of feedback not given sufficient consideration is the Land at Dairyhouse Lane, which remains allocated (AS4) despite being non-compliant with NPPF and PpE policies. Paragraphs 3.69 and 3.70 (page 20) confirm:

- Of 25 respondents commenting, only 6 indicated clear support, 18 were clear objections
- Natural England confirmed they did not support this allocation.

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Open Space designation is another issue that has not been given conscientious consideration as we set out elsewhere in our response.

Furthermore, there is evidence of bias. Paragraph 5.1 states “*Although a formal Call for Sites exercise was not undertaken as part of the Part 2 consultation, potential sites submitted for inclusion within the Trafford Local Plan have been recorded*”. The wider land at New Carrington (CS-45, proposed by Wain Estates) was included in the list of sites (page 28). It, along with 6 others, was listed as a ‘new’ site.

Friends of Carrington Moss has been campaigning for 10 years. Repeatedly requesting that Carrington Moss is allocated for protection, preservation and restoration including in our Local Plan responses – yet our request was, once again, excluded from the list!

Date	Event	FOCM Responses (not including the numerous responses to planning applications over the years)
2016	GMCA published the first draft of the Gtr Mcr Spatial Framework for consultation	Residents living adjacent to Carrington Moss knew nothing about the plans to allocate 300 hectares of local Green Belt for development of 11,500 homes, 750,00m ² warehousing, there were no site notices, no letters to homes to advise them of the loss of green spaces and the increased industrialisation of the area
2017	Trespasser signage was erected on footpaths and bridleways on Carrington Moss in January 2017	Our first public meeting was held on 8 th February 2017 - it was attended by almost 100 people. The Friends of Carrington Moss was established by a number of passionate local residents who recognised the importance of the natural capital assets and the huge levels of harm to be caused by the proposed developments
2018	Trafford Local Plan Consultation	Detailed response to the Local Plan consultation, including a Call for Sites submission proposing the protection, preservation, conservation and restoration of Carrington Moss
2019	Gtr Mcr Spatial Framework (GMSF) Consultation	Very detailed response to the spatial plan consultation, including highlighting the importance of protecting, preserving and restoring Carrington Moss . At this point, the loss of Green Belt had been reduced to 240 hectares, the number of homes proposed reduced to 10,000 and the amount of warehousing space increased to 900,000m ²
2021	Trafford Local Plan Consultation	Detailed response to the Local Plan consultation, including requesting that the following statement be added to the carbon neutral vision “ Trafford’s peat mosses at Carrington and Warburton will be preserved and restored to maximise carbon sequestration and support achievement of our aim to be carbon neutral by 2038 ”.
2021	Places for Everyone Consultation	Very detailed response to the spatial plan consultation, including challenging the sustainability of development on a peat moss, Grade 2 agricultural land, woodland and wetland habitats . The loss of Green Belt was reduced to 169 hectares, the number of homes to 5,000 and the space for warehousing to 380,000m ²
2025	Trafford Local Plan Consultations (April and September)	Detailed response to the Local Plan consultations, including a Call for Sites submission which recognised that 19.9 hectares of very deep peat had already been approved for development and requesting that the remainder of the 335 hectare peat moss be protected to minimise harm as required by the Places for Everyone Policies.

We explicitly made our request for the site to be reconsidered and included within the local plan because peatland restoration has not been covered in the New Carrington Masterplan process.

In addition, it appears no conscientious consideration was given to our request for a comprehensive Green/Grey Belt Assessment given that the IA did not identify the potential risks of the lack of a Green/Grey Belt review. Trafford should be minimising the risks associated with speculative development 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.

Notwithstanding our previous feedback, it is astounding that there has been no Green/Grey Belt assessment given a landowner has indicated that it would utilise this designation in proposing its “*entire landholding as a future allocation*” (page 367).

Whilst Trafford has declined to include the Wain Estates landholdings in this Local Plan, the landowner can still push speculative planning applications forward in the future, leaving the Carrington, Partington, Sale West and Warburton communities vulnerable to a significant increase in development, the associated traffic, congestion, pollution and accidents and the resulting chronic long-term health conditions.

That Trafford is wedded to road schemes for this area, rather than public transport and sustainable freight hubs, gives this risk a high probability of materialising.

We note that the Friends of Carrington Moss response has been listed as a personal response from Marj Powner (Appendix I, page 78), this is incorrect. Our response was the consolidated feedback from numerous residents following discussions at online public meetings and via email. The Friends of Carrington Moss has over 3,500 supporting members.

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03b. Please give details of why you consider the Local Plan is sound or not.

General:

See our response to Representation 1.

Specific to Representation 2: (Consultation Statement)

There is no evidence that conscientious consideration has been given to citizen feedback in the previous consultation.

04a. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant, in respect of any legal compliance matters you have identified at question 03a.

You will need to say why each modification will make the Local Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please write your response here:

For this specific representation: (Consultation Statement)

The previous Consultation responses should be reviewed, and the Consultation Statement should be more explicit about how those responses have been given conscientious consideration in this iteration of the plan.

Given that Natural England considers Carrington Moss to be a 335 hectare restorable, irreplaceable habitat, our request for the site to be allocated for restoration and preservation should be reconsidered.

A Green/Grey Belt review should be undertaken to explicitly confirm the status of Trafford's Green Belt and to allocate Green Belt Additions, where appropriate.

04b. Please set out the modification(s) you consider necessary to make the Local Plan sound, in respect of any soundness matters you have identified at question 03b.

You will need to say why each modification will make the Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please write your response here:

For this specific representation: (Consultation Statement)

Where appropriate, policies should be updated following conscientious consideration of consultation responses.

Allocation AS4 should be removed from the plan.

FOCM – Trafford Local Plan Reg 19 Response



05. If your representation is seeking a modification to the plan, do you wish to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)



06. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please write your response here:

FOCM – Trafford Local Plan Reg 19 Response



Part B: Representation

FOCM Representation number: 3 (Scoping Report)

01a To which Publication Document does this representation relate?

Trafford Local Plan 2022-2039 Publication Version (July 2026)



Policies Map

Integrated Assessment Report (IA)

Habitats Regulations Assessment (HRA)

01b To which section of the Publication Document stated in question 01a does this representation relate?

Policy/ section reference Scoping Report

Page number Various – see examples below

Paragraph number Various - see examples below

Policies Map layer

02a. Do you consider the Local Plan is legally compliant?

Yes

No



02b. Do you consider the Local Plan is sound?

Yes

No



03a. Please give details of why you consider the Local Plan is legally compliant or not.

General:

Specific to Representation 3: (Scoping Report)

This document does not comply with the principles of the regulator's [Green Claims Code](#), which requires the following for all environmental data:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated.

03b. Please give details of why you consider the Local Plan is sound or not.

General:

Specific to Representation 3: (Scoping Report)

The data in this report needs to include a level of detail proportionate to the circumstances, the scale of change proposed and the impact of that change on affected communities. The Equalities Profile (page 146), for example, does not provide any information by Ward.

In addition, in some parts of Partington and Sale West over 40% of households have no access to a car, a much higher figure than those in mentioned in paragraph 5.33 (page 39).

The data at Table 16 (for example) should be at a small area output level to ensure inappropriate, unsustainable solutions, such as the Carrington Relief Road, are not inappropriately foisted on communities.

The Baseline Data section of this report needs to include all data that is relevant to decision-making including data related to areas covered by PfE allocations. The evidence reports also need to be reviewed, the Trafford-Health-Inequalities-Needs-Assessment-2023, for example, does not include pollution-related health conditions, even though this is a huge issue for Partington residents and they are experiencing chronic health conditions at a much higher incidence rate than GM or England.

Will the CRR improve current Health Inequalities?

No, it will worsen current very poor health outcomes!

The government says¹ that ***“Poor air quality is the largest environmental risk to public health in the UK, as long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy”***.

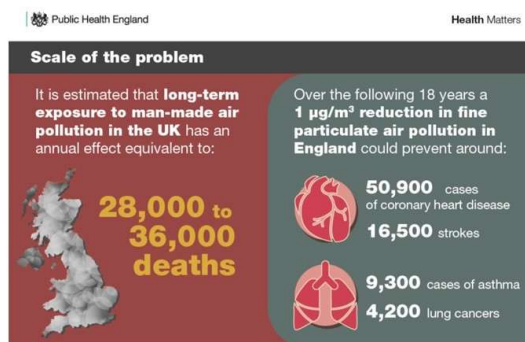
What the Trafford Health Inequalities Data Report (2022)² says about those who present at Partington GP practices includes:

- Asthma prevalence (9.83% and 9.08%) is significantly higher than England (6.38%) and GM (6.88%) averages
- COPD prevalence (4.5% and 4.23%) is much higher than England (1.93%) and GM (2.34%) averages
- Cardiovascular Disease prevalence is higher (2.37%) in one surgery, compared to the England (1.19%) and GM (1.16%) averages (Hypertension also has a higher prevalence at both surgeries)

This demonstrates that air pollution could already be a factor in health issues for Partington residents

¹ <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

² <https://gmpcb.org.uk/wp-content/uploads/Trafford-West-Inequalities-Data-Report-May-2022.pdf>



The list of SBIs at paragraph 5.39 (page 41) only includes 11 of Trafford’s 48 sites, the rest are from other boroughs. A list comparing the SBI list from the Capita report with the GMEU SBI register is submitted as part of our response.

Whilst we recognise a list of SBIs is also included at Appendix 6 of the plan itself, if this is an example of the quality of the data in the Scoping Report, how can any of the other information in the report be trusted?

The Baseline data also does not include any detailed information about the public rights of way or permissive routes in Trafford

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04a. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant, in respect of any legal compliance matters you have identified at question 03a.

You will need to say why each modification will make the Local Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please write your response here:

For this specific representation: (Scoping Report)

The document should be reviewed to ensure it is compliant with the regulator's Green Claims Code.

04b. Please set out the modification(s) you consider necessary to make the Local Plan sound, in respect of any soundness matters you have identified at question 03b.

You will need to say why each modification will make the Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please write your response here:

For this specific representation: (Scoping Report)

The document should be reviewed and updated to correct errors, incorporate small area statistics and sufficient data to enable sound and sustainable planning decisions to be made.

05. If your representation is seeking a modification to the plan, do you wish to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)



06. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please write your response here:

FOCM – Trafford Local Plan Reg 19 Response



Part B: Representation

FOCM Representation number: 4 (Open Space Assessment)

01a To which Publication Document does this representation relate?

Trafford Local Plan 2022-2039 Publication Version (July 2026)



Policies Map

Integrated Assessment Report (IA)

Habitats Regulations Assessment (HRA)

01b To which section of the Publication Document stated in question 01a does this representation relate?

Policy/ section reference Open Space Assessment

Page number Various – see examples below

Paragraph number Various - see examples below

Policies Map layer

02a. Do you consider the Local Plan is legally compliant?

Yes

No



02b. Do you consider the Local Plan is sound?

Yes

No



03a. Please give details of why you consider the Local Plan is legally compliant or not.

General:

Specific to Representation 4: (Open Space Assessment)

This document does not comply with the principles of the regulator's [Green Claims Code](#), which requires the following for all environmental data:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated.

FOCM – Trafford Local Plan Reg 19 Response



Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please write your response here:

For this specific representation: (Open Space Assessment)

The document should be reviewed to ensure it is compliant with the regulator's Green Claims Code.

04b. Please set out the modification(s) you consider necessary to make the Local Plan sound, in respect of any soundness matters you have identified at question 03b.

You will need to say why each modification will make the Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please write your response here:

For this specific representation: (Open Space Assessment)

The document should be reviewed and must show comprehensive information to ensure decisions are based on a comprehensive understanding of the natural capital assets in the area and the risks to be faced by communities because of development.

An Open Space Assessment for the area known as Carrington Moss should be undertaken.

05. If your representation is seeking a modification to the plan, do you wish to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)



06. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please write your response here:

FOCM – Trafford Local Plan Reg 19 Response



Part B: Representation

FOCM Representation number: 5 (SFRA Addendum)

01a To which Publication Document does this representation relate?

Trafford Local Plan 2022-2039 Publication Version (July 2026)



Policies Map

Integrated Assessment Report (IA)

Habitats Regulations Assessment (HRA)

01b To which section of the Publication Document stated in question 01a does this representation relate?

Policy/ section reference SFRA Addendum

Page number Various – see examples below

Paragraph number Various - see examples below

Policies Map layer

02a. Do you consider the Local Plan is legally compliant?

Yes

No



02b. Do you consider the Local Plan is sound?

Yes

No



03a. Please give details of why you consider the Local Plan is legally compliant or not.

