

Trafford Local Plan Reg 19 Response

Part A Personal Details

Title: Put your title here (Mr, Mrs, Ms, etc)

First Name: Put your first name here

Last Name: Put your surname here

Job Title: Unless you are completing your response as a group, you don't need to put anything here or in the next box

Organisation: Put your organisation name here if relevant

Address: Put your address here

Post Code: Put your postcode here

Contact Phone Number: Put your phone number here

Email Address: Put your email address here

Please select the 'Opt in' option if you wish to be kept informed of the progress of the Local Plan

Opt In ☒

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Part B: Representation

Representation number: 1 (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



02c. If you do not consider the Local Plan is sound, which aspect of soundness does this relate to?

Positively prepared



Justified



Effective



Consistent with national policy



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

The Integrated Assessment is inadequate, imbalanced and overly positive, and the review of previous Consultation responses has not given conscientious consideration to resident feedback. 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:

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- 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.

The assessment of the Land at Dairyhouse Lane (Allocation AS4) is a clear example of the imbalance in the Integrated Assessment.

The IA gives positive scores during the short and medium term, despite the site having an expected delivery date of 2040 or beyond. It makes no reference to the lack of compliance with national or regional policy, and it demonstrates extreme bias in the scoring, with positive scores (for economic and other benefits) being artificially inflated and the negative scores (for loss of environmental and ecological assets) being exceedingly understated.

The assessment of this site suggests the IA is merely a bureaucratic formality, 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.

The feedback from the previous consultation about this allocation appears to have been dismissed despite only 6 respondents indicating clear support and 18 making clear objections (along with Natural England confirming they did not support this allocation).

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

The policies and the evidence supporting the plan are incomplete and some of the assessments are weak and/or contain errors or omissions. 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.

In addition, the Plan allocates this site which is non-compliant with NPPF paragraph 188, which requires that plans allocate land with the least environmental or amenity value, and PfE policies, including JP-G4 (Lowland Wetlands and Mosslands) and PfE Policy JP-G7 (Trees and Woodland).

This is a very small, environmentally and ecologically rich site, which the plan indicates will not be delivered until 2040 or beyond. It will, therefore, deliver no benefits during the plan period, so should not be allocated.

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.

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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:

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.

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:

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: