TRAFFORD COUNCIL

Trafford Local Plan
Publication Version Representation Form

This form has two parts –
Part A – Personal Details: need only be completed once.

Part B – Your representation(s): Please fill in a separate sheet for each representation you wish to make.

Please return to Trafford Council by 23:59 18th September 2026 by email or post, preferably in electronic format through email.

- Email: localplan.consultation@trafford.gov.uk
- Post: Strategic Planning, Trafford Council, Trafford Town Hall, Talbot Road, Stretford, M32 0TH

Part A: Personal details

Title (required)	MRS
First Name (required)	LILLIAN
Last Name (required)	BURNS
Job Title (if applicable)	Planning & transport policy volunteer
Organisation (if applicable)	Campaign to Protect Rural England (CPRE), Cheshire Branch
Address Line 1 (required)	Victoria Buildings
Line 2	Lewin Street
Line 3	Middlewich

Line 4	Cheshire
Post Code (required)	CW10 9AT
Contact Phone Number	01606 835046
E-mail Address (required)	info@cprecheshire.org.uk
Please select the 'Opt in' option if you wish to be kept informed of the progress of the Local Plan*	Opt in (√) Opt out ( )

*The progress of the Local Plan includes:

- Submission of the Local Plan for independent examination
- Public hearing sessions
- Publication of the Inspector's Report on the Examination of the Local Plan
- The Adoption of the Local Plan

Part B: Your Representation (Please use a separate sheet for each representation)

01a. To which Publication Document does this representation relate?
Please tick as appropriate

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: _Spatial Strategy Fig 3-1 & Policy ST1, Southern Areas (D): PIE Policy JP-Strat 9_____

Page number: 28, 31_& 34_____

Paragraph number: _3.29_____

Policies Map layer: _____

Do you consider the Local Plan is:

02a. Legally compliant? (required) Yes ( ) No ( )
(See the Representation Guidan√ce Note)

02b. Sound? (required) Yes ( ) No (√)
(See the Representation Guidance Note)

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.

Please write your response here:

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

Please write your response here:

The Local Plan is unsound because it has persisted in carrying through from the 'Places for Everyone' spatial framework the flawed decision to sanction building on irreplaceable peatland at Carrington Moss, despite strong contra indications flagged by Natural England and others, it being contrary to national and local climate policies and in contravention of the National Planning Policy Framework (NPPF) which says:

"*in order to contribute to climate change mitigation and the transition to net zero, development proposals should* ….
1.f. Contribute to the creation or restoration of habitats which can act as carbon stores, such as through woodland planting and peatland restoration, while avoiding harm to habitats which can act as important carbon stores, including peatland and salt marsh"
(NPPF, August 2026, National decision-making policies, CC2: Mitigation of Climate Change, p.29). N.B. This phrasing was unchanged from the draft version of December 2025.

Additionally, the plan to build on Carrington Moss contravenes Trafford's own carbon resilience policy within this Local Plan that is being tabled for endorsement. Section 4 of the Plan declares how important it is to Trafford to become carbon neutral by 2038. It makes no sense, therefore, not to have dropped the plan to build on this area of the Manchester Mosses – the Manchester Mosses being a European designated site. The Greater Manchester Ecology Unit described the site, in their Habitats Regulations Assessment of the Draft Trafford Local plan as *'fragile'* and as *being 'vulnerable to external influences'* (para. 4.1).

Biodiversity net gain will be difficult to achieve and the site fails to comply with paragraph 188 of the NPPF which calls for planning authorities to *"allocate land with the least environmental or amenity value".*

We would point as well to the Climate Change Risk Assessment, dated April 2025, (doc. ref. 10993 003) which forms part of the Plan's evidence base, and which sets out a whole series of risks in Table 1. Many of these factors are relevant to the Carrington Moss situation and should not be ignored. This document also quotes at length international, national and local climate agreements. CPRE question how placing development on Carrington Moss can possibly sit comfortably within the known risks and the commitments made.

Another factor that concerns CPRE is the omission of sustainable transport in respect of the New Carrington site. The New Carrington concept is founded on the delivery of four new roads. Yet it is understood there is considerable merit in the proposition by local groups that a former railway line could be converted to a tram-train route. Also not addressed are public rights of way around and across Carrington Moss.

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:

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 size of the proposals for New Carrington should be reduced so as not to include any development on precious peat land and the remainder of the site needs to be addressed properly for sustainable transport and active travel.

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:

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Part B: Your Representation (Please use a separate sheet for each representation)

01a. To which Publication Document does this representation relate?
Please tick as appropriate

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: _____Chapter 5, Policy R1: Meeting Trafford's Housing Requirement_____

Page number: _____ 59

Paragraph number: _____

Policies Map layer: _____

Do you consider the Local Plan is:

02a. Legally compliant? (required) Yes ( ) No ( )
(See the Representation Guidance Note)

02b. Sound? (required) Yes ( ) No (√)
(See the Representation Guidance Note)

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.

Please write your response here:

CPRE has issues with:

1. The way that one development site is referenced and

2. The overall number of houses being sought by the local authority. We believe that the authority is making unnecessary over-provision with attendant impacts on the environment.