General:

Specific to Representation 5: (SFRA Addendum)

This document does not comply with the principles of the regulator's [Green Claims Code](#), which requires the following for all environmental data:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated.

FOCM – Trafford Local Plan Reg 19 Response



03b. Please give details of why you consider the Local Plan is sound or not.

General:

Specific to Representation 5: (SFRA Addendum)

This document reveals that there has been insufficient consideration of flood risks.

The conclusion is *"Overall, the updated evidence confirms that flood risk does not present a fundamental constraint to the delivery of the Trafford Local Plan. The Local Plan policies, together with Places for Everyone Policy JP-S4, Policy JP-G3 and Trafford's locally specific water and flood risk policies, provide a robust framework for managing flood risk, adapting to climate change, and ensuring that future development remains safe for its lifetime without increasing flood risk elsewhere"*. Given the scale of development in current water capture and storage areas, this seems very unachievable. As an example, the Carrington Relief Road is being proposed on land that requires 2.5 x more water storage capacity than the alternative (according to Trafford's documentation), this scheme alone could render flood risk objectives undeliverable.

Our concerns include:

- the evidence is out of date, Trafford has agreed a fudge with the Environment Agency to manipulate the consequences, this piecemeal approach does not consider the risks to Trafford land areas as a whole
- cumulative flood risk has not been taken into consideration, nor have upstream developments and the loss of land that previously captured and stored significant levels of surface water flooding, given all the development approved since 2019
- future flood risk will be exacerbated by the complete destruction of Carrington Moss, given that the extracted peat is likely to be replaced by crushed stone, with little or no water retention capacity, flood risk in the borough will drastically increase
- future extreme weather conditions do not appear to have been given sufficient weight.

In an example of the lack of data to support flood modelling, Trafford and the Environment Agency appear to have very little historical data on the river heights of Sinderland Brook and its tributaries, but the existing flood walls confirm previous flooding problems BEFORE the addition of recent and further building and climate change. Temporary depth gauges have been recently installed, but these will not show the water depth on, for example, 31st December 2024 (a date remembered by local communities due to extreme flooding). With the El Nino effect in the Pacific, forecasters are indicating a wet early winter in the northern hemisphere. The impacts of this phenomenon could be extensive.

The data also does not show all the risks that could be experienced by Trafford residents because of development, including, for example, an assessment of surface water flooding, as shown on government's [flood risk for planning map](#).

04a. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant, in respect of any legal compliance matters you have identified at question 03a.

You will need to say why each modification will make the Local Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

FOCM – Trafford Local Plan Reg 19 Response



After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please write your response here:

For this specific representation: (SFRA Addendum)

The document should be reviewed to ensure it is compliant with the regulator's Green Claims Code.

04b. Please set out the modification(s) you consider necessary to make the Local Plan sound, in respect of any soundness matters you have identified at question 03b.

You will need to say why each modification will make the Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please write your response here:

For this specific representation: (SFRA Addendum)

The document should be reviewed and must evidence sufficient information to ensure decisions are based on a thorough understanding of the natural capital assets in the area and the risks to be faced by communities because of development and climate change.

Trafford should model the rainfall of 31st December 2024 as an example of extreme and frequent events and seek to mitigate for similar (and more extreme) incidents occurring because of climate change. The Environment Agency and Trafford should review the proposed approach to ensure there is a clear and comprehensive assessment of cumulative flood risk, that the risks associated with the loss of Carrington Moss are fully considered and that expected future extreme weather conditions are given sufficient emphasis.

05. If your representation is seeking a modification to the plan, do you wish to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)



06. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please write your response here:

Part B: Representation

FOCM Representation number: 6 (Climate Change Risk Assessment)

FOCM – Trafford Local Plan Reg 19 Response



01a To which Publication Document does this representation relate?

Trafford Local Plan 2022-2039 Publication Version (July 2026)

Policies Map



Integrated Assessment Report (IA)

Habitats Regulations Assessment (HRA)

01b To which section of the Publication Document stated in question 01a does this representation relate?

Policy/ section reference Climate Change Risk Assessment

Page number Various – see examples below

Paragraph number Various - see examples below

Policies Map layer

02a. Do you consider the Local Plan is legally compliant?

Yes

No



02b. Do you consider the Local Plan is sound?

Yes

No



03a. Please give details of why you consider the Local Plan is legally compliant or not.

General:

Specific to Representation 6: (Climate Change Risk Assessment)

This document does not comply with the principles of the regulator's [Green Claims Code](#), which requires the following for all environmental data:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated.

03b. Please give details of why you consider the Local Plan is sound or not.

General:

Specific to Representation 6: (Climate Change Risk Assessment)

FOCM – Trafford Local Plan Reg 19 Response



Trafford's peat mosses, Carrington Moss (currently circa 335 hectares and considered by Natural England to be a restorable, irreplaceable habitat) and Warburton Moss (once 200 hectares but now much smaller) play a huge role in both mitigating and addressing climate change risks, including, for example:

- Supporting resilience through carbon sequestration and storage
- Reducing the risk of flooding and providing water storage capacity at a time of increased risk of scarcity
- Providing a unique and essential habitat for depleted bird and wildlife species populations

Table 4 - Local Plan Impact on 'Natural Environment and Assets' Risks (page 26) suggests that *"The Local Plan will help to enhance natural carbon stores and carbon sequestration through the protection and enhancement of local nature and biodiversity sites. Particularly beneficial are the policies to enhance the Great Manchester Wetlands (NE5), protect the Mersey Valley (NE6), and protect and enhance trees, woodland and hedgerows (NE7)"*

This is overly positive given Trafford is currently planning to destroy Carrington Moss, cause significant harm to Warburton Moss and allocate a peatland site. These issues are not highlighted in the CCRA, nor is the consequential impact on Trafford residents.

The government's [Nature Based Solutions for Water Resources Handbook](#) puts peatland restoration at the top of the list of opportunities and states that *"Peatland restoration has a high scale of benefits achievable"*. At a time when drought and flooding are materialising as key aspects of climate change, this issue should have been paramount in a CCRA for Trafford and should have been reflected in the scoring/analysis.

The assessment also suggests that the risks to agriculture (N6) and to food security (N10) are not directly relevant to Local Plan. This is incorrect. The plan to change the use of productive best and most versatile agricultural land at a time of huge economic and climate uncertainty (with the government highlighting the risks in the [National Security Assessment](#)) is ill-advised and should have been reflected in the scoring/analysis.

Paragraphs 4.37 (page 20) and 4.42 (page 21), for example, are also overly positive and do not do justice to the importance of the natural environment or our natural capital assets, which will be significantly impacted by proposed developments in the New Carrington area. The issue is also not picked up in Table 3, which is a list of 'Policy Opportunities to Reduce Climate Risks'

The assessment of Allocation AS4 (Dairyhouse Lane, page 52) is particularly weak, mitigation is not possible, so compensation for loss of woodland is proposed, rather than the removal of the allocation from the plan.

04a. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant, in respect of any legal compliance matters you have identified at question 03a.

You will need to say why each modification will make the Local Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please write your response here:

FOCM – Trafford Local Plan Reg 19 Response



For this specific representation: (Climate Change Risk Assessment)

The document should be reviewed to ensure it is compliant with the regulator's Green Claims Code.

04b. Please set out the modification(s) you consider necessary to make the Local Plan sound, in respect of any soundness matters you have identified at question 03b.

You will need to say why each modification will make the Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please write your response here:

For this specific representation: (Climate Change Risk Assessment)

The document should be reviewed and must show comprehensive information to ensure decisions are based on a comprehensive understanding of the natural capital assets in the area and the risks to be faced by communities because of development and climate change.

The document should be updated to make reference to the risks related to the loss of irreplaceable habitats, natural carbon stores and other natural capital assets (such as best and most versatile agricultural land).

Allocation AS4 should be removed from the plan.

05. If your representation is seeking a modification to the plan, do you wish to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)



06. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please write your response here:

FOCM – Trafford Local Plan Reg 19 Response



Part B: Representation

FOCM Representation number: 7 (Local Plan Vision)

01a To which Publication Document does this representation relate?

Trafford Local Plan 2022-2039 Publication Version (July 2026)



Policies Map

Integrated Assessment Report (IA)

Habitats Regulations Assessment (HRA)

01b To which section of the Publication Document stated in question 01a does this representation relate?

Policy/ section reference Local Plan Vision

Page number page 22

Paragraph number paragraph 2.2

Policies Map layer

02a. Do you consider the Local Plan is legally compliant?

Yes

No



02b. Do you consider the Local Plan is sound?

Yes

No



03a. Please give details of why you consider the Local Plan is legally compliant or not.

General:

Specific to Representation 7: (Local Plan Vision)

This document does not comply with the principles of the regulator's [Green Claims Code](#), which requires the following for all environmental data:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated.



03b. Please give details of why you consider the Local Plan is sound or not.

General:

Specific to Representation 7: (Local Plan Vision)

Whilst it is aspirational, the Local Plan Vision, as documented, is not deliverable.

The Vision says, for example, that, by 2039, the Local Plan will support “*decisive action on the climate crisis, and the delivery of resilient sustainable places, achieving borough-wide carbon neutrality by 2038*”.

The proposals to destroy an irreplaceable habitat that currently sequesters and stores huge amounts of carbon mean that, whenever approved development commences, there will be a huge carbon emissions event that should be taken into consideration when calculating the borough’s journey towards carbon neutrality.

The Eastern and Southern Link roads proposed in this plan will be constructed across the deepest parts of the peatland. Developments of housing and warehousing are also proposed on peatland, including the allocation AS4. A planning application that will destroy 20 hectares of very deep peat (between 1 and 3 metres in thickness) has already been approved (without the NPPF required ‘suitable compensation strategy’ existing). The peat extraction will cause a huge carbon emissions event. The Carrington Relief Road, whilst just touching the northern extent of the peat moss, will cause hydrology changes that will impact the wider mossland.

The Vision also suggests that “*Trafford will enhance biodiversity and protect its natural assets, ensuring high-quality green and blue spaces that support health, wellbeing and active lifestyles*”.

Again, this is not what the Local Plan will deliver. The extensive biodiversity and natural capital assets at New Carrington are not being enhanced or protected, they are being destroyed and, given the peat is likely to be replaced by crushed stone, with little or no water retention capacity, flood risk in the borough will drastically increase as a consequence of the Plan.

The suggestion that the Local Plan will deliver “*a safe, accessible and sustainable transport network*”, is also incorrect. At New Carrington, the largest development in PfE, the proposals are centred around 4 major new roads, not public transport hubs. Public funding will be used to prolong car/HGV dependency rather than prioritising additional public transport services and enhancing walking, cycling and horse riding routes.

If there is an expectation that high quality design and placemaking will underpin all development, “*improving air quality, reducing health inequalities, celebrating heritage and supporting successful cultural, sporting, education and leisure facilities for future generations*”, development should not result in increased air, noise, light, vibration, dust and water pollution (to say nothing of carbon emissions). Monitoring health inequalities should include the inequalities suffered by those most at risk from those pollutants. Residents in Partington, for example, already suffer from higher than national or regional incidence of asthma, COPD and cardiovascular disease. The proposals in PfE and this plan will exacerbate those conditions.

In terms of celebrating heritage, why aren’t our 10,000 year old peat mosses being celebrated and restored as residents have been requesting for almost 10 years.

As for future generations, the proposals for New Carrington will create places that are neither sustainable nor resilient as they will increase flood risk and carbon emissions, reduce food security, further deplete populations of red listed bird species and endangered wildlife, destroy woodland, wetland and irreplaceable habitats and will increase traffic, congestion, pollution and chronic health conditions.

FOCM – Trafford Local Plan Reg 19 Response



04a. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant, in respect of any legal compliance matters you have identified at question 03a.

You will need to say why each modification will make the Local Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please write your response here:

For this specific representation: (Local Plan Vision)

The document should be reviewed to ensure it is compliant with the regulator's Green Claims Code.

04b. Please set out the modification(s) you consider necessary to make the Local Plan sound, in respect of any soundness matters you have identified at question 03b.

You will need to say why each modification will make the Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please write your response here:

For this specific representation: (Local Plan Vision)

Make changes to the Plan to make the Vision deliverable. This would include decisive action to change or remove any proposals that will impact the intentions set out in the Vision.

05. If your representation is seeking a modification to the plan, do you wish to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)



06. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please write your response here:

FOCM – Trafford Local Plan Reg 19 Response



Part B: Representation

FOCM Representation number: 8 (Local Plan Policies)

01a To which Publication Document does this representation relate?