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

Please write your response here:

1. The important Housing Policy R1: Meeting Trafford's Housing Requirement (para. 5.9, page 59) only refers to 'Davenport Green'. There are also other places in the Local Plan, eg. in Policy EJ4 (on Offices), where only the term 'Davenport Green' is used. However, this area is also known as the Timperley Wedge and the masterplan for it calls it the Timperley Wedge Allocation. To avoid confusion, CPRE suggests that each time this particular site is referenced, it should be referred to as 'Davenport Green/ Timperley Wedge'.

2. It would appear that Trafford MBC are making provision for far more dwellings than they need to. The over-arching Greater Manchester Spatial Framework, 'Places for Everyone', calls for a housing requirement of a minimum of **19,077** net additional dwellings from Trafford, ie.an annual average of 1,222 homes p.a. There also needs to be a 20% buffer added to that for the first five years. But the Housing Topic Paper, dated July 2026, is showing that strategic sites alone would supply well over 30,000, although not all within the 20-year plan period:-

   AN 1 Wharfside (inc. masterplan for re-building Old Trafford stadium area) 15,000

AN 2 Civic Quarter …	4,000
AN3 Trafford Waters …	3,000
AN 4 Pomona Docks …	3,200
JPA3.2 Davenport Green/ Timperley Wedge …	2,500
JPA 30 New Carrington …	5,000
	32,200

   These figures do not take into account modest and small sized sites, windfalls or the fact that there are 1,193 long term empty homes in the borough.

   The consequence of making such an enormous provision is that far more Green Belt would be allocated than absolutely essential and far more open spaces would be lost than needs to be the case. The full, cumulative, climate change, air quality and flood risk impacts of such a policy do not appear to have been given consideration and nor does the loss of wildlife and the unnecessary loss of precious peat land.

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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Please write your response here:

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:

Trafford should radically reassess their housing allocations in the light of the environmental consequences of over-provision. CPRE would like to see the housing allocations for this Local Plan period reduced to a level which mirrors the minimum housing needs requirement, with Green Belt areas and peat land removed as a priority and also those areas at greatest risk of flooding.

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.
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Part B: Your Representation (Please use a separate sheet for each representation)

01a. To which Publication Document does this representation relate?
Please tick as appropriate

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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: Chapter 6: Economy and Jobs.
Para. 1.3_____
Page number: 95
_____
Paragraph number: A
iv_____

Policies Map layer: _____

Do you consider the Local Plan is:

02a. Legally compliant? (required) Yes ( ) No ( )
(See the Representation Guidance Note)

02b. Sound? (required) Yes ( ) No (√)
(See the Representation Guidance Note)

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.

Please write your response here:

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

Please write your response here:

The National Planning Policy Framework (NPPF) requires development plans to set out sustainable economic growth plans for rural areas (Plan-making policies, E1, 1a, page 40). Consequently, Trafford's Local Plan policy for The Rural Economy (EJ5) and supporting paragraphs should add a proviso that natural capital assets are taken into consideration.

Ideally, there should also be a commitment to improve active travel in rural areas in order to be in compliance with NPPF Decision-making policy TR3e (page 70) which states that opportunities to improve walking, wheeling, cycling and public transport should be taken.

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.

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Please write your response here:

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:

Paragraph 1.3 should read: *"the borough supports a strong rural economy and a range of wildlife habitats that enhance ecological diversity, provide important green corridors* ***and do not result in a depletion of natural environmental capital****.*

The borough will also endeavour to improve active travel opportunities in rural areas*"* (Additional words proposed are in bold).

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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Integrated Assessment Report (IA)	
Habitats Regulations Assessment (HRA)	

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

Chapter 7 (Transport and Movement)– Inter-related Policies TM3 (The Highway Network) & TM7 (Safeguarded routes)

Page numbers: 119 & 133

Paragraph number: _____

Policies Map layer: _____

Do you consider the Local Plan is:

02a. Legally compliant? (required) Yes ( ) No ( )
(See the Representation Guidan√ce Note)

02b. Sound? (required) Yes ( ) No (√)
(See the Representation Guidance Note)

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

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

Please write your response here:

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

Please write your response here:

The Local Plan is unsound because these two inter-related policies lack specificity to an extraordinary extent.

(1) Policy TM3 uncompromisingly promotes the construction of new highway infrastructure that might be perceived as improving traffic flows on a number of corridors and motorway junctions

(2) Policy TM7 uncompromisingly sanctions new roads across the deepest part of peatland at Carrington, while at Davenport Green/ the Timperley Wedge a new spine road is identified as being a fundamental requirement.

There is no qualification included in the policies in relation to environmental capital or impacts on human health (both areas currently have poor air quality) and the transport appraisals carried out for 'Places for Everyone' were not sufficiently finite and focused primarily on impacts on major roads. In any event, they were conducted prior to the Covid lockdowns and therefore prior to significant changes in home working..

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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:

Both policies need to outline what they are supporting in highway terms much more clearly and they need to provide the evidence base that shows they are environmentally sustainable, not harmful to human health and have fully taken into consideration increases in home working.

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