Trafford Local Plan 2022-2039 Publication Version (July 2026)



Policies Map

Integrated Assessment Report (IA)

Habitats Regulations Assessment (HRA)

01b To which section of the Publication Document stated in question 01a does this representation relate?

Policy/ section reference Local Plan Policies

Page number Various (see below)

Paragraph number Various (see below)

Policies Map layer

02a. Do you consider the Local Plan is legally compliant?

Yes

No



02b. Do you consider the Local Plan is sound?

Yes

No



03a. Please give details of why you consider the Local Plan is legally compliant or not.

General:

Specific to Representation 8: (Local Plan Policies)

This document does not comply with the principles of the regulator's [Green Claims Code](#), which requires the following for all environmental data:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated.



03b. Please give details of why you consider the Local Plan is sound or not.

General:

Specific to Representation 8: (Local Plan Policies)

- Policy ST1: The Spatial Strategy (page 30) does not mention growth of the rural economy or the conservation or enhancement of natural capital assets
- Policy ST2: Sustainable Development (page 33) does not include a definition of sustainable development (and there is not one in the NPPF)
- Policy CR4: Energy Generation and Storage Development (page 43) should explicitly require a noise assessment to be carried out
- Policy CR7: Water Efficiency (page 49) should make reference to the need to minimise abstraction from Trafford's water courses
- Policy R2: Meeting Affordable and Social Housing Needs (page 57) lacks a specific policy (similar to HO5 aii in the new NPPF) for affordable housing where land could be released from Green Belt, especially given current affordable housing requirement in New Carrington is so low (15%) and the main landowner has indicated that they will use Grey Belt rules to propose their "*entire landholding*" as an allocation
- Policy EJ1: Employment Land (page 77) and associated policies (Policy EJ3: Industry and Warehousing, Policy EJ4: Office Development) does not include any restrictions on development proposed adjacent to residential properties, such as an explicit requirement that B8 warehouses and the 24/7 operation of such megasheds will not be permitted within 500 metres of residential properties, that a Residential Visual Amenity Assessment (RVAA) is a requirement for any overly dominant development to determine if it will alter private residential views enough to render a property an unattractive, unpleasant place to live and that a genuine noise assessment will be carried out to ensure residents do not suffer the consequences of unsustainable development being approved, such as the conditions being endured by [Astley residents](#). All such policy criteria should apply to developments in New Carrington as well as in the rest of the borough.
- Policy EJ5: Rural Economy (page 87) - unlike other economy and jobs policies, does not include any growth targets, nor any protectional criteria against change of use, it appears to ignore government policy announcements that are intended to support growth in the rural economy, including farming. The government has published, for example, a food strategy for England, which included several high-level goals, including supporting economic growth in the food sector and improving the resilience of domestic food production. In addition, given the extreme level of depletion of farmland bird species, the policy should also make reference to farmers dedicating a minimum of 10% of their land to targeted wildlife management, including care of hedgerows and the creation of wildflower margins and beetle banks to boost protein-rich bugs for nestlings. There is also no monitoring associated with the growth of the rural economy, which was totally excluded from PfE on the understanding that it would be fully covered in local plans.
- Policy TM1C: Walking, Wheeling and Cycling in Trafford Central (page 102) makes no reference to connectivity from Sale West to the extensive public rights of way (PROW) and permissive routes on, across and around Carrington Moss

FOCM – Trafford Local Plan Reg 19 Response



- Policy TM1W: Walking, Wheeling and Cycling in Trafford West (page 104) makes no reference to the repeated requests from communities for over 5 years for upgrades to the extensive PROWs and permissive routes on, across and around Carrington Moss. Whilst paragraph 7.19 confirms that the “*lists are not exhaustive*”, we strongly feel that Trafford’s repeated dismissal of our requests highlights that the Plan is not being developed to support the communities Trafford is supposed to serve.
- Policy TM2: Public Transport (page 107) our repeated requests for over 5 years (including in consultation responses related to the Local Plan) for what is labelled the ‘Trafford Greenway’ in Policy TM1W to be a tram/train route, given the scale of developments proposed at Carrington (and that the former railway line is considered by Network Rail to be a ‘live’ line) have been ignored once again. This plan confirms (paragraph 3.13) that the New Carrington allocation is “*one of the largest strategic development locations in the region*”, yet Trafford proposes that it is developed around 4 new roads, rather than public transport and sustainable freight hubs. This does not reduce car/HGV dependency and is contrary to the TfGM Transport Strategies 2040 and 2050. Whilst paragraph 7.74 mentions that there is an aspiration for this route to be utilised for public transport, we feel the commitment in the Local Plan should be stronger as it is for allocations in other parts of the district (such as AN1 and AN3).
- Policy TM3: The Highway Network (page 111) does not include a target to achieve the TfGM Transport Strategy 2040 & 2050 aim of no net increase in motor vehicle traffic by 2040
- Policy TM4: Movement of Goods (page 115) should require a limitation of vehicle movements near to residential properties, particularly during nighttime hours
- Policy TM6: Mitigating Transport Impacts (page 123) does not reference the need to consider alternatives and to select the option that delivers transport services with the least environmental and/or ecological harm.
- Policy TC2: Development within Designated Centres (page 133) does not mention that residents should be consulted about the proposals to develop new centres, for example, in New Carrington.
- Policy NE1: Local Nature Recovery Strategy omits New Carrington from the list set out at paragraph 9.15 (page 154). Parts of the New Carrington site have been identified as Core Nature Recovery Sites and Opportunity Areas in the LNRS. This is important as this part of Trafford contains the borough’s highest concentration of natural capital assets, many of which will be destroyed by proposed or intended development.
- Policy NE3: Nature Conservation (page 157) – the policy should refer to Appendix 6 and should explicitly require proposed development to ensure there is a 500m buffer between SBIs and SSSIs and any construction. The policy does not identify (or even plan to identify) any additional sites for conservation/preservation (SBIs) despite the district’s Enhanced Biodiversity Duty (none were identified or allocated within PfE). We did request that Carrington Moss be designated for preservation and restoration in our previous response, something we have been requesting now for 10 years. The government’s [Nature Based Solutions for Water Resources Handbook](#) puts peatland restoration at the top of the list of opportunities and states that “*Peatland restoration has a high scale of benefits achievable*”. At a time when drought and flooding are materialising as key aspects of climate change, such a request should have been given comprehensive consideration.

FOCM – Trafford Local Plan Reg 19 Response



- Policy NE5: Carbon Storage and Natural Habitats (page 160) is not deliverable as Trafford plans to destroy its largest natural carbon sequestration and storage asset (Carrington Moss) through proposed development (with the landowner highlighting their intentions to propose more in their response to the previous Local Plan consultation). Given that Trafford has already approved development on very deep peat (between 1m and 3m thickness), without a masterplan being in place and without the NPPF policy (193c) required suitable compensation strategy existing, communities have no confidence that this policy will be delivered.
- Monitoring of policies relating to the Natural Environment (page 168) do not comply with government guidance given the Enhanced Biodiversity duty. Whilst the target is no net loss of conservation sites or woodland, there is no requirement to increase the number of sites and no monitoring of the loss of peatland areas.
- Policy OS1: Open Space, Play, Sport and Recreation (page 172) – the evidence base supporting this policy (Trafford's Open Spaces Assessment) is flawed, as set out elsewhere in our response. The information in Appendix 7 (South, page 407, Central, page 412 and West, page 416) is inconsistent and incomplete. Whilst Redbrook, Sinderland Brook and Firs Plantation are documented, the area known as Carrington Moss is not listed in the Natural and Semi-Natural Green Space for these three localities. This is an extensive area that is extremely well used by deprived communities for walking, cycling and horse riding and other outdoor pursuits, including photography, green social prescribing, mindfulness and forest bathing. The Open Space Assessment does not include an assessment as required by NPPF paragraphs 103 and 104 for the Carrington Moss area. As this was not done for PFE, it should be included in this Local Plan. This is especially important given that Wain Estates has indicated that they intend to put forward their entire landholdings for development.
- Policy WA1: Managing Flood Risk (page 190) – The Flood Risk Assessment is high level (see our comments about the addendum) and will not result in compliance with national policy (NPPF 170) to ensure development is “*made safe for its lifetime without increasing flood risk elsewhere*”.
- Policy WA3: Flood Storage Areas (page 194) – is not deliverable as the largest flood water storage area in the borough, Carrington Moss is not listed. This whole area will no longer be available for water storage due to proposed and intended development, this will leave communities in Carrington, Partington, Sale West and Warburton at a huge and increased risk of surface water flooding. Monitoring should include the number of flooding incidents attributable to inappropriate or unsustainable development.
- Policy BE2: Tall Buildings (page 217) – whilst we recognise Policy BE1 does provide some protection for resident amenity, we believe there should be an explicit requirement for overly dominant development, such as B8 warehouses or Data Centres, to be located at least 500m from the nearest residential property (and that the 24/7 operation of such developments will not be permitted within 500 metres of residential properties), that a Residential Visual Amenity Assessment (RVAA) is a requirement to determine whether it will alter private residential views enough to render a property an unattractive, unpleasant place to live and that a genuine noise assessment will be carried out to ensure residents do not suffer the consequences of unsustainable development being approved, such as the conditions being endured by [Astley residents](#). All such policy criteria should apply to developments in New Carrington as well as in the rest of the borough.
- Policy BE3: Historic Environment (page 220) – the list of conservation areas at Appendix 8 is incomplete as it does not include the Carrington and Warburton Mosses, which are 10,000 years old and surely worthy of inclusion as Trafford's oldest heritage assets.

FOCM – Trafford Local Plan Reg 19 Response



- Policy BE4: Agent of Change (page 225) – the policy should reference the required level/quality of noise assessment to ensure that any planning applications adequately and accurately predict the noise levels that will be experienced by residents (given the experience of [Astley residents](#) is that there are a significant number of noise events each night that exceed the maximum predicted in the planning assessment).
- Policy BE5: Environmental Protection (page 226) – the term ‘*unacceptable risk*’ must be defined. According to the [Trafford Health Inequalities Data Report \(2022\)](#) the prevalence of asthma, COPD and Cardiovascular Disease for patients who present at Partington GP practices are significantly higher than England and GM averages. This demonstrates that air pollution could already be a factor in health issues for Partington residents so how will ‘*unacceptable risk*’ be determined to ensure that those figures do not rise further.
- Policy BE6: Hazardous Installations (page 228) the term ‘*unacceptable risk*’ must be defined. The policy should also refer to the requirements related to transporting hazardous materials. In proposing to open the A1 road in Carrington to through traffic, for example, the council clearly does not consider substantially increasing the number of vehicles travelling through inner COMAH zones to be an unacceptable risk.
- Monitoring (page 232) – the indicators are minimal and should at least include monitoring the materialisation of risks, the number of complaints relating to noise or other pollutants and the number of pollution or hazard related incidents.
- Policy FCW1: New Carrington Infrastructure Contributions (page 248) – omits any reference to the requirement to compensate for the cumulative loss of the peat moss (NPPF paragraph 193c), which states that a “*suitable compensation strategy*” must exist. The previous consultation referred to in paragraph 14.62 did not include any reference to the cumulative loss of peat, nor the cumulative impact on the natural capital assets within the masterplan area. FOI requests to Trafford reveals that compensation for loss of peat will be assessed on a “*case by case*” basis, that there is no process for doing this and it appears that the cumulative impact on the overall sustainability of this restorable, irreplaceable habitat (Natural England’s assessment) has not been considered.
- Policy FC4: Sustainable Transport and Highways (page 251) should make reference to horse riding infrastructure (as specific surfacing requirements are necessary). There are over 1,000 horses stabled on and around Carrington Moss alone (according to the British Horse Society).
- Policy FC5: Managing and Monitoring Arrangements (page 252) should make it explicit that all detailed monitoring reports will be transparently available to the public.

04a. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant, in respect of any legal compliance matters you have identified at question 03a.

You will need to say why each modification will make the Local Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please write your response here:



For this specific representation: (Local Plan Policies)

The document should be reviewed to ensure it is compliant with the regulator's Green Claims Code. The Friends of Carrington Moss request, in their previous consultation responses, for Carrington Moss to be designated for preservation, conservation and restoration, should be reconsidered.

04b. Please set out the modification(s) you consider necessary to make the Local Plan sound, in respect of any soundness matters you have identified at question 03b.

You will need to say why each modification will make the Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please write your response here:

For this specific representation: (Local Plan Policies)

Make the necessary changes to the Plan to address the points raised in question 03b, including:

- Policy ST1: The Spatial Strategy (page 30) – add a criterion D(iv) 'Protect and grow the Rural Economy and support the conservation and enhancement of the area's natural capital assets'.
- Policy ST2: Sustainable Development (page 33) – add a paragraph (3.35) setting out what the council considers sustainable development must encompass. We do not consider building on irreplaceable habitats, focusing development around roads, rather than sustainable passenger and freight transport, or depleting natural capital assets such as best and most versatile agricultural land, woodland wetland and water capture/storage areas, for example, to constitute development that meets the needs of the present without compromising the ability of future generations to meet their own needs (but the council clearly thinks differently).
- Policy CR4: Energy Generation and Storage Development (page 43) amend criterion D to say 'Energy storage proposals must demonstrate how fire safety, contamination and other relevant risks, including noise, have been assessed and mitigated from the outset'.
- Policy CR7: Water Efficiency (page 49) add a criterion D which states 'Proposals must minimise abstraction from Trafford's water courses'.
- Policy R2: Meeting Affordable and Social Housing Needs (page 57) add a criterion H which states 'where land is proposed to be released from the Green Belt for development, including via Grey Belt designation, the national Green Belt Golden Rules will apply'
- Policy EJ1: Employment Land (page 77) – add a new criterion I which states 'Overly dominant development and 24/7 operations will not be permitted within 500m of residential properties. All such development must provide a Residential Visual Amenity Assessment (RVAA) and a rigorous noise assessment' and a new criterion J which confirms 'All such policy criteria apply to developments in New Carrington and Davenport Green, as well as in the rest of the borough'.



- Policy EJ5: Rural Economy (page 87) – add a new criterion B which states ‘The loss of existing rural employment site(s) will not be permitted’, a criterion C which states ‘Ensuring that a sufficient land supply to meet the needs of the rural economy is available and will be achieved by: i. Identifying and protecting a suitable range of rural land and allocations to provide sufficient new opportunities for rural growth and modernisation’, a criterion D which states ‘Any developments within the rural economy will be expected to dedicate a minimum of 10% of the land to targeted wildlife management, will replant or repair hedgerows and will create wildflower margins and, for example, beetle banks to boost protein-rich bugs to support the recovery of red listed bird species populations’. In addition, the table at paragraph 6.50 should be updated to include monitoring related to the amount and classification of agricultural land, hedgerow status and ground nesting farmland bird populations.
- Policy TM1C: Walking, Wheeling and Cycling in Trafford Central (page 102) include reference in the text and the graphic (Figure 7.3) to identify the connectivity from Sale West to the extensive public rights of way (PROW) and permissive routes on, across and around Carrington Moss.
- Policy TM1W: Walking, Wheeling and Cycling in Trafford West (page 104) – update criterion E to confirm that improvements will be made to the extensive PROWs and permissive routes on, across and around Carrington Moss.
- Policy TM2: Public Transport (page 107) insert criterion D(i) to confirm that, during this Plan Period, Trafford will explore the feasibility of reopening the former railway line between Timperley and Irlam for tram/train services
- Policy TM3: The Highway Network (page 111) – insert criterion A(iii) to confirm Trafford will **not** support proposals which will obstruct achievement of the aims of the TfGM Transport Strategy
- Policy TM4: Movement of Goods (page 115) insert a new criterion E (Nighttime Hours) which states ‘restrictions will be placed on vehicle movements within 500m of residential properties to prevent 24/7 operations.
- Policy TM6: Mitigating Transport Impacts (page 123) insert a new criterion iv to confirm that developments will be expected to consider alternatives and select the option that delivers sustainable transport services with the least environmental and/or ecological harm.
- Policy TC2: Development within Designated Centres (page 133) insert a new criterion C(i) which states that ‘residents must be consulted about proposals for new retail floor space in New Carrington’.
- Policy NE1: Local Nature Recovery Strategy – update paragraph 9:15 to include New Carrington.
- Policy NE3: Nature Conservation (page 157) – update criterion B to say ‘The following designated Core Local Nature Sites and nature conservation assets, as defined on the Policies Map and in the list at Appendix 6, will be protected from development’, update criterion C to say ‘C. Development proposals must ensure there is a 500m buffer between any site listed in Appendix 6 and the proposed construction and, where there will be impacts which are likely to affect any of the above designations must consider the potential impacts and provide appropriate mitigation in accordance with PfE Policy JP-G8. Insert a new criterion D to confirm that proposals which identify additional sites for conservation and/or preservation will be supported.
- Policy NE5: Carbon Storage and Natural Habitats (page 160) – insert a new criterion C which states ‘development proposals which impact natural carbon sequestration and storage assets will not be supported’.

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- Monitoring of policies relating to the Natural Environment (page 168) – the table at paragraph 9.47 should be updated to include ‘All Irreplaceable Habitats, including peatland’ in the list of Retention of Nature Conservation Sites and the target for those sites should be changed from ‘no net loss’ to ‘increase/enhance/restoration’. The Land Area of Woodlands and Copses (Hectares) should be changed from ‘no net loss’ to ‘increase/enhance’.
- Policy OS1: Open Space, Play, Sport and Recreation (page 172) – update Appendix 7 (South, page 407, Central, page 412 and West, page 416) to include the area known as Carrington Moss in the Natural and Semi-Natural Green Space for these three localities. Commission an Open Space Assessment, as required by NPPF paragraphs 103 and 104, for the Carrington Moss area.
- Policy WA1: Managing Flood Risk (page 190) – Please see our comments in our representation related to the SFRA Addendum.
- Policy WA3: Flood Storage Areas (page 194) – insert criterion A(iii) to add the area known as Carrington Moss to the list of sites safeguarded from development
- Monitoring – the table at paragraph 11.23 should include the number of flooding incidents attributable to inappropriate or unsustainable development.
- Policy BE2: Tall Buildings (page 217) – insert a new criterion xiv which states that ‘overly dominant development, such as B8 warehouses or Data Centres, must be located at least 500m from the nearest residential property (and 24/7 operation of such developments will not be permitted within 500 metres of residential properties), that a Residential Visual Amenity Assessment (RVAA) and a robust noise assessment will be required for all such developments’. Insert a new criterion xv to confirm that developments in New Carrington must comply with these policy criteria.
- Policy BE3: Historic Environment (page 220) – update Appendix 8 to include the Carrington and Warburton Mosses.
- Policy BE4: Agent of Change (page 225) – add a new criterion C(iv) which explicitly requires new development to carry out a comprehensive Noise Impact Assessment (NIA) to evaluate the commercial and industrial operations near residential areas.
- Policy BE5: Environmental Protection (page 226) – expand criterion B to set out what the council considers would comprise ‘unacceptable risk’.
- Policy BE6: Hazardous Installations (page 228) – expand criterion B1 to set out what the council considers would comprise ‘unacceptable risk’, including in relation to transporting hazardous materials.
- Monitoring (page 232) – the table at paragraph 13.48 should be expanded to include monitoring of materialisation of risks, the number of complaints relating to noise or other pollutants and the number of pollution or hazard related incidents.
- Policy FCW1: New Carrington Infrastructure Contributions (page 248) – update criterion E(ii) to add the following ‘including compensation for the cumulative loss of irreplaceable habitat, such as Carrington Moss’.
- Policy FC4: Sustainable Transport and Highways (page 251) – update criterion B(i) to include horse riding infrastructure.
- Policy FC5: Managing and Monitoring Arrangements (page 252) – add a new criterion D ‘Publishing Monitoring Reports – all monitoring reports will be publicly available within 4 weeks of being completed’.

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05. If your representation is seeking a modification to the plan, do you wish to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)



06. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please write your response here:

FOCM – Trafford Local Plan Reg 19 Response



Part B: Representation

FOCM Representation number: 9 (Allocation AS4 Dairyhouse Lane)

01a To which Publication Document does this representation relate?

Trafford Local Plan 2022-2039 Publication Version (July 2026)



Policies Map

Integrated Assessment Report (IA)

Habitats Regulations Assessment (HRA)

01b To which section of the Publication Document stated in question 01a does this representation relate?

Policy/ section reference Allocation AS4 Land at Dairyhouse Lane

Page number 356

Paragraph number All

Policies Map layer

02a. Do you consider the Local Plan is legally compliant?

Yes

No



02b. Do you consider the Local Plan is sound?

Yes

No



03a. Please give details of why you consider the Local Plan is legally compliant or not.

General:

Specific to Representation 9: (Allocation AS4 Dairyhouse Lane)

This document does not comply with the principles of the regulator's [Green Claims Code](#), which requires the following for all environmental data:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated.

FOCM – Trafford Local Plan Reg 19 Response



03b. Please give details of why you consider the Local Plan is sound or not.

General:

Specific to Representation 9: (Allocation AS4 Dairyhouse Lane)

This is a very small, environmentally and ecologically rich site, which the plan indicates will not be delivered until 2040 or beyond. Despite this, the Integrated Assessment unreasonably scores the impact of the development as 'Neutral'.

Analysis of the previous consultation showed that Natural England and the majority of respondents did not support the allocation of this site, which does not meet the NPPF policy requirement 188 (allocate land with least environmental or amenity value). It is also contrary to PfE Policy JP-G4 (Lowland Wetlands and Mosslands) and PfE Policy JP-G7 (Trees and Woodland).

Policy criterion F indicates that *"a suitable compensation strategy should be identified and delivered, including the potential restoration of lowland raised bog and complementary habitats elsewhere"*. Given that Trafford is determined to completely destroy Carrington Moss, is this restoration intended to take place in another district?

Furthermore, we estimate that at least 2,000 trees will need to be felled. Given the loss of the area known as Carrington Moss, where will the policy required 2:1 replacement of trees (at least 4,000) be located?

04a. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant, in respect of any legal compliance matters you have identified at question 03a.

You will need to say why each modification will make the Local Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please write your response here:

For this specific representation: (AS4 Land at Dairyhouse Lane)

The document should be reviewed to ensure it is compliant with the regulator's Green Claims Code.

04b. Please set out the modification(s) you consider necessary to make the Local Plan sound, in respect of any soundness matters you have identified at question 03b.

You will need to say why each modification will make the Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please write your response here:

For this specific representation: (AS4 Land at Dairyhouse Lane)

FOCM – Trafford Local Plan Reg 19 Response



Given that this site cannot be delivered in a policy-compliant manner, the allocation should be removed from the Plan

05. If your representation is seeking a modification to the plan, do you wish to participate in examination hearing session(s)?

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No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)



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Please write your response here:

FOCM – Trafford Local Plan Reg 19 Response



Part B: Representation

FOCM Representation number: 10 (Policies Map)

01a To which Publication Document does this representation relate?

Trafford Local Plan 2022-2039 Publication Version (July 2026)

Policies Map



Integrated Assessment Report (IA)

Habitats Regulations Assessment (HRA)

01b To which section of the Publication Document stated in question 01a does this representation relate?

Policy/ section reference Policies Map

Page number All

Paragraph number

Policies Map layer

02a. Do you consider the Local Plan is legally compliant?

Yes

No



02b. Do you consider the Local Plan is sound?

Yes

No



03a. Please give details of why you consider the Local Plan is legally compliant or not.

General:

Specific to Representation 10: (Policies Map)

This document does not comply with the principles of the regulator's [Green Claims Code](#), which requires the following for all environmental data:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated.

FOCM – Trafford Local Plan Reg 19 Response



03b. Please give details of why you consider the Local Plan is sound or not.

General:

Specific to Representation 10: (Policies Map)

All components that may influence development locations should be listed, especially given that there are several omissions, including the following:

- All irreplaceable habitats should be shown, including, for example, Trafford's peat mosses (in accordance with NPPF 192)
- The sites set out in the Local Nature Recovery Strategy (Core Local Nature Site and Nature Recovery Opportunity Areas) should also be shown
- All natural capital assets should be included, such as the Transpennine Trail and other existing active travel routes, best and most versatile agricultural land, flood risk areas, etc
- The location of hazardous businesses (COMAH zones) and contaminated sites should also be included in the map.

04a. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant, in respect of any legal compliance matters you have identified at question 03a.

You will need to say why each modification will make the Local Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please write your response here:

For this specific representation: (Policies Map)

The document should be reviewed to ensure it is compliant with the regulator's Green Claims Code.

04b. Please set out the modification(s) you consider necessary to make the Local Plan sound, in respect of any soundness matters you have identified at question 03b.

You will need to say why each modification will make the Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please write your response here:

For this specific representation: (Policies Map)

Update the Policies Map to include the omissions mentioned above.

FOCM – Trafford Local Plan Reg 19 Response



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No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)



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Please write your response here